

# Salisbury Walk In Health Centre

## Privacy Notice

We understand how important it is to keep your personal information safe and secure and we take this very seriously. We have taken steps to make sure your personal information is looked after as required by Law.

This privacy notice explains how we, as a data controller, use any personal information we collect about you as a patient of health care services provided by Salisbury Walk In Centre.

Please read this Privacy Notice carefully, as it contains important information about how we use the personal and healthcare information we collect on your behalf.

### 1. WHY WE PROVIDE THIS PRIVACY NOTICE

We are required to provide you with this Privacy Notice by Law. It explains how we use the personal and healthcare information we collect, store and protect about you. The Law states we must inform you about:

- a. Why we collect your personal and healthcare information.
- b. How we use any of your personal and healthcare information.
- c. What we do with your personal information.
- d. Who and why we share it with or pass it on to.
- e. How long we can keep your information.

### 2. OUR DATA PROTECTION OFFICER (DPO)

Our registered DPO is Anna Morton. The DPO contact details are in section 21 if you have any questions or requests about:

- a. How your information is being held, used and protected.
- b. Access to your information including any recordings held on our CCTV system. More details are in section 4.
- c. If you are unclear or have any queries relating to this Policy and your rights as a patient. More details of your rights are in section 20.
- d. Opting In or Out of Risk Stratification – Details are in section 10i.

- e. Opting In or Out of sharing anonymised or pseudoanonymised data – Details are in section 11.
- f. Sharing your Summary Care Record (SCR) – Details are in section 7.
- g. Translation of this Privacy Notice if English is not your first language.
- h. Procuring a hard copy of this Privacy Policy.
- i. If you wish to make a complaint about anything to do with your personal and healthcare information. Details are in section 22.

### **3. ABOUT US**

We, at Salisbury Walk in Centre ('the organisation') situated at Millstream Medical Centre, Avon Approach, Salisbury, SP1 3SL is a Data Controller and in some instances Data Processors of your information. This means we are responsible for collecting, storing, handling and protecting your personal and healthcare information when you register with us as a patient.

Our organisation is registered with the Information Commissioner's Office (ICO) as a data controller under the Data Protection Act 2018. Our registration number is **ZA372045** and can be viewed online in the ICO public register at:

[Click Here To Check The Register](#)

### **4. CLOSED CIRCUIT TELEVISION (CCTV)**

Our Landlord uses CCTV covering the internal entrance, waiting room, corridors and reception. It is used solely to keep people and property safe. CCTV is not used to collect evidence to inform other decisions. The ICO code of Practice is followed which can be read here:

[Click Here To Read The ICO Code of Practice](#)

Our Landlord retains footage or stores data from our CCTV system for a maximum of five days.

### **5. INFORMATION WE COLLECT FROM YOU**

The information we collect from you includes:

- a. Your contact details (such as your name, address, telephone number, email address, legal representative).
- b. Proof of identity if required.

- c. Details and contact numbers of your next of kin / emergency contacts if required.
- d. Your age, gender and ethnicity.
- e. Details in relation to your medical and social history.
- f. Any contact the organisation has had with you, e.g. reasons for attendance.
- g. Medical notes and details of investigations, diagnosis, treatment, management planning and consultations with our GPs and other health professionals within the organisation involved in your direct healthcare.
- h. CCTV footage

## **6. INFORMATION ABOUT YOU FROM OTHERS**

We also collect personal information about you when it is sent to us to facilitate provision of healthcare services from the following:

- a. A hospital, a consultant or any other medical or healthcare professional, or any other person involved with your general healthcare and welfare or those you may be caring for.
- b. Notes and details of investigations, diagnosis, treatment, management planning and consultations about your health.
- c. Relevant information from other health professionals, relatives or those who care for you.
- d. Social Care Services.
- e. Police, Court Orders and Fire and Rescue.

## **7. YOUR SUMMARY CARE RECORD (SCR)**

Your Summary Care Record is an electronic record of important patient information created from the GP medical records. It contains information about medications, allergies and any bad reactions to medications in the past. It can be seen by staff in other areas of the health and care system involved in your direct care.

During the height of the pandemic changes were made to the Summary Care Record (SCR) to make additional patient information available to all appropriate clinicians when and where they needed it, to support direct patients care, leading to improvements in both care and outcomes.

These changes to the SCR will remain in place unless you decide otherwise.

