Keele Practice

Integrated with North Staffordshire Combined Healthcare NHS Trust

Patient Privacy Notice

This privacy notice tells you what to expect us to do with your personal information when you contact us or use our services.

Our contact details

Name: Keele Practice

Address: Health Centre, Keele University, Newcastle-under-Lyme, Staffs ST5 5BG

General phone number: 01782 753550

Website: www.keelepractice.co.uk

We are the controller for your information, alongside North Staffordshire Combined Healthcare NHS Trust. Jointly, we decide on why and how information is used and shared.

Data Protection Officer contact details

Our Data Protection Officer is Sahra Smith and she is responsible for monitoring our compliance with data protection requirements. You can contact her with queries or concerns relating to the use of your personal data at DPO@combined.nhs.uk

ICO Registration Number: Z8606519

Primary Care Network (PCN)

Many people are living with long term conditions such as diabetes and heart disease or suffer with mental health issues and may need to access their local health services more often.

To meet these needs, we are working together with other GP Practices and community, mental health, social care, pharmacy, hospital and voluntary services in our local area in groups of practices known as Primary Care Networks (PCNs).

PCNs build on existing primary care services and enable greater provision of proactive, personalised, coordinated and more integrated health and social care for people close to home. Clinicians describe this as a change from reactively providing appointments to proactively caring for the people and the communities they serve.

The objective of Primary Care Networks (PCNs) is for group practices working together to create more collaborative workforces which ease the pressure of GP's, leaving them better able to focus on patient care. The aim is for all areas within England to be covered by a PCN.

KEELE PRACTICE is a member of the Newcastle South PCN which includes the following local GP Practices:

- Madeley Practice, ST5 5DA
- Ashley Surgery, TF9 4LF
- Silverdale Village Surgery, ST5 6PS
- Kingsbridge Medical Practice, ST5 3HP
- Dr Patel (Betley Surgery), CW3 9BL

How do we get information and why do we have it?

The personal information we collect is provided by you to seek care – this is used directly for your care.

We also receive personal information about you indirectly from others, in the following scenarios

- from other health and care organisations involved in your care so that we can provide you with care
- from family members or carers to support your care

What information do we collect?

Personal information

We currently collect and use the following personal information:

- Name, address, postcode, date of birth, NHS Number, phone number, mobile number, email address, gender
- Your next of kin and contact details

More sensitive information

We process the following more sensitive data (including special category data):

- data concerning physical or mental health (for example, notes, reports treatment details or support you need and receive, tests and diagnosis, appointment information, medicines, sides effects and allergies, details about your appointments or diagnosis, home visit information, treatment outcome information you provide, patient experience feedback, information from other professionals, relatives or those who care for you or know you well)
- data revealing racial or ethnic origin
- data concerning a person's sex life
- data concerning a person's sexual orientation
- genetic data (for example, details about a DNA sample taken from you as part of a genetic clinical service)
- biometric data (where used for identification purposes)
- data revealing religious or philosophical beliefs
- data relating to criminal or suspected criminal offences

What is our lawful basis for using information?

Personal information

Under the UK General Data Protection Regulation (UK GDPR), the lawful basis we rely on for using personal information:

(a) We have your consent - this must be freely given, specific, informed and unambiguous (Research only)

(c) We have a legal obligation - the law requires us to do this, for example where NHS England or the courts use their powers to require the data. See this list for the most likely laws that apply when using and sharing information in health and care

(e) We need it to perform a public task - a public body, such as an NHS organisation or Care Quality Commission (CQC) registered social care organisation, is required to undertake particular activities by law. See this list for the most likely laws that apply when using and sharing information in health and care.

More sensitive data

Under UK GDPR, the lawful basis we rely on for using information that is more sensitive (special category):

(b) We need it for employment, social security and social protection reasons (if authorised by law). See this list for the most likely laws that apply when using and sharing information in health and care.

(h) To provide and manage health or social care (with a basis in law). See this list for the most likely laws that apply when using and sharing information in health and care.

(i) Public health (with a basis in law)

We are required by law to share information from your health records in certain circumstances. Information is shared so that the NHS and/or the UK Health Security Agency can plan and manage services, check that the care being provided is safe and prevent infectious diseases from spreading.

We will share information with NHS England, the Care Quality Commission and the UK Health Security Agency when the law requires us to.

We must also share your information if a court of law orders us to do so.

You are unable to object to the sharing of information to comply with legal requirements.

