**Privacy Notice**

**We understand how important it is to keep your personal information safe and secure and we takethis very seriously. We have taken steps to make sure your personal information is looked after inthe best possible way and we review this regularly.**

**Please read this privacy notice (‘Privacy Notice’) carefully, as it contains important informationabout how we use the personal and healthcare information we collect on your behalf.**

**1. WHY WE ARE PROVIDING THIS PRIVACY NOTICE**

We are required to provide you with this Privacy Notice by Law. It explains how we use the personaland healthcare information we collect, store and hold about you. If you are unclear about how weprocess or use your personal and healthcare information, or you have any questions about this PrivacyNotice or any other issue regarding your personal and healthcare information, then please do contactour **Data Protection Officer** (details below).

The Law says:

A. We must let you know why we collect personal and healthcare information about you;

B. We must let you know how we use any personal and/or healthcare information we hold onyou;

C. We need to inform you in respect of what we do with it;

D. We need to tell you about who we share it with or pass it on to and why; and

E. We need to let you know how long we can keep it for.

**2. THE DATA PROTECTION OFFICER**

The Data Protection Officer for the Surgery is Dr V Mallya who can be contacted as follows:

dpo.rochdale@nhs.net

Please contact him if

• You have any questions about how your information is being held;

• If you require access to your information or if you wish to make a change to your information;

• If you wish to make a complaint about anything to do with the personal and healthcareinformation we hold about you;

• Or any other query relating to this Policy and your rights as a patient.

**3. ABOUT US**

We, at Pennine Surgery, Littleborough Health Centre, Featherstall Road, Littleborough, OL15 8HF are are a **Data Controller** of your information. Thismeans we are responsible for collecting, storing and handling your personal and healthcareinformation when you register with us as a patient.

There may be times where we also process your information. That means we use it for a particularpurpose and, therefore, on those occasions we may also be **Data Processors**. The purposes for whichwe use your information are set out in this Privacy Notice.

**4. INFORMATION WE COLLECT FROM YOU**

The information we collect from you will include:

A. Your contact details (such as your name and email address, including place of work and workcontact details);

B. Details and contact numbers of your next of kin, and emergency contacts;

C. Your age range, gender, ethnicity;

D. Details in relation to your medical history;

E. The reason for your visit to the Surgery;

F. Medical notes and details of diagnosis and consultations with our GPs and other healthprofessionals within the Surgery involved in your direct healthcare, including all investigations.

G. Relevant information from other health professionals, relatives or those who care for you, orinformation provided to the surgery by you (including that provided via our surgery website).

**5. INFORMATION ABOUT YOU FROM OTHERS**

We also collect personal information about you when it is sent to us from the following:

A. a hospital, a consultant or any other medical or healthcare professional, or any other personinvolved with your general healthcare.

**6. YOUR SUMMARY CARE RECORD**

Your summary care record is an electronic record of your healthcare history (and other relevantpersonal information) held on a national healthcare records database provided and facilitated by NHSEngland.This record may be shared with other healthcare professionals and additions to this record may alsobe made by relevant healthcare professionals and organisations involved in your direct healthcare.You may have the right to demand that this record is not shared with anyone who is not involved inthe provision of your direct healthcare. If you wish to enquire further as to your rights in respect ofnot sharing information on this record then please contact our Data Protection Officer.

To find out more about the wider use of confidential personal information and to register your choiceto opt out if you do not want your data to be used in this way, please visit www.nhs.uk/my-datachoice.

Note if you do choose to opt out, you can still consent to your data being used for specific purposes.

However, if you are happy with this use of information you do not need to do anything. You mayhowever change your choice at any time.

**7. WHO WE MAY PROVIDE YOUR PERSONAL INFORMATION TO, AND WHY**

Whenever you use a health or care service, such as attending Accident & Emergency or usingCommunity Care Services, important information about you is collected to help ensure you get thebest possible care and treatment. This information may be passed to other approved organisationswhere there is a legal basis, to help with planning services, improving care, research into developingnew treatments and preventing illness. All of this helps in improving better care to you and your familyand future generations. However, as explained in this privacy notice, confidential information aboutyour health and care is only used in this way where allowed by law and would never be used for anyother purpose without your clear and explicit consent.

