

CLICK PCN PRACTICE PRIVACY NOTICE

<p>YOUR INFORMATION, WHAT YOU NEED TO KNOW</p>	<p><u>If you want to speak to us about your data, please see the contact details at the end of this document</u></p> <p>This notice describes why we collect information about you, how your information will be used and your rights in respect of your data.</p> <p>Any changes to this notice will be published on our website and in a prominent area at the Practice.</p>
<p>WHO ARE WE?</p> <p>What is a Primary Care Network (PCN)?</p>	<p>CLICK Primary Care Network (PCN) is made up of the following practices:</p> <ul style="list-style-type: none">• Ariel Healthcare Chard• Langport Surgery Langport• Summervale Surgery Ilminster• The Meadows Surgery Ilminster• Church View Medical Centre Ilminster <p>A Primary Care Network (PCN) is a group of practices within a geographical area who work together to improve the care they can offer by sharing knowledge and expertise and working collaboratively for the benefit of their patients.</p>

WE ARE A DATA CONTROLLER

As your GP practice we are responsible for any data we hold about you within our various systems and act as a Data Controller. For information on what this means please visit:

<https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/controllers-and-processors/controllers-and-processors/what-are-controllers-and-processors/#2>

We are registered with the ICO. Our registration numbers are:

- Ariel Healthcare | ZB408592
- Summervale Surgery | Z6254684
- Langport Surgery | Z6488065
- Church View Medical Centre | ZA012965
- The Meadows Surgery | Z1860189

WHY DO WE COLLECT INFORMATION ABOUT YOU?

Your records are used to ensure you get the best possible care. Your information helps us to make the best decisions about your care and helps us provide you with proactive advice and guidance. Important information is also collected to help us to remind you about specific treatment which you might need, such as health checks, immunisations for children and reminders for screening appointments. We work with other NHS services to co-ordinate these.

Information held about you may be used to help protect the health of the public and to help us to improve NHS services. Information may be used within the GP practice to monitor the quality of the service provided (known as 'clinical audit').

<p>WHAT DATA DO WE COLLECT AND RECEIVE ABOUT YOU?</p>	<p>Records are stored digitally (such as on computer systems, phone systems, audio or video files), and on paper and include personal details about you such as your address, carers, legal representatives, emergency contact details, as well as:</p> <ul style="list-style-type: none"> • Any appointments, visits, emergency appointments • Notes and reports about your health • Details about your diagnosis, treatment and care • Details about any medication you are taking • Results of investigations such as laboratory tests, x-rays • Relevant information from health and care professionals, relatives or carers • Phone call recordings, emails or online requests made to the practice • Details of any payments made to the practice for private services • CCTV footage (<i>for purposes of safety and security</i>) <p>We also receive information from other organisations that are caring for you that we hold in your record. This will include letters and test results.</p>
<p>HOW DO WE KEEP YOUR INFORMATION SAFE?</p>	<p>We know you value your privacy and that the information we hold about you is sensitive and important.</p> <p>To make sure we keep your data safe we follow all applicable UK Law on data protection and security.</p> <p>To that end, we use digital systems that meet NHS standards and ensure any written information we hold about you is kept secure. All our staff are required to complete yearly training on security and governance to ensure your data is kept safe and used appropriately.</p>