How we use your information

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

These records may be electronic, a paper record or a mixture of both. We use a combination of technologies and working practices to ensure that we keep your information secure and confidential.

We are one of many practices working in the health and care system to improve care for patients and the public.

Whenever you use a health or care service, such as attending Accident & Emergency or using Community Care services, important information about you is collected in a patient record for that service. Collecting this information helps to ensure you get the best possible care and treatment.

The information collected about you when you use these 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 provided
- research into the development of new treatments
- preventing illness and diseases
- monitoring safety
- planning services

This may only take place when there is a clear legal basis to use this information. All these uses help to provide better health and care for you, your family and future generations.

Confidential patient information about your health and care is only used like this where allowed by law.

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.

We do not need your consent or agreement to do this.

We will either receive or collect information when someone contacts us with safeguarding concerns or we believe there may be safeguarding concerns and make enquiries to relevant providers.

The data collected by our staff in the event of a safeguarding situation will be minimised to include only the necessary personal information. In addition to some basic demographic and contact details, we will also process details of what the safeguarding concern is – this is likely to be special category information.

The data may be shared with:

- Healthcare professionals and staff at this practice
- Local hospitals
- Out of hours services
- Diagnostic and treatment centres
- Other organisations involved in the provision of direct care to individual patients
- Police
- Local Authorities

Information is shared to protect people from harm. Information will be shared in line with practice and trust safeguarding policies

Patient Communication

We would like to use your name, contact details, and email address to inform you of NHS services, or provide information about your health to manage your healthcare needs.

We do operate an SMS Text-Messaging service and you will be asked whether you wish to provide your explicit consent to enable us to contact you via this method.
We also offer online consultations as an alternative to contacting us by telephone. Many enquiries can

be dealt without the need for an appointment. You are required to register and give your consent to use this. Your personal information will be safeguarded in the same way it would be with any other consultation.

We have a telephone system that can record your calls to the practice. It is standard practice to record telephone calls for quality monitoring, training, compliance and security purposes. A recorded message at the start of the call will tell you that you are being recorded, why and what your rights are.

Only authorised practice staff can access call recordings and will only retrieve them in the following circumstances:

- We need to investigate a complaint
- We need to investigate and manage an incident
- We need to check that standards in call handling are being met

All calls made into the practice will be retained for 36 months.

When using electronic methods to communicate with our patients, we ensure we abide by the requirements of the Privacy and Electronic Communication Regulations 2003 and review these regulations alongside the UK GDPR to ensure we are using your data appropriately when communicating with you.

Medicines Management

The Practice are contractually required to conduct Medicines Management Reviews of all medications prescribed to our patients. This is necessary to ensure patients receive the most appropriate, up-to-date and cost-effective treatments. The reviews are carried out by the newly formed Integrated Care Board Medicines Management Team under a Data Processing contract with the Practice. All members of the Medicines Management Team are appropriately qualified Pharmacists or Clinical experts, and we work collectively to ensure your medical needs are being met.

GP Connect Service

GP Connect helps clinicians gain access to GP patient records during interactions away from a patient's registered practice and makes their medical information available to appropriate health and social care professionals when and where they need it, to support the patient's direct care.

From a privacy, confidentiality and data protection perspective, GP Connect provides a method of secure information transfer and reduces the need to use less secure or less efficient methods of transferring information, such as email or telephone.

The local GP Connect service allows authorised clinical staff at NHS 111 to seamlessly access our practice's clinical system and book directly on behalf of a patient. This means that should you call NHS 111 and the clinician believes you need an appointment with us, the clinician will access available appointment slots only (through GP Connect) and book you in. This will save you time as you will not need to contact the practice direct for an appointment. This will be with your permission.

We will not be sharing any of your information and the practice will only allow NHS 111 to see available appointment slots. They will not even have access to your record. However, NHS 111 will share any relevant data with us, but you will be made aware of this. This will help your GP in knowing what treatment / service / help you may require.

Please note if you no longer require the appointment or need to change the date and time for any reason you will need to speak to one of our reception staff and not NHS 111.

Identifying patients who might be at risk of certain diseases

Your health records will be searched by a computer programme so that we can identify patients who might be at high risk from certain diseases such as heart disease of unplanned admissions to hospital. This is called risk stratification for case-funding.

This means we can offer you additional care and support as early as possible.

This process will involve linking information from your GP record with information from other health and social care services you have used.

