

# NEEDHAM MARKET COUNTRY PRACTICE

<b>Title</b>	<b>Practice Privacy Notice</b>
<b>Date Reviewed</b>	25 <sup>th</sup> July 2018

## 2018 PRIVACY NOTICE

<b>Privacy Policy</b>
This policy explains how Needham Market Country Practice uses the personal information collected from you for the provision of your medical care. It also describes how long that information is kept for and the limited circumstances in which we might disclose it to third parties
<b>Information about you and how we use it</b>
When you come to the surgery, information about you, your medical treatment and family background may be recorded, on paper and computer, to help us care for you. The information is part of your health record and will be kept in case we need to see you again. Members of the clinical teams looking after you may share your personal health information with each other. This team may include healthcare professionals and support staff. All NHS staff are bound by law and a strict code of confidentiality, and are monitored by the Surgery's Caldicott Guardian (Dr Chris Lewis), who is responsible for ensuring patients' confidentiality is respected. Your confidentiality is very important to us, and we have strict controls in place to protect your information.
<b>How your records are used to help you</b>
Accurate, up-to-date information about you: <ul style="list-style-type: none"><li>• helps staff to assess your health and care for you</li><li>• will help staff to treat you in future, in the surgery or elsewhere</li><li>• allows staff to monitor and if necessary investigate the care you have received.</li></ul>
<b>How your records help us</b>
Accurate, up-to-date information about you: <ul style="list-style-type: none"><li>• helps us provide high quality care and meet all our patients' needs</li><li>• helps us train healthcare professionals and support research and development</li><li>• is necessary for the surgery to be paid for your treatment</li><li>• supports audits of NHS services and accounts</li><li>• supports investigation of any incidents or issues that arise</li><li>• contributes to national NHS statistics.</li></ul>
<b>Sharing your information</b>
Sometimes we have to pass on information by law: <ul style="list-style-type: none"><li>• to notify a birth or death</li><li>• when an infectious disease such as meningitis or measles may endanger the safety of others</li><li>• where a formal court order has been issued</li><li>• when sharing information with the police may prevent a serious crime, or prevent harm to you or other people.</li></ul> We may have to share information about you with non-NHS staff (for example Social Services): we will only do this if it is necessary, and if we need your consent we will ask you for it. The main NHS organisations which may need your information are Clinical Commissioning Groups, Commissioning Support Units, other NHS trusts, hospitals, other GP practices and ambulance services. If we have to share information about you, we will remove your personal details where possible.
<b>Your information rights</b>
<ul style="list-style-type: none"><li>• You have the right to know how we will use your personal information.</li><li>• You have the right to see your health record (your medical notes). This is known as Right of Subject Access.</li><li>• You have the right to object to us making use of your information.</li><li>• You can ask us to change or restrict the way we use your information and we have to agree if possible.</li><li>• You have the right to ask for your information to be changed, blocked or erased if it is incorrect.</li></ul>
<b>Cookies</b>
Our practice website uses cookies to function correctly. You may delete cookies at any time but doing so may result in some parts of the site not working correctly.
<b>Change of Details</b>

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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.

## Accessing your Health Record (a 'Subject Access' request)

If you wish to see full details of the information the Needham Market Country Practice holds in connection with you, you will need to make a subject access request under the General Data Protection Regulations 2018. You have a right to request access to view or to obtain copies of what information the surgery holds about you and to have it amended should it be inaccurate. In order to request this, your request must be made in writing. For information from the hospital or other NHS Organisations you should write directly to them.

There may be a charge to have a printed copy of the information held about you

We are required to respond to you within 30 days

You will need to give adequate information (for example full name, address, date of birth, NHS number and details of your request) so that your identity can be verified and your records located.

To see a copy of your health record or to ask to see parts of it relating to specific points, please send a written request to:

Subject Access, Needham Market Country Practice, Barking Road, Needham Market, Suffolk, IP6 8EZ

or by email to [iesccg.needhammarketpractice@nhs.net](mailto:iesccg.needhammarketpractice@nhs.net)

Your notes will be prepared for you and depending on what you require access to online records may be granted, a document could be emailed to you or a qualified member of staff will talk you through the content.

Your right to see some information may be limited - for example, if it includes details about other people.

