



South Gloucestershire Medical Services Ltd.

PRIVACY POLICY

INTRODUCTION

The following information explains who we are, why information is collected about you, the ways in which this information may be used, who it is shared with and how we keep it safe. It also explains how the company uses the information we hold about you, how you go about accessing this information if you wish to see it and to have any inaccuracies corrected or erased.

WHO WE ARE

South Gloucestershire Medical Services Ltd. is an organisation involved with medical services, including but not limited to, research and occupational health. We are based at Coalpit Heath Surgery and West Walk Surgery in Yate. Our team consists of General Practitioners, Practice Nurses, Research Nurses and Occupational Health nurses.

WHAT INFORMATION DO WE COLLECT FROM YOU?

Records of your medical contacts with us are stored electronically and on paper and include personal details about you such as your address, carers, emergency contact details, as well as:

- Any contact we have had with you, such as appointments, clinic visits, and telephone calls
- Notes and reports about your health
- Details about your treatment and care
- Details about any medication you are taking
- Results of investigations such as laboratory tests, x-rays
- Information about any medical trial you are involved in with us
- Relevant information from other health professionals, relatives or those who care for you

WHY DO WE COLLECT THIS INFORMATION?

Your records are used to ensure we are able to safely perform research, occupational health or other medical services, and give you the best possible care from our nurses and doctors. It enables the staff to see previous treatments, medications and enables them to make informed decisions about future decisions about your care. It helps the doctors to see lists of previous treatments and any special considerations which need to be taken into account when care is provided.

Important information is also collected to help us to remind you about specific treatment which you might need, such as follow up clinic visits or occupational health reviews.

Staff use your information to help deliver more effective treatment to you and to help us to provide you with proactive advice and guidance.

WHO MIGHT WE SHARE YOUR INFORMATION WITH?

There are a number of ways information collected about you is shared, which includes:

1. Patient referrals – With your agreement, we may refer you to other services and healthcare providers not provided by us, or we may work with other services to provide your care here. Once you have been seen for your referral, the other health care provider will normally tell us about the treatment they have provided for you and any follow up which we need to provide. This information is then included in your record.
2. Hospital, Community or Social Care Services – Sometimes the clinicians caring for you need to share some of your information with others who are also supporting you. This could include hospital or community based specialists, nurses, health visitors, therapists or social care services.



3. Research Sponsors – if you are involved in a medical research trial, full details of who your information is shared with is detailed in the consent form that you will be asked to sign when you decide to take part in the trial. This varies significantly from trial to trial, and is often pseudo-anonymised, but is likely to include staff employed by the Research Sponsor and other regulatory bodies.
4. Your employer – if you are attending as part of an occupational health check with your employer, details of the assessment will be reported back to your referring employer.
5. The organisation also shares anonymised data with a number of other research bodies to enable clinical research to be undertaken, but no personally identifiable data is shared.

WHAT DO WE DO WITH YOUR INFORMATION?

The healthcare professionals who provide your care maintain records about your health. This is a record of your care history and allows health care professionals to review your care to help inform future decisions about your treatment. Sharing this information helps to improve the treatment you receive. We follow strict data sharing guidelines to keep your information safe and secure.

HOW LONG DO WE KEEP YOUR INFORMATION?

Health and social care records are subject to a nationally agreed code of practice which regulates the minimum period for which records must be kept. This specifies that GP records should be retained until 10 years after the patient's death or after the patient has permanently left the country, unless they remain in the European Union. Electronic patient records must not be destroyed or deleted for the foreseeable future. For more information, see the records management code of practice: <https://digital.nhs.uk/article/1202/Records-Management-Code-of-Practice-for-Health-and-Social-Care-2016>.

In the event that you are involved in a research trial, your data may be kept for longer periods and this will vary from trial to trial. This information is often made clear to you as part of the consent process, but if it is not, you can ask the research team at any time.

HOW DO WE KEEP YOUR INFORMATION SAFE?

We are committed to protecting your privacy and will only use information collected lawfully in accordance with:

- General Data Protection Regulation 2017
- Data Protection Act 1998
- 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

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 such as a life or death situation, or where the law requires information to be passed, or where it is in the best interest of the patient to share the information.

In May 2018, a new national regulation called the General Data Protection Regulation came into force and we have a legal responsibility to ensure that we will also comply with these regulations.

YOUR INDIVIDUAL RIGHTS

Data Protection laws give you rights with regard to your information, below are details of how we will manage requests you might make. If you have any concerns about the use of your data and your rights, please contact us.



HOW CAN I ACCESS THE INFORMATION YOU HOLD ABOUT ME?

You have a right under the Data Protection laws to have access to copies of the information we hold about you and to have it amended should it be inaccurate. In order to request this, you need to do the following:

Write to us or ask at reception about having access to your records. For information from the hospital or other organisations you should contact them directly.

We will respond to your request within one month of receipt of your request.

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.

HAVE INACCURACIES CORRECTED OR ERASED

If you feel that the personal data that we hold about you is inaccurate or incomplete then please let us know and we will update your records within one month of notification. If this incorrect information has been sent onwards, we will also inform any other organisations of this. If it is not possible to correct the information then we will write to you to let you know the reason behind the decision and inform you how you can complain about this.

RIGHT TO OBJECT – RESTRICT PROCESSING

As a patient, you have the right to object to personal data about you being used or shared. We will always listen to your concerns and endeavour to manage them to your satisfaction; however we have to balance your concerns with our ability to provide you with safe and effective care.

If you are a carer and have a Lasting Power of Attorney for health and welfare then you can also object to personal data being used or shared on behalf of the patient who lacks capacity.

If you do not hold a Lasting Power of Attorney then you can raise your specific concerns with a member of our team. If you have parental responsibility and your child is not able to make an informed decision for themselves, then you can make a decision about information sharing on behalf of your child. If your child is competent then this must be their decision.

OBJECTIONS / COMPLAINTS

Should you have any concerns about how your information is managed at the practice, please contact Vicky Hawkins, Data - Protection Officer Tel: 01454 272252.

If you remain dissatisfied with our response you can contact the Information Commissioner's Office at Wycliffe House, Water Lane, Wimslow, Cheshire SK9 5AF – Enquiry Line: 01625 545700 or online at www.ico.gov.uk

Changes to Privacy Policy

We keep our privacy policy under regular review and we will place any updates on this web page. This privacy policy was last updated on 6/2/19.