Dr PMA Simpson and Partners Privacy Notice

**Data Protection Privacy Notice for Patients**

**COVID-19 Privacy Notice (This Privacy Notice is to run alongside our standard Practice Privacy Notice)**

Due to the unprecedented challenges that the NHS and we, Dr PMA Simpson and Partners face due to the worldwide COVID-19 pandemic, there is a greater need for public bodies to require additional collection and sharing of personal data to protect against serious threats to public health.

In order to look after your healthcare needs in the most efficient way we, Dr PMA Simpson and Partners may therefore need to share your personal information, including medical records, with staff from other GP Practices including Practices within our Primary Care Network, as well as other health organisations (i.e. Clinical Commissioning Groups, Commissioning Support Units, Local authorities etc.) and bodies engaged in disease surveillance for the purposes of research, protecting public health, providing healthcare services to the public and monitoring and managing the Covid-19 outbreak and incidents of exposure.

The Secretary of State has served notice under Regulation 3(4) of the Health Service (Control of Patient Information) Regulations 2002 (COPI) to require organisations to process confidential patient information in the manner set out below for purposes set out in Regulation 3(1) of COPI.

***Purpose of this Notice***

The purpose of this Notice is to require organisations such as Dr PMA Simpson and Partners to process confidential patient information for the purposes set out in Regulation 3(1) of COPI to support the Secretary of State’s response to Covid-19 (Covid-19 Purpose). “Processing” for these purposes is defined in Regulation 3(2) and includes dissemination of confidential patient information to persons and organisations permitted to process confidential patient information under Regulation 3(3) of COPI. This Notice is necessary to require organisations such as Dr PMA Simpson and Partners to lawfully and efficiently process confidential patient information as set out in Regulation 3(2) of COPI for purposes defined in regulation 3(1), for the purposes of research, protecting public health, providing healthcare services to the public and monitoring and managing the Covid-19 outbreak and incidents of exposure.

***Requirement to Process Confidential Patient Information***

The Secretary of State has served notice to recipients under Regulation 3(4) that requires Dr PMA Simpson and Partners to process confidential patient information, including disseminating to a person or organisation permitted to process confidential patient information under Regulation 3(3) of COPI.

Dr PMA Simpson and Partners is only required to process such confidential patient information:

• where the confidential patient information to be processed is required for a Covid-19 Purpose and will be processed solely for that Covid-19 Purpose in accordance with Regulation 7 of COPI

• from 20th March 2020 until 30th September 2020.

***Covid-19 Purpose.***

A Covid-19 Purpose includes but is not limited to the following:

• understanding Covid-19 and risks to public health, trends in Covid-19 and such risks, and controlling and preventing the spread of Covid-19 and such risks

• identifying and understanding information about patients or potential patients with or at risk of Covid-19, information about incidents of patient exposure to Covid-19 and the management of patients with or at risk of Covid-19 including: locating, contacting, screening, flagging and monitoring such patients and collecting information about and providing services in relation to testing, diagnosis, self-isolation, fitness to work, treatment, medical and social interventions and recovery from Covid-19

• understanding information about patient access to health services and adult social care services and the need for wider care of patients and vulnerable groups as a direct or indirect result of Covid-19 and the availability and capacity of those services or that care

• monitoring and managing the response to Covid-19 by health and social care bodies and the Government including providing information to the public about Covid-19 and its effectiveness and information about capacity, medicines, equipment, supplies, services and the workforce within the health services and adult social care services

• delivering services to patients, clinicians, the health services and adult social care services workforce and the public about and in connection with Covid-19, including the provision of information, fit notes and the provision of health care and adult social care services

• research and planning in relation to Covid-19.

***Recording of processing***

A record will be kept by Dr PMA Simpson and Partners of all data processed under this Notice.

***Sending Public Health Messages***

Data protection and electronic communication laws will not stop Dr PMA Simpson and Partners from sending public health messages to you, either by phone, text or email as these messages are not direct marketing.

