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Manor View Practice

Bushey Medical Centre, London Road, Bushey, Watford WD23 2NN

Telephone Watford (01923) 225224 (Emergencies) Watford (01923) 247446 (Appointments)

Fax 01923 213270

www.manorviewpractice.co.uk

Practice Manager: Ms Liz Webb

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 ('Privacy Notice') carefully, as it contains important information about how we use the personal and healthcare information we collect on your behalf.

1. 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 do this, if you have any questions about this Privacy Notice or if you have any other issue regarding your personal and healthcare information, please contact **Ms Liz Webb, Practice Manager** or **Mr Sav Georgiou, Deputy Practice Manager** (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.
- C. We need to inform you about what we do with it.
- D. We need to tell you about who we share it with or pass it on to and why.
- E. We need to let you know how long we can keep it for.

2. THE DATA PROTECTION OFFICER

The Data Protection Officer at the Surgery is Dr Nicola Harris. Please contact Ms Liz Webb or Mr Sav Georgiou on (01923) 247446 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.
- If you have any other query relating to this Policy and your rights as a patient.

3. ABOUT US

We, at Manor View Practice (**'The Practice'**) situated at Bushey Medical Centre, London Road, WD23 2NN, are responsible for *collecting, storing and handling* your personal and healthcare information when you register with us as a patient.

There may be times when we also *process* your information. That means we use it for a particular purpose. The purposes for which we use your information are set out in this Privacy Notice.

4. INFORMATION WE COLLECT FROM YOU

The information we collect from you will include:

- A. Your contact details (such as your name and email address, 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 Practice.
- F. Medical notes which include details of diagnosis and consultations with our GPs and other health professionals within the Surgery involved in your direct healthcare.
- G. Patient feedback surveys, for example, The Friends and Family Test (FFT). Further information: www.nhs.uk/NHSEngland/AboutNHSServices/Pages/nhs-friends-and-family-test.aspx

5. INFORMATION ABOUT YOU WE COLLECT 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. Relevant information from relatives or those who care for you.
- C. The police.
- D. The home office.
- E. Solicitors.
- F. Insurance companies.

6. IDENTIFYING RISK OF SUFFERING A PARTICULAR CONDITION:

The NHS is increasingly collecting patient's medical details to help identify your risk of suffering a particular condition, to help avoid emergency hospital admissions or when to provide preventative measures. Information about you is collected from a number of sources including NHS Trusts and from this GP Practice. That information – in an anonymous form – is checked through specialist software which sends the results back to your GP (who alone will be able to identify you). This procedure known as "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.*

7. MEDICINE MANAGEMENT

The Practice may conduct Medicines Management Reviews of patients' prescription medications to ensure patients receive the most appropriate, up to date and cost effective treatments. This service may be provided by Pharmacists and Technicians employed by Herts Valleys CCG (<http://hertsvalleysccg.nhs.uk/about-us>), or by outside providers contracted by The Practice (for example via Interface Clinical Services (www.interface-cs.co.uk/)). They are bound by the same confidentiality rules as our staff are.

8. 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 Liz Webb or Sav Georgiou.

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/my-data-choice.

Note, if you do choose to opt out you can still consent to your data being used for specific purposes. 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.

9. 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 these details to assist them in the provision of your direct healthcare needs. These would include:

- A. Hospital professionals (such as doctors, consultants, nurses, etc).
- B. Other GPs/Doctors.
- C. Pharmacists.
- 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.

10. OTHER PEOPLE TO WHOM WE PROVIDE YOUR INFORMATION

- A. Commissioners.
- B. Clinical Commissioning Groups.
- C. Local authorities.
- D. Community health services.
- E. For the purposes of complying with the law e.g. Police, Solicitors, Insurance Companies.
- F. Anyone you have given your consent to, to view or receive your record, or part of your record. **Please note, however, 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 which details you are consenting to be disclosed.**

- G. **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 Clinical Commissioning Group and with other practices whereby certain key “**hub**” practices offer appointments on our behalf. This means, those key “**hub**” practices will have to have access to your medical record (if an appointment is booked at a hub practice). 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 so your data is always protected and used for those purposes only.

The key **Hub** practices are as follows:

Baldwins Lane, The Elms, Holywell
 Suthergrey, Upton, Callowland, Cassio, Health Inclusion Matters
 Garston, Tudor, Vine House, Sheepcot, Abbotswood
 South Oxhey, Consulting Rooms, Attenborough
 Chorleywood, New Road, Gade

- H. **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. 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 information, these are as follows:

- To ensure practices are adhering to local and national guidelines;
- To promote good medical care.

