

THE WESTERHAM PRACTICE

June 2021

Practice privacy notice

The Westerham Practice 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 The Westerham Practice maintains 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 Clinical Practice Research Datalink and QResearch 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.

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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.

Risk stratification

Risk stratification is a mechanism used to identify and subsequently manage those patients deemed as being at high risk of requiring urgent or emergency care. Usually this includes patients with long-term conditions, e.g. cancer. Your information is collected by a number of sources, including The Westerham Practice; this information is processed electronically and given a risk score which is relayed to your GP who can then decide on any necessary actions to ensure that you receive the most appropriate care.

Invoice validation

Your information may be shared if you have received treatment to determine which Clinical Commissioning Group (CCG) 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 (national data opt-out programme) or if you are unable to do so or do not wish to do so online, by speaking to a member of staff.

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.

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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 westerham.enquiries@nhs.net. GP practices are data controllers for the data they hold about their patients⁶
2. Write to the data controller at The Westerham Practice, Market Square, Westerham, Kent. TN16 1RB
3. Ask to speak to the practice manager Tanya Shaw

The Data Protection Officer (DPO) for The Westerham Practice is Pamela Ashe and she is based at NHS Kent and Medway CCG.

Complaints

In the unlikely event that you are 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 June 2022.

⁶ [BMA GPs as data controllers under the GDPR](#)
