**Coronavirus (COVID-19) pandemic and your information**

The ICO recognises the unprecedented challenges the NHS and other health professionals are facing during the Coronavirus (COVID-19) pandemic.

The ICO also recognise that 'Public bodies may require additional collection and sharing of personal data to protect against serious threats to public health.' The Government have also taken action in respect of this and on 20th March 2020 the Secretary of State for Health and Social Care issued a Notice under Regulation 3(4) of The Health Service (Control of Patient Information) Regulations 2002 requiring organisations such as GP Practices to use your information to help GP Practices and other healthcare organisations to respond to and deal with the COVID-19 pandemic.

In order to look after your healthcare needs during this difficult time, we may urgently need to share your personal information, including medical records, with clinical and non clinical staff who belong to organisations that are permitted to use your information and need to use it to help deal with the Covid-19 pandemic. This could (amongst other measures) consist of either treating you or a member of your family and enable us and other healthcare organisations to monitor the disease, assess risk and manage the spread of the disease.

Please be assured that we will only share information and health data that is **necessary** to meet yours and public healthcare needs. The Secretary of State for Health and Social Care has also stated that these measures are temporary and will expire on 30th September 2020 unless a further extension is required. Any further extension will be will be provided in writing and we will communicate the same to you.

Please also note that the data protection and electronic communication laws do not stop us from sending public health messages to you, either by phone, text or email as these messages are not direct marketing.

It may also be necessary, where the latest technology allows us to do so, to use your information and health data to facilitate digital consultations and diagnoses and we will always do this with your security in mind.

If you are concerned about how your information is being used, please contact our DPO using the contact details provided in this Privacy Notice.

**Privacy Notice for National COVID-19 and Flu Vaccination Programmes**

NHS England has established a centralised service for the management of both the COVID-19 and seasonal flu vaccination programmes. This service is supported by a central system, the Immunisation Management System.

When you attend for your Covid-19 vaccination a record will be made that you have been vaccinated and when. Normally, vaccinations are undertaken in GP settings. However, the delivery of the Covid-19 vaccine is being undertaken in a variety of care settings.

NHS England is responsible for processing your personal data for the purposes of the national vaccination programme.

To find out more, you can access the NHS England privacy notice at:

<https://www.england.nhs.uk/contact-us/privacy-notice/>

**Privacy Notice for Healthy.io**

**ACR project for patients with diabetes**

A programme sponsored by NHS Digital to monitor urine albumin:creatinine ratio (ACR) annually for patients with diabetes. This enables patients with diabetes to test their kidney function from home. We will share your contact details with Healthy.io to enable them to contact you and send you a test kit. This will help identify patients at risk of kidney disease and help us agree any early interventions that can be put in place for the benefit of your care. If you do not wish to take part in the service, you have the opportunity to decline when Healthy.io contact you. If you do not wish to receive any further information from Healthy.io then they will delete any data that they hold about you and we will continue to manage your care within the Practice. Further information about this is available at: <https://lp.healthy.io/minuteful_info/>.

**Patient Privacy Notice – short version**

Rooley Lane Medical Centre has a legal duty to explain how we use any personal information we collect about you, as a registered patient, at the practice. Staff at this practice maintain records about your health and the treatment you receive in electronic and paper format.

**What information do we collect about you?**

We will collect information such as personal details, including name, address, next of kin, records of appointments, visits, telephone calls, your health records, treatment and medications, test results, X-rays, etc. and any other relevant information to enable us to deliver effective medical care.

**How we will use your information**

Your data is collected for the purpose of providing direct patient care; however, we can disclose this information if it is required by law, if you give consent or if it is justified in the public interest. The practice may be requested to support research; however, we will always gain your consent before sharing your information with medical research databases such as the National Institute of Health Research (NIHR), MeDiNova Clinical Research or others when the law allows.

In order to comply with its legal obligations, this practice may send data to NHS Digital when directed by the Secretary of State for Health under the Health and Social Care Act 2012. Additionally, this practice contributes to national clinical audits and will send the data that is required by NHS Digital when the law allows. This may include demographic data, such as date of birth, and information about your health which is recorded in coded form; for example, the clinical code for diabetes or high blood pressure.

Processing your information in this way and obtaining your consent ensures that we comply with Articles 6(1)(c), 6(1)(e) and 9(2)(h) of the GDPR.

