

The Azad Practice Patient and Service User Privacy Notice

The Azad Practice is a registered healthcare provider with the Care Quality Commission, we are situated at:

- 1st Floor Boleyn Centre 152 Barking Road London E6 3BD,
nelondonicb.theazadpractice@nhs.net, 02084758550, Practice Manager
Asha Faiz

We also part of the Newham Central 1 Network (also known NC1).

As a registered patient or service user at our GP practices, we understand how important it is to keep your personal and healthcare information safe and secure, and we take this very seriously. We have taken steps to make sure your information is looked after in the best possible way, and we review this regularly.

When we use your personal information, we must ensure that the use is lawful, fair and transparent and complies with all the other principles and requirements of the UK General Data Protection Regulation (UK GDPR). Please read this privacy notice carefully, as it contains important information about how we use the personal information we collect about you.

What is a privacy notice?

A privacy notice explains the personal information (also known as personal data) we collect about our patients and service users and how it is used. Being open and providing clear information to patients about how we use your personal information is an essential requirement of the UK GDPR.

Under the UK GDPR, we must use personal information in a fair and lawful manner. This applies to everything that is done with a patient's personal information. This means that the organisation must:

- have lawful and appropriate reasons for the use or collection of personal information
- not use the information in a way that may cause harm to the individuals (e.g. improper sharing of their information with third parties)
- be open about how the information will be used and provide appropriate privacy notices when collecting personal information
- handle personal information in line with data protection legislation and guidance

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Author	Sohifa Kadir

- not use the collected information inappropriately or unlawfully.

Our data controller contact details

The Azad Practice is the data controller of your personal information. This means we are responsible for collecting, storing and handling your personal and healthcare information when you register with us as a patient or service user.

The purposes for which we use your information are set out in this privacy notice. We are registered with the Information Commissioner's Office; our registration number is Z8648242.

We are situated at 1st Floor Boleyn Centre 152 Barking Road London E6 3BD, and you should contact us at your registered GP practice if you have a question about your personal information.

Data Protection Officer contact details

Our Data Protection Officer is the NHS NEL GP DPO and is responsible for monitoring our compliance with data protection requirements.

You can contact our DPO with queries or concerns relating to the use of your personal information:

NHS NEL GP DPO
NHS North East London Integrated Care Board
Email: Itservicedesk.nelicb@nhs.net
Telephone: 0300 303 6778

Subject Access Requests (SARs) should be made in writing to your registered GP practice's Practice Manager and will be handled by the GP practice SAR administrator.

Personal information we collect from you

The information we collect from you will include:

- your contact details (such as your name and email address, including place of work and work contact details)
- details and contact numbers of your next of kin or emergency contacts
- your date of birth, gender, ethnicity
- details in relation to your medical history
- the reason for your visit to the GP practice

- medical notes and details of diagnosis and consultations with our GPs and other health professionals within the GP practice or Primary Care Network involved in your direct healthcare.

Personal information we collect from third parties

When you register with one of our GP practices, we will receive your GP medical records if you were registered with another practice.

Whilst registered with us, we also collect personal and healthcare information about you when it is sent to us from a hospital, a consultant or any other medical or healthcare professional, or any other person involved with your healthcare.

We may also receive personal information from other organisations such as:

- law enforcement e.g. police
- courts e.g. court order
- border control and immigration
- social services
- insurance companies.

Special category information we collect about you

Personal information about your health falls into a special category of information because it is very sensitive.

When we receive your personal and healthcare information, either from you or a third party, in addition to the health information, it may contain other special category information.

Special category information is personal data revealing your:

- racial or ethnic origin
- political opinions
- religious or philosophical beliefs
- trade union membership
- genetic data
- biometric data (where used for identification purposes)
- health
- sex life
- sexual orientation.

How we use your personal information and special category information

We use your personal and healthcare information in the following ways:

- to provide you direct healthcare.
- when we refer you to another health and care service.

- when we need to speak to, or contact other doctors, consultants, nurses or any other medical/healthcare professional or organisation during the course of your diagnosis or treatment or ongoing healthcare.
- when we receive a complaint or legal claim from you.
- when we are required by law to share your information to another organisation, such as other organisations within the North East London Integrated Care System, the police, by court order, solicitors, or immigration enforcement.
- when we receive data sharing access requests from other organisations for the purposes of your direct healthcare, or for research and planning.

We will never pass on your information to anyone else who does not need it, or has no right to it, unless you give us clear consent to do so.

