

Practice Privacy Notice

Your data, privacy and the Law. How we use your medical records

- This practice handles medical records and personal data according to the laws on data protection and confidentiality.
- We share medical records with health professionals who are involved in providing you with care and treatment. This is on a need to know basis and event by event.
- Some of your data may be automatically copied to the Shared Care Summary Record if you have consented to this.
- We may share some of your data with the local out of hours care provider and emergency care services with your consent.
- Data about you is used to manage national screening campaigns such as Flu, Cervical cytology and Diabetes prevention.
- Data about you, usually de-identified, is used to manage the NHS and make payments.
- We share information when the law requires us to do so, for instance when we are inspected or reporting certain illnesses or safeguarding vulnerable people.
- Your data is used to check the quality of care provided by the NHS.
- We may also share medical records for medical research. Where this identifies individuals it will not be done without consent.

For more detailed information on how your data is used please see the Detailed Privacy Notices folder in the waiting room or visit our web site www.sturrysurgery.co.uk

Detailed Privacy Notices

Author: Jeremy Lawrence

Reviewed: 24/05/2018

Next review: May 2019

The following detailed privacy notices provide further information on how information is processed by the practice, in accordance with the General Data Protection Regulations (GDPR)2018.

Index

Page 6 – Common Law Duty of Confidentiality

Page 7 – Right to Object

Page 8 – Right to Access and the Right to Rectification

General information sharing for direct medical care

Page 9 – Routine Direct Medical Care

Page 12 - Emergency Direct Medical Care

Page 14 – National Screening Programmes

Data Profiling

Page 16 – Risk Stratification

Access to your GP Record

Page 19 - Community & Other Clinical Staff

Page 21 - Multidisciplinary meetings within the Local Care Team

Page 23 - Remote Consultations

Page 25 - Medical Interoperability Gateway (MIG)

Page 27 - Medicines Management

NHS Data Sharing Databases

Page 29 - The National summary Care Record (Basic)

Page 31 - The National summary Care Record (Enriched)

Accessing your information on other databases

Page 33 - Open Exeter

Page 35 - East Kent hospitals DART-OCM

Page 37 - Patient Online

Statutory Disclosures of Information

Page 39 - Care Quality Commission

Page 41 - The Courts

Page 43 - DVLA

Page 45 - The General Medical Council

Page 47 - The Health Service Ombudsman

Page 49 - HMRC

Page 51 - NHS Counter-fraud Service

Page 53 - The National Diabetes audit

Page 55 - Individual GP level Data

Page 57 - Female Genital Mutilation (FGM)

Page 59 - Police

Page 61 - Public Health England

Page 63 - Child Protection disclosures to Local Authority

Page 65 - Child Protection disclosures to Children's Services (Section 47 of the
Children's Act 1989)

Page 67 - Safeguarding Adults disclosures to Local Authority

Permissive Disclosures

Page 69 - Police

Page 71 - Child Protection disclosures to Children's Services (Section 17 of the
Children's Act 1989)

Page 73 - Other Third Parties

Data Processors

Page 75 - Emis Health Ltd

Page 77 - DocMan Ltd

Page 79 - Kent County Council

Page 81 - Webpost

Pharmacies

Page 83 - Electronic Prescription Service

Page 85 - Pharmacy collection of prescriptions

Communicating with our patients

Page 87 - By Letter

Page 89 - By Telephone

Page 91 - By SMS / Text

Page 93 - By Email (medical)

Page 95 - By Email (non-medical)

Employees

Page 97 - GP's as Employers

Payments

Page 99 - Payments to the practice

The Common Law Duty of Confidentiality

Where reference is made to the Common Law Duty of Confidentiality it is taken to mean the following:

Common law is not written out in one document like an Act of Parliament. It is a form of law based on previous court cases decided by judges; hence, it is also referred to as 'judge-made' or case law. The law is applied by reference to those previous cases, so common law is also said to be based on precedent.

The general position is that if information is given in circumstances where it is expected that a duty of confidence applies, that information cannot normally be disclosed without the information provider's consent.

In practice, this means that all patient information, whether held on paper, computer, visually or audio recorded, or held in the memory of the professional, must not normally be disclosed without the consent of the patient. It is irrelevant how old the patient is or what the state of their mental health is; the duty still applies.