## Lawful basis for direct care and administrative purposes

All health and adult social care providers are subject to the statutory duty under section 251B of the Health and Social Care Act 2012 to share information about a patient for their direct care. This duty is subject to both the common law duty of confidence and currently the DPA98 (and in due course the DPA18 and GDPR 2018).

For common law purposes, sharing information for direct care is on the basis of implied consent, which may also cover administrative purposes where the patient has been informed or it is otherwise within their reasonable expectations. Under the GDPR, for processing personal data in the delivery of direct care, and for providers' administrative purposes, the Article 6 condition for lawful processing that is available to all publically funded health and social care organisations in the delivery of their functions is:

**6(1)(e) '...for the performance of a task carried out in the public interest or in the exercise of official authority...'**

Personal data concerning health are special categories of personal data; the most appropriate Article 9 condition for direct care or administrative purposes is:

**9(2)(h) '...medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems...'**

## Length of time information will be held

In order to comply with the General Data Protection Regulations, your details will only be kept for the shortest time required. This will vary according to the type of data being held.

## Notification

The General Data Protection Regulations 2018 requires organisations to register a notification with the Information Commissioner to describe the purposes for which they process personal and sensitive information.

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

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

## Who is the Data Controller?

The Data Controller, responsible for keeping your information secure and confidential is: David Shedden, Needham Market Country Practice.

## Complaints

Should you have any concerns about how your information is managed by the Practice please contact the Practice Manager at the following address: David Shedden, Needham Market Country Practice, Barking Road, Needham Market, Suffolk, IP6 8EZ

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.

If you are still unhappy following a review by the Practice you can then complain to the Information Commissioners Office (ICO). [www.ico.org.uk](http://www.ico.org.uk), [casework@ico.org.uk](mailto:casework@ico.org.uk), telephone: 0303 123 1113 (local rate) or 01625 545 745

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### **APPENDIX A – NEEDHAM MARKET COUNTRY PRACTICE ROUTINE SHARING PARTNERS**

Processing Activities	Sharing Partners (including any third party providers of services)	Link
Referral	West Suffolk Hospital	<a href="http://www.wsh.nhs.uk/Home.aspx">http://www.wsh.nhs.uk/Home.aspx</a>
	Ipswich Hospital	<a href="http://www.ipswichhospital.nhs.uk/">http://www.ipswichhospital.nhs.uk/</a>
	Norfolk and Norwich Hospital.	<a href="http://www.nnuh.nhs.uk/">http://www.nnuh.nhs.uk/</a>
	Addenbrookes Hospital.	<a href="https://www.cuh.nhs.uk/addenbrookes-hospital">https://www.cuh.nhs.uk/addenbrookes-hospital</a>
	Allied Physios.	<a href="http://ahpsuffolk.co.uk/">http://ahpsuffolk.co.uk/</a>
	Suffolk Social Services.	<a href="https://www.suffolk.gov.uk/adult-social-care-and-health/">https://www.suffolk.gov.uk/adult-social-care-and-health/</a>
	East Anglian Ambulance Service.	<a href="https://www.eastamb.nhs.uk/">https://www.eastamb.nhs.uk/</a>
	BMI Hospital	<a href="https://www.bmihealthcare.co.uk/hospitals/bmi-st-edmunds-hospital">https://www.bmihealthcare.co.uk/hospitals/bmi-st-edmunds-hospital</a>
	Suffolk GP Federation	<a href="https://suffolkfed.org.uk/">https://suffolkfed.org.uk/</a>
	NHS Continuing Healthcare.	<a href="http://www.ipswichandeastsuffolkccg.nhs.uk/LocalServices/ContinuingHealthcare.aspx">http://www.ipswichandeastsuffolkccg.nhs.uk/LocalServices/ContinuingHealthcare.aspx</a>
	Spire	<a href="https://www.spirehealthcare.com/">https://www.spirehealthcare.com/</a>
	Norfolk & Suffolk Mental Health Trust	<a href="http://www.nsft.nhs.uk">www.nsft.nhs.uk</a>
	Suffolk Community Healthcare/CCC	<a href="http://www.suffolkcommunityhealthcare.co.uk/Home.aspx">http://www.suffolkcommunityhealthcare.co.uk/Home.aspx</a>
	Customer First	<a href="https://www.suffolk.gov.uk/">https://www.suffolk.gov.uk/</a>
	AAA Screening	<a href="http://www.colchesterhospital.nhs.uk/abdominal_aortic_aneurysm.shtml">http://www.colchesterhospital.nhs.uk/abdominal_aortic_aneurysm.shtml</a>
Bupa	<a href="https://finder.bupa.co.uk/Hospital/view/52979/west_suffolk_hospital">https://finder.bupa.co.uk/Hospital/view/52979/west_suffolk_hospital</a>	
Nuffield Health	<a href="https://www.nuffieldhealth.com/privacy">https://www.nuffieldhealth.com/privacy</a>	
Test Results	CareUK	<a href="http://www.careuk.com/care-homes/our-care-homes/our.../improving-services-in-suffolk">www.careuk.com/care-homes/our-care-homes/our.../improving-services-in-suffolk</a>