The legal justification for using your personal information and special category information

Purpose	Lawful basis for processing personal information	Lawful basis for processing special category information
Direct healthcare Provided by your registered GP practice, or data sharing with another healthcare provider or individual providing you care.	Article 6(1)(e) UK GDPR - Public task. Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.	Article 9(2)(h) UK GDPR - Health or social care (with a basis in law). Processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care
Planning By The Azad Practice , or data sharing with another organisation for the purpose of improving or commissioning of patient services	Article 6(1)(e) UK GDPR - processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.	Article 9(2)(h) UK GDPR - processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of
Research	Article 6(1)(e) UK GDPR - processing is necessary	Article 9(2)(j) UK GDPR - processing is necessary

By The Azad Practice , or data sharing with another organisation for the purpose of improving or commissioning of patient services.	for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.	for archiving purposes in the public interest, scientific or historical research purposes or
Legal proceedings	Article 6(1)(e) UK GDPR - processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. or Article 6(1)(c) UK GDPR - processing is necessary for compliance with a legal obligation to which the controller is subject.	Article 9(2)(f) UK GDPR - processing is necessary for the establishment, exercise or defence of legal claims. or Article 9(2)(g) UK GDPR - processing is necessary for reasons of substantial public interest.
<p>Common Law Duty of Confidentiality</p> <p>When we use your healthcare information, in addition to complying with data protection law, we are also obliged to follow the common law duty of confidentiality. This means that when you share your health and care in confidence it must not be disclosed without some form of legal authority or justification. We satisfy this requirement by relying on your implied consent to provide you care and will ask you for your explicit consent for any other uses where we do not have a lawful basis.</p>		
<p>Third parties mentioned in your GP medical records</p> <p>Sometimes we will record information about third parties mentioned by you to us during any consultation. We are under an obligation to make sure we also protect that third party's rights as an individual and to ensure that references to them which may breach their rights to confidentiality, are removed before we send any information to any other party including yourself.</p> <p>Third parties can include (but not limited to): spouses, partners, and other family members.</p>		
Data sharing		

Whenever you use a health or care service, such as attending Accident & Emergency or using Community Care Services, important information about you is collected to help ensure you get the best possible healthcare and treatment.

This information may be passed to other approved organisations where there is a legal basis, to help with planning health and care services, improving care, research into developing new treatments and preventing illness. All of this helps in providing better care to you and your family and future generations.

However, as explained in this privacy notice, confidential information about your health and care is only used where it is allowed by law, and it would never be used for any other purpose without your explicit consent.

Data sharing with healthcare organisations and people for your direct healthcare

We may pass your personal information on to the following people or organisations, because these organisations may require your information to assist them in the provision of your direct healthcare needs. It, therefore, may be important for them to be able to access your information in order to ensure they may properly deliver their services to you:

- Hospital professionals (such as doctors, consultants, nurses, etc.)
- Other GPs/Doctors
- Pharmacists
- Nurses and other healthcare professionals
- Dentists
- Any other person that is involved in providing services related to your general healthcare, including mental health professionals, private sector providers including pharmaceutical companies to allow for the provision of medical equipment, dressings, hosiery etc.

Your summary care record (SCR)

The Summary Care Record (SCR) is a national database that holds electronic records of important patient information such as current medication, allergies and details of any previous bad reactions to medicines, created from GP medical records. It can be seen and used by authorised staff in other areas of the NHS health and care system involved in your direct care.

To learn more about the SCR, please visit the NHS England website at: [Summary Care Record - NHS England Digital](#).

As a registered patient you will already have a SCR, unless you have previously chosen not to have one. The record will contain key information about the medicines you are taking, allergies you suffer from and any adverse reactions to medicines you have had in the past. You can also wish to share further medical

information that includes: your significant illnesses and health problems, operations and vaccinations you have had in the past, how you would like to be treated (such as where you would prefer to receive care), what support you might need and who should be contacted for more information about you.

Information about your healthcare may not be routinely shared across different healthcare organisations and systems. You may need to be treated by health and care professionals that do not know your medical history. Essential details about your healthcare can be difficult to remember, particularly when you are unwell or have complex care needs.

Having a SCR can help by providing healthcare staff treating you with vital information from your health record. This will help the staff involved in your care make better and safer decisions about how best to treat you.

As a patient you have the right to opt-out from your SCR being shared with other healthcare organisations. If you wish to enquire further as to your rights in respect of not sharing information on this record, then please contact the Practice Manager at your registered GP practice. You can opt-in again at any time.