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

A. Hospital professionals (such as doctors, consultants, nurses, etc);

B. Other GPs/Doctors;

C. Pharmacists;

D. Nurses and other healthcare professionals;

E. Dentists;

F. Any other person that is involved in providing services related to your general healthcare,including mental health professionals.

**8. OTHER PEOPLE WHO WE PROVIDE YOUR INFORMATION TO**

A. Commissioners;

B. Clinical Commissioning Groups;

C. Local authorities;

D. Community health services;

E. For the purposes of complying with the law e.g. Police, Solicitors, Insurance Companies;

F. Anyone you have given your consent to, to view or receive your record, or part of your record.

**Please note, if you give another person or organisation consent to access your record wewill need to contact you to verify your consent before we release that record. It is importantthat you are clear and understand how much and what aspects of, your record you giveconsent to bedisclosed.**

G. **Extended Access –** we provide extended access services to our patients which means you canaccess medical services outside of our normal working hours. In order to provide you with thisservice, we have formal arrangements in place with the Clinical Commissioning Group andwith the surgeries that form the Exeter GP Federation named Exeter Primary Care. This means,these practices will have to have access to your medical record to be able to offer you theservice. Please note to ensure that those practices comply with the law and to protect the useof your information, we have very robust data sharing agreements and other cleararrangements in place to ensure your data is always protected and used for those purposesonly.

H. **Data Extraction by the Clinical Commissioning Group –** the clinical commissioning group attimes extracts medical information about you, but the information we pass to them via ourcomputer systems **cannot identify you to them.** This information only refers to you by way ofa code that only your practice can identify (it is pseudo-anonymised). This therefore protectsyou from anyone who may have access to this information at the Clinical CommissioningGroup from **ever** identifying you as a result of seeing the medical information and we will**never** give them the information that would enable them to do this. There are good reasonswhy the Clinical commissioning Group may require this pseudo-anonymised information. Thisinformation is used to plan and improve services. The information collected includes data suchas the area patients live, age, gender, ethnicity, language preference, country of birth andreligion. The CCG also collects information about whether patients have long term conditionssuch as diabetes; blood pressure, cholesterol levels and medication.

**9. ANONYMISED INFORMATION**

Sometimes we may provide information about you in an anonymised form. If we do so, then none ofthe information we provide to any other party will identify you as an individual and cannot be tracedback to you.

**10. YOUR RIGHTS AS A PATIENT**

The Law gives you certain rights to your personal and healthcare information that we hold, as set outbelow:

A. **Access and Subject Access Requests**

You have the right to see what information we hold about you and to request a copy of thisinformation.If you would like a copy of the information we hold about you please put your request in writing forthe attention of the Practice Manager. We will provide this information free of charge however, wemay in some **limited and exceptional** circumstances have to make an administrative charge for anyextra copies if the information requested is excessive, complex or repetitive.

We have one month to reply to you and give you the information that you require. We would ask,therefore, that any requests you make are in writing and it is made clear to us what and how muchinformation you require.

B. **Online Access**

You may ask us if you wish to have online access to your medical record. However, there will be certainprotocols that we have to follow in order to give you online access, including written consent andproduction of documents that prove your identity.

Please note that when we give you online access, the responsibility is yours to make sure that youkeep your information safe and secure if you do not wish any third party to gain access.

C. **Correction**

We want to make sure that your personal information is accurate and up to date. You may ask us tocorrect any information you think is inaccurate. It is very important that you make sure you tell us ifyour contact details including your mobile phone number has changed.

D. **Removal**

You have the right to ask for your information to be removed however, if we require thisinformationto assist us in providing you with appropriate medical services and diagnosis for your healthcare, thenremoval may not be possible.

E. **Objection**

We cannot share your information with anyone else for a purpose that is not directly related to yourhealth, e.g. medical research, educational purposes, etc. We would ask you for your consent in orderto do this however, you have the right to request that your personal and healthcare information is notshared by the Surgery in this way. Please note the Anonymised Information section in this PrivacyNotice.