The identifying parts of your information (name, address, date of birth etc) are removed an analysis of your data is undertaken with an overall risk score allocated. This information is sent back to us and in our role as data controller, in an identifiable form which helps us work with you more closely.

Please note that you are not happy to have your information used in this way, you do have the right to opt-out in most circumstances. Individual risk management at practice level is deemed to be part of your direct healthcare and is covered by our legal powers as stated above.

We use Aristotle Risk Stratification software which is operated by members of the Clinical Coding and Summarising Team, who are trained to abide by strict confidentiality requirements.

If you are not happy for your information to be included in the risk stratification service (even though it is in a format which does not directly identify you), you can choose to opt-out.

In this case, because pseudonymised data is being used, the National Data Opt-Out does not apply. Instead, please tell us and we will apply an opt-out code to your record to ensure that your information is not included in the programme.

Population Health Management (PHM)

Population Health Management is a mechanism adopted for improving the health of our population by using data to help make choices on the provision of health care locally. It includes various strategic tools to identify local 'at risk' cohorts of patients which enables us to then work to design and target interventions to prevent ill-health and to improve care and support for people with ongoing health conditions and to reduce inequalities in healthcare.

It uses pseudonymised data (ie where information that identifies you has been removed and replaced with a pseudonym. This will only ever be reidentified if we discover that you may benefit from a particular health intervention, in which case only the relevant staff at our practice will be able to see your personal information in order to offer this service to you.

PHM is a partnership approach across the NHS and other public services, the outputs of the PHM programme will be shared across these organisations. All have a role to play in addressing the interdependent issues that affect people's health and wellbeing.

If you are not happy for your information to be included in the PHM service (even though it is in a format which does not directly identify you), you can choose to opt-out.

In this case, because pseudonymised data is being used, the National Data Opt-Out does not apply.

Instead, please tell us and we will apply an opt-out code to your record to ensure that your information is not included in the programme.

National Screening Programmes

The NHS provides national screening programmes to detect diseases or conditions early such as bowel cancer, cervical and breast cancer, aortic aneurysm and diabetes. The information is shared so that the correct people are invited for screening and that those who are most at risk can be offered treatment.

You can opt-out of the national screening programmes so that you do not receive invitations – please see to a member of staff at the practice.

Online Access to Your Health Records

GP practices in England are required to give patients online access to their medical records as part of the NHS Long-Term Plan commitments to provide patients with digital access to their health records.

The right of patients to seek access to their medical records is governed by data protection law. An exception can be made where the record contains data that could, in the opinion of your GP, be seriously harmful to the patient if they saw it, or if it contains confidential information about a third party. We are required to validate your identity before we can approve online access to your health records. Patients remain responsible for the way they manage their online records and are urged to keep log in details safe, keep their information secure and be mindful of risks of sharing information.

From potentially **November 2023**, patients at this practice who have online accounts, such as through the NHS App, will be able to read new entries in their health record. GP IT system configuration is being changed so that existing online users have access to their future, or prospective, health information entered after this change is made. New online users set up after this date will also receive this level of access by default. We will be able to customise or remove access for individuals if having access to future, or perspective, GP health information is inappropriate. Patients will be able to see

information once it is entered or filed onto their record in the clinical system. Patients will not see their historic, or past, health record information unless we have already given you access previously.

Patients will also not have access to administrative tasks or communications between practice staff.

OpenSAFELY Service

NHS England has been directed by the Government to establish and operate the OpenSAFELY COV-19 Service and the OpenSAFELY Data Analytics Service. These services provide a secure environment that supports research, clinical audit, service evaluation and health surveillance for COVID-19 and other purposes.

Each GP Practice remains the controller of its own GP patient data but is required to let approved users run queries on pseudonymised patient data. This means identifiers are removed and replaced with a pseudonym.

Only approved users are allowed to run these queries and they will not be able to access information that directly or indirectly identifies individuals.

Patients who do not wish for their data to be used as part of this process can register type 1 opt out with their GP.

Clinical Practice Research Datalink

Clinical Practice Research Datalink (CPRD) is a real-world research service supporting retrospective and prospective public health and clinical studies. CPRD is jointly sponsored by the Medicines and Healthcare Products Regulatory Agency and the National Institute for Health Research (NIHR), as part of the Department of Health and Social Care.

CPRD collects anonymised patient data from a network of GP practices across the UK. Primary care data are linked to a range of other health related data to provide a longitudinal, representative UK population health dataset. The data encompass 60 million patients, including 16 million currently registered patients.