Three circumstances making disclosure of confidential information lawful are:

- where the individual to whom the information relates has consented;
- where disclosure is in the public interest; and
- where there is a legal duty to do so, for example a court order.

The Right to Object

Like all other healthcare organisations, Dr Molony & Partners relies upon Article 6(1)(e) – Official Authority - of the GDPR as the most common legal basis by which to process personal data.

Accordingly, patients (the data subjects) have the right to express a “right to object” to the processing of information that relies upon that Article as the legal basis.

For many data processing purposes, whilst we rely upon Article 6(1)(e), we nevertheless ask for, and record, your explicit consent before we share or access your data in this way. If you do not consent, we do not process your data in that way.

At any time after, however, you have the right to object and request that we cease processing your data in that way.

Individuals must have an objection on “grounds relating to his or her particular situation”.

We will always look carefully at any such “right to object” request, and if we can accommodate it, we will. In some cases, however, we will not be able to – for example, we cannot realistically uphold a right to object to the electronic storage of your GP record, or the conversion of any paper records to electronic records and the receipt of electronic communication from hospital trusts. To do so would put the surgery in a position where it could not safely provide you with medical care.

If you do wish to express the right to object to a particular data processing function, then please contact the surgery or the Practice Manager, explaining what data processing you are objecting to and the grounds relating to your particular situation.

The Right to Access and the Right to Rectification

You have the right to access your personal data – that is, your GP record. This is known as a Subject Access Request and can be made either verbally or in writing. Once a request has been made we will respond to it within 1 month.

The GDPR includes a right for individuals to have inaccurate personal data rectified, or completed if it is incomplete. This applies to your GP record.

The Data Protection Act states that personal data is inaccurate if it is incorrect or misleading as to any matter of fact.

If you believe that entries within your GP record are inaccurate, incorrect or misleading then please do let us know. You can make a request for rectification verbally or in writing.

You may wish to discuss the relevant entry with your GP first, but you do not have to.

We will assess your concerns and respond to your request within one calendar month.

It may be the case that we cannot “delete” the relevant record or entry, because it is important that the entry, assessment or medical opinion be retained so that there is an understanding and explanation of subsequent events (such as how you were treated, or what further tests were organised) in your medical history.

Where we are not able to “delete” information, we can add a note to the disputed entry explaining your remaining concerns and we can offer you the option of adding an addendum of your own.

Please be aware that an alteration to an electronic record, or deletion of an entry in it, is always preserved (together with the original entry) as part of the electronic audit trail.

If you remain dissatisfied with the outcome of your request then you can follow our standard NHS complaints procedure, or approach the Information Commissioner’s Office directly.

Routine Direct Medical Care – Privacy Notice

Explanation

This practice keeps data on you relating to who you are, where you live, what you do, your family, possibly your friends, your employers, your habits, your problems and diagnoses, the reasons you seek help, your appointments, where you are seen and when you are seen, who by, referrals to specialists and other healthcare providers, tests carried out here and in other places, investigations and scans, treatments and outcomes of treatments, your treatment history, the observations and opinions of other healthcare workers, within and without the NHS as well as comments and aide memoires reasonably made by healthcare professionals in this practice who are appropriately involved in your health care.

When registering for NHS care, all patients who receive NHS care are registered on a national database, the database is held by NHS Digital, a national organisation which has legal responsibilities to collect NHS data.

GPs have always delegated tasks and responsibilities to others that work with them in their surgeries, on average an NHS GP has between 1,500 to 2,500 patients for whom he or she is accountable. It is not possible for the GP to provide hands on personal care for each and every one of those patients in those circumstances, for this reason GPs share your care with others, predominantly within the surgery but occasionally with outside organisations.

If your health needs require care from others outside this practice we will exchange with them whatever information about you is necessary for them to provide that care. When you make contact with healthcare providers outside the practice but within the NHS it is usual for them to send us information relating to that encounter. We will retain part or all of those reports. Normally we will receive equivalent reports of contacts you have with non-NHS services but this is not always the case.

Your consent to this sharing of data, within the practice and with those others outside the practice is assumed and is allowed by the Law.