***Digital Consultations***

It may also be necessary, where the latest technology allows Dr PMA Simpson and Partners to do so, to use your information and health data to facilitate digital consultations and diagnoses and we will always do this with your security in mind.

***Research and Pandemic Planning***

The Secretary of State has directed NHS Digital to collect, process and analyse data in connection with COVID-19 to support the Secretary of State’s response to COVID-19 and support various COVID-19 purposes set out in the COVID-19 Public Health Directions 2020, 17 March 2020 (as amended) (COVID-19 Direction) and below. This enables NHS Digital to collect data and analyse and link the data for COVID-19 purposes with other data held by NHS Digital.

The purpose of the data collection is also to respond to the intense demand for General Practice data to be shared in support of vital planning and research for COVID-19 purposes, including under the general legal notice issued by the Secretary of State under Regulation 3(4) of the Health Service (Control of Patient Information) Regulations 2002 (COPI).

 NHS Digital has therefore been requested by the joint co-chairs of the Joint GP IT Committee (JGPITC) (the BMA and RCGP) to provide a tactical solution during the period of the COVID-19 pandemic to meet this demand and to relieve the growing burden and responsibility on General Practices. On 15 April 2020 the BMA and RCGP therefore gave their support via JGPITC to NHS Digital’s proposal to use the General Practice Extraction Service (GPES) to deliver a data collection from General Practices, at scale and pace, as a tactical solution to support the COVID-19 response in the pandemic emergency period.

It is a requirement of the JGPITC that all requests by organisations to access and use this data will need to be made via the NHSX SPOC COVID-19 request process, that will triage and prioritise these requests and refer appropriate requests on to the NHS Digital Data Access Request Service (DARS).   NHS Digital will consult with representatives of the BMA and the RCGP on all requests for access to the data. An outline of the process for this agreed with the BMA and the RCGP is published here. Requests by organisations to access record level data from this collection will also be subject to Independent Group Advising on the Release of Data (IGARD) consideration. Data applicants will need to demonstrate they have a lawful basis to access the data for COVID-19 purposes.

***Benefits of this sharing***

Organisations, including the Government, health and social care organisations and researchers need access to this vital data for a range of COVID-19 purposes, to help plan, monitor and manage the national response to the COVID-19 pandemic, which will help save lives. COVID-19 purposes for which this data may be analysed and used may include:

* understanding COVID-19 and risks to public health, trends in COVID-19 and such risks, and controlling and preventing the spread of COVID-19 and such risks
* identifying and understanding information about patients or potential patients with, or at risk of COVID-19, information about incidents of patient exposure to COVID-19 and the management of patients with or at risk of COVID-19 including: locating, contacting, screening, flagging and monitoring such patients and collecting information about and providing services in relation to testing, diagnosis, self-isolation, fitness to work, treatment, medical and social interventions and recovery from COVID19
* understanding information about patient access to health services and adult social care services as a direct or indirect result of COVID-19, and the availability and capacity of those services • monitoring and managing the response to COVID-19 by health and social care bodies and the Government including providing information to the public about COVID-19 and its effectiveness and information about capacity, medicines, equipment, supplies, services and the workforce within the health services and adult social care services
* delivering services to patients, clinicians, the health services and adult social care services workforce and the public about and in connection with COVID-19, including the provision of information, fit notes and the provision of health care and adult social care services; and
* research and planning in relation to COVID-19.

Data may be analysed and linked to other data held by NHS Digital or held by other organisations to which access to the data is granted for COVID-19 purposes, through the process described above.

Data will be collected nationally from all GP Practices by NHS Digital every fortnight. All requests to access this data will be triaged through the NHSX SPOC COVID-19 request process and assessed and fulfilled by NHS Digital through DARS. This will significantly reduce the burden on General Practice at a time when demand on resources is high, enabling General Practice to focus on delivering health care and support to patients. It will also reduce compliance burden and risk for General Practice associated with sharing data and complying with the terms of the general legal notice issued under COPI, which applies to General Practices.

