

GP Care UK Ltd

Patient Privacy Policy

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1. How we use your information

Your information will be held by GP Care UK Limited. This privacy notice is to let you know how we will undertake to look after your personal information. This includes what you tell us about yourself and what we learn while providing you with care or treatment. This notice also tells you about your privacy rights and how the law protects you.

As part of the services we offer, we are required to process personal data about our patients and, in some instances, the friends or relatives of our patients. “Processing” can mean collecting, recording, organising, storing, sharing or destroying data.

We are committed to being transparent about why we need your personal data and what we do with it. This information is set out in this privacy notice. It also explains your rights when it comes to your data.

2. Who we are

GP Care is an innovative provider of high-quality healthcare services to both NHS and Self-Funding Patients, from a wide network of convenient community settings across the South West of England. We are registered with the Care Quality Commission and our clinical services are highly efficient such that they provide Patients with fast access to expert clinical care whilst delivering significant cost savings to the NHS and affordable services to Self-Funding Patients.

Our registered address is: GP Care UK Limited, 160 Aztec West, Bristol BS32 4TU Telephone: 0333 332 2100.

3. Why do we collect your data?

We need this data so that we can provide high-quality care and support. By law, we need to have a lawful basis for processing your personal data.

We process your data because we have a legal obligation to do so under the Health and Social Care Act 201

We may also process your data with your consent. If we need to ask for your permission, we will offer you a clear choice and ask that you confirm to us that you consent. We will also explain clearly to you what we need the data for and how you can withdraw your consent at any time.

4. When you contact us by phone

We record all calls made to and from this organisation for your protection, and for monitoring purposes. They may be used for training and audit purposes to maintain our quality and high standards. Patient confidentiality is important. However, in certain circumstances, it may be necessary to share your details with third parties including health and social care professionals.

How the law protects you:

Your privacy is protected by legislation and below is an explanation of how this works in practice. The law says that we are allowed to use personal information only if we have good reason to do so and this includes sharing it outside GP Care UK Limited. The law says we must have one or

more of these reasons to process your data. The law requires us to have a separate reason for processing special category data such as health data. These reasons are grouped and summarised below.

Any type of personal data	Special category data, e.g. Medical Information
Performing a public interest task	With your explicit consent
Legal obligation	Protecting your other vital interests
Protecting your or other vital interests	Defend legal claims
With your consent	Medical purposes
For entering into a contract	Research purposes
Legitimate interest	Vital interests
	Safeguarding
	Substantial public interest / statutory purposes

The table below lists the individual purposes we may use your data and identifies the reason or the legal basis that the law permits us to do this.

What we use your information for	Our reason / legal basis
To inform the decisions made about your care	Medical purposes
To help ensure that your treatment and advice, and the treatment of others is safe and effective	Medical purpose / vital interests
To help us work effectively with other organisations and healthcare professionals who may be involved in your care	Medical purpose
We send it to your registered GP practice so that your GP, nurse, or other medical professionals involved in your care can assess your health and any care you may need	Medical purpose
Help us to thoroughly investigate any feedback, including patient surveys, or concerns you may have about the contact with our service	Public task / substantial public interest
Provided to other health professionals involved in your direct care, e.g. Onward referral in an acute hospital	Medical purpose
Help us to investigate complaints, legal claims, and untoward events	Public task / substantial public interest / legal claims
Supply data to help plan and manage services; check that the care being provided is safe; prevent infectious diseases from spreading	Legal obligation / public interest task / medical purpose
Help us conduct clinical audit to ensure we are providing a safe, high quality service and support the provision of care by other healthcare professionals	Public interest task / medical purpose

To facilitate payment for self-funded services	For entering into a contract
To support safeguarding for patients who, for instance, may be particularly vulnerable to protect them from harm or other forms of abuse	Public interest task / vital interest / safeguarding
For an administrative purpose to help manage how we provide you with services, e.g. where you nominate individuals to manage your appointments on your behalf	Consent
To inform our clinicians and support staff of any relevant factor which may pose a risk to their wellbeing while delivering care to patients. This is to fulfil our duty of care to staff.	Legitimate interest
To process requests, you make to access your personal data	Legal obligation / substantial public interest / statutory purposes

5. National data opt-out programme.

The national data opt-out policy does not apply where information is being used or shared for an individual patient's care. It only applies to use or disclosure of data for purposes beyond individual care such as research and planning. GP Care only uses Patient identifiable information for the purposes of Care.

