# [**KING EDWARD'S & SWAKELEYS MEDICAL CENTRES**](https://www.kingedwardsandswakeleysmc.nhs.uk/Home)

Swakeleys Medical Centre, Ickenham 01895 632021 / 01895 632114

King Edwards Medical Centre, Ruislip 01895 632021 / 01895 632114

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| 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 process or use your personal and healthcare information, or you have any questions about this Privacy Notice or any other issue regarding your personal and healthcare information, then please do contact our **Data Protection Officer** (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 in respect of what we do with it;

D. We need to tell you about who we share it with or pass it on to and why; and

E. We need to let you know how long we can keep it for.

1. **THE DATA PROTECTION OFFICER**

The Data Protection Officer is ***Ernest Norman Williams***.

You can contact him on:

E Norman-Williams Information Governance Manager (GDPR Certified Practitioner)

BHH CCGs, 4th Floor, The Heights, 59 -65 Lowlands Road,HA1 3AW

Alternatively you can call: 020 8966 1093 or email: ernest.norman-williams@nhs.net 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;

• Or any other query relating to this Policy and your rights as a patient.

**3. ABOUT US**

We, at the Swakeleys Medical Centre, Ickenham, UB10 8DQ & King Edward's Medical Centre, 19 King Edwards Road, Ruislip, Middlesex, HA4 7AE, are a Data Controller of your information. This means we are responsible for collecting, storing and handling your personal and healthcare information when you register with us as a patient.

There may be times where we also process your information. That means we use it for a particular purpose and, therefore, on those occasions we may also be Data Processors. 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 Surgery;

F. Medical notes and details of diagnosis and consultations with our GPs and other health

Professionals within the Surgery involved in your direct healthcare.

**5. INFORMATION ABOUT YOU 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.

**6. 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 our Data Protection Officer.

To find out more about the wider use of confidential personal information and to register yourchoice to opt out if you do not want your data to be used in this way, please visit

https://nhs.uk/your-nhs-data-matters

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

However, 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.

7. **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 proving 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 your information to assist them in the provision of your direct healthcare

needs. It, therefore, may be important for them to be able to access your information in order to

ensure they may properly deliver their services to you:

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.

**8. OTHER PEOPLE WHO WE PROVIDE YOUR INFORMATION TO**

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, 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 how much and what aspects of, your**

**record you give consent 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 this service on our

behalf for you as a patient to access outside of our opening hours. This means, those key

“hub” practices will have to have access to your medical record to be able to offer you the

service. 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 to ensure your data is always protected and used for those purposes

only.

**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 (it is pseudo-anonymised). 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.

**9. 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.

**10. 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 speak to Reception to obtain

an application form. 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**

i. We are currently working towards offering online access to all our patients. If you

would like to view your medical records online please speak to reception who will sign

you up for the online access.

Please note that online access will also provide access to your medical record. It is your responsibility

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.

**11. 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.

**12. 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 never pass on your personal information to anyone else who does not need it, or has no**

**right to it, unless you give us clear consent to do so.**

**13. 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).

**14. 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

**15. 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.

**16. CHILDREN**

There is a separate Privacy Notice for patients under the age of 16, a copy of which may be obtained

on request.

**17. 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 our Data Protection Officer.

**18. 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 our Data Protection Officer.

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/>.

**19. 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.

**20. 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.

**21. 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.

**22. 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.

**23. CHANGES TO OUR PRIVACY NOTICE**

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

2019

**North West London DPO Service:** [**infogovernance@nhs.net**](mailto:infogovernance@nhs.net)

**North West London DPC: Mohital Haque**

**Information Governance Lead: Alpna Chavda Practice Manager**

**Caldicott Guardian: Dr M Mashru**