***Legal Basis for this collection***

NHS Digital has been directed by the Secretary of State under section 254 of the 2012 Act under the COVID-19 Direction to establish and operate a system for the collection and analysis of the information specified for this service: GPES Data for Pandemic Planning and Research (COVID-19). A copy of the COVID-19 Direction is published here:  https://digital.nhs.uk//about-nhs-digital/corporate-information-and-documents/directions-anddata-provision-notices/secretary-of-state-directions/covid-19-public-health-directions-2020.

Details of the information to be collected can be found on the NHS Digital website – Specification of this DPN. Type 1 objections will be upheld in collecting this data from General Practices and therefore the data for those patients who have registered a Type 1 objection with their GP will not be collected. The Type 1 objection prevents an individual’s personal identifiable confidential information from being shared outside of their GP Practice except when it is being used for the purposes of their direct care. The National Data Opt-Out will not apply to the collection of the data, as this is a collection which is required by law.

This information is required by NHS Digital under section 259(1)(a) of the 2012 Act to comply with the COVID-19 Direction. In line with section 259(5) of the 2012 Act, all organisations in England that are within the scope of this Notice, as identified below under Health and Social Care Bodies within the scope of the collection, must comply with the requirement and provide information to NHS Digital in the form, manner and for the period specified in this Notice.   This Notice is issued in accordance with the procedure published as part of NHS Digital’s duty under section 259(8) of the 2012 Act.

***Visitors to The Practice***

We have an obligation to protect our staff and employees’ health, so it is reasonable for staff at Dr PMA Simpson and Partners to ask any visitors to our practice to tell us if they have visited a particular country, or are experiencing COVID-19 symptoms. This must only be in pre-approved circumstances and we would also ask all patients to consider government advice on the NHS 111 website and not attend the practice.

Where it is necessary for us to collect information and specific health data about visitors to our practice, we will not collect more information than we need, and we will ensure that any information collected is treated with the appropriate safeguards.

***Review and Expiry of this Notice***

This Notice will be reviewed on or before 30 September 2020 and may be extended by The Secretary of State. If no further notice is sent to Dr PMA Simpson and Partners by The Secretary of State this Notice will expire on 30 September 2020.

***Standard Dr PMA Simpson and Partners Privacy Notice below***

**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 you or about you from other organisations.

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

This Notice explains

* ·         Who we are and how we use your information
* Information about our Data Protection Officer
* What kinds of personal information about you we hold and use (process)
* 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 / stored by us?
* What are your rights under Data Protection laws

The General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA 2018) became law on 25th May 2018. The GDPR is a single EU-wide regulation on the protection of confidential and sensitive (special) information, the DPA 2018 deals with elements of UK law that differ from the European Regulation, both came into force in the UK on the 25th May 2018, repealing the previous 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 the practice responsible for your personal data is Dr PMA Simpson and Partners.

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.**

Dr PMA Simpson and Partners will be what’s known as the ‘Controller’ of your personal data.

We collect basic personal data about you and location-based information.  This does include name, address and 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 life information that are linked to your healthcare, we may also receive this information about you from other health providers or third parties.

**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.  These records help to provide you with the best possible healthcare and treatment.

NHS health records may be electronic, paper-based or a mixture of both.  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, your carer or legal representative and emergency contact details.
* Any contact the surgery has had with you, such as appointments, clinic visits, emergency appointments.
* 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 the services we provide. Limited information may be used within the GP practice for clinical audit to monitor the quality of the service we provided.

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

We need 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, 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, (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 several sources including NHS Trusts and from this GP Practice. The identifying parts of your data are removed, analysis of your data is undertaken, and a risk score is then determined. This is then 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 in most circumstances, please contact the practice for further information about opt out.

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.

**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 CCGs Medicines Management Team under a Data Processing contract with the Practice.

**Patient Communication**

The Practice will 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 improve your health., Your contact details may be used to invite you to receive further information about such research opportunities.