HOW WE USE YOUR INFORMATION: FOR PROVIDING YOUR CARE

Prescriptions	Where you have agreed we will send information on your prescriptions to your nominated pharmacy, either by the Electronic Prescribing Service (EPS) or by paper. We also send prescription information to the NHSBSA for administration and claims purposes.
Test requests and results	Where we undertake tests on you, such as blood tests, we will send the sample and details of the tests we are requesting to the most appropriate pathology laboratory. The data shared with the laboratory will include your NHS number, name, the type of test requested and any health information relevant to doing the test and producing the result or report. We will receive the test results back from the laboratory electronically and these will be stored in your patient record.
Extended services and out of hours	We work closely with neighbouring practices and 'out of hours' providers including NHS 111 to ensure that if you need care from a doctor outside of normal hours that they have access to your records when needed to give you the best possible care. This may be delivered over the phone, in person or via video consultation as appropriate. Within CLICK PCN the Enhanced Access Service is run by the PCN and appointments may be held by any of the practices and clinicians within the PCN.
Patient referrals	<p>With your agreement, your GP or Nurse may refer you to other services not provided by the practice, or they may work with other services to provide your care in the practice. Information will be shared by letters, emails and shared record systems.</p> <p>Once you have been seen, the other care agency will tell us about the treatment they have provided for you and any support which your GP needs to provide. This information is then included in your record. Referrals can be to lots of different services, such as smoking cessation services, social prescribers, voluntary services and other health and care agencies, as appropriate for your care.</p>
Hospital, Community or Social Care Services	Sometimes the staff caring for you need to share some of your information with others who are also supporting you. This could include hospital or community-based specialists, nurses, health visitors,

	<p>therapists or social care services. Information will be shared to organisations where you receive care, whether that is local or further away, if you need specialist care or emergency care in another.</p>
<p>Shared computer systems</p>	<p>Health and Social care services are developing shared systems to share data efficiently and quickly. It is important for anyone treating you to be able to access your shared record so that they have all the information they need to care for you. This will be during your routine appointments and also in urgent situations such as going to A&E, calling 111 or going to an out of hours appointment. It is also quicker for staff to access a shared record than to try to contact other staff by phone or email.</p> <p>Only authorised staff can access the systems and the information they see is carefully checked so that it relates to their job. Systems do not share all your data, just data which services have agreed is necessary to include.</p> <p>For more information about shared care records, please visit: https://nhssomerset.nhs.uk/about-us/digital-projects/sider/</p>
<p>Digital Tools</p>	<p>We also use a range of digital tools to support improved patient care. These digital tools may relate to very specific conditions and use of them supports diagnosis, clinical decision making, prescribing and management of a condition. Often these digital tools are developed and managed by third parties who are contracted by the NHS for the provision of this very specific work to ensure the best patient care. Your information may be shared with these organisations where it is relevant to your care. These may include but are not limited to, clinical system providers, (where your record is stored), practice website, phone system providers or diagnostic system providers. (e.g. blood pressure testing systems)</p> <p>We also use other digital systems to aid in the day-to-day operations of the practice. These may include but are not limited to, Financial and Administration systems, websites etc.</p> <p>Some of the digital tools used by the practice may use automation or AI to improve accuracy and operating efficiency within the practice.</p>

Safeguarding of children or vulnerable adults	If we have significant concerns or hear about an individual child or vulnerable adult being at risk of harm, we may share relevant information with other organisations, such as local authorities and the Police, involved in ensuring their safety.
Ensuring medicines work well	We work with the local Medicines Management team of the Integrated Care Board (ICB) to help get the best out of medicines for patients and ensure they are effective in managing conditions. This generally uses anonymous data, but occasionally they will assist in reviews of medication for patients with complex needs. Doctors may also seek advice and guidance on prescribing queries.
Identifying health risks	Systems known as 'risk stratification tools' are used to help determine a person's risk of suffering particular conditions and enable us to focus on preventing ill health before it develops. Information in these systems comes from a number of sources, such as hospitals and the practice. This can help us identify and offer you additional services to improve your health.
Population Health Management	Health and care services work together as 'Integrated Care Systems (ICS)' and share data for the following reasons: <ul style="list-style-type: none"> • Understanding the health and care needs of the care system's population, including health inequalities • Provide support to where it will have the most impact • Identify early actions to keep people well, not only focusing on people in direct contact with services but, looking to join up care across different partners.
Multi-disciplinary team meetings	For some long-term conditions, such as diabetes, the practice participates in meetings with staff from other agencies involved in providing care, to help plan the best way to provide care to patients with these conditions.
National Services (including screening programmes)	There are some national services like the National Diabetes Audit and the National Cancer Screening Programmes that collect and keep information from across the NHS. This is how the NHS knows when to contact you about services like cervical, breast or bowel cancer screening.

