**ST LUKE’S SURGERY, PINFOLD HEALTH CENTRE**

**Data Protection Privacy Notice for Patients**

**Introduction:**

This privacy notice lets you know what happens to any personal data that you give to us, or any information that we may collect from or about you.

This privacy notice applies to personal information processed by or on behalf of the practice.

This Notice explains

* Who we are, how we use your information?
* Information about our Data Protection Officer
* What kinds of personal information we hold about you and what information we use.
* What are the legal grounds for our processing of your personal information (including when we share it with others)?
* What should you do if your personal information changes?
* For how long your personal information is retained by us?
* What are your rights under data protection laws?

The General Data Protection Regulation (GDPR) became law on 24th May 2016. This is a single EU-wide regulation on the protection of confidential and sensitive information. It entered into force in the UK on the 25th May 2018, repealing the Data Protection Act (1998).

For the purpose of applicable data protection legislation (including but not limited to the General Data Protection Regulation (Regulation (EU) 2016/679) (the "GDPR"), and the Data Protection Act 2018 (currently in Bill format before Parliament) the practice responsible for your personal data is St Luke’s Surgery.

This Notice describes how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations to you. Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights

**How we use your information and the law.**

St Luke’s Surgery will be what is known as the ‘Controller’ of your personal data.

We collect basic personal data about you, which does not include any special types of information or location-based information. This does however include name, address, contact details such as email and mobile number etc.

We will also collect sensitive confidential data known as “special category personal data”, in the form of health information, religious belief (if required in a healthcare setting) ethnicity, and sex during the services we provide to you and or linked to your healthcare through other health providers or third parties.

The practice complies with the Information Standard DCB3058 and the National Data opt out.

How can you access, amend move the personal data that you have given to us?

As an individual, you have the following rights over your personal information:

**a. Right to be informed**

You have the right to be informed on how we handle process and share your personal information; this privacy notice ensures as a practice we satisfy this right.

**b. Right to access your information**

You can request access to and/or copies of the personal data we hold about you, free of charge (subject to exemptions) within one calendar month. Such requests can be made verbally or in writing, but we do request that you provide us with adequate information to process your request, such as providing your full name, address, date of birthm nhs number and details of your request and where necessary any documents to verify your identity.

On processing your request there may be occasions when information maybe withheld if we as a practice believe that releasing the information to you could cause serious harm or distress. Information may also be withheld if another person (i.e. third party) is identified in the record and they do not want their information disclosed to you. However, if the other person mentioned in your records was acting in their professional capacity in caring for you, in normal circumstances they could not prevent you from having access to that information.

To request a copy or request access to information we hold about you, please contact us via Reception.

**c. Right to rectification**

The correction of personal data when incorrect, out o date or incomplete will be acted upon within one calendar month of receipt of such a request. Please ensure the practice has the correct contact details for you at all times.

**d. Right to erasure**

Under Article 17 of the UK GDPR individuals have the riught to have personal data erased. This is also known as the ‘right to be forgotten’. The right is not absolute and only applies in certain circumstances, for example, when your personal data is no longer necessary for the purpose, which it was originally collected or processed for or if you wish to withdraw your consent after you have previously given your consent.

**e. Right to restrict processing**

Article 18 of the UK GDPR gives individuals the right to restrict the processing of their personal data in certain circumstances. This means that you can limit the way that the practice uses your data. This is an alternative to requesting the erasure of your data. Individuals have the right to restrict the processing of their personal data where they have a particular reason for wanting the restriction.

**f. Right to data portability**

The right to data portability gives individuals the right to receive personal data they have provided to the Practice in a structured, commonly used, and machine-readable format (i.e., email, upload to a portable device etc.).

**g. Right to object to processing**

Article 21 of UK GDPR gives you the right to object to processing, however, please note if we can demonstrate compelling legitimate grounds which outweighs your interest, then processing can continue.  If we did not process any information about you and your health care if would be very difficult for us to care and treat you.