**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, at the heart of what we do.

Our legal basis for processing For the General Data Protection Regulation (GDPR) purposes 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…’*

**Research**

Clinical Practice Research Datalink (CPRD) collects de-identified patient data from a network of GP practices across the UK. Primary care data are linked to a range of other health related data to provide a longitudinal, representative UK population health dataset.  You can opt out of your information being used for research purposes at any time (see below), full details can be found here: –

https://cprd.com/transparency-information

**The legal bases for processing this information**

CPRD do not hold or process personal data on patients; however, NHS Digital (formally the Health and Social Care Centre) may process ‘personal data’ for us as an accredited ‘safe haven’ or ‘trusted third-party’ within the NHS when linking GP data with data from other sources. The legal bases for processing this data are:

* Medicines and medical device monitoring: Article 6(e) and Article 9(2)(i) – public interest in the area of public health
* Medical research and statistics: Article 6(e) and Article 9(2)(j) – public interest and scientific research purposes

Any data CPRD hold or pass on to bona fide researchers, except for clinical research studies, will have been anonymised in accordance with the Information Commissioner’s Office Anonymisation Code of Practice. We will hold data indefinitely for the benefit of future research, but studies will normally only hold the data we release to them for twelve months.

**Categories of personal data**

The data collected by Practice staff in the event of a safeguarding situation will be as much personal information as is possible that is necessary to obtain 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 (such as health information).

**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.

**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).

***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 Data Protection Officer as below.*

**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 Regulation (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 Dr PMA Simpson and Partners 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.  If 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.

**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 DPO as below.

**National Opt-Out Facility**

***You can choose whether your confidential patient information is used for research and planning.***

***Who can use your confidential patient information for research and planning?***

*It is used by the NHS, local authorities, university and hospital researchers, medical colleges and pharmaceutical companies researching new treatments.*

***Making your data opt-out choice***

*You can choose to opt out of sharing your confidential patient information for research and planning. 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.*

***Will choosing this opt-out affect your care and treatment?***

*No, 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 screenings for bowel cancer.*

***What should you do next?***

*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 securely online or through a telephone service.*

***You can change your choice at any time. To find out more or to make your choice visit nhs.uk/your-nhs-data-matters or call 0300 303 5678***

**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 such as a Data Processor as above).  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.

**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 Network
* NHS Commissioning Support Units
* Independent Contractors such as dentists, opticians, pharmacists
* Private Sector Providers
* Voluntary Sector Providers
* Ambulance Trusts
* Clinical Commissioning Groups
* 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
* 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 consent for this to happen when this is required.

**Computer System**

This practice operates a Clinical Computer System 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 Organisation (above).  Wherever possible, their staff will ask your consent before your information is viewed.

For further detailed information on how the record sharing works in our system please read the [TPP Patient Information Leaflet](http://www.gpwebsolutions-host.co.uk/13669/files/2018/06/TPP-Patient-Information.pdf)

**Shared Care Records**

To support your care and improve the sharing of relevant information to our partner organisations (as above) when they are involved in looking after you, we will share information to other systems.  You can opt out of this sharing of your records with our partners at anytime 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 Dr PMA Simpson and Partners an appropriate contract (art 24-28) 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.

**Summary Care Record – sharing your information for your care across the NHS.**

Your core Summary Care Record is created when you register at a GP practice (although you should be given the option to opt in/out during your registration). If you do not express a preference, it is currently assumed that your consent is implied.

The **Summary Care Record** shares only your contact details, medications and allergies with other healthcare professionals involved in your care.

You can also choose to share a **Summary Care Record with Additional Information.** This shares contact details, medications, allergies, diagnosis list, care plans, end of life care and immunisations with other healthcare professionals. Sensitive data is excluded. A Summary Care Record with Additional Information will only be created for you if you explicitly choose this option.  All current and past information is shared for each category.

Choosing to share a summary care record with additional information is thought to be of great benefit if you are admitted to hospital locally or elsewhere in the UK.

You can opt out of sharing any of your information in a Summary Care Record. If you decide not to share this will not affect your entitlement to care. However, it could result in the delivery of your care being less efficient as other health professionals will not have access to these parts of your medical history.