Regardless of your past decisions about your Summary Care Record preferences, you will still have the same options that you currently have in place to opt out of having a Summary Care Record, including the opportunity to opt-back in to having a Summary Care Record or opt back in to allow sharing of Additional Information. Further details about the SCR and your choices can be found here:

[Click Here To Find Out More About Summary Care Record](#)

More details on SCR are on your registered GP Practice website.

## **8. YOUR INTEGRATED CARE RECORDS (ICR)**

Bath and North East Somerset, Swindon and Wiltshire Integrated Care Record (BSW ICR) is a digital care record system for sharing information in Bath and North East Somerset, Swindon and Wiltshire. It allows instant, secure access to your health and social care records for the professionals involved in your care.

Relevant information from your digital records is shared with people who look after you. This gives them up-to-date information making your care safer and more efficient.

Salisbury Walk In Centre uses the system in the following way:

- We can access your data stored within the system

Further details about the BSW ICR and how your information can be found here:

[Click Here To Find Out More About Integrated Care Records](#)

## **9. WHO WE MAY PROVIDE YOUR PERSONAL INFORMATION TO AND WHY**

How your data is used is protected by law and we only use your data where we have an acceptable reason for doing so. The reasons we process your data are:

a. Whenever you use a health or care service, such as attending Accident & Emergency (A&E) or using Community Care Services, important information about you is collected to help ensure you get the best possible care and treatment. This information may be passed to other approved organisations where there is a legal basis to help with planning 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 in this way where allowed by law and would never be used for any other purpose without your clear and explicit consent.

We may also pass your personal information on to the following people or organisations, because they may require it to assist in the provision of your direct healthcare.

b. Hospitals, healthcare professionals and urgent care professionals (such as doctors, consultants, nurses, etc.).

c. Pharmacists, Opticians and Dentists.

## **10. OTHER PEOPLE WHO WE PROVIDE YOUR INFORMATION TO**

a. Commissioners.

b. Integrated Care Boards (ICBs) including referral management services to process referrals to other NHS organisations and associated services and medicine management.

c. Local authorities including Social Care, Safeguarding Teams and Education.

d. Community health services.

f. For the purposes of complying with the law:

- Care Quality Commission (CQC) - The CQC regulates health and care services to ensure that safe care is provided. The law requires that we must report certain serious events to the CQC, for example, when patient safety has been put at risk. Further information about the CQC can be found here:

[Click Here To Find Out More About The CQC](#)

- Public Health England - The law requires us to share data for public health reasons, for example to prevent the spread of infectious diseases or other diseases which threaten the health of the population. We will report the relevant information to local health protection team or Public Health England.

[Click Here For Further Information About Notifiable Disease Reporting To Public Health England](#)

- Police, Fire and Rescue
- Solicitors and Insurance Companies.

g. Anyone you have given your consent to view or receive your record, or part of your record. Please note, if you give another person or organisation consent to access your record we will need to contact you to verify your consent before we release that record. It is important that you are clear and understand how much and what aspects of your record you give consent to be disclosed.

h. At times the ICB extracts medical information about you but the information we pass to them via our computer systems cannot identify you to them. This information only refers to you by way of a code that only we can identify because it is pseudoanonymised. This

protects you from anyone who may have access to this information at the ICB from ever identifying you as a result of seeing the medical information and we will never give them the information that would enable them to do this.

There are good reasons why the ICB may require this pseudoanonymised information as follows:

- To evaluate service provision, patient outcomes and key performance indicators to determine quality of care and value for money
- To evaluate the appropriateness and cost effectiveness of prescribing
- To calculate service costs
- To identify need/opportunity for improvement

i. Risk stratification data tools are increasingly being used in the NHS to help determine a person's risk of suffering a condition, preventing an unplanned or (re)admission and identifying a need for preventive intervention. Information about you is collected from several sources including NHS Trusts and from your registered GP Practice. A risk score is then arrived at through an analysis of your de-identified information and is only provided back to your registered GP Practice as Data Controller in an identifiable form. Risk stratification enables your registered GP Practice to focus on preventing ill health and not just the treatment of sickness. If necessary, the Practice may be able to offer you additional services. Further information about risk stratification is available from:

[Click Here For More Information](#)

## **11. ANONYMISED OR PSEUDOANOYMISED INFORMATION**

Sometimes we provide information about you in an anonymised or pseudoanonymised form. All personal information we use and transmit is fully compliant with the ICO Anonymisation Code of Practice which can be read here:

[Click Here To Read The Code of Practice](#)

## **12. THIRD PARTIES MENTIONED ON YOUR MEDICAL RECORD**

Sometimes we 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 redacted before we send any information to any other party including yourself. Third parties can include: spouses, partners, and other family members.