**h. Rights in relation to automated decision making and profiling**

Automated individual decision-making is a decision made by automated means (i.e., a computer system) without any human involvement.  If any of the processes we use rely on automated decision making, you do have the right to ask for a human to review any computer-generated decision at any point

**Why do we need your information?**

The health care professionals who provide you with care maintain records about your health and any treatment or care you have received previously (e.g. NHS Trust, GP Surgery, Walk-in clinic, etc.). These records help to provide you with the best possible healthcare.

NHS health records may be electronic, on paper or a mixture of both, and we use a combination of working practices and technology to ensure that your information is kept confidential and secure.

Records about you may include the following information:

• Details about you, such as your address, carer, legal representative, emergency contact details

• Any contact the surgery has had with you, such as appointments, clinic visits, emergency appointments, etc.

• Notes and reports about your health

• Details about your treatment and care

• Results of investigations such as laboratory tests, x-rays etc

• Relevant information from other health professionals, relatives or those who care for you

* Contact details (including email address,mobile telephone number and home telephone number)

To ensure you receive the best possible care, your records are used to facilitate the care you receive, including contacting you.Information held about you may be used to help protect the health of the public and to help us manage the NHS and to improve the services we provide. Information may be used within the GP practice for clinical audit to monitor the quality of the service provided.

**How do we lawfully use your data?**

We need to know your personal, sensitive and confidential data in order to provide you with Healthcare services as a General Practice, under the General Data Protection Regulation we will be lawfully using your information in accordance with: -

*Article 6, (1)( e) 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) 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 systems*

This Privacy Notice applies to the personal data of our patients and the data you have given us about your carers/family members.

**Risk Stratification**

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 a number of sources including NHS Trusts and from this GP Practice. A risk score is then arrived at through an analysis of your de-identified information is only provided back to your GP as data controller in an identifiable form. Risk stratification enables your GP to focus on preventing ill health and not just the treatment of sickness. If necessary, your GP may be able to offer you additional services. Please note that you have the right to opt out of your data being used in this way. Individual risk management at a GP practice level however is deemed to be part of your individual healthcare and is covered by our legal powers above.

**7. Population Health Management**

Population Health Management improves population health by data driven planning and delivery of proactive care to achieve maximum impact. It includes segmentation, stratification and impactability modelling to identify local ‘at risk’ cohorts – and, in turn, designing and targeting interventions to prevent ill-health and to improve care and support for people with ongoing health conditions and reducing unwarranted variations in outcomes.

The benefits of Population Health Management are:

· Using data-driven insights and evidence of best practice to inform target interventions to improve the health & wellbeing of specific populations & cohorts

· The wider determinants of health, not just health & care

· Making informed judgements, not just relying on the analytics

· Prioritising the use of collective resources to have the best impact

· Acting together – the NHS, local authorities, public services, the VCS, communities, activists & local people. Creating partnerships of equals

· Achieving practical tangible improvements for people & communities

Information about you is collected from several sources including NHS Trusts and from this GP Practice. The identifying parts of your data are removed, and an analysis of your data is undertaken. This analysis may be undertaken by external organisations who are acting on behalf of your GP Practice and have a Data Processing contract with the Practice. This is then provided back to your GP as data controller in an identifiable form.  As a result of population health management, your GP may be able to offer you additional services

**Medicines Management**

The Practice may conduct Medicines Management Reviews of medications prescribed to its patients. This service performs a review of prescribed medications to ensure patients receive the most appropriate, up to date and cost-effective treatments. The reviews are carried out by the ICB’s medicines management team under a Data Processing contract with the practice.

**GP Connect / NHS 111 Service**

Patients in the West Midlands are able to benefit from the sharing of information to better manage their care with use of the GP Connect system.

This includes sharing; personal contact details, diagnosis, medications, allergies and test results, between healthcare professionals involved in your individual care. Additional Information has been added to over 40 million patients’ Summary Care Records (SCRs) so far unless they have previously informed the NHS that they did not want their SCR or Additional Information to be shared.

Existing SCR controls are still in place so patient consent preferences can be changed in the same way as before. Any changes made to these preferences during the temporary legal arrangement period will last beyond this period as well.

