**PRIVACY POLICY**

How we use your personal information

This fair processing notice explains why the GP practice collects information about you and how that information may be used.

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

NHS health records may be electronic, on paper or a mixture of both, and we use a combination of working practices and technology to ensure that your information is kept confidential and secure. Records which this GP Practice holds about you may include the following information;

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

 contact details

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

 emergency appointments, etc.

• Notes and reports about your health • Details about your treatment and care

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

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

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 software managed by Leander Family Practice, 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.

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. This service is provided to practices within Croydon Clinical Commissioning Group.

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 2017 (GDPR)

• 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 new 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. 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 (When you change GP practices)

• 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

• 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

NHS Health Checks

All of our patients aged 40-74 not previously diagnosed with cardiovascular disease are eligible to be invited for an NHS Health Check. Nobody outside the healthcare team in the practice will see confidential information about you during the invitation process and only contact details would be securely transferred to a data processor (if that method was employed). You may be ‘given the chance to attend your health check either within the practice or at a community venue. If your health check is at a community venue all data collected will be securely transferred back into the practice system and nobody outside the healthcare team in the practice will see confidential information about you during this process.

Access to personal information

You have a right under the Data Protection Act 2017 (GDPR) to access/view information the Practice holds about you, and to have it amended or removed should it be inaccurate. This is known as ‘the right of subject access’. If we hold information about you we will:

* give you a description of it;
* tell you why we are holding it;
* tell you who it could be disclosed to; and
* let you have a copy of the information in an intelligible form.

If you would like to make a ‘subject access request’ please contact the Practice Manager in writing.

 • 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

**Cookies**

The practice website uses cookies; you should read the Privacy policy advertised at the bottom of the home page if you would like to know more about the information they store and use.

Our website ‘Usage of Cookies’ page contains information about cookies used by our website. This page also provides details of how to block cookies if required.

For more detailed information about cookies visit:

<https://ico.org.uk/for-the-public/online/cookies/>

You can also find out how to delete or block cookies in the privacy statement, should you need any further help with this please don’t hesitate to contact the practice named data protection officer:

Name: Dr A Siddiqui

**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.

**Who is the Data Controller?**

The Data Controller, responsible for keeping your information secure and confidential is: Leander Family Practice

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

The Practice is registered as a data controller under the Data Protection Act 2017 and is compliant to the General Data Protection Regulation. The registration number is and can be viewed online in the public register at:

<http://ico.org.uk/what_we_cover/register_of_data_controllers>

**Objections / Complaints**

Should you have any concerns about how your information is managed at the GP, please contact the GP Practice Manager, Ms L Gurses.

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).

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.

The practice is also required to report any breeches of confidentiality to the ICO

**Further information**

The Information Commissioner’s Office is the Regulator for the Data Protection Act 2017 and offer independent advice and guidance on the law and personal data, including your rights and how to access your personal information. For further information please visit the Information Commissioner’s Office website at <http://www.ico.gov.uk>.