People who have access to your information will only normally have access to that which they need to fulfil their roles.

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

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.	
1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
3) Purpose of the processing	This is a Direct Care purpose, Special category of data (health) Direct Care is care delivered to the individual alone, most of which is provided in the surgery. After a patient agrees to a referral for direct care elsewhere, such as a referral to a specialist in a hospital, necessary and relevant information about the patient, their circumstances and their problem will need to be shared with the other healthcare workers, such as specialist, therapists, technicians etc. The information that is shared is to enable the other healthcare workers to provide the most appropriate advice, investigations, treatments, therapies and or care.
4) Lawful basis for processing	Lawful basis under GDPR: Article 6(1)(e) – Official Authority Article 9(2)(h) – Provision of health
How does this comply with the Common Law Duty of Confidentiality? <ul style="list-style-type: none"> • Consent <ul style="list-style-type: none"> ○ Implied (e.g. direct care) ○ Explicit (e.g. 2^o uses) • Control of Patient Information Regulations 2002 (e.g. Reg 5 - “s251”) • “overriding public interest” (to safeguard you or another person) • legal obligation (e.g. court order) 	Consent (implied) This means that it would be reasonable to infer that you agree to the use of the information as long as: <ul style="list-style-type: none"> • We are accessing the information to provide or support your direct care, or are satisfied that the person we are sharing the information with is accessing or receiving it for this purpose • Information is readily available to you, explaining how your information will be used and that you have the right to object • We have no reason to believe that you have objected • We are satisfied that anyone we disclose personal information to understands that we are giving it to them in confidence, which they must respect
5) Recipient or categories of recipients of the processed data	The data will be shared with health and care professionals and support staff in this surgery and at hospitals, diagnostic and treatment centres who contribute to your personal care. This may include, but is not limited to, East Kent Hospitals NHS

	Trust, Out of Hours care providers, Physiotherapy providers, Ultrasound providers, counsellors, home oxygen providers, wheelchair providers, weight management & healthy lifestyle services.
6) Rights to object	You have the right to object to some or all the information being processed under Article 21. Please contact the Data Protection Officer or the practice. 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
7) Right to access and correct	You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law.
8) Retention period	The data will be retained in line with the law and national guidance. https://digital.nhs.uk/article/1202/Records-Management-Code-of-Practice-for-Health-and-Social-Care-2016
9) Right to Complain.	You have the right to complain to the Information Commissioner's Office, you can use this link https://ico.org.uk/global/contact-us/ or call their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate) There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)

Emergency Direct Medical Care – Privacy Notice

Explanation

There are occasions when intervention is necessary in order to save or protect a patient’s life or to prevent them from serious immediate harm, for instance during a collapse or diabetic coma or serious injury or accident. In many of these circumstances the patient may be unconscious or too ill to communicate. In these circumstances we have an overriding duty to try to protect and treat the patient. If necessary we will share your information and possibly sensitive confidential information with other emergency healthcare services, the police or fire brigade, so that you can receive the best treatment.

The law acknowledges this and provides supporting legal justifications.

Individuals have the right to make pre-determined decisions about the type and extent of care they will receive should they fall ill in the future, these are known as “Advance Directives”. If lodged in your records these will normally be honoured despite the observations in the first paragraph.

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.	
1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
3) Purpose of the processing	This is a Direct Care purpose, Special category of data (health) Doctors have a professional responsibility to share data in emergencies to protect their patients or other persons. Often in emergency situations the patient is unable to provide consent.
4) Lawful basis for processing	Lawful basis under GDPR: Article 6(1)(e) – Official Authority Article 9(2)(h) – Provision of health
How does this comply with the Common Law Duty of Confidentiality? <ul style="list-style-type: none"> • Consent <ul style="list-style-type: none"> ○ Implied (e.g. direct care) ○ Explicit (e.g. 2^o uses) • Control of Patient Information Regulations 2002 (e.g. Reg 5 - “s251”) 	Consent (implied) This means that it would be reasonable to infer that you agree to the use of the information as long as: <ul style="list-style-type: none"> • We are accessing the information to provide or support your direct care, or are satisfied that the person we are sharing the information with is accessing or receiving it for this purpose • Information is readily available to you, explaining how

