



## PRIVACY NOTICE

We understand how important it is to keep your personal information safe and secure and we take this very seriously. We have taken steps to make sure your personal information is looked after in the best possible way and we review this regularly. Please read this privacy notice carefully, as it contains important information about how we use the personal and healthcare information we collect on your behalf.

### 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 personal and healthcare information we collect, store and hold about you. If you are unclear about how we process or use your personal and healthcare information, or you have any questions about this Privacy Notice or any other issue regarding your personal and healthcare information, then please do contact our 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 on you; under articles
  - a. 6(1)(e) under contract to provide NHS service; and
  - b. 9(2)(h) to deliver direct healthcare
- 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.

### THE DATA PROTECTION OFFICER

The Data Protection Officer at the Surgery is Caroline Sims. You can contact her via the practice on 01425 478901 or email [whccg.ringwoodmc@nhs.net](mailto:whccg.ringwoodmc@nhs.net) 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 healthcare information we hold about you;
- Or any other query relating to this Policy and your rights as a patient.

### ABOUT US

We, at the Ringwood Medical Practice ('the Surgery') situated at Ringwood Medical Centre, The Close, Ringwood, Hants BH24 1JY, are a Data Controller of your information. This means we are responsible for collecting, storing and handling your personal and healthcare information 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 particular purpose and, therefore, on those occasions we may also be Data Processors. The purposes for which we use your information are set out in this Privacy Notice.

### **INFORMATION WE COLLECT FROM YOU**

The information we collect from you will include:

- A. Your contact details (such as your name and email address, telephone numbers, including place of work and work contact details);
- B. Details and contact numbers of your next of kin;
- 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 health professionals within the Surgery involved in your direct healthcare.
- G. e-Consult Templates (enter symptoms on an online form and receive instant self-help advice, together with signposting to NHS 111, pharmacies and other healthcare services.)
- H. Friends and Family Test (a quality survey of the service we provide)

### **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 person involved with your general healthcare.
- B. Applications for firearms
- C. Police, Local Authorities, Social Services, DVLA or other governing bodies

### **YOUR SUMMARY CARE RECORD**

Your summary care record is an electronic record of your healthcare history (and other relevant personal information) held on a national healthcare records database provided and facilitated by NHS England.

This record may be shared with other healthcare professionals and additions to this record may also be 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 in the provision of your direct healthcare. If you wish to enquire further as to your rights in respect of not 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 choice to opt out if you do not want your data to be used in this way, please visit [www.nhs.uk/your-nhs-data-matters](http://www.nhs.uk/your-nhs-data-matters) .

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 may however change your choice at any time.

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

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

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

- A. **Hospital professionals** (such as doctors, consultants, nurses, etc);
- B. **Other GPs / Doctors;**
- C. **Pharmacists** (of your choice) **concerning your medication / prescriptions**

Prescriptions containing personal identifiable and health data will be shared with chemists / pharmacies, in order to provide patients with essential medication or treatment as their health needs dictate. This process is achieved either by face to face contact with the patient or electronically. Where patients have specified a nominated pharmacy they may wish their repeat or acute prescriptions to be ordered and sent directly to the pharmacy making a more efficient process. Arrangements can also be made with the pharmacy to deliver medication.

- 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;
- G. **Care Navigators;**
- H. **Care and Health Information Exchange (CHIE).**

The CHIE is an electronic summary record for people living in Hampshire, Portsmouth and Southampton. GP Surgeries, hospitals, social care and community care teams collect information about you and store it electronically on separate computer systems. The Care and Health Information Exchange stores summary information from these organisations in one place so that – with your consent – professionals can view it to deliver better care to you. This record contains more information than the SCR, but is only available to organisations in Hampshire. For more information Visit [www.chie.org.uk](http://www.chie.org.uk) .

#### **OTHER PEOPLE WHO WE PROVIDE YOUR INFORMATION TO:**

- **Commissioners;**
- **Clinical Commissioning Groups;**
- **Local authorities;**
- **Community health services;**  
e.g. Care and Health Information Exchange (CHIE) – formerly Hampshire Health Record
- **For the purposes of complying with the law** e.g. Police, Solicitors, Insurance Companies;
- **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 we will need to contact you to verify your consent before we release that record. It is important that you are clear and understand how much and what aspects of, your record you give consent to be disclosed.
- **Extended Access** – we provide extended access services to our patients which means you can access medical services outside of our normal working hours. In order to provide you with this service, we have formal arrangements in place with the West Hampshire Clinical Commissioning Group and with other practices whereby certain key “hub” practices offer this service on our behalf for you as a patient to access outside of our opening hours. This means, those key “hub” practices will have to have access to your medical record to be able to offer you the service. Please note to ensure that those practices comply with the law and to protect the use of your information, we have very robust data sharing agreements and other clear arrangements in place to ensure your data is always protected and used for those purposes only.