6. Groups of personal information

This explains what all the different types of personal information mean, that are covered by data protection law.

We use different kinds of personal information. The groups are all listed here so that you can see what categories of information we hold about you.

Type of personal information	Description
Contact	Name, contact details and address
Demographic	Age, gender
Medical	Record of treatment or care received. Medical diagnosis, referrals and history of prescribed medicine
Transactional	Details of any payments you have made for our self-funded services
Locational	Where you received treatment or care
Communication	This includes correspondence or online submissions relating to concerns, complaints, or feedback about the services you have received. All telephone calls received by the organisation are recorded
Identifiers	NHS number
Miscellaneous	Any other relevant information that may influence the manner health care services are delivered e.g. mobility; travel needs etc

7. Where we collect your data from

We collect data that you provide to us when you:

- Contact us by phone
- Complete a paper or electronic form
- When you receive treatment or care from us
- Visit our websites

We also receive information about you from other sources to ensure that we provide you with effective and comprehensive treatment as well as the delivery of other services we may provide. These sources include:

- GP practices
- NHS trusts
- Clinical commissioning groups
- Social networks (for instance if you communicate with us through Facebook or Twitter)
- NHS Digital
- NHS England
- Local authorities

8. How long we retain your records

We only hold on to your information for as long as is necessary and in line with NHS Retention of the NHS Records Management Code of Practice for Health Social Care 2021.

It recommends that records should be retained for the following periods:

- Adult health records – 8 years after discharge
- Obstetric, maternity, antenatal and post-natal records – 25 years following discharge
- Cancer diagnosis records – 30 years from diagnosis or 8 years from death
- Pathology reports - 8 years after discharge
- Clinical audits – 5 years from creation
- Clinical diaries – 2 years from the end of the year to which they relate
- Clinical protocols – 25 years from creation
- Equipment maintenance logs – 11 years from decommissioning
- Referrals not accepted – 2 years from referral
- Incidents (serious) – 20 years from date of incident
- Incidents (non-serious) – 10 years from date of incident
- Policies, strategies and operating procedures including business plans – life of organisation plus 6 years
- Patient leaflets – 6 years from end of use
- Staff records – 6 years after leaving or 75th birthday whichever is sooner

Where records are to be destroyed it will be done using a safe and reputable source and written confirmation of the destruction should be obtained and retained.

9. If you choose not to give personal information

You can choose not to give us personal information. In this section we explain the effects this may have.

In some instances, we may require your consent to collect personal information about you. If you choose not to give it to us it may, in some instances, delay or prevent us from providing you with a

service. For instance, we may be unable to follow up or deal effectively with any concerns or complaints you have reported to us.

We may sometimes ask for information that is useful, but not essential. We will make this clear when we ask for it. You do not have to give us these extra details and it won't affect the care or treatment you receive from us.

10. Cookies

This section contains a link to our Cookies Guidance

Cookies are small computer files that get sent down to your PC, tablet, or mobile phone by websites when you visit them. They stay on your device and get sent back to the website they came from when you go there again. Cookies store information about your visits to that website, such as your choices and other details. Some of this data does not contain personal details about you but it is still protected by this Privacy notice.

11. Your data - your rights

The following sections contain information about how you can exercise your rights to have control on the personal data we hold on you.

12. How to complain

This section gives details of how to contact us to make a complaint about data privacy. It also shows you where you can get in touch with the Information Commissioner Office (ICO) who is the UK supervisory authority and regulates data protection law.

Please let us know if you are unhappy with how we have used your personal information. You can contact us on 0333 332 2100 and tell us that you would like to make a complaint, email us at Complaints@gpcare.org.uk or by writing to GP Care UK Limited, 160 Aztec West, Bristol BS32 4TU. Please visit <https://gpcare.org.uk/contact-us/> for more information.

You also have the right to complain to the regulator, and to lodge an appeal if you are not happy with the outcome of a complaint by using the ICO's [Report a Concern](#)

Alternatively, you can contact them in writing at: Information Commissioners Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113.

13. How to withdraw your consent

If we are using your consent as the basis for processing your data you have the right to withdraw it at any time. Once you have indicated that you no longer give consent, we will cease to process it for this purpose.

Please note that this will only apply in circumstances where we are relying on your consent to use your personal data.

Please also be aware that if you withdraw your consent, we may in certain circumstances not be able to provide certain services to you. If this is the case, we will tell you.