More information on GP Connect can be found at: <https://digital.nhs.uk/services/gp-connect/gp-connect-in-your-organisation/gp-connect-privacy-notice> or <https://digital.nhs.uk/services/summary-care-records-scr/summary-care-record-supplementary-transparency-notice> for summary care record.

Health information is shared with NHS 111 provider.

**9. Patient Communication**

The Practice would like to use your name, contact details, and email address to inform you of NHS services, or provide inform about your health/information to manage your healthcare or information about the management of the NHS service.  There may be occasions where authorised research facilities would like you to take part in research in regard to your particular health issues, to try and improve your health. Your contact details may be used to invite you to receive further information about such research opportunities, but you must give your explicit consent to receive messages for research purposes.

**10. Safeguarding**

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

Our legal basis for processing information for safeguarding purposes, as stipulated in the UK GDPR is:

Article 6(1)(e) ‘…exercise of official authority…’.

For the processing of special categories data, the basis is:

Article 9(2)(b) – ‘processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law

**10.1 Categories of personal data**

The data collected by Practice staff in the event of a safeguarding situation, will be minimised to include only the personal information as is necessary in order to handle the situation. In addition to some basic demographic and contact details, we will also process details of what the safeguarding concern is. This is likely to be special category information.

**10.2 Sources of the data**

The Practice will either receive or collect information when someone contacts the organisation with safeguarding concerns, or we believe there may be safeguarding concerns and make enquiries to relevant providers.

**10.3 Recipients of personal data**

The information is used by the Practice when handling a safeguarding incident or concern. We may share information accordingly to ensure duty of care and investigation as required with other partners such as local authorities, the police or healthcare professionals (i.e., their GP or mental health team).

**11. Research**

Clinical Practice Research Datalink (CPRD) collects anonymised patient data from a network of GP practices across the UK. Primary care data is linked to a range of other health related data to provide a fully representative UK population health dataset.  You can opt out of your information being used for research purposes at any time, for full details on CRPD please visit www.cprd.com/transparency-information.

**12. General Practice Data for Planning and Research**

The Government is delaying the implementation of the General Practice Data for Planning and Research (GP DPR) programme until four key areas of work are strengthened:

· the ability for patients to opt out, or back in, to sharing their GP data with NHS Digital, with data being deleted even if it has been uploaded previously

· the backlog of opt-outs has been fully cleared

· a Trusted Research Environment (TRE) is available where approved researchers can work securely on de-identified patient data which does not leave the environment

· a campaign of engagement and communication has increased public awareness of the programme, explaining how data is used and patient choices

This delay will also provide more time to speak with patients, doctors, health charities and others.

This Privacy Notice will be updated when further details of the proposed implementation have been confirmed. For further information please refer to NHS Digitals webpage on this subject matter

The NHS needs data about the patients it treats in order to plan and deliver its services and to ensure that care and treatment provided is safe and effective. The General Practice Data for Planning and Research data collection will help the NHS to improve health and care services for everyone by collecting patient data that can be used to do this. For example, patient data can help the NHS to:

· monitor the long-term safety and effectiveness of care.

· plan how to deliver better health and care services.

· prevent the spread of infectious diseases.

· identify new treatments and medicines through health research.

GP practices already share patient data for these purposes, but this new data collection will be more efficient and effective.  We have agreed to share the patient data we look after in our practice with NHS Digital who will securely store, analyse, publish, and share this patient data to improve health and care services for everyone. This includes:

· informing and developing health and social care policy

· planning and commissioning health and care services

· taking steps to protect public health (including managing and monitoring the coronavirus pandemic)

· in exceptional circumstances, providing you with individual care.

· enabling healthcare and scientific research

This means that we can get on with looking after our patients and NHS Digital can provide controlled access to patient data to the NHS and other organisations who need to use it to improve health and care for everyone.

Contributing to research projects will benefit us all as better and safer treatments are introduced more quickly and effectively without compromising your privacy and confidentiality. NHS Digital has engaged with the British Medical Association (BMA), Royal College of GPs (RCGP) and the National Data Guardian (NDG) to ensure relevant safeguards are in place for patients and GP practices.