Further details are available in this: [Summary Care Record Additional Information](http://www.gpwebsolutions-host.co.uk/13669/files/2018/06/scr_patient_leaflet_additional_information-2.pdf)

This is also available in an easy read version: [Easy Read Summary Care Record Guid](http://www.gpwebsolutions-host.co.uk/13669/files/2018/06/scr_easy_read_patient_leaflet_additional_information-1.pdf)e

**You can change your mind about your Summary Care Record at any time.**

To register or change your Summary Care Record preferences, please complete this form and return it to us: [Enriched Summary Care Record Consent](http://www.gpwebsolutions-host.co.uk/13669/files/2018/06/SCR-Consent.pdf)

**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 online at (<https://digital.nhs.uk/article/1202/Records-Management-Code-of-Practice-for-Health-and-Social-Care-2016>).

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

Even if we already hold your personal data, you still have various rights in relation to it. To get in touch about these, please contact us. We will seek to deal with your request without undue delay, and in any event in accordance with the requirements of any applicable laws. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

Right to object: If we are using your data and you do not agree, you have the right to object. We will respond to your request within one month (although we may be allowed to extend this period in certain cases). This is NOT an absolute right sometimes we will need to process your data even if you object.

Right to withdraw consent: Where we have obtained your consent to process your personal data for certain activities (for example for a research project, or consent to send you information about us or matters you may be interested in), you may withdraw your consent at any time.

Right to erasure: In certain situations (for example, where we have processed your data unlawfully), you have the right to request us to “erase” your personal data. We will respond to your request within one month (although we may be allowed to extend this period in certain cases) and will only disagree with you if certain limited conditions apply. If we do agree to your request, we will delete your data but will need to keep a note of your name/ other basic details on our register of individuals who would prefer not to be contacted. This enables us to avoid contacting you in the future where your data are collected in unconnected circumstances. If you would prefer us not to do this, you are free to say so.

Right of data portability: If you wish, you have the right to transfer your data from us to another data controller. We will help with this with a GP to GP data transfer and transfer of your hard copy notes.

**Primary Care Network**

The objective of primary care networks (PCNs) is for group practices 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 that by July 2019, all areas within England will 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 more easily integrate with the wider health and care system.

All GP practices are expected to come together in geographical networks covering populations of approximately 30–50,000 patients by June 2019 if they are to take advantage of additional funding attached to the GP contract. This size is consistent with the size of the primary care homes, which exist in many places in the country, but much smaller than most GP Federations.

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

**Greater Manchester Care Record**

Patients in Greater Manchester are able to benefit from the sharing of information via the GM Care Record. This shares contact details, diagnosis list, medications, allergies, test results, referrals & letters and care plans between health professionals in Leeds. Information is shared by GP practices, the Hospital trusts, Community and Mental Health services, and Social Care.

You have the right to object to your Leeds Care Record being shared by contacting them directly. Details are available via their website on

<https://healthinnovationmanchester.com/the-gm-care-record-privacy/>

<https://digital.nhs.uk/coronavirus/gpes-data-for-pandemic-planning-and-research/transparency-notice-gpes-data-for-pandemic-planning-and-research-covid-19>

You can opt in and out of these sharing agreements whenever you choose. Details of these schemes are

**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 a 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 provide you with information 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 contact the Practice Manager 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 at the GP, please contact the GP Practice Manager or the Data Protection Officer as above. If you are still unhappy following a review by the GP practice, you have a right to lodge a complaint with a supervisory authority: You have a right to complain to the UK supervisory Authority as below.

**Information Commissioner:**

Wycliffe house

Water Lane

Wilmslow

Cheshire

SK9 5AF

**Tel:**     01625 545745

https://ico.org.uk/

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.

If you would like to know more about your rights in respect of the personal data we hold about you, please contact the Data Protection Officer as below.

**Data Protection Officer:**

The Practice Data Protection Officer is Paul Couldrey of PCIG Consulting Limited. Any queries regarding Data Protection issues should be addressed to him at: –

**Email:**  Couldrey@me.com

**Postal:**PCIG Consulting Limited

7 Westacre Driv
Quarry Bank
Dudley
West Midlands
DY5 2EE

**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.