GP Connect

We use an NHS IT service called GP Connect to support your direct healthcare. GP Connect makes patient information available to all appropriate clinicians when and where they need it, to support direct patient care, leading to improvements in both care and outcomes. GP Connect is not used for any purpose other than direct care.

Authorised clinicians such as GPs, NHS 111 clinicians, care home nurses (if you are in a care home), secondary care trusts and social care clinicians are able to access the GP records of the patients they are treating via GP connect.

The NHS 111 service (and other services determined locally e.g., other GP practices in a Primary Care Network) will be able to book appointments for patients at GP practices and other local services.

To learn more about GP Connect, please visit the NHS England website: GP Connect Transparency Notice - NHS England Digital.

As a patient you have the right to opt-out from your healthcare information being shared another provider via GP Connect. If you wish to enquire further as to your rights in respect of not sharing information via GP Connect, then please contact the Practice Manager at your registered GP practice. You can opt-in again at any time.

London Care Record

The London Care Record is a secure view of your health and care information. It lets health and care professionals involved in your care see important details about your health when and where they need them.

It can show doctors, nurses and other care professionals any conditions you have, your test results, medicines you take, anything you're allergic to, plans for your care and other important information.

Having a single, secure view of your information helps speed up communication between care professionals across London, and beyond and helps inform the decisions they make about your care.

You can read the London Care Record Privacy Notice [here](#). This document explains why health and care organisations share information about you and how that information may be used in the London Care Record programme.

<https://www.onelondon.online/london-care-record/>

Primary Care Network

The objective of Primary Care Networks (PCNs) is for group practices together to create more collaborative workforces that ease the pressure of GPs, leaving them better able to focus on patient care. All areas within England are covered by a PCN.

All GP practices have come together in geographical networks covering populations of approximately 30–50,000 patients to take advantage of additional funding attached to the GP contract. This size is consistent with the size of the primary care homes that exist in many places in the country but are much smaller than most GP federations.

This means that this organisation may share your information with other practices within the PCN to provide you with your care and treatment.

We are part of the NC1 Primary Care Network.

NHS health checks

Cohorts of our patients aged 40-74 not previously diagnosed with cardiovascular disease are eligible to be invited for an NHS Health Check. Nobody outside the healthcare team at this organisation will see confidential information about you during the invitation process.

Safeguarding

The organisation is dedicated to ensuring that the principles and duties of safeguarding adults and children are consistently and conscientiously applied with the wellbeing of all at the heart of what we do.

Safeguarding information such as referrals to safeguarding teams is retained by this organisation when handling a safeguarding concern or incident. We may share information accordingly to ensure a duty of care and investigation as required with other partners such as local authorities, the police or healthcare professionals (i.e., the mental health team).

Data sharing for non-healthcare purposes

Your personal information may be shared with other organisations for non-direct healthcare purposes, these organisations include:

- NHS Commissioning Support Units
- NHS England
- NHS Integrated Care Boards
- Multi-agency Safeguarding Hub
- Local authorities
- Social care services
- Education services

Invoice validation

Your personal information may be shared if you have received treatment to determine which ICB is responsible for paying for your treatment.

This information may include your name, address and treatment date. All of this information is held securely and confidentially; it will not be used for any other purpose or shared with any third parties.

Pseudo-anonymised data extraction by North East London Integrated Care Board (NEL ICB)

NEL ICB (North East London Integrated Care Board) is the NHS organisation responsible for planning and buying health services across North East London to meet the population's needs, making sure all parts of the local health system work effectively together.

NEL ICB extracts medical information about you as a patient, but the information we pass to the organisation via our computer systems cannot identify you to them. This information only refers to you by way of a code that only your practice can identify (it is pseudo-anonymised). This therefore protects you from anyone who may have access to this information at NEL ICB from ever identifying you when accessing the information. We will never give NEL ICB the information that would enable them to identify you.

There are good reasons why NEL ICB may require this information, these are as follows:

- To assist in analysing current health services and proposals for developing future services.
- To develop risk stratification models to help GPs to identify and support patients with long term conditions and to help prevent unplanned hospital admissions or reduce the risk of certain diseases developing, such as diabetes.
- Using risk stratification to help NEL ICB to understand the health needs of the local population in order to plan and commission the right services. Examples include:
 - Flu vaccination uptake
 - Enhanced access
 - Commissioned services
 - Medicines management (review of prescribed medicines)
 - Childhood Immunisations
 - Risk stratification (such as hospital admission prevention).

