

# Privacy Notice: 306 Medical Centre

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We are committed to protecting your privacy. You can access our website without giving us any information about yourself. But sometimes we do need information to provide services that you request, and this statement of privacy explains data collection and use in those situations.

In general, you can visit our web site without telling us who you are and without revealing any information about yourself. However there may be occasions when you choose to give us personal information, for example, when you choose to contact us or request information from us. We will ask you when we need information that personally identifies you or allows us to contact you.

We collect the personal data that you may volunteer while using our services. We do not collect information about our visitors from other sources, such as public records or bodies, or private organisations. We do not collect or use personal data for any purpose other than that indicated below:

- To send you confirmation of requests that you have made to us
- To send you information when you request it.

We intend to protect the quality and integrity of your personally identifiable information and we have implemented appropriate technical and organisational measures to do so. We ensure that your personal data will not be disclosed to State institutions and authorities except if required by law or other regulation.

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should be aware that we don't have any control over the other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting these sites.

## How we use your personal information

This Privacy Notice explains why the GP practice collects information about you and how that information may be used.

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 are used to help to provide you with the best possible healthcare.

NHS health care 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 this GP Practice hold about you may include the following information;

- Details about you, such as your name, address, carers, legal representatives and 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

To ensure you receive the best possible care, your records are used to facilitate the care you receive. Information held about you may be used to help protect the health of the public and to help us manage the

NHS. Information may be used within the GP practice for clinical **Audit** to monitor the quality of the service provided.

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

### **Risk Stratification**

Risk stratification data tools are increasingly being used in the NHS to help determine a person's risk of suffering a particular 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 using managed software and 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.

### **Medicine 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.

### **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 and General Data Protection Regulation 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.

The practice 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 new information sharing principle following Dame Fiona Caldecott'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 Caldecott principles. They should be supported by the policies of their employers, regulators and professional bodies.

### **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

- NHS **Commissioning** Support Units
- Independent Contractors such as dentists, opticians, pharmacists
- Private Sector Providers
- Voluntary Sector Providers
- Ambulance Trusts
- Clinical **Commissioning** Groups
- Primary Care Networks
- Social Care Services
- Health and Social Care Information Centre (HSCIC)
- Local Authorities
- Education Services
- Fire and Rescue Services
- Police & Judicial Services
- Voluntary Sector Providers
- Private Sector Providers
- 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 explicit consent for this 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.

Authorised Clinicians such as GPs, NHS 111 Clinicians, Care Home Nurses (if you are in a Care Home), Secondary Care Trusts, Social Care Clinicians are able to access the GP records of the patients they are treating via a secure NHS Digital service.

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.

This practice uses a shared record system called the London Care Record. The London Care Record is a secure view of your health and care information and lets health and care professionals involved in your care see important details about your health when and where they need them. Having a single, secure view of your information helps speed up communication between care professionals across London, improves the safety of care and can save lives.

London Care Record can only be lawfully looked at by staff who are directly involved in your care. Your information isn't available to anyone who doesn't need it to provide treatment, care and support to you. Your details are kept safe and won't be made public, passed on to a third party who is not directly involved in your care, used for advertising or sold. For more information please read the London Care Record privacy notice for South East London here: [The London Care Record - South East London ICS \(selondonics.org\)](http://TheLondonCareRecord-SouthEastLondonICS.selondonics.org)

You have the right to object to your information being available through London Care Record. Although patients have the right to object and request restrictions on sharing their records, there may be instances where this request will not be upheld due to a clinical need as determined by the direct care giver. Please discuss this with your GP/ health and social care worker and you can find further information in this London Care Record leaflet.

For further information and advice about data protection or your right to object to sharing your data you can contact the team at Lewisham and Greenwich Trust who manage the London Care Record for South East London [www.lewishamandgreenwich.nhs.uk/london-care-record](http://www.lewishamandgreenwich.nhs.uk/london-care-record) or you can call 020 3192 6011 and leave your name and number for someone to contact you.

If you have already requested to stop sharing on Local Care Record in South East London, then you will not have to request this again for London Care Record.

## **IGPR**

We use a processor, iGPR Technologies Limited (“iGPR”), to assist us with responding to report requests relating to your patient data, such as subject access requests that you submit to us (or that someone acting on your behalf submits to us) and report requests that insurers submit to us under the Access to Medical Records Act 1988 in relation to a life insurance policy that you hold or that you are applying for. iGPR manages the reporting process for us by reviewing and responding to requests in accordance with our instructions and all applicable laws, including UK data protection laws. The instructions we issue to iGPR include general instructions on responding to requests and specific instructions on issues that will require further consultation with the GP responsible for your care.