You can opt out of your information being used for research purposes at any time by contacting our practice and further information on CPRD, including privacy information, can be found by accessing the following links:

https://www.cprd.com/home
https://www.cprd.com/privacy-notice

Research/Service Evaluation and your Consent

On occasion, if you have given us your consent to be contacted for other reasons outside of your direct care needs, we may contact you to ask you to take part in research that the Practice may be involved in, or to complete a survey asking for your thoughts on a particular service. Partaking in research, surveys, evaluations, questionnaires etc. is purely optional but does help us to develop services with you making them better for the people that matter, our patients.

To do this lawfully we adhere to article 6(1)(a) of UK GDPR. We will ensure the way we obtain your consent is suitable for your needs, and may require you to sign a consent form, tick a box or verbally provide consent that we will record in your records, but whatever method we feel is the most appropriate we will inform you of this at the time of requirement.

National Data Opt-Out

Most of the time, anonymised data is used for research and planning so that you cannot be identified in which case your confidential patient information isn't needed.

You have a choice about whether you want your confidential patient information to be used in this way. If you are happy with this use of information you do not need to do anything. If you do choose to opt out your confidential patient information will still be used to support your individual care.

To find out more or to register your choice to opt out, please visit www.nhs.uk/your-nhsdata-matters. On this web page you will:

- See what is meant by confidential patient information

- Find examples of when confidential patient information is used for individual care and examples of when it is used for purposes beyond individual care
- Find out more about the benefits of sharing data
- Understand more about who uses the data
- Find out how your data is protected
- Be able to access the system to view, set or change your opt-out setting
- Find the contact telephone number if you want to know any more or to set/change your opt-out by phone
- See the situations where the opt-out will not apply

You can also find out more about how patient information is used at:

https://www.hra.nhs.uk/information-about-patients/ (which covers health and care research); and https://understandingpatientdata.org.uk/what-you-need-know (which covers how and why patient information is used, the safeguards and how decisions are made)

You can change your mind about your choice at any time.

Data being used or shared for purposes beyond individual care does not include your data being shared with insurance companies or used for marketing purposes and data would only be used in this way with your specific agreement.

Health and care organisations have to put systems and processes in place so they can be compliant with the national data opt-out and apply your choice to any confidential patient information they use or share for purposes beyond your individual care. Our organisation is currently compliant with the national data opt-out policy.

Who do we share information with?

We may share information with the following types of organisations:

- Healthcare professionals and staff at this practice
- Local hospitals
- Out of hours services
- Diagnostic and treatment centres
- Third party data processors

Third party data processors

We will share information (where required) with carefully selected third party service providers.

When we use a third party to process information on our behalf, we will always have an appropriate agreement in place to ensure that they keep the information secure, that they do not use or share information other than in accordance with our instructions and that they are operating appropriately.

Examples of functions that may be carried out by third parties include:

- Companies that provide IT services & support, including our core clinical systems; systems which manage patient facing services (such as our website and service accessible through the same); data hosting service providers; systems which facilitate appointment bookings or electronic prescription services; document management services etc
- Delivery services (for example if we were to arrange for delivery of any medicines to you)
- Payment providers (if for example you were paying for a prescription or a service such as travel vaccinations)
- Archiving companies

Further details regarding specific third-party processors can be supplied on request to the practice.

Is information transferred outside the UK?

We do not transfer information outside the UK.

How we maintain the confidentiality of your records

Every member of staff who works for an NHS organisation 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/or in accordance with the 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.

Our practice policy is to respect the privacy of our patients, their families, and our staff and to maintain compliance with the UK GDPR and all UK-specific Data Protection Requirements. Our policy is to ensure all personal data related to our patients will be protected.

All employees and sub-contractors engaged by our practice are asked to sign a confidentiality agreement. The practice will, if required, sign a separate confidentiality agreement if the client deems it necessary.

In certain circumstances you may have the right to withdraw your consent to the processing of data. Please contact the practice if you wish to withdraw your consent. In some circumstances we may need to store your data after your consent has been withdrawn to comply with a legislative requirement. 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.

Adoption Records

As a practice we are committed to applying appropriate legislation in all of our undertakings. In relation to adopted patients, current adoption legislation requires that all adopted patients are given a new NHS number, and that all previous medical information relating to the patient is put into a newly created medical record.

