

How we use your information to provide you with healthcare

This Privacy Statement explains what Person Identification Data (PID) Salus Medical Services Ltd. (Salus) holds about you, why we hold it and how it is used.

Salus healthcare professionals who provide you with medical care maintain records about your health and about any treatment or care you have or have received previously. These records help to provide you with the best possible healthcare.

The information we hold is stored on secure NHS-approved systems. This may include:

- Details about you, such as your address, carer, legal representative, emergency contact details.
- We also record:
 - a) Any contact Salus has had with you
 - b) Notes and reports about your health
 - c) Details about your treatment, medication and care
 - d) Relevant information from other health professionals
 - e) Information from relatives or those who care for you
- Information held about you may be used to help protect the health of the public and to help us manage NHS services. Information may be used within Salus for clinical audit to monitor the quality of the service provided.
- Some of this information will be held centrally and used for statistical purposes. Where we do this, we take strict measures to ensure that individual patients cannot be identified.
- Our website gives you the opportunity to ask questions, send feedback or make a Subject Access Request. Any contact information you provide will only be used for the stated purpose.

How we ensure your records are held confidentially

We are committed to protecting your privacy and will only use information collected lawfully in accordance with:

- Data Protection Act 2018
- General Data Protection Regulations 2018
- Human Rights Act 1998
- Common Law Duty of Confidentiality
- Health and Social Care Act 2012
- NHS Codes of Confidentiality
- Information Security and Records Management
- Information: To Share or Not to Share Review

And until 31st March 2022

- Notice under Regulation 3(4) of the Health Service Control of Patient Information Regulations 2002 (in relation to supporting the Government's Covid-19 response)

Every member of staff who works for an organisation providing NHS services has a legal obligation to keep information about you confidential.

We will only ever use or pass on information about you if others involved in your care have a genuine need for it. We will not disclose your information to any third party without your permission unless there are exceptional circumstances (i.e. life or death situations), where the law requires information to be passed on and in accordance with the new information sharing principle following Dame Fiona Caldicott's information sharing review (Information: To share or not to share) where "The duty to share information can be as important as the duty to protect patient confidentiality."

This means that health and social care professionals should have the confidence to share information in the best interests of their patients within the framework set out by the Caldicott principles. The policies of their employers, regulators and professional bodies are designed to help them do so.

It is your responsibility to tell your us about any changes.

It is important that you tell us, or your GP Practice, if any of your details such as your name or address have changed or if any of your details such as date of birth is incorrect in order for this to be amended. You have a responsibility to inform them of any changes so your record is accurate and up to date.

You have the right to object to our sharing your data in some circumstances, but we have an overriding responsibility to do what is in your best interests. Please see below.

Other important information about how your information is used to provide you with healthcare and improve the NHS:

Identifying patients who might be at risk of certain diseases

Your medical records will be searched by a computer program so that we can identify patients who might be at high risk from certain diseases such as heart disease or unplanned admissions to hospital. This means we can offer patients additional care or support as early as possible.

This process may also involve linking information from your GP record with information from other health or social care services you have used. Information which identifies you will only be seen by ourselves, your GP practice and by limited individuals at our Data Processor (NHS South, Central and West Commissioning Support Unit). For more information please contact us.

Safeguarding

Sometimes we need to share information so that other people, including healthcare staff, children or others with safeguarding needs, are protected from risk of harm. These circumstances are rare, but we do not need your consent or agreement to do this.

Please see our local policies for more information, these are available from our admin office.

Medlink

A Practice may offer registered patients the option to conduct a secure online review via a system called Medlink. If you agree to this, your data will be made available in Medlink in order to conduct the review and on completion it will attach a review summary to your permanent medical record. If appropriate (e.g. completing a vaccine consent form), you can request a copy of the document be sent to your personal email – the email address will not be used for any other purpose. Any personal data remaining on the system is anonymised and then deleted after 1 month.

National Audits

We contribute to national clinical audits so that healthcare can be checked and reviewed. Information from medical records can help doctors and other healthcare workers measure and check the quality of care which is provided to you. The results of the checks or audits can show where services are doing well and where they need to improve.

The results of the checks or audits are used to recommend improvements to patient care. Data are sent to NHS Digital, a national body with legal responsibilities to collect data.

The data will include information about you, such as your NHS Number and date of birth and information about your health which is recorded in coded form, for example the code for diabetes or high blood pressure.