**13. Opting Out**

If you don’t want your identifiable patient data to be shared for purposes except for your own care, you can opt-out by registering a National Data Opt-out. Your individual care will not be affected if you opt out using either option.

**13.2 National Data Opt-Out**

If you don’t want your confidential patient information to be shared by NHS Digital with other organisations for purposes except your own care – either GP data, or other data it holds, such as hospital data – you can register a National Data Opt-out.

If you have registered a National Data Opt-out, NHS Digital will not share any confidential patient information about you with other organisations, unless there is an exemption to this, such as where there is a legal requirement or where it is in the public interest to do so, such as helping to manage contagious diseases like coronavirus. You can find out more about exemptions on the NHS website.

There is an intention for the National Data Opt-out to apply to any confidential patient information shared by the GP practice with other organisations for purposes except your individual care. This means it will replace the Type-1 Opt-out. If this happens, patients who have registered a Type 1 Opt-out will be informed. Please note that the National Data Opt-out will not apply to confidential patient information being shared by GP practices with NHS Digital, as it is a legal requirement for us to share this data with NHS Digital and the National Data Opt-out does not apply where there is a legal requirement to share data.

You can find out more about and register a National Data Opt-out or change your choice on nhs.uk/your-nhs-data-matters or by calling 0300 3035678.

You can also set your opt-out preferences via the NHS App if you are registered to use this application

**13.3 The legal bases for processing this information.**

The Health and Social Care Act 2012 covers the sharing and collection of health and care data.  It states that when the Secretary of State for Health and Social Care needs to collect and analyse data to help the health service, they can tell NHS Digital to do this for them.  The instruction, which NHS Digital must act on, is called a direction.  In this case:

The Secretary of State for Health and Social Care sent a direction to NHS Digital, instructing them to collect and analyse general practice data for health and social care purposes including policy, planning, commissioning, public health, and research purposes.

NHS Digital sent all GP practices a document called a Data Provision Notice, giving details of the data it needs GP Practices like ours to share so it can comply with the direction.  All GP Practices in England are required to share data with NHS Digital when they are sent a Data Provision Notice.

Under data protection law, we can only share patient data if we have a legal basis under Articles 6 and 9 of the UK GDPR.  Our legal basis for sharing patient data with NHS Digital is Article 6(1)(c) – legal obligation, as we are required under the 2012 Act to share it with NHS Digital.

When we are sharing patient data about health, we also need a legal basis under Article 9 of the UK GDPR.  This is:

· Article 9(2)(g) – as we are sharing patient data for reasons of substantial public interest, for the purposes of NHS Digital exercising its statutory functions under the General Practice Data for Planning and Research Directions. It is substantially in the public interest to process patient data for planning and research purposes to improve health and care services for everyone. This is permitted under paragraph 6 of Schedule 1 of the Data Protection Act 2018 (DPA).

· Article 9(2)(h) – as we are sharing patient data for the purposes of providing care and managing health and social care systems and services. This is permitted under paragraph 2 of Schedule 1 of the DPA.

· Article 9(2)(i) – as patient data will also be used for public health purposes. This is permitted under paragraphs 3 of Schedule 1 of the DPA.

· Article 9(2)(j) – as patient data will also be used for the purposes of scientific research and for statistical purposes. This is permitted under paragraph 4 of Schedule 1 of the DPA.

**14. Third party processors**

In order to deliver the best possible service, the practice will share data (where required) with other NHS bodies such as other GP practices and hospitals. In addition, the practice will use carefully selected third party service providers. When we use a third-party service provider to process data on our behalf then we will always have an appropriate agreement in place to ensure that they keep the data secure, that they do not use or share information other than in accordance with our instructions and that they are operating appropriately. Examples of functions that may be carried out by third parties include:

· Companies that provide IT services & support, including our core clinical systems; systems which manage patient facing services (such as our website and service accessible through the same); data hosting service providers; systems which facilitate appointment bookings or electronic prescription services; document management services etc.