Any information relating to the identity or whereabouts of the birth parents will not be included in the new record. Whilst changing or omitting information from medical records would usually be contrary to ethical and professional guidance, this is not the case for the records of adopted patients and there is a legal requirement that it takes place. We will ensure as a Practice we adhere to strict codes of confidentiality when handling any information regarding adoption.

Transgender Records

As a practice we are committed to demonstrating we reflect our core values and the values of North Staffordshire Combined Healthcare NHS Trust which is to provide compassionate, approachable, responsible and excellent care to all, and ensure this is inclusive of all patients. Any patient who identifies as a different gender, or indeed as a non-binary person, will be treated with the same levels of care and compassion as all patients.

Patients may request to change gender on their patient record at any time and do not need to have undergone any form of gender reassignment treatment to do so. When a patient changes gender, the current process on NHS systems requires that they are given a new NHS number and must be registered as a new patient at the practice. All previous medical information relating to the patient will be transferred into a newly created medical record with reference to previous gender or NHS number removed.

Any patient who wishes to change gender on their medical records must inform us that they wish to register their new gender on the clinical system; we will then inform the patient that this will involve a new NHS number being issued for them.

Subsequent changes to gender would involve a new NHS number. Any requests to formally change gender will be processed within 5 working days to ensure there is no interruption to clinical care as per the guidance issued by Primary Care Support England which can be accessed by clicking this link: PCSE Gender Reassignment Process

Common law duty of confidentiality

All health and social care providers are subject to the statutory duty under section 251B of the Health and Social Care Act 2023 to share information about a patient for their direct care. This duty is subject to both the Common Law Duty of Confidentiality' and UK Data Protection Legislation.

In our use of health and care information, we satisfy the common law duty of confidentiality because you have provided us with your consent (we have taken it as implied to provide you with care).

How do we store your electronic personal information?

All personal information is held electronically on our practice clinical system, EMIS Web (Egton Medical Information Systems).

EMIS stores personal information via EMIS Web, which uses a highly secure, cloud-hosted environment provided by Amazon Web Services ("AWS"). The data stored in this cloud environment remains in the UK at all times and is fully encrypted both in transit and at rest.

How long do we store your information for:

Your information is securely stored for the time periods specified in the Records Management Code of Practice

Destruction

This will only happen following a review of the information at the end of its retention period. Where data has been identified for disposal, we have the following responsibilities:

To ensure that information held in manual form is destroyed using a cross-cut shredder or contracted to a reputable confidential waste company that complies with European Standard EN15713 and obtain certificates of destruction. The practice uses B&M Secure Shredding to dispose of confidential waste and they have an ICO Registration Number of ZA320906 to ensure that electronic storage media used to store, or process information are destroyed or overwritten to national standards.

Sharing of Electronic Patient Records within the NHS

EMIS Web enables your record to be shared (subject to strict agreements on how it will be used) with other clinicians so that everyone caring for you is fully informed about your medical history, including allergies and medication. To provide around the clock safe care, unless you have asked us not to, we will make information available to our Partner Organisations. Wherever possible, their staff will ask your consent before your information is viewed.

Our partner organisations:

- NHS Trusts/Foundation Trusts
- Other GP Practices
- Primary Care Networks (PCNs)
- Integrated Care Systems (ICSs)
- NHS Commissioning Support Units
- Independent Contractors such as dentists, opticians, pharmacists
- Private Sector Providers
- Voluntary Sector Providers
- Ambulance Trusts
- Integrated Care Systems (ICS)
- Social Care Services
- NHS England (NHSE) and NHS Digital (NHSD)
- Multi Agency Safeguarding Hub (MASH)
- Local Authorities
- Education Services
- Fire and Rescue Services
- Police & Judicial Services
- Other 'data processors' with a proven legal basis allowing us to share

In addition, NHS England have implemented the Summary Care Record which contains information including medication you are taking and any bad reactions to medication that you have had in the past.

In most cases, particularly for patients with complex conditions and care arrangements, the shared electronic record plays a vital role in delivering the best care and a co-ordinated response, considering all aspects of your physical and mental health. Many patients are understandably not able

to provide a fully account of their care or may not be able to do so. The shared record means patients do not have to repeat their medical history at every care setting.

You record will be automatically setup to be shared with the organisations listed above, however you have the right to ask us to disable to function or restrict access to specific elements of your record. This will mean that the information recorded by us will not be visible in any other care setting.