The key Hub practices are as follows: The Practice, Lymington Hospital (TPAL) and The Practice, Ringwood (TPAR), under Southern Health NHS Foundation Trust

- **Data Extraction by the Clinical Commissioning Group** – the clinical commissioning group at times extracts medical information about you, but the information we pass to them via our computer systems cannot identify you to them. This information only refers to you by way of a code that only your practice can identify (it is pseudo-anonymised). This therefore protects you from anyone who may have access to this information at the Clinical Commissioning Group from ever identifying you as a result of seeing the medical information and we will never give them the information that would enable them to do this. There are good reasons why the Clinical commissioning Group may require this pseudo-anonymised information. This information is used to plan and improve services. The information collected includes data such as the area patients live, age, gender, ethnicity, language preference, country of birth and religion. The CCG also collects information about whether patients have long term conditions such as diabetes; blood pressure, cholesterol levels and medication
- **Royal College of General Practitioners (RCGP) Research and Surveillance Centre (RSC)**  
This practice is one of over 600 practices in England contributing pseudonymised data for national research and surveillance.  
These data enable continuous monitoring of infections and diseases in the community and is used in ethically approved research. The RCGP RSC is the main source of information for Public Health England (PHE) and helps with prediction and management of flu out-breaks and pandemics. Providing pseudonymised data does not affect patients, their care or privacy, however if you no longer wish to allow your information to be used, please speak to your GP.

- **Population Health Management**

Health and care services work together as 'Integrated Care Systems' (ICS) and are sharing data in order to:

- Understanding the health and care needs of the care system's population, including health inequalities
- Provide support to where it will have the most impact
- Identify early actions to keep people well, not only focusing on people in direct contact with services, but looking to join up care across different partners.

Type of Data – Identifiable/Pseudonymised/Anonymised/Aggregate Data. NB only organisations that provide your individual care will see your identifiable data.

Legal Basis - Article 6(1)(e); "necessary... in the exercise of official authority vested in the controller" And Article 9(2)(h) Provision of health and care

Processor to which data is disclosed: Cerner Ltd, Optum Ltd, NECS CSU

Population Health Management also incorporates the use of risk stratification tools as an integral part of the purpose

- **Healthy.io – ACR project for patients with diabetes** (Urine Albumin to Creatinine Ratio)

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 confirm that you wish them to 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: <http://bit.ly/uACRtest>

- **Coronavirus Act 2020** has enabled the NHS to respond to the COVID-19 pandemic by improving the access that doctors, nurses and other authorised health and care professionals have to medical records and information. This will help organisations to treat and advise patients who are not attending their usual GP practice or who have called NHS 111 more safely. See paragraph below

## **COVID-19 and CORONAVIRUS ACT 2020**

Additional functionality has been deployed across *GP Connect* to give GPs, NHS 111 clinicians, and those in urgent and emergency care settings providing direct care, access to all primary care medical records through the *GP Connect* solution. For GPs and other authorised health professionals the increased functionality of *GP Connect* will:

- Improve GPs ability to treat patients outside of their registered practice, giving patients easier access to a GP when they need one, regardless of demand or staffing levels in their own practice, for example within a network or a federation hub;

- Give authorised health and care professionals working in primary care, NHS 111 - including the COVID Clinical Assessment Service (CCAS) - and other appropriate direct care settings, access to the GP records of the patients they are treating, regardless of where they are registered;
- Allow remote organisations such as NHS 111 to book appointments directly with the patients GP practice including the ability to manage referrals from the COVID Clinical Assessment Service (CCAS). This will enable healthcare professionals to provide more timely care and provide flexibility for the primary care system

### **ANONYMISED INFORMATION**

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

### **RECORDED INFORMATION**

Telephone call recording - All incoming and outgoing calls via Reception or any Clinician may be recorded. Recordings are stored on a secure web portal provided by our telephone supplier. Recordings will only be accessed when necessary; this could be in the event of a complaint or for training purposes.