· Delivery services (for example if we were to arrange for delivery of any medicines to you).

· Payment providers (if for example you were paying for a prescription or a service such as travel vaccinations).

Further details regarding specific third-party processors can be supplied on request to the practice.

**How do we maintain the confidentiality of your records?**

We are committed to protecting your privacy and will only use information collected lawfully in accordance with:

* Data Protection Act 2018
* The General Data Protection Regulations 2016
* Human Rights Act 1998
* Common Law Duty of Confidentiality
* Health and Social Care Act 2012
* NHS Codes of Confidentiality, Information Security and Records Management
* Information: To Share or Not to Share Review

Every member of staff who works for an NHS organisation has a legal obligation to keep information about you confidential.

We will only ever use or pass on information about you if others involved in your care have a genuine need for it. We will not disclose your information to any third party without your permission unless there are exceptional circumstances (i.e. life or death situations), where the law requires information to be passed on and / or in accordance with the information sharing principle following Dame Fiona Caldicott’s information sharing review (Information to share or not to share) where “The duty to share information can be as important as the duty to protect patient confidentiality.” This means that health and social care professionals should have the confidence to share information in the best interests of their patients within the framework set out by the Caldicott principles.

Our practice policy is to respect the privacy of our patients, their families and our staff and to maintain compliance with the General Data Protection Regulations (GDPR) and all UK specific Data Protection Requirements. Our policy is to ensure all personal data related to our patients will be protected.

All employees and sub-contractors engaged by our practice are asked to sign a confidentiality agreement. The practice will, if required, sign a separate confidentiality agreement if the client deems it necessary. If a sub-contractor acts as a data processor for St Luke’s Surgery an appropriate contract (art 24-28) will be established for the processing of your information.

In Certain circumstances you may have the right to withdraw your consent to the processing of data. Please contact the Data Protection Officer in writing if you wish to withdraw your consent. In some circumstances we may need to store your data after your consent has been withdrawn to comply with a legislative requirement.

Some of this information will be held centrally and used for statistical purposes. Where we do this, we take strict measures to ensure that individual patients cannot be identified. Sometimes your information may be requested to be used for research purposes – the surgery will always gain your consent before releasing the information for this purpose in an identifiable format. In some circumstances you can Opt-out of the surgery sharing any of your information for research purposes.

**16. With your consent we would also like to use your information**

There are times that we may want to use your information to contact you or offer you services, not directly about your healthcare, in these instances we will always gain your consent to contact you.  We would however like to use your name, contact details, and email address to inform you of other services that may benefit you.  We will only do this with your consent.  There may be occasions where authorised research facilities would like you to take part on innovations, research, improving services or identifying trends, you will be asked to opt into such programmes if you are happy to do so.

At any stage where we would like to use your data for anything other than the specified purposes and where there is no lawful requirement for us to share or process your data, we will ensure that you have the ability to consent and opt out prior to any data processing taking place. This information is not shared with third parties or used for any marketing and you can unsubscribe at any time via phone, email or by informing the practice

**Where do we store your information electronically?**

All the personal data we process is processed by our staff in the UK however for the purposes of IT hosting and maintenance this information may be located on servers within the European Union.

No 3rd parties have access to your personal data unless the law allows them to do so and appropriate safeguards have been put in place. We have a Data Protection regime in place to oversee the effective and secure processing of your personal and or special category (sensitive, confidential) data.

All patient data is held in NHS Approved Data Centres for example EMIS WEB (our clinical system)hold your data in an AWS data warehouse.

**Who are our partner organisations?**

We may also have to share your information, subject to strict agreements on how it will be used, with the following organisations;

* NHS Trusts / Foundation Trusts
* GP’s
* Primary Care Networks
* NHS Commissioning Support Units
* Independent Contractors such as dentists, opticians, pharmacists
* Private Sector Providers
* Voluntary Sector Providers
* Ambulance Trusts
* Integrated Care Systems (ICS)
* Integrated Care Voard (ICB)
* Integrated Care Partnerships (ICPs)
* Social Care Services
* NHS England (NHSE) and NHS Digital (NHSD)
* Multi Agency Safeguarding Hub (MASH)
* Local Authorities
* Education Services
* Fire and Rescue Services
* Police & Judicial Services
* Other ‘data processors’ which you will be informed of

You will be informed who your data will be shared with and in some cases asked for consent for this to happen when this is required.