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	Express Diagnostics (24hr ECGS)	<a href="http://www.expressdiagnostics.co.uk/patients/heart-tests/24-hour-holter-ecg/">www.expressdiagnostics.co.uk/patients/heart-tests/24-hour-holter-ecg/</a>
	St Nicolas Hospice	<a href="https://stnicholashospice.org.uk/">https://stnicholashospice.org.uk/</a>
	The Pathology Partnership	<a href="https://www.healthwatchsuffolk.co.uk/services/north-east-essex-and-suffolk-pathology-services-neeps/">https://www.healthwatchsuffolk.co.uk/services/north-east-essex-and-suffolk-pathology-services-neeps/</a>
GP+	Suffolk GP Federation	<a href="https://suffolkfed.org.uk/">https://suffolkfed.org.uk/</a>
Electronic Prescribing	Decided by patient	Patient nominates their own pharmacy
Discharge notices	West Suffolk Hospital	<a href="http://www.wsh.nhs.uk/Home.aspx">http://www.wsh.nhs.uk/Home.aspx</a>
	Ipswich Hospital	<a href="http://www.ipswichhospital.nhs.uk/">http://www.ipswichhospital.nhs.uk/</a>
	Norfolk and Norwich Hospital.	<a href="http://www.nnuh.nhs.uk/">http://www.nnuh.nhs.uk/</a>
	Addenbrookes Hospital.	<a href="https://www.cuh.nhs.uk/addenbrookes-hospital">https://www.cuh.nhs.uk/addenbrookes-hospital</a>
Confidential waste removal	Shred It	<a href="https://www.shredit.co.uk/en-gb/privacy-policy">https://www.shredit.co.uk/en-gb/privacy-policy</a>
Online Triage	Engage Consult (Wiggly Amps) and then eConsult	<a href="https://www.wiggly-amps.com/privacy-policy/">https://www.wiggly-amps.com/privacy-policy/</a> <a href="https://econsult.net/privacy-policy/">https://econsult.net/privacy-policy/</a>
Online Access	Patient Access	<a href="https://patient.emisaccess.co.uk/content/privacy">https://patient.emisaccess.co.uk/content/privacy</a>
Patient Texts	MJOG	<a href="https://www.mjog.com/">https://www.mjog.com/</a>
Pathology Courier	The Pathology Partnership	<a href="https://www.healthwatchsuffolk.co.uk/.../the-pathology-partnership-riverside-clinic-ip...">https://www.healthwatchsuffolk.co.uk/.../the-pathology-partnership-riverside-clinic-ip...</a>
	North East Essex, Suffolk Pathology Services	<a href="http://www.ipswichhospital.nhs.uk/a-zofservices/clinicaldepartments/pathology.htm">http://www.ipswichhospital.nhs.uk/a-zofservices/clinicaldepartments/pathology.htm</a>
Patient Notes Transfer	Capita	<a href="http://www.capita.com/">www.capita.com/</a>
	CitySprint Courier	<a href="https://www.citysprint.co.uk/">https://www.citysprint.co.uk/</a>
Police Requests	Suffolk Constabulary	<a href="https://www.suffolk.police.uk/">https://www.suffolk.police.uk/</a>
Coroner	Suffolk Coroners	<a href="https://www.suffolk.gov.uk/births-deaths-and-ceremonies/the-coroner-service/">https://www.suffolk.gov.uk/births-deaths-and-ceremonies/the-coroner-service/</a>