14. Letting us know if your personal information is incorrect

Here you can find out how to contact us if you think the information, we hold for you is wrong, incomplete, or out of date.

You have the right to question any information we have about you that you think is incorrect. We'll take reasonable steps to check this for you and correct it.

If you want to do this please contact us on 0333 332 2100 and tell us or by writing to us at info@gpcare.org.uk or GP Care UK Limited, 160 Aztec West, Bristol BS32 4TU.

15. How to get a copy of your personal information

You can request a copy of the information we hold about you by writing into us. You will need to provide forms of identification however the service is free of charge, although the law permits us to charge in certain limited circumstances and we let you know if this is the case. You can download the Data Subject Request Form by going to the following link: <https://gpcare.org.uk/wp-content/uploads/2022/02/Request-to-access-medical-records.docx>

16. Other rights

What if you want us to stop using your personal information? This section explains about your right to object and other data privacy rights you have – as well as how to contact us about them.

You can object to us keeping or using your personal information. This is known as the 'right to object'. You can also ask us to delete, remove, or stop using your personal information if there is no need for us to keep it. This is known as the 'right to erasure' or the 'right to be forgotten'.

Please be aware that this is not an absolute right and there may be reasons why we why we cannot comply with your request. However please tell us if you think that we should not be using it.

We may sometimes be able to restrict the use of your data. This means that it can only be used for certain things, such as legal claims or to exercise legal rights.

You can ask us to restrict the use of your personal information if:

- It is not accurate
- It has been used unlawfully but you don't want us to delete it
- It is not relevant anymore, but you want us to keep it for use in legal claims
- You have already asked us to stop using your data, but you are waiting for us to tell you if we are allowed to keep on using it

If we do restrict your information in this way, we will not use or share it in other ways while it is restricted.

If you want to object to how we use your data, or ask us to delete it or restrict how we use it or, please contact us on 0333 332 2100 or by writing to us at info@gpcare.org.uk or GP Care UK Limited, 160 Aztec West, Bristol BS32 4TU.

17. Who we may share information with

Sometimes we need to share your information with other organisations? For example, you may need to be onward referred to the Acute Trust and we may need to share information about you to facilitate this.

We will only ever use or pass on information about you if others involved in your care have a genuine need for it. Anyone who receives information from us is also under a legal duty to keep it confidential and secure.

Please be aware that when assisting the police with the investigation of a serious crime, or if there are concerns regarding child protection/vulnerable adults, it may be necessary for us to share your personal information with external agencies without your knowledge or consent.

We may also share information with organisations such as:

- NHS Trusts (e.g. hospitals)
- Integrated Care Boards (ICBs)
- Community / district nurses
- The ambulance or other emergency services
- General Practitioners
- Local authorities
- Multi-Agency Safeguarding Hub (MASH)
- NHS 111
- The Care Quality Commission, ICO and other regulated auditors
- Public Health England
- NHS Digital
- Non-NHS health care providers

Furthermore, in supporting the treatment and care we deliver to our patients we engage the professional services of other organisations to assist us in delivering our objectives. This may sometimes require the need for these organisations to process personal data on our behalf. Please note that your information will only be used in support of the purposes for processing your data, which have been listed in the table above and only under our instruction. We have contractual or similar agreements with these organisations which strictly govern how any personal data is used. Under no circumstances will your data be used for any marketing purposes.

The organisations that may process personal data on our behalf are from the following sectors:

- Auditing and consultation services
- Courier services
- Information Management services (e.g. secure data destruction)
- IT system support services (e.g. clinical systems and office support)
- Legal services
- Payment card services - to facilitate card payment transactions.
- Scanning and data storage services
- Translation services

18. Not a patient but perhaps a relative, friend, next of kin or otherwise have an involvement with a patient?

It is possible that we also hold information on you as part of someone else's record. The nature of the information held about you will depend on the circumstances in which that the information was collected. For instance, if you have been named as a patient's next of kin, we will hold your name and

a means of contacting you such as a phone number or address. Under data protection law, you will be entitled to receive a copy of this information unless there is good reason not to provide it.

19. Sending data outside of the European Economic Area [EEA]

In the normal course of our business we do not send personal data outside the EEA. However, if this is required, we would only do it with your explicit consent.

20. Data Protection Officer

GP Care UK Limited has appointed a Data Protection Officer and they can be contacted on 0333 332 2100 or by writing to us at info@gpcare.org.uk or GP Care UK Limited, 160 Aztec West, Bristol BS32 4TU.