**Maintaining confidentiality and accessing your records**

We are committed to maintaining confidentiality and protecting the information we hold about you. We adhere to the General Data Protection Regulation (GDPR), the NHS Codes of Confidentiality and Security, as well as guidance issued by the Information Commissioner’s Office (ICO). You have a right to access the information we hold about you, and if you would like to access this information, you will need to complete a Subject Access Request (SAR). Please ask at reception for a SAR form and you will be given further information. Furthermore, should you identify any inaccuracies; you have a right to have the inaccurate data corrected.

**Invoice validation**

Your information may be shared if you have received treatment to determine which Integrated Care Boards (ICB) is responsible for paying for your treatment. This information may include your name, address and treatment date. All of this information is held securely and confidentially; it will not be used for any other purpose or shared with any third parties.

**Opt-outs**

You have a right to object to your information being shared. Should you wish to opt out of data collection, please contact a member of staff who will be able to explain how you can opt out and prevent the sharing of your information; this is done by registering to opt out online at [www.digital.nhs.uk/services/national-data-opt-out-programme](http://www.digital.nhs.uk/services/national-data-opt-out-programme) This is the National Data opt-out Programme website, or if you are unable to do so or do not wish to do so online, by speaking to a member of staff.

1. **OpenSAFELY COVID-19 Service**

NHS England has been directed by the government to establish and operate the OpenSAFELY COVID-19 Service and the OpenSAFELY Data Analytics Service. These services provide a secure environment that supports research, clinical audit, service evaluation and health surveillance for COVID-19 and other purposes.

Each GP practice remains the controller of its own GP patient data but is required to let approved users run queries on pseudonymised patient data. This means identifiers are removed and replaced with a pseudonym.

Only approved users are allowed to run these queries, and they will not be able to access information that directly or indirectly identifies individuals.

Patients who do not wish for their data to be used as part of this process can register a [type 1 opt out](https://www.nhs.uk/using-the-nhs/about-the-nhs/opt-out-of-sharing-your-health-records/) with their GP.

Here you can find [additional information about OpenSAFELY](https://www.opensafely.org/)

**Retention periods**

In accordance with the NHS Codes of Practice for Records Management, your healthcare records will be retained for 10 years after death, or if a patient emigrates, for 10 years after the date of emigration.

**What to do if you have any questions**

Should you have any questions about our privacy policy or the information we hold about you, you can:

1. Contact the practice’s data controller via email at [B83042.rooleylane@nhs.net](mailto:B83042.rooleylane@nhs.net), please use the subject header DATA CONTROLLER. GP practices are data controllers for the data they hold about their patients[[1]](#footnote-1)
2. Ask to speak to the Practice Manager - Anita Summerfield, or one of her deputies – Emma Iball or David Whitfield

The Data Protection Officer (DPO) for Rooley Lane Medical Centre is Dal Sharry-Khan and she is based at Scorex House, 1 Bolton Road, Bradford BD1 4AS.

**Complaints**

Please speak to the Practice Manager if you have any concerns, questions or complaints about any aspect of this Patient Privacy Notice.

In the unlikely event that you are still unhappy with any element of our data-processing methods, you have the right to lodge a complaint with the ICO. For further details, visit ico.org.uk and select ‘Raising a concern’.

**Changes to our privacy policy**

We regularly review our privacy policy and any updates will be published on our website, in our newsletter and on posters to reflect the changes. This policy is to be reviewed as and when changes occur or within 2 years – February 2024 - (whichever is soonest). .

**Detailed Privacy Notice**

We also have a detailed Privacy notice which explains exactly what information we collect, store, use and share about all data subjects. This notice also includes the Privacy Impact Assessments (PIA) carried out for all information flows. This can be accessed via our Practice website [www.rooleylanemedicalcentre.co.uk](http://www.rooleylanemedicalcentre.co.uk) or by contacting the practice and asking to view the documents. Copies can also be requested if needed.

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1. [BMA GPs as data controllers under the GDPR](https://www.google.co.uk/url?sa=t&rct=j&q=&esrc=s&source=web&cd=2&ved=0ahUKEwi3gLCPg-zZAhWHJMAKHceMAvoQFgg7MAE&url=https%3A%2F%2Fwww.bma.org.uk%2F-%2Fmedia%2Ffiles%2Fpdfs%2Femployment%2520advice%2Fethics%2Fgps-data-controllers-under-gdpr-mar2018.pdf%3Fla%3Den&usg=AOvVaw31JOTJSIlR7y9BCae7OFfA) [↑](#footnote-ref-1)