We may also use external companies to process personal information, such as for archiving purposes. These companies are bound by contractual agreements to ensure information is kept confidential and secure. All employees and sub-contractors engaged by our practice are asked to sign a confidentiality agreement. If a sub-contractor acts as a data processor for St Luke’s Surgery an appropriate contract (art 24-28) will be established for the processing of your information.

**19. Invoice Validation**

If you have received treatment within the NHS, access to your personal information may be required to determine which Integrated Care Board should pay for the treatment or procedure you have received.

This information would most likely include information such as your name, address, NHS number, date of treatment and may be passed on to enable the billing process. These details are held in a secure environment and kept confidential. This information will only be used to validate invoices and will not be shared for any further purposes.

**20. NHS Health Checks**

All 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 in the Practice will see confidential information about you during the invitation process and only contact details would be securely transferred to a data processor (if that method was employed). You may be ‘given the chance to attend your health check either within the practice or at a community venue. If your health check is at a community venue all data collected will be securely transferred back into the practice system and nobody outside the healthcare team in the practice will see confidential information about you during this process.

**Computer System of Choice**

This practice operates a Clinical Computer System of Choice on which NHS Staff record information securely.  This information can then be shared with other clinicians so that everyone caring for you is fully informed about your medical history, including allergies and medication.

To provide around the clock safe care, unless you have asked us not to, we will make information available to our Partner Organisations (as listed above).  Wherever possible, their staff will ask for your consent before your information is viewed.

**21. Shared Care Records**

To support your care and improve the sharing of relevant information to our partner organisations when they are involved in looking after you, we will share information to other systems.  You have a right to object of this sharing of your records with our partners at any time if this sharing is based on your consent.

We may also use external companies to process personal information, such as for archiving purposes. These companies are bound by contractual agreements to ensure information is kept confidential and secure.  All employees and sub-contractors engaged by our practice are asked to sign a confidentiality agreement. If a sub-contractor acts as a data processor for [Practice] an appropriate contract will be established for the processing of your information.

Sharing your information without consent

We will normally ask you for your consent, but there are times when we may be required by law to share your information without your consent, for example:

· where there is a serious risk of harm or abuse to you or other people.

· Safeguarding matters and investigations

· where a serious crime, such as assault, is being investigated or where it could be prevented.

· notification of new births

· where we encounter infectious diseases that may endanger the safety of others, such as meningitis or measles (but not HIV/AIDS)

· where a formal court order has been issued

· where there is a legal requirement, for example if you had committed a Road Traffic Offence.

**How long will we store your information?**

We are required under UK law to keep your information and data for the full retention periods as specified by the NHS Records management code of practice for health and social care and national archives requirements.

More information on records retention can be found in the NHS Records Management Code of Practice 2021.

**22.1 Destruction of records/information**

This will only happen following a review of the information at the end of its retention period. Where data has been identified for disposal, we have the following responsibilities:

· to ensure that information held in manual form is destroyed using a cross-cut shredder or contracted to a reputable confidential waste company that complies with European Standard EN15713 and obtain certificates of destruction.

· to ensure that electronic storage media used to store, or process information are destroyed or overwritten to national standards.

**23. Primary Care Networks**

The objective of Primary Care Networks (PCNs) is for group practices working together to create more collaborative workforces which ease the pressure of GP’s,

leaving them better able to focus on patient care. The aim is for all areas within England to be covered by a PCN.

Primary Care Networks form a key building block of the NHS long-term plan. Bringing general practices together to work at scale has been a policy priority for some years for a range of reasons, including improving the ability of practices to recruit and retain staff; to manage financial and estates pressures; to provide a wider range of services to patients and to integrate with the wider health and care system more easily.