11. WHO ARE OUR PARTNER SOFTWARE SUPPLIERS/BUSINESSES?

We use a number of pieces of software and organisations outside of the NHS to facilitate your healthcare and enable our staff to contact you. These are as follows:

Name	Description	Can employees of the organisation access patient information?	GDPR statement
EMIS	Clinical system holds patient demographic and medical information – remote server	The servers and the connection to the practice are encrypted, so EMIS staff are not able to access patient information in this way. EMIS support staff are able to dial in remotely with the consent of our staff for problem solving.	https://supportcentre.emishealth.com/emis-group-and-the-gdpr-general-data-protection-regulation/ (only accessible with a log in so information can be requested from the practice)

Horizon	Telephone system – call recording onto a server located within the practice	Horizon is cloud-based. All the recordings are downloaded weekly to the practice server. Support staff from Chiltern are able to dial in remotely with the consent of our staff for problem solving.	https://www.gamma.co.uk/privacy/
MJog	SMS and smart messaging system between the practice and patients.	Patient's emis (clinical system) numbers are uploaded to MJog website. The website has an encrypted link to the patient database which is interrogated for the patient's name and mobile number. MJog employees would only have access to this identifiable information when troubleshooting – they will sometimes dial in to an HEMC staff member's PC with the consent of the member of staff to fix a problem.	https://www.mjog.com/privacy-policy/ https://www.mjog.com/gdpr-approaches-new-data-protection-legislation/ https://www.mjog.com/data-protection-changes-weeks-away/
iGPR	iGPR is a software tool that assists us with creating insurance reports.	iGPR staff have no access to patient information as it is fully encrypted whilst being transmitted to the insurer.	http://www.igpr.co.uk/privacy/
Docman	Clinical software which holds patient letters and documents.	Docman support staff can remotely dial in with the consent of our staff for problem solving.	Pending
Docmail	Docmail is an external printing and mailing agency which we use to send large batches of letters.	Docmail staff can dial in remotely with the consent of our staff for problem solving.	http://www.cfhdmail.com/tob.html
Egton	The practice's primary general IT support	Healthcare Computing support staff are able to remotely dial in with the consent of our staff for problem solving.	https://support.egton.net/support-centre/egton-and-the-gdpr-general-data-protection-regulation/

	provider.		
Lexacom	Dictation software which clinical staff use to dictate letters for the secretaries to type.	Lexacom support staff are able to dial in remotely with the consent of our staff for problem solving.	https://www.lexacom.co.uk/privacy-policy/
MDU / MPS / MDDUS	Indemnity organisations	We may send by email or discuss by phone identifiable information if the organisation is supporting a GP in a patient complaint or litigation. Information will be redacted where possible.	https://www.themdu.com/privacy-policy https://www.medicalprotection.org/home/privacy-cookies-policy https://www.mddus.com/mddus-policies/privacy-notice
Numed	Numed provides software and support for our Spirometer, 12hr BP machine.	Numed support staff can remotely dial in with the consent of our staff for problem solving.	https://www.numed.co.uk/gdpr-statement-of-compliance
GP2DRS (Diabetic eye screening programme)	Manage recall and screening of diabetic patients for diabetic retinopathy	The Diabetic Eye Screening Programme is commissioned by NHS England. West Herts Diabetic Eye Screening Programme support invitation for eye screening and ongoing care. This data may be shared with any Hospital Eye Services a patient is under the care of to support further treatment and with other healthcare professionals involved in patient care.	https://digital.nhs.uk/about-nhs-digital/our-work/keeping-patient-data-safe/gdpr/gdpr-register/diabetic-retinopathy-eye-screening-gp2drs

12. 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.

13. YOUR RIGHTS AS A PATIENT

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

A. 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 contact (01923) 247446. 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.

B. 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 verification process to 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.

C. 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.

D. 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.

E. 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.

F. 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.

14. 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.

15. HOW WE USE THE INFORMATION ABOUT YOU

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

- A. 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.
- B. 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 normally ask you for your consent, but there are times when we may be required by law to share your information without your consent, for example:
 - where there is a serious risk of harm or abuse to you or other people.
 - where a serious crime, such as assault, is being investigated or where it could be prevented.
 - notification of new births.
 - where we encounter infectious diseases that may endanger the safety of others, such as meningitis or measles (but not HIV/AIDS).
 - where a formal court order has been issued.
 - where there is a legal requirement, for example if you had committed a Road Traffic Offence.

16. 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).

17. 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

18. 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.

19. UNDER 16s

There is a separate privacy notice for patients under the age of 16, a copy of which may be obtained on request.

20. PATIENT PARTICIPATION GROUP

Contact information that you have provided to the PPG is held by them. This will only be used for PPG purposes. If you want your details removed, please contact them directly on mvppg1@gmail.com

21. 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 Ms Liz Webb, Practice Manager or Mr Sav Georgiou, Deputy Practice Manager on (01923) 247446.

22. 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 Ms Liz Webb, Practice Manager or Mr Sav Georgiou, Deputy Practice Manager on (01923) 247446.

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/>.

23. OUR WEBSITE

The only website this Privacy Notice applies to is the Surgery's website. 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.

24. COOKIES

The Surgery's website uses cookies. For more information on which cookies are used and how they are used, please see its Cookies Policy (www.mysurgerywebsite.co.uk/disclaimer.htm)

If you also have requested and access to online services, please see the cookies policy for the service provider you utilise:

Patient Access (patient.emisaccess.co.uk/content/cookies)

Evergreen Life (<https://www.evergreen-life.co.uk/cookie-policy>)

Dimec (<http://www.dimec.me/privacy/>)

25. 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.

26. 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.

27. 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.

28. CHANGES TO OUR PRIVACY NOTICE

We regularly review and update our Privacy Notice. This Privacy Notice was last updated on May 2018.