	<p>You can find out how the NHS holds and shares your information for national programmes on the NHS screening website. Please visit: https://www.nhs.uk/conditions/nhs-screening/</p> <p>Data may also be shared on anyone who contracts a 'communicable disease', such as Covid 19, in order to manage public health and safety.</p>
<p>Other organisations we may share your data with</p> <p>(Information is shared only where appropriate, and where agreements are in place on its use, storage and legal basis for processing)</p>	<ul style="list-style-type: none"> • SCWCSU (<i>NHS South, Central and West Clinical Support Unit</i>) • Other GP Practices (<i>e.g. PCN practices, or other practices involved in your care</i>) • Independent contractors (<i>e.g. Dentists, Opticians etc.</i>) • Solicitors • Insurance companies • Voluntary sector organisations (<i>Voluntary organisations bought in to support the practice with improving provision of health or management services</i>) • Private sector organisations (<i>private organisations bought in to support the practice with improving provision of health or management services</i>) • Fire and rescue services • Police • Education providers (<i>Schools, Colleges, Universities etc.</i>) • Local authorities (<i>Somerset Council etc.</i>) • Judicial services • CHIS (<i>Child Health Information Services</i>) • Postal services (<i>e.g. Royal Mail, UK Mail, Docmail, DPD</i>) • Paper record storage solution organisations (<i>e.g. Lloyd George paper records</i>) • Financial organisations (<i>e.g. banks, accounting firms</i>) • Various third-party IT system suppliers • Homeless health service • Research organisations

**HOW WE USE YOUR INFORMATION:
BEYOND PROVIDING YOUR CARE**

The information collected about you when you use our services can also be used and provided to other organisations for purposes beyond your individual care, for instance to help with:

- improving the quality and standards of care
- research into the development of new treatments
- preventing illness and diseases
- monitoring safety
- planning new services
- public health screening
- assisting the Care Quality Commission with any investigations
- investigating fraud
- providing performance statistics as required by the ICS/ICB, NHSE, Department of Health or other relevant regulatory body
- assist in the training and education of new health care professionals

Wherever possible data used for these purposes is anonymised so that you cannot be identified. If information cannot be completely anonymous, then this may only take place when the law allows the information to be used. All these uses help to provide better health and care for you, your family and future generations.

DO WE HAVE ANY STATUTORY DISCLOSURES?

Sometimes we are duty bound by laws to disclose information to organisations such as the Care Quality Commission, the Driver and Vehicle Licencing Agency, the General Medical Council, Her Majesty's Revenue and Customs and Counter Fraud services. In these circumstances we will always try to inform you before we are required to disclose, and we only disclose the minimum information that the law requires us to.

<p>CAN I OBJECT TO THE OF USE OF DATA FOR PURPOSES BEYOND YOUR CARE?</p>	<p>The NHS Constitution states, ‘You have a right to request that your personal and confidential information is not used beyond your own care and treatment and to have your objections considered’. For further information please visit: https://www.gov.uk/government/publications/the-nhs-constitution-for-england</p> <p>National data opt-out The national data opt-out enables patients to opt-out from the use of their personal confidential data for research or planning purposes. To find out more or to register to opt out, please visit: http://www.nhs.uk/your-nhs-data-matters</p> <p>If you have any concerns about the use of your data not covered by the National Data Opt out, please contact the practice.</p>
<p>HOW LONG DO WE HOLD INFORMATION FOR?</p>	<p>Healthcare records are kept for the lifetime of the patient and a period of time after death. If you move to a new practice, your record will be transferred. If the practice you have left needs to access your record, for example to deal with a historic complaint, they will let you know. When information has been identified for destruction or deletion it will be disposed of using approved confidential disposal procedures.</p> <p>All information we have is stored in line with the NHS Records Management Code of Practice. For more information please visit: https://transform.england.nhs.uk/information-governance/guidance/records-management-code/</p>

<p>YOUR RIGHTS:</p>
<p>Data Protection laws give you several rights, including access to your data, correction, erasure, objection and restriction of use of your data. Details on how to request access to your data are set out below. If you have any concerns about the accuracy and use of your records, please contact us.</p>

HOW CAN I ACCESS MY RECORDS?

RIGHT OF ACCESS TO YOUR INFORMATION
(SUBJECT ACCESS REQUEST)

You have the right to have a copy of the information we hold about you. There are some safeguards regarding what you will have access to, and you may find information has been removed for the following reasons.