All GP practices are expected to come together in geographical networks covering populations of approximately 30–50,000 patients and take advantage of additional funding attached to the GP contract.

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

St Luke’s Surgery is a member of the Walsall North PCN which includes the following local GP Practices:

Pinfold Medical,

Bloxwich Medical Practice

Birchils Medical Centre

Khan Medical Practice

St Mary’s Practice

Harden Blakenall

Lichfield Street Surgery

Lower Farm Health Centre

**Access to your personal information**

Data Subject Access Requests (DSAR): You have a right under the Data Protection legislation to request access to view or to obtain copies of what information the surgery holds about you and to have it amended should it be inaccurate. To request this, you need to do the following:

• Your request should be made to the Practice – for information from the hospital or other Trust/NHS organisation you should write direct to them

• There is no charge to have a copy of the information held about you

• We are required to respond to you within one month

• You will need to give 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 information we hold about you at any time.

**What should you do if your personal information changes?**

You should tell us so that we can update our records please speak to a Receptionist as soon as any of your details change, this is especially important for changes of address or contact details (such as your mobile phone number), the practice will from time to time ask you to confirm that the information we currently hold is accurate and up-to-date.

**Objections / Complaints**

Should you have any concerns about how your information is managed or wish to object to any of the data collection at the Practice at the GP, please contact the GP Practice Manager or your healthcare professional to discuss how the disclosure of your personal information can be restricted. All patients have the right to change their minds and reverse a previous decision. Please contact the practice if you change your mind regarding any previous choice.

If you would like to make a ‘data subject access request’ please contact the practice in writing. We will endeavour to respond to your request within one calendar month or two months if the request is complex.

Any changes to this notice will be published on our website and on the Practice notice board.

Suspected breaches in data protection can be reported to the Practice Data Protection Officer,

**Michelle Wiles, Information Governance Manager Contact address: Information Governance Team, Civic Centre, St Peters Square, Wolverhampton, WV1 1SH Email:** **bcicb.dpo@nhs.net**

Breaches in data protection will result in an incident investigation. Serious breaches will be reported to the Information Commissioners Office (ICO).

It is the responsibility of all employees of the Practice to report suspected breaches of information security to the Practice Manager and Data Protection Officer without delay.

The Practice is registered as a data controller with the ICO. The registration number is Z6904666 and can be viewed online in the public register or by contacting the ICO, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

If you are happy for your data to be used for the purposes described in this privacy notice, then you do not need to do anything.  If you have any concerns about how your data is shared, then please contact the Practice Data Protection Officer, Caldicott Guardian or IG Lead.

If you would like to know more about your rights in respect of the personal data that we hold about you, please use the contact details below:

IG Lead: Debbie Walker

Caldicott Guardian: Dr R Chauhan

Data Protection Officer: Michelle Wiles, Information Governance Manager – Black Country

**27. Useful Links**

Please find below some links to external webpages which you may wish to access to find out additional information: ·

**Information Commissioners Office** - <https://ico.org.uk/>

**NHS Constitution** - <https://www.gov.uk/government/publications/the-nhs-constitution-for-england>

 **NHS Digital Guide to Confidentiality in Health and Social Care ·** <https://digital.nhs.uk/data-and-information/looking-after-information/data-security-and-information-governance/codes-of-practice-for-handling-information-in-health-and-care/a-guide-to-confidentiality-in-health-and-social-care>

 **Health Research Authority** · <https://www.hra.nhs.uk/>

**Health Research Authority Confidentiality Advisory Group (CAG) ·** <https://www.hra.nhs.uk/planning-and-improving-research/application-summaries/confidentiality-advisory-group-registers/>

 **National Data Opt-Out ·** <https://digital.nhs.uk/services/national-data-opt-out>

**Records Management Code of Practice** <https://transform.england.nhs.uk/information-governance/guidance/records-management-code/>

**Changes:**

It is important to point out that we may amend this Privacy Notice from time to time. If you are dissatisfied with any aspect of our Privacy Notice, please contact the Practice Data Protection Officer.