To learn more about NEL ICB, please visit the organisation's website:

<https://northeastlondon.icb.nhs.uk/>

Data sharing with NHS England

We will share structured and coded data from your GP medical records with NHS England. We are required to do this by law.

Information that directly identifies you as an individual patient, including your NHS number, General Practice Local Patient Number, postcode, date of birth and if relevant date of death, is replaced with unique codes produced by de-identification software before it is sent to NHS England. This means that no one will be able to directly identify you in the data.

NHS England will collect:

- Data on your sex, ethnicity, and sexual orientation
- Clinical codes and data about diagnoses, symptoms, observations, test results, medications, allergies, immunisations, referrals and recalls and appointments including information about your physical, mental, and sexual health
- Data about the staff who have treated you
- Coded data that is not needed due to its age – for example medication, referral and appointment data that is over 10 years old

- Coded data that GPs are not permitted to share by law – for example certain codes about IVF treatment and certain information about gender re-assignment.

Anonymised data

Sometimes we may provide other organisations information in anonymised form. If we do so, then none of the information we provide to any other party will not identify you as an individual and cannot be traced back to you.

Data security and retention - How long we keep your personal information

As an NHS provider we keep your personal and healthcare information in line with NHS England's Records Management Code of Practice: Records Management Code of Practice - NHS Transformation Directorate (england.nhs.uk)

We are the data controller for your GP medical records whilst you are a registered patient at our GP practices. If you register with another GP practice your medical records will transfer with you, and the new GP practice will be the data controller responsible for keeping your records up to date and giving to you access if you make a subject access request (SAR).

Security and storage of your personal information

We take the security of your personal and healthcare information very seriously and we do everything we can to ensure that it is protected. We regularly update our processes and systems, and we also ensure that our staff are properly trained. We also carry out assessments and audits of the information that we hold about you and make sure that if we provide any other services, we carry out risk assessments and security reviews.

All of our staff, contractors and locums receive appropriate and regular training to ensure they are aware of their personal responsibilities and have legal and contractual obligations to uphold confidentiality, enforceable through disciplinary procedures. Only a limited number of authorised staff have access to personal information where it is appropriate to their role and this is strictly on a need-to-know basis.

We also have contractual arrangements with all our data processors that covers data protection responsibilities that they must maintain when working with us.

We hold your GP medical records in an electronic patient record system called EMIS Web which is provided by Optum UK. Optum UK store the information in cloud storage supplied by Amazon Web Services (AWS). The information is stored in the UK and is fully encrypted both in transit and at rest. AWS is one of the

world's largest cloud companies, already supporting numerous public sector clients (including the NHS), and it offers the highest levels of security and support. They do not have access to your personal information.

Auditing of clinical notes

We regularly audit clinical notes as part of our commitment to the effective management of healthcare. Auditing clinical management is no different to a multi-disciplinary team meeting discussion whereby management is reviewed and agreed. We always maintain confidentiality.

Keeping your records up to date

Under the UK GDPR we are legally obliged to protect any personal and healthcare information that we hold about you and we take this very seriously, it is imperative that you let us know immediately if you change any of your contact details.

Text messaging and contacting you

We may contact you using SMS texting to your mobile phone in the event that we need to notify you about appointments and other services that we provide to you involving your direct care, therefore you must ensure that we have your up to date details. This is to ensure we are sure we are actually contacting you and not another person.

As we are obliged to protect any confidential information we hold about you, it is imperative that you let us know immediately if you change any of your contact details.

The SMS service is operated on an 'opt-in' basis we will assume that you have given us permission to contact you via SMS if you have provided your mobile telephone number as part of your contact details. Please let your GP practice know if you wish to opt-out of this SMS service. We may also contact you using the email address you have provided to us.

Telephone call recordings

When you call our GP practices all calls are recorded.

We record calls for purposes of seeking clarification in the event of a dispute with a patient or service user, and also for staff training. Our staff access to call recordings is restricted to our senior management.

At The Azad Practice call recordings are retained for up to 12 months.

If you require access to your calls with the practice, you will need to submit a Subject Access Request to the Practice Manager.

Our website and cookies

When you visit our website, cookies are placed on to your computer to optimise your experience. A cookie is a small file of letters and numbers that is downloaded on to your computer when you visit a website. You have the option to decline the use of cookies on your first visit to the website.

CCTV at our GP practice locations

The safety of our patients, service users, visitors and staff are paramount.

