

OLD MILL SURGERY
VIEWPARK HEALTH CENTRE,
BURNHEAD STREET,
VIEWPARK,
UDDINGSTON.

01698 815111

PRACTICE PRIVACY NOTICE

Old Mill Surgery is committed to protecting your personal data and privacy. This privacy notice will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

The Practice, Old Mill Surgery, is the data controller and is responsible for your personal data. If you have any questions about the Privacy Notice, please contact the Practice Manager.

Old Mill Surgery aims to provide high quality health care to registered patients and temporarily registered patients. To do this we must keep records about you, your health and the care we have provided or plan to provide to you.

The General Data Protection Regulation (GDPR) and UK Data Protection Act 2018 (2018) enables the Practice to lawfully process data under the following condition of Article 6:

- **6(1)(e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.**

Data will also be processed under the following special category conditions of Article 9:

- **9(2)(b) processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject**
- **9(2)(h) processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional and subject to the conditions and safeguards referred to in paragraph**

Doctors and other health professionals working in the practice, such as Practice Nurses, Pharmacists will make electronic or written records in your clinical records. The Practice Manager and administrative staff may also record information for the purposes such as updating personal details, arranging appointments, passing information to you from clinical staff, or processing medication request information.

Your clinical records will contain personal details (such as your name, address, date of birth, NHS CHI number, and next of kin). More sensitive Personal Details will contain:

- information about contact we have had with you, such as information exchanged during a visit to the surgery or a home visit.
- Notes and reports about your health
- Details and records about your treatment and care
- Results of X-rays, laboratory tests etc.

What do we do with your information?

- Refer you to other healthcare providers when you need other services or tests
- Share samples with laboratories for testing (like blood samples)
- Share test results with hospitals or community services (like blood tests) allow out of hours GPs to look at your practice record when you go to an appointment
- Send prescriptions to a pharmacy
- Patients are texted in relation to healthcare service
- Samples are provided to the courier for delivery to pathology
- In the event of death, submit electronic information for the purposes of generating a death certificate. The Death Certification Review Service will select random Certificates for review and discuss this in more detail with the GP.
- Share reports with the procurator fiscal
- Receive reports of appointments you have attended elsewhere such as with the physiotherapist; or if you have had a stay in hospital

What else do we do with your information?

Along with these activities that allow us to provide health care to you, we use information in other ways which allow us to ensure that care is safe and to provide data for the improvement and planning of services.

- Quality / payment / performance reports are provided to NHS Lanarkshire
- As part of clinical research - information that identifies you will be removed, unless you have consented to being identified
- Undertaking clinical audits with in the Practice
- Supporting staff training

Sharing when Required by Law

Sometimes we will be required to share your information and will not always be able to discuss this with you directly. Examples might be for the purposes of detection or prevention of crime, where it is in the wider public interest, to safeguard children or vulnerable adults or where required by court order.

Information Access and Rights

Data protection law provides you with a number of rights that the practice must support you with.

Right to Access

You have the right to obtain:

- confirmation that information is being used, stored or shared by the practice.
- a copy of information held about you

We will respond to your request within one month of receipt or tell you when it might take longer.

We are required to validate your identity or someone making a request on your behalf

Right to Correction

If information about you is incorrect, you are entitled to request that we correct it

There may be occasions, where we are required by law to maintain the original information - our Data Protection Officer will talk to you about this and you may request that the information is not used during this time. Where you disagree with the practice about accuracy, a note may be added to the record to explain that you disagree. The circumstances when information can be removed from medical records are extremely rare due to medico-legal reasons.

We will respond to your request within one month of receipt or tell you when it might take longer.

Complaints

You also have the right to make complaints and request investigations into the way your information is used. Please contact our Data Protection Officer or visit the link below for more information.

For more detailed information on your rights visit <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

Case Finding

Sometimes your information will be used to identify whether you need particular support from us. Those involved in your care might look at particular indicators and contact you to take action for healthcare purposes such as preventing you from having to visit accident and emergency by supporting you in your own home or in the community.

We will use automated technology to help us identify people that might be required but ultimately, the decision about how to support you is made by those involved in your care.

Our Data Protection Officer will be happy to speak to you about this if you have any concerns or objections.

Information Technology

The practice will use third parties to provide services that involve your information such as:

- Removal and destruction of confidential waste
- Provision of clinical systems
- Provision of connectivity and servers

Data analytics or warehousing (these allow us to make decisions about care or see how effectively the practice is run - personal data will never be sold or made available to organisations not related to the to your care delivery)

We have contracts in place with these third parties that prevent them from using it in any other way than instructed. These contracts also require them to maintain good standards of security to ensure your confidentiality.

How do we Protect your Information?

We are committed to ensuring the security and confidentiality of your information. There are a number of ways in which we do this:

- Staff receive training about protecting and using personal data
- Policies are in place for staff to follow and are regularly reviewed
- We check that only minimum amount of data is shared or accessed
- We use passwords to access systems, this helps ensure that the right people are accessing data - people with a 'need to know'
- We use encrypted emails and storage which would make it difficult for someone to 'intercept' your information
- We report and manage incidents to make sure we learn from them and improve
- We put in place contracts that require providers and suppliers to protect your data as well
- We do not send your data outside of the EEA

Retention Periods

GP Medical records will be retained until death. At death, the records will be returned to the Health Board. Occasionally the records may be returned to the Practice for legal reasons, enabling the compilation of medical reports or the completion of insurance reports. Records will be returned to the Health Board.

Lodging a complaint with the Information Commissioner

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK's independent authority for data protection (<https://ico.org.uk/>). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.