Summary Care Records with Additional Information

Additional Information in a patient's SCR will enable health and care professionals to have better medical information about the patient they are treating at the point of care. Additional information includes:

- significant medical history (past and present)
- reason for medication
- anticipatory care information/care plans (such as information about the management of long-term conditions)
- end of life care information
- immunisations

By including this Additional Information in your SCR, health and care staff can give you better care if you need health care away from your usual GP practice:

- in an emergency
- when you're on holiday
- when your surgery is closed
- at out-patient clinics
- when you visit a pharmacy

Patients can opt-out of having a summary care record or opt-out of having additional information included. Patients who have opted-out of having a Summary Care Record or chosen to have a core Summary Care Record only by declining to provide consent for Additional Information to be shared will continue to have their preferences respected.

Integrated Care Record – One Health and Care

One Health and Care pulls the key information from different health and social care systems and displays it in one combined record. This enables registered health and social care professionals involved in your care to find all the key, most up to date information in one place which helps provide better, safer care.

When you contact a partner organisation involved in your care as a patient/service user, information is collected about you and records maintained about the care and services that have been provided.

The organisations that are participating in One Health and Care are:

- Staffordshire and Stoke-on-Trent GP practices
- University Hospitals of North Midlands NHS Trust
- University Hospitals of Derby and Burton NHS Foundation Trust
- Midlands Partnership NHS Foundation Trust
- North Staffordshire Combined Healthcare NHS Trust
- Staffordshire County Council (Social Care)
- Stoke-on-Trent City Council (Social Care)
- Continuing Healthcare Services
- West Midlands Ambulance Service
- Shropshire, Telford and Wrekin GP practices
- Shropshire Community Health NHS Trust
- Midlands Partnership NHS Foundation Trust
- Shropshire Council (Social Care)
- Telford and Wrekin Council (Social Care)
- Shrewsbury and Telford Hospital NHS Trust
- Robert Jones & Agnes Hunt Orthopaedic Hospital
- West Midlands and Black Country GP practices
- The Dudley Group NHS Foundation Trust
- Sandwell and West Birmingham Hospitals Trust

- Walsall Healthcare NHS Trust
- Royal Wolverhampton Hospitals NHS Trust
- Black Country Healthcare NHS Foundation Trust
- Dudley Integrated Health and Care Trust
- Dudley Metropolitan Borough Council (Social Care)
- Wolverhampton City Council (Social Care)

All partner organisations involved with One Health and Care are registered with the Information Commissioner's Office (ICO) to process your personal data in accordance with the current Data Protection Legislation and any subsequent revisions.

More information on this initiative can be found by accessing the One Health and Care Website by clicking here

What are your data protection rights?

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information (known as a subject access request).

Such requests can be made verbally or in writing, but we do request that you provide us with adequate information to process your request, such as providing full name, address, date of birth, NHS number and details of your request and, where necessary, any documents to verify your identity.

On processing a request there may be occasions when information may be withheld if we as a practice believe that releasing the information to you could cause serious harm or distress.

Information may also be withheld if another person (i.e., third party) is identified in the record, and they do not want their information disclosed to you. However, if the other person mentioned in your records was acting in their professional capacity in caring for you, in normal circumstances they could not prevent you from having access to that information.

To request a copy or request access to information we hold about you please contact:

Post: Practice Manager, Keele Practice, Health Centre, Keele University, Newcastle-under-Lyme, Staffs ST5 5BG

General phone number: 01782 753550

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Please ensure we always have the correct contact details for your and be prepared to have information checked at each communication with us.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances, for example when your personal information is no longer necessary for the purpose which it was originally collected or processed for, or if you wish to withdraw your consent after you have previously given your consent.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances. This means that you can limit the way that we use your information. This is an alternative to requesting the erasure of your information.

You have the right to restrict the processing of your personal information where you have a particular reason for wanting the restriction.

Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.

Please note if we can demonstrate compelling legitimate grounds which outweigh your interest, the processing can continue. If we do not process any information about you and your healthcare, it would be very difficult to care and treat you.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact the Practice Manager if you wish to make a request.

Automated decision making - We may use your information to make automated decisions without human involvement. If any of the processes we use rely on automated decision making, you do have the right to ask for a human to review any computer-generated decisions at any point.

How do I complain?

Should you have any concerns about how we manage your information at the practice, please contact the Practice Manager in the first instance. Your complaint will be reviewed and investigated and the outcome of your complaint will be shared with you.

Following this, if you are still unhappy with how we have used your information, you can then complain to the ICO: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF Helpline number: 0303 123 1113 ICO website: https://www.ico.org.uk

Date of last review

June 2024