Closed-circuit television (CCTV) cameras have been installed in and around our GP practice sites to assist in deterring crime, and also the prevention and detection of crime.

The CCTV system is also intended to assist with the identification, apprehension and prosecution of offenders, and the identification of actions that might result in prosecution or disciplinary action.

The existence and position of CCTV cameras are there to help to deter any unauthorised access to restricted areas within our practice sites, in the event of an incident, help to identify individuals involved.

If you require access to a CCTV recording of you, please submit a subject access request to the Practice Manager. You will need to provide the date and time of the event.

Your data subject rights

Under the UK GDPR all individuals have certain rights in relation to the personal information an organisation holds about them.

These rights are:

- the right to be informed about the processing of your data
- the right of access to the data held about you (Subject access request)
- the right to have that information amended in the event that it is not accurate
- the right to have the information deleted
- the right to restrict processing
- the right to have your data transferred to another organisation (data portability)
- the right to object to processing

- rights in relation to automated decision making and profiling.
- Currently we do not use automated decision-making such as AI that does not include human involvement.

How to make a subject access request, or exercise your other data subject rights

Under the UK GDPR you have the right to access and receive a copy of your personal information held by us, this is called a Subject Access Request (SAR). You also have the right to ask us to amend any inaccuracies.

To submit a SAR, please contact the Practice Manager using the contact details above.

There is no charge to have a copy of the personal information held about you. However, we may, in some limited and exceptional circumstances, have to make an administrative charge for any extra copies if the information requested is excessive, complex or repetitive.

We are required to provide you with the personal information within one month.

We would ask therefore that any requests you make are in writing and it is made clear to us what and how much information you require.

In your request, please provide adequate information (for example full name, address, date of birth, NHS number and details of your request) so that your identity can be verified, and your records located.

For information from a hospital or other Trust/NHS organisation you should write directly to the organisation.

Your data opt-out rights (research and planning purposes)

The NHS uses information about patients (personal information) to research, plan and improve the services it offers, and the treatment and care patients receive.

To help improve and innovate services, NHS England collects patient information from GP practices, hospitals and other healthcare providers. You can choose whether or not your personal information is used for research and planning. There are different types of data sharing you can opt out of.

Type 1 opt-out

To stop your registered GP practice from sharing your personal information for research and planning purposes, you will need to fill opt-out form and return it to your GP practice. Please download the form from the NHS England website: Opt out of sharing your health records - NHS (www.nhs.uk).

Please note, if you choose Type 1 Opt-out, your GP practice will not share your personal information for research and planning. However, NHS England will still be able to collect and share personal data from other healthcare providers, such as hospitals.

National data opt-out

The national data opt-out (NDOO) is a service that allows patients to opt-out of their confidential patient information used for research and planning purposes. The opt-out choice is recorded and managed by NHS England, and not your registered GP practice.

There may still be times when your confidential patient information is used; for example, during an epidemic where there might be a risk to you or to other people's health. You can also still consent to take part in a specific research project.

Your confidential patient information will still be used for your individual care. Choosing to opt-out will not affect your care and treatment. You will still be invited for screening services such as screening for bowel cancer.

You do not need to do anything if you are happy about how your confidential patient information is used.

If you do not want your confidential patient information to be used for research and planning, you can choose to opt-out by using one of the following:

- Online service – patients registering need to know their NHS number or their postcode as registered at their GP practice
- Telephone service 0300 303 5678 which is open Monday to Friday between 0900 and 1700
- NHS App – for use by patients aged 13 and over (95% of surgeries are now connected to the NHS App). The app can be downloaded from the App Store or Google play
- "Print and post" registration form:
https://assets.nhs.uk/prod/documents/Manage_your_choice_1.1.pdf
Photocopies of proof of applicant's name (e.g., passport, UK driving licence etc.) and address (e.g., utility bill, payslip etc.) need to be sent with the application. It can take up to 14 days to process the form once it arrives at NHS, PO Box 884, Leeds, LS1 9TZ.

Your right to complain

If you have any concerns about the use of your personal information, you can make a complaint to the Practice Manager at your registered GP practice using the contact details at the top of this privacy notice.

If you remain unhappy with how we have used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office

Wycliffe House, Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

Accessibility

Access to this privacy notice, and where English is not your first language
If English is not your first language you can request a translation of this Privacy Notice. Please contact our Practice Managers of individual sites.

Changes to this privacy notice

We regularly review and update our Privacy Notice; the next update is due on 30 June 2025.