- Where your doctor has decided that some information may cause significant harm to you or someone else
- Where the information is about someone else (third party) and is confidential to them

You can make a request by asking or writing to the practice. We may ask you to complete a form so that we have a record of your request. You will need to provide proof of identity.

You can also access your data at any time using the NHS App. For more information on how to access the NHS App and to view your records, please visit <https://www.nhs.uk/nhs-app/>
Your level of access to your records may vary. If you are unable to access the data you need through the NHS App, please contact the practice to discuss.

WHAT IF THERE IS SOMETHING WRONG IN MY RECORD?

If you believe that there are any errors in the information that we hold about you, then you can ask us to correct it. Please contact the practice in the first instance to discuss.

CAN I GET ANYTHING REMOVED FROM MY RECORD?

Legally, we cannot remove any of the information we hold about you. This information is required to take care of your health needs.

However, if you disagree, In the first instance please contact the practice to discuss.
You are free to obtain your own legal advice.

<p>OUR LAWFUL BASIS FOR PROCESSING:</p>	<p>The use of personal data for providing care is supported under the following Article 6 and 9 conditions of the GDPR:</p> <ul style="list-style-type: none"> • 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 • 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...’
<p>HAVE YOUR DETAILS CHANGED?</p>	<p>It is important that you tell us as soon as possible if any of your personal details change. This is to reduce the risk of your personal information being sent by the practice to the wrong location or phone number.</p>
<p>HOW WE USE YOUR MOBILE TELEPHONE NUMBER</p>	<p>If you provide us with your mobile phone number, we may use this to send you text reminders about your appointments or other health screening information. Please let us know if you do not wish to receive text reminders on your mobile.</p>
<p>HOW WE USE YOUR EMAIL ADDRESS</p>	<p>Where you have provided us with your email address, we may use this to send you information relating to your health and the services we provide. If you do not wish to receive communications by email, please let us know.</p>
<p>WHO IS OUR DATA PROTECTION OFFICER?</p>	<p>Should you have any questions or concerns about your data, please contact our Data Protection Officer Kevin Caldwell via the following methods:</p> <p>Email: somicb.GPDPO@nhs.net Telephone: 01935 384000</p>

YOUR RIGHT TO COMPLAIN

If you have concerns or are unhappy about any of our services, please contact the practice on:

Ariel Healthcare: 01460 67763

Summervale Surgery: 01460 52354

Langport Surgery: 01458 250464

Church View Medical Centre: 01460 55300

The Meadows Surgery: 01460 52284

send a letter to: The Practice Manager:

Ariel Healthcare, 59 Fore Street Chard, Somerset, TA20 1QA

Summervale Surgery, Canal Way, Ilminster, Somerset, TA19 9FE

Langport Surgery, North Street, Langport, TA10 9RH

Church View Medical Centre, Broadway Road, Broadway, Ilminster, Somerset, TA19 9RX

The Meadows Surgery, Canal Way, Ilminster, TA19 9FE

or email us on:

Ariel Healthcare: somicb.arielhealthcare@nhs.net

Summervale Surgery: somicb.reception.staff@nhs.net

Langport Surgery: - [Please visit our contacts page to see our complaints policy and procedure](#)

Church View Medical Centre: churchview.mc@nhs.net

The Meadows Surgery: meadows.surgeryilm@nhs.net

or please visit the practice website complaints page.

Ariel Healthcare: <https://arielhealthcare.nhs.uk/contact/feedback-and-complaints>

Summervale Surgery: <https://summervalesurgery.co.uk/compliments-feedback-and-ideas/>

Langport Surgery: <https://langportsurgery.co.uk/contact-the-practice/>
Church View Medical Centre: <https://www.churchviewmc.nhs.uk/complaints.htm>
The Meadows Surgery: <https://themeadowssurgery.co.uk/feedback-complaints/>

For independent advice about data protection, privacy and data-sharing issues, you can contact:

The Information Commissioner
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Phone: 0303 123 1113

Visit the ICO Website: <https://ico.org.uk/global/contact-us>