<ul style="list-style-type: none"> • “overriding public interest” (to safeguard you or another person) • legal obligation (e.g. court order) 	<p>your information will be used and that you have the right to object</p> <ul style="list-style-type: none"> • We have no reason to believe that you have objected • We are satisfied that anyone we disclose personal information to understands that we are giving it to them in confidence, which they must respect
<p>5) Recipient or categories of recipients of the shared data</p>	<p>The data will be shared with Healthcare professionals and other workers in emergency and out of hours services and at local hospitals, diagnostic and treatment centres.</p>
<p>6) Rights to object</p>	<p>You have the right to object to some or all of the information being shared with the recipients. Contact the Data Protection Officer or the practice.</p> <p>You also have the right to have an “Advance Directive” placed in your records and brought to the attention of relevant healthcare workers or staff.</p>
<p>7) Right to access and correct</p>	<p>You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law. If we share or process your data in an emergency when you have not been able to consent, we will notify you at the earliest opportunity.</p>
<p>8) Retention period</p>	<p>The data will be retained in line with the law and national guidance. https://digital.nhs.uk/article/1202/Records-Management-Code-of-Practice-for-Health-and-Social-Care-2016</p>
<p>9) Right to Complain.</p>	<p>You have the right to complain to the Information Commissioner’s Office, you can use this link https://ico.org.uk/global/contact-us/</p> <p>or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)</p> <p>There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)</p>

National Screening Programmes – Privacy Notice

Explanation

The NHS provides national screening programmes so that certain diseases can be detected at an early stage. These currently apply to bowel cancer, breast cancer, aortic aneurysms and diabetic retinal screening service. The law allows us to share your contact information with Public Health England so that you can be invited to the relevant screening programme.

More information can be found at: <https://www.gov.uk/topic/population-screening-programmes>

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.	
1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
3) Purpose of the processing	This is a Direct Care purpose, Special category of data (health) The NHS provides several national health screening programs to detect diseases or conditions earlier such as; cervical and breast cancer, aortic aneurysm and diabetes. More information can be found at https://www.gov.uk/topic/population-screening-programmes The information is shared so as to ensure only those who should be called for screening are called and or those at highest risk are prioritised.
4) Lawful basis for processing	Lawful basis under GDPR: Article 6(1)(e) – Official Authority Article 9(2)(h) – Provision of health
How does this comply with the Common Law Duty of Confidentiality? <ul style="list-style-type: none"> • Consent <ul style="list-style-type: none"> ○ Implied (e.g. direct care) ○ Explicit (e.g. 2^o uses) • Control of Patient Information Regulations 2002 (e.g. Reg 5 - “s251”) 	Consent (implied) This means that it would be reasonable to infer that you agree to the use of the information as long as: <ul style="list-style-type: none"> • We are accessing the information to provide or support your direct care, or are satisfied that the person we are sharing the information with is accessing or receiving it for this purpose • Information is readily available to you, explaining how

<ul style="list-style-type: none"> • “overriding public interest” (to safeguard you or another person) • legal obligation (e.g. court order) 	<p>your information will be used and that you have the right to object</p> <ul style="list-style-type: none"> • We have no reason to believe that you have objected • We are satisfied that anyone we disclose personal information to understands that we are giving it to them in confidence, which they must respect
<p>5) Recipient or categories of recipients of the shared data</p>	<p>The data will be shared with Public Health England</p>
<p>6) Rights to object</p>	<p>You have the right to object to this processing of your data and to some or all of the information being shared with the recipients. Contact the Data Protection Officer or the practice. For national screening programmes: you can opt so that you no longer receive an invitation to a screening programme.</p> <p>See: https://www.gov.uk/government/publications/opting-out-of-the-nhs-population-screening-programmes</p> <p>Or speak to your practice.</p>
<p>7) Right to access and correct</p>	<p>You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law.</p>
<p>8) Retention period</p>	<p>GP medical records will be kept in line with the law and national guidance.</p> <p>Information on how long records can be kept can be found at: https://digital.nhs.uk/article/1202/Records-Management-Code-of-Practice-for-Health-and-Social-Care-2016</p>
<p>9) Right to Complain.</p>	<p>You have the right to complain to the Information Commissioner’s Office, you can use this link https://ico.org.uk/global/contact-us/</p> <p>or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)</p> <p>There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)</p>

Risk Stratification – Privacy Notice

Explanation

The records we keep enable us to plan for your care.