## **13. LEGAL JUSTIFICATION FOR COLLECTING AND USING YOUR INFORMATION**

The Law states we need a legal basis to collect and handle your personal and healthcare information. These are as follows:

- a. We have been commissioned by Salisbury Foundation Trust to deliver healthcare services to you. This contract provides that we are under a legal obligation to ensure that we deliver medical and healthcare services to the public.
- b. Sometimes we also rely on the fact that you give us consent to use your personal and healthcare information so that we can take care of your healthcare needs. Please note that you have the right to withdraw consent at any time if you no longer wish to receive services from us.
- c. Providing you with the appropriate healthcare, where necessary. The Law refers to this as 'protecting your vital interests' where you may be in a position not to be able to consent.

## **14. SPECIAL CATEGORIES**

The Law states that personal information about your health falls into a special category of information because it is very sensitive. Reasons that may entitle us to use and process your information may be as follows:

- a. Where we may need to handle your personal information when it is considered in the public interest. For example, when there is an outbreak of a specific disease and we need to contact you for treatment, or we need to pass your information to relevant organisations to ensure you receive advice and/or treatment.
- b. When you have given us consent.
- c. If you are incapable of giving consent, and we must use your information to protect your vital interests (e.g. if you have had an accident and you need emergency treatment).
- d. If we need your information to defend a legal claim against us by you, or by another party.
- e. Where we need your information to provide you with medical and healthcare services.

## **15. HOW LONG WE KEEP YOUR PERSONAL INFORMATION**

We follow the NHS X Records Management Code of Practice 2021 and carefully consider any personal information that we store about you, and we will not keep your information for longer than is necessary for the purposes as set out in this Privacy Notice.

[Click Here To Read The NHX Records Management Code Of Practice 2021](#)

## **16. HOW WE USE THE INFORMATION ABOUT YOU**

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

a. When we need to speak to, or contact other doctors, consultants, nurses or any other medical/healthcare professional or organisation during your diagnosis or treatment or ongoing healthcare.

b. When we are required by Law to hand over your information to any other organisation, such as the police, by court order, solicitors, or immigration enforcement.

c. In accordance with the Law mainly:

- The Data Protection Act (DPA)2018.

[Click Here To Read The DPA](#)

- General Data Protection Regulation (GDPR) 2018.

[Click Here To Read The ICO Information On GDPR](#)

- Freedom of Information Act (FOIA) 2000.

[Click Here To Read ICO Information On The FOIA](#)

- Privacy and Electronic Communications (EC Directive) Regulations (PECR) 2003.

[Click Here To Read These Regulations](#)

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

## 17. INFORMATION ASSETS USED

Our organisation used a variety of systems to record patient's care and needs, for communication and for clinical, safety and financial governance information:

- **Accurx** – Patient communication software to contact patients via SMS, email and the NHS app.
- **Agilo Software (TeamNet)** – Used for clinical, safety and financial governance information
- **MS Teams** – Used for patient, staff and governance communications
- **My Calls** – used for telephone activity reporting
- **NHS Portal** – used for audit data
- **NHS mail** – NHS email which may contain patient medical information. Clinical, safety and financial governance information.
- **PCSE** - Patient medical information. Clinical and financial governance information.
- **Shrewd (Vitalhub Uk Ltd)** – Used for resilience monitoring recording only numbers of patients that have been seen or are waiting to be seen.
- **SystemOne** – the patient record system
- **Website** - Patient medical information given via patient through our contact form. Clinical, safety and financial governance information. Employment information.



## 18. TEXT MESSAGING, EMAILING AND CONTACTING YOU

Because we are obliged to protect any confidential information, we hold about you, which we take this very seriously, it is imperative that you let us know immediately if you change any of your contact details.

We may contact you using email or SMS texting to your mobile phone in the event that we need to notify you about the appointment that we provide to you involving your direct care, or with information following your appointment such as a barcode number for a prescription or Friends and Family feedback links, therefore you must ensure that we have your up to date details. This is to ensure we are sure we are contacting you and not another person.

## 19. NHS NATIONAL DATA OPT OUT

Whenever you use a health or care service, such as attending Accident & Emergency or using Community Care Services, important information about you is collected in a patient record for that service. Collecting this confidential patient information helps to ensure you get the best possible care and treatment.