## **Accurx and Iplato**

We use Accurx and Iplato, as processors compliant with the NHS data governance standards, to assist us with effective communication with patients. They are simply processing patient personal information on our instructions to enable us to provide individual patient care. For further information: Accurx - <https://www accurx.com/security#faq> and IPlato - <https://www.iplato.com/privacy/>

## **NHS App**

We use the [NHS App Messaging Service](https://digital.nhs.uk/services/nhs-app/nhs-app-guidance-for-gp-practices/guidance-on-nhs-app-features/nhs-app-messaging-service) - (<https://digital.nhs.uk/services/nhs-app/nhs-app-guidance-for-gp-practices/guidance-on-nhs-app-features/nhs-app-messaging-service>) provided by NHS England to send you messages relating to your health and care. You need to be an NHS App user to receive these messages. Further information about the service can be found at the privacy notice for the NHS App managed by NHS England at: [NHS App Privacy Policy](https://www.nhs.uk/nhs-app/nhs-app-legal-and-cookies/nhs-app-privacy-policy/privacy-policy/) - (<https://www.nhs.uk/nhs-app/nhs-app-legal-and-cookies/nhs-app-privacy-policy/privacy-policy/>)

## **ACR project for patients with diabetes (and/or other conditions)**

The data is being processed for the purpose of delivery of a programme, sponsored by NHS Digital, to monitor urine for indications of chronic kidney disease (CKD) which is recommended to be undertaken annually for patients at risk of chronic kidney disease e.g., patients living with diabetes. The programme enables patients to test their kidney function from home. We will share your contact details with Healthy.io to enable them to contact you and send you a test kit. This will help identify patients at risk of kidney disease and help us agree any early interventions that can be put in place for the benefit of your care. Healthy.io will only use your data for the purposes of delivering their service to you. If you do not wish to receive a home test kit from Healthy.io we will continue to manage your care within the Practice. Healthy.io are required to hold data we send them in line with retention periods outlined in the Records Management code of Practice for Health and Social Care. Further information about this is available at: [https://lp.healthy.io/minute/ful\\_info/](https://lp.healthy.io/minute/ful_info/).

## **Legal basis for sharing this data**

In order for your Personal Data to be shared or processed, an appropriate “legal basis” needs to be in place and recorded. The legal basis for direct care via GP Connect or Local care Record is the same as the legal basis for the care you would receive from your own GP, or another healthcare provider:

- for the processing of personal data: Article 6.1 (e) of the 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”.
- for the processing of “Special Category Data” (which includes your medical information): Article 9.2 (h) of the 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 health or social care or treatment or the management of health or social care systems and services”.

## **Your rights**

Because the legal basis used for your care using GP Connect or Local care Record are the same as used in other direct care situations, the legal rights you have over this data under UK GDPR will also be the same- these are listed elsewhere in our privacy notice.

### **Access to personal information**

You have a right under the Data Protection Act 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. In order to request this, you need to do the following:

- Your request must be made in writing to the GP – for information from the hospital you should write direct to them
- There may be a charge to have a printed copy of the information held about you
- We are required to respond to you within 30 days
- 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

### **Objections / Complaints**

Should you have any concerns about how your information is managed at the GP, please contact the Practice Service and Development Manager. If you are still unhappy following a review by the GP practice, you can then complain to the Information Commissioners Office (ICO) via their website ([www.ico.gov.uk](http://www.ico.gov.uk)).

If you are happy for your data to be extracted and 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.

### **Change of Details**

It is important that you tell the person treating you if any of your details such as your name or address have changed or if any of your details such as date of birth is incorrect in order for this to be amended. You have a responsibility to inform us of any changes so our records are accurate and up to date for you.

### **Notification**

The Data Protection Act requires organisations to register a notification with the Information Commissioner to describe the purposes for which they process personal and sensitive information.

This information is publicly available on the Information Commissioners Office website [www.ico.org.uk](http://www.ico.org.uk)

The practice is registered with the Information Commissioners Office (ICO).

Who is the Data Controller? The Data Controller is responsible for keeping your information secure and confidential.

### **Complaints**

Our Caldicott Guardian is Dr M Chawdhery. Our Data Protection Officer is Mr Mo Dawood.

Should you have any concerns about how your information is managed by the Practice please contact the Practice at the following address:

306 Medical Centre | 306 Lordship Lane | London | SE22 8LY

Email: [selicb.306medicalcentre@nhs.net](mailto:selicb.306medicalcentre@nhs.net)

Tel: 02086934704