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reports	Service	
Quality, performance, payment and safety reports	ACE	<a href="http://www.acecic.co.uk/">www.acecic.co.uk/</a>
	East Anglian Diabetic Eye Screening	<a href="http://www.eadesp.co.uk/">www.eadesp.co.uk/</a>
	Provide	<a href="https://www.provide.org.uk/access-to-your-information/">https://www.provide.org.uk/access-to-your-information/</a>
	CQRS	<a href="https://digital.nhs.uk/about-nhs-digital/our-work/keeping-patient-data-safe/how-we-look-after-your-health-and-care-information">https://digital.nhs.uk/about-nhs-digital/our-work/keeping-patient-data-safe/how-we-look-after-your-health-and-care-information</a>
	NHS England	<a href="https://www.england.nhs.uk/">https://www.england.nhs.uk/</a>
	IESCCG	<a href="http://www.ipswichandeastsuffolkccg.nhs.uk/AboutUs.aspx">www.ipswichandeastsuffolkccg.nhs.uk/AboutUs.aspx</a>
	Public Health	<a href="https://www.suffolk.gov.uk/adult-social-care-and-health/public-health/">https://www.suffolk.gov.uk/adult-social-care-and-health/public-health/</a>
Provision of IT Systems and Support	NELCCG	<a href="http://www.nelcsu.nhs.uk/">www.nelcsu.nhs.uk/</a>
Provision of clinical system	EMIS Web	<a href="https://www.emishealth.com/products/emis-web">https://www.emishealth.com/products/emis-web</a>
Infectious Diseases	Anglia Health Protection Team	<a href="https://www.gov.uk/guidance/contacts-phe-health-protection-teams">https://www.gov.uk/guidance/contacts-phe-health-protection-teams</a>
Staff Pension	NEST	<a href="https://www.nestpensions.org.uk/schemeweb/NestWeb/faces/public/.../loginPage.xhtml">https://www.nestpensions.org.uk/schemeweb/NestWeb/faces/public/.../loginPage.xhtml</a>
Telephone System	APR	<a href="http://www.aprtelecoms.co.uk/">http://www.aprtelecoms.co.uk/</a>
Cleaning	Helping Hands	<a href="http://www.helpinghandscleaning.co.uk/">http://www.helpinghandscleaning.co.uk/</a> (No patient identifiable data shared with Helping Hands. Confidentiality agreement in place with staff)
Digital Dictation	Lexacom	<a href="https://www.lexacom.co.uk/privacy-policy/">https://www.lexacom.co.uk/privacy-policy/</a>
Accountancy	BDO	<a href="https://www.bdo.co.uk/en-gb/privacy-statement">https://www.bdo.co.uk/en-gb/privacy-statement</a>
Banking	Lloyds Bank	<a href="https://www.lloydsbank.com/">https://www.lloydsbank.com/</a>
Sexual Health	GUM	<a href="http://www.icash.nhs.uk">www.icash.nhs.uk</a>
Healthy Living	One Life Suffolk	<a href="http://www.onelifesuffolk.co.uk">www.onelifesuffolk.co.uk</a>
Drug/ Alcohol	Turning Point	<a href="http://www.turning-point.co.uk">www.turning-point.co.uk</a>
Mental Health	Wellbeing	<a href="http://www.wellbeingnands.co.uk">www.wellbeingnands.co.uk</a>

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Care Homes	Barking Hall & Uvedale	<a href="http://www.healthcarehomes.co.uk">www.healthcarehomes.co.uk</a>
Care Homes	Baylham CC & Barham CC	<a href="http://www.cardinal-healthcare.co.uk/Uvedale">www.cardinal-healthcare.co.uk/Uvedale</a>
Private Hospital	Nuffield	<a href="http://www.nuffieldhealth.com">www.nuffieldhealth.com</a>
Gender Identity Clinic	GIDS	<a href="http://www.gids.nhs.uk">www.gids.nhs.uk</a>
Ophthalmology	Evolutio	<a href="http://www.evolutio-uk.com">www.evolutio-uk.com</a>
Counselling	Mind	<a href="http://www.suffolkmind.org.uk">www.suffolkmind.org.uk</a>
DVLA	DVLA	<a href="http://www.gov.uk/dvla">www.gov.uk/dvla</a>
Housing	Suffolk CC	<a href="http://www.midsuffolk.gov.uk">www.midsuffolk.gov.uk</a>
Out of Hours Service	Adastra	<a href="https://www.oneadvanced.com/privacy-policy/">https://www.oneadvanced.com/privacy-policy/</a>