The confidential patient information collected about you when you use these services can also be used and provided to other organisations for purposes beyond your individual care where allowed by law.

You have a choice about whether you want your confidential patient information to be used in this way. If you are happy with this use of information, you do not need to do anything. If you choose to opt out your confidential patient information will still be used to support your individual care.

We do not share your confidential patient information for purposes beyond your individual care without your permission. When sharing data for planning and reporting purposes, we use anonymised data so that you cannot be identified in which case your confidential patient information isn't required.

Information being used or shared for purposes beyond individual care does not include your confidential patient information being shared with insurance companies or used for marketing purposes and information would only be used in this way with your specific agreement.

Health and care organisations that process confidential patient information have to put systems and processes in place so they can be compliant with the national data opt-out. They must respect and apply your opt-out preference if they want to use or share your confidential patient information for purposes beyond your individual care.

Salisbury Walk In Centre are currently compliant with the national data-out policy as we do not share your confidential patient information for purposes beyond your individual care without your permission.

[Click Here To Find Out More Or Register Your Choice To Opt Out](#)

You can change your choice at any time.

## 20. YOUR RIGHTS AS A PATIENT

In addition to the questions and requests outlined in section 2 the Law also gives you certain rights to your personal and healthcare information that we hold, as set out below:

You have a right to:

- ask for a copy of the information we hold about you;
- correct inaccuracies in the information we hold about you
- withdraw any consent you have given to the use of your information;
- complain to the relevant supervisory authority in any jurisdiction about our use of your information
- in some circumstances:
  - ask us to erase information we hold about you;
  - request a copy of your personal data in an electronic format and require us to provide this information to a third party;
  - ask us to restrict the use of information we hold about you; and
  - object to the use of information we hold about you.

You can choose whether your health records are shared for research or planning here:

[Click Here To Opt In Or Out Of Sharing](#)

## 21. CONTACT DETAILS FOR THE DPO

If you wish to exercise any of your privacy rights or on other matters outlined in section 2 please submit a Subject Access Request (SAR) to the DPO.

The ICO has excellent advice on the submission of a SAR which we recommend reading before any submission to us. Details here:

[Click Here For ICO Details On Your Rights Of Access](#)

The DPO can be contacted using any of the following methods:

- a. By email to: [Salisbury.walkincentre@nhs.net](mailto:Salisbury.walkincentre@nhs.net)

Please use **“SAR Request. For the attention of the DPO”** as the subject header.

- b. By letter addressed to: The DPO, Wilcodoc Ltd, Central Health Clinic, Avon Approach, Salisbury, SP1 3SL
- c. By telephoning 01722 331191 giving clear details of your requirement.

d. By verbally giving the receptionist/clinician details of your requirement.

By Law we will provide any SAR information requests free of charge however, we are allowed in some limited and exceptional circumstances to make an administrative charge for any extra copies if the information requested is excessive, complex or repetitive.

## **22. COMPLAINTS ON OUR HANDLING OF A SAR**

We have 30 days to reply to any SAR received. If you wish to challenge our reply you can complain and if necessary, request a deadlock letter from us if you remain dissatisfied. This ICO information may help you to raise a complaint to us.

[Click Here For ICO Information On Raising A Concern](#)

As a last resort, which we hope will never be necessary, you have the right to contact the ICO to make a complaint about us. More details are here:

[Click Here For More Details On Making A Complaint To The ICO](#)

[Click Here For The ICO Contact Details](#)

## **23. UNDER 16?**

Please read our privacy notice for children aged 15 and under here:

[Click Here for the Privacy Notice for Children](#)

## **24. OUR WEBSITE**

This website Privacy Notice only applies to Salisbury Walk in Centre at:

[Click Here To Read Our Website Privacy Policy](#)

If you use any of the courtesy hyperlinks provided on our website including this Privacy Notice, you will need to read the individual website privacy policies. We take no responsibility for the content or security of other websites.

## **25. COOKIES**

Our website does not use cookies to track your activity online. For more information about what data the website collects please visit the Website Privacy Policy.

[Click Here To Read Our Website Privacy Policy](#)

## **26. WHERE TO FIND OUR PRIVACY NOTICE**

A copy of this Privacy Notice is held at reception, on our website or a copy will be provided on request. You can also download from our website.

## **27. CHANGES TO OUR PRIVACY NOTICE**

We keep our privacy notice under regular review and we will place any updates on our website. This privacy notice was last updated June 2024.