F. **Transfer**

You have the right to request that your personal and/or healthcare information is transferred, in anelectronic form (or other form), to another organisation, but we will require your clear consent to beable to do this.

**11. THIRD PARTIES MENTIONED ON YOUR MEDICAL RECORD**

Sometimes we record information about third parties mentioned by you to us during any consultation.We are under an obligation to make sure we also protect that third party’s rights as an individual andto ensure that references to them which may breach their rights to confidentiality, are removedbefore we send any information to any other party including yourself. Third parties can include:spouses, partners, and other family members.

**12. HOW WE USE THE INFORMATION ABOUT YOU**

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

A. when we need to speak to, or contact other doctors, consultants, nurses or any othermedical/healthcare professional or organisation during the course of your diagnosis ortreatment or on going healthcare;

B. when we are required by Law to hand over your information to any other organisation, suchas the police, by court order, solicitors, or immigration enforcement.

***We will never pass on your personal information to anyone else who does not need it, or has noright to it, unless you give us clear consent to do so.***

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

The Law says we need a **legal basis** to handle your personal and healthcare information.

**CONTRACT:** We have a contract with NHS England to deliver healthcare services to you. This contractprovides that we are under a legal obligation to ensure that we deliver medical and healthcare servicesto the public.

**CONSENT:** Sometimes we also rely on the fact that you give us consent to use your personal andhealthcare information so that we can take care of your healthcare needs.

Please note that you have the right to withdraw consent at any time if you no longer wish to receiveservices from us.

**NECESSARY CARE**: Providing you with the appropriate healthcare, where necessary. The Law refers tothis as ‘protecting your vital interests’ where you may be in a position not to be able to consent.

**LAW:** Sometimes the Law obliges us to provide your information to an organisation (see above).

**14. SPECIAL CATEGORIES**

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

**PUBLIC INTEREST**: Where we may need to handle your personal information when it is considered tobe in the public interest. For example, when there is an outbreak of a specific disease and we need tocontact you for treatment, or we need to pass your information to relevant organisations to ensureyou receive advice and/or treatment;

**CONSENT**: When you have given us consent;

**VITAL INTEREST**: If you are incapable of giving consent, and we have to use your information to protectyour vital interests (e.g. if you have had an accident and you need emergency treatment);

**DEFENDING A CLAIM**: If we need your information to defend a legal claim against us by you, or byanother party;

**PROVIDING YOU WITH MEDICAL CARE**: Where we need your information to provide you with medicaland healthcare services

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

We carefully consider any personal information that we store about you, and we will not keep yourinformation for longer than is necessary for the purposes as set out in this Privacy Notice.

**16. IF ENGLISH IS NOT YOUR FIRST LANGUAGE**

If English is not your first language you can request a translation of this Privacy Notice. Please contactour Data Protection Officer.

**17. COMPLAINTS**

If you have a concern about the way we handle your personal data or you have a complaint aboutwhat we are doing, or how we have used or handled your personal and/or healthcare information,then please contact our Data Protection Officer.

However, you have a right to raise any concern or complaint with the UK information regulator, at theInformation Commissioner’s Office: https://ico.org.uk/.

**18. OUR WEBSITE**

The only website this Privacy Notice applies to is the Surgery’s website. If you use a link to any otherwebsite from the Surgery’s website then you will need to read their respective privacy notice. We takeno responsibility (legal or otherwise) for the content of other websites.

**19. COOKIES**

The Surgery’s website does not use cookies.

**20. SECURITY**

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

**21. TEXT MESSAGING, EMAIL AND CONTACTING YOU**

Because we are obliged to protect any confidential information we hold about you and we take thisvery seriously, it is imperative that you let us know immediately if you change any of your contactdetails.

**22. WHERE TO FIND OUR PRIVACY NOTICE**

You may find a copy of this Privacy Notice on our website, or a copy may be provided on request.

**23. CHANGES TO OUR PRIVACY NOTICE**

We regularly review and update our Privacy Notice. This Privacy Notice was last updated on 25th May2018.

Disclaimer: The surgery does not accept any responsibility for the content of any websites in the links providedin this document.