### **CCTV**

CCTV is in operation in our waiting rooms, corridors and car park only. This is monitored via a screen in our back Reception office for the safety and security of our patients, staff and premises; particularly in the upstairs waiting room which is unstaffed. Recordings are stored on a secure computer drive, kept for 7 days and then erased, and will only be accessed when necessary.

### **YOUR RIGHTS AS A PATIENT**

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

- **Access and Subject Access Requests**  
You have the right to see what information we hold about you and to request a copy of this information.  
If you would like a copy of the information we hold about you please email [whccg.enquiries-rmc@nhs.net](mailto:whccg.enquiries-rmc@nhs.net). We will provide this information free of charge however, we may in some limited and exceptional circumstances have to make an administrative charge for any extra 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 much information you require.
- **Online Access**  
You may ask us if you wish to have online access to your medical record. However, there will be certain protocols that we have to follow in order to give you online access, including written consent and production of documents that prove your identity.  
Please note that when we give you online access, the responsibility is yours to make sure that you keep your information safe and secure if you do not wish any third party to gain access.
- **Correction**  
We want to make sure that your personal information is accurate and up to date. You may ask us to correct any information you think is inaccurate. It is very important that you make sure you tell us if your contact details including your mobile phone number has changed.

- **Removal**  
You have the right to ask for your information to be removed however, if we require this information to assist us in providing you with appropriate medical services and diagnosis for your healthcare, then removal may not be possible.
- **Objection**  
We cannot share your information with anyone else for a purpose that is not directly related to your health, e.g. medical research, educational purposes, etc. We would ask you for your consent in order to do this however, you have the right to request that your personal and healthcare information is not shared by the Surgery in this way. Please note the Anonymised Information section in this Privacy Notice.
- **Transfer**  
You have the right to request that your personal and/or healthcare information is transferred, in an electronic form (or other form), to another organisation, but we will require your clear consent to be able to do this.

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

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

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

The lawful basis for processing your data under GDPR is under

- Article 6 (1) (e) under a contract to provide NHS services; and,
- Article 9 (2) (h) to deliver direct healthcare

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

- when we need to speak to, or contact other doctors, consultants, nurses or any other medical/healthcare professional or organisation during the course of your diagnosis or treatment or on going healthcare;
- when we are required by Law to hand over your information to any other organisation, such as the police, by court order, solicitors, or immigration enforcement.

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

### **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 contract provides that we are under a legal obligation to ensure that we deliver medical and healthcare services to the public.

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

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

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

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

### **SPECIAL CATEGORIES**

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

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

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

**VITAL INTEREST:** If you are incapable of giving consent, and we have to use your information to protect your 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 by another party;

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

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

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

### **UNDER 16s**

We are in the process of creating a separate privacy notice for patients under the age of 16, a copy of which will be available soon. The principles of this notice remain the same; however there will be the addition of sharing information with parents/guardians.

### **IF ENGLISH IS NOT YOUR FIRST LANGUAGE**

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

### **COMPLAINTS**

If you have a concern about the way we handle your personal data or you have a complaint about what 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 the Information Commissioner's Office: <https://ico.org.uk/>.

### **OUR WEBSITE**



The only website this Privacy Notice applies to is the Surgery's website, [www.ringwoodmc.co.uk](http://www.ringwoodmc.co.uk) . If you use a link to any other website from the Surgery's website then you will need to read their respective privacy notice. We take no responsibility (legal or otherwise) for the content of other websites.

## **SECURITY**

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

## **TEXT MESSAGING AND CONTACTING YOU**

Because we are obliged to protect any confidential information we hold about you and we take this very seriously, it is imperative that you let us know immediately if you change any of your contact details. We may contact you using SMS texting to your mobile phone in the event that we need to notify you about appointments and other services that we provide to you involving your direct care, therefore you must ensure that we have your up to date details. This is to ensure we are sure we are actually contacting you and not another person.

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

You may find a copy of this Privacy Notice in the Surgery's reception, on our website, or a copy may be provided on request.

## **CHANGES TO OUR PRIVACY NOTICE**

We regularly review and update our Privacy Notice. This Privacy Notice was last updated on 10<sup>th</sup> June 2020.