We will only share your information for national clinical audits or checking purposes when the law allows. For more information about national clinical audits see the Healthcare Quality Improvements Partnership website:

<https://www.hqip.org.uk/>

or phone 020 7997 7370.

You have the right to object to your identifiable information being shared for national clinical audits. Please contact us if you wish to object.

Public Health

We have a legal obligation to share information with Public Health England if we become aware that you, a member of your family or people you have been in contact with are suffering from certain conditions known as notifiable diseases. These are often diseases that are rare in the UK such as Anthrax, Malaria or Leprosy but also include Food Poisoning, Measles and Scarlet Fever.

The law allows us to share your information to prevent the spread of these conditions and the organisms that cause them.

The General Data Protection Regulations (GDPR) requires to provide you with the following information:

Data Controller	Salus Medical Services Limited. Aldershot Centre for Health Hospital Hill ALDERSHOT GU11 1AY
Data Protection Officer	DPO: Laura Taw Email: GP-IGEnquiries.scwcsu@nhs.net
Purpose of the processing	<ul style="list-style-type: none">• To give direct health or social care to individual patients. For example, when a patient agrees to a direct care referral, such as to a hospital, relevant patient information will be shared with other health/care staff to enable them to appropriately advise, investigate, treat and/or care.• For checks and reviews of quality of care (audits and clinical governance.)
Lawful basis for processing	<p>The processing of personal data in the delivery of direct care and for providers' administrative purposes in this surgery and in support of direct care elsewhere is supported under the following Article 6 and 9 conditions of the GDPR:</p> <p><i>Article 6(1)(e) '...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...'; and</i></p> <p><i>Article 9(2)(h) 'necessary for the purposes of preventative 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...'</i></p> <p>We will also recognise your rights established under UK case law collectively known as the "Common Law Duty of Confidentiality"</p>
Recipient or categories of recipients of the processed data	<p>The data will be shared with:</p> <ul style="list-style-type: none">• healthcare professionals and staff in this organisation• local hospitals• out of hours services• diagnostic and treatment centres or other organisations involved in the provision of direct care to individual patients• organisations providing National Screening Programmes or NHS audits <p>We also share data with NHS South, Central and West Commissioning Support Unit who extract data from our systems and combine it with information from other sources such as local hospitals to undertake 'risk stratification', a process</p>

intended to help us identify patients most likely to need additional support and plan for that eventuality.

Rights to object

- You have the right to object to some or all the information being processed under Article 21. Please contact the Data Controller. You should be aware that this is a right to raise an objection; that is not the same as having an absolute right to have your wishes granted in every circumstance.
 - You are not able to object to your name, address and other demographic information being sent to NHS Digital. This is necessary if you wish to be registered to receive NHS care.
 - You are not able to object when information is legitimately shared for safeguarding reasons. In appropriate circumstances it is a legal and professional requirement to share information for safeguarding reasons. This is to protect people from harm.
 - You cannot object to us sharing data with the Care Quality Commission if they need it for their regulatory function.
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Right to access and correct

- You have the right to access your medical record and have any errors or mistakes corrected. Please speak to a member of staff or look at our 'Data Subject Access Request Form' on the website.
 - We are not aware of any circumstances in which you will have the right to delete correct information from your medical record; although you are free to obtain your own legal advice if you believe there is no lawful purpose for which we hold the information and contact us if you hold a different view.
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Retention period

Salus medical records will be kept in line with the law and national guidance. Information on how long records are kept can be found at:

<https://digital.nhs.uk/article/1202/Records-Management-Code-ofPractice-for-Health-and-Social-Care-2016>

or speak to the Data Protection Officer.

Right to complain

If you are happy for your data to be extracted and used for the purposes described in this Privacy Notice, then you do not need to do anything.

If you have any concerns about how your data is shared, then please contact Salus. In the first instance please contact the Data Controller via:

David GILES

david.giles@nhs.net

You have the right to complain to the Information Commissioner's Office. If you wish to complain follow this link:

<https://ico.org.uk/global/contact-us/> or call the helpline 0303 123 1113

Data we get from other organisations

We receive information about your health from other organisations who are involved in providing you with health and social care. For example, if you go to hospital for treatment or an operation the hospital will send us a letter to let us know what happens. This means your medical record is kept up-to date when you receive care from other parts of the health service.