This practice keeps data on you that we apply searches and algorithms to in order to identify preventive interventions.

This means using only the data we hold or in certain circumstances linking that data to data held elsewhere by other organisations, and usually processed by organisations within or bound by contracts with the NHS.

If any processing of this data occurs outside the practice your identity will not be visible to the processors. Only this practice will be able to identify you and the results of any calculated factors, such as your risk of having a heart attack in the next 10 years or your risk of complications due to frailty.

You have the right to object to our processing your data in these circumstances and before any decision based upon that processing is made about you. Processing of this type is only lawfully allowed where it results in individuals being identified with their associated calculated risk. It is not lawful for this processing to be used for other ill-defined purposes, such as “health analytics”.

Despite this we have an overriding responsibility to do what is in your best interests. If we identify you as being at significant risk of having, for example a heart attack or stroke, we are justified in performing that processing.

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.

1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372

<p>3) Purpose of the processing</p>	<p>This is a Direct Care purpose, Special category of data (health).</p> <p>The practice performs computerised searches of some or all of our records to identify individuals who may be at increased risk of certain conditions or diagnoses i.e. Diabetes, heart disease, risk of falling). Your records may be amongst those searched. This is often called “risk stratification” or “case finding”. These searches are sometimes carried out by Data Processors who link our records to other records that they access, such as hospital attendance records. The results of these searches and assessment may then be shared with other healthcare workers, such as specialist, therapists, technicians etc. The information that is shared is to enable the other healthcare workers to provide the most appropriate advice, investigations, treatments, therapies and or care.</p>
<p>4) Lawful basis for processing</p>	<p>Lawful basis under GDPR: Article 6(1)(e) – Official Authority Article 9(2)(h) – Provision of health</p>
<p>How does this comply with the Common Law Duty of Confidentiality?</p> <ul style="list-style-type: none"> • Consent <ul style="list-style-type: none"> ○ Implied (e.g. direct care) ○ Explicit (e.g. 2^o uses) • Control of Patient Information Regulations 2002 (e.g. Reg 5 - “s251”) • “overriding public interest” (to safeguard you or another person) • legal obligation (e.g. court order) 	<p>Consent (implied)</p> <p>This means that it would be reasonable to infer that you agree to the use of the information as long as:</p> <ul style="list-style-type: none"> • We are accessing the information to provide or support your direct care, or are satisfied that the person we are sharing the information with is accessing or receiving it for this purpose • Information is readily available to you, explaining how your information will be used and that you have the right to object • We have no reason to believe that you have objected • We are satisfied that anyone we disclose personal information to understands that we are giving it to them in confidence, which they must respect
<p>5) Recipient or categories of recipients of the shared data</p>	<p>The data will be shared for processing with NHS Digital and for subsequent healthcare with Canterbury & Coastal CCG and the local frailty service.</p>
<p>6) Rights to object</p>	<p>You have the right to object to this processing where it might result in a decision being made about you. That right may be based either on implied consent under the Common Law of Confidentiality, Article 22 of GDPR or as a condition of a Section 251 approval under the HSCA. It can apply to some or all of the information being shared with the recipients. Your right to object is in relation to your personal circumstances. Contact the Data Protection Officer or the</p>

	practice.
7) Right to access and correct	You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law.
8) Retention period	The data will be retained in line with the law and national guidance. https://digital.nhs.uk/article/1202/Records-Management-Code-of-Practice-for-Health-and-Social-Care-2016 .
9) Right to Complain.	<p>You have the right to complain to the Information Commissioner’s Office, you can use this link https://ico.org.uk/global/contact-us/</p> <p>or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)</p> <p>There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)</p>

Community & Other Clinical Staff – Privacy Notice

Explanation

It is common for other healthcare professionals not employed by the surgery but involved in clinical care to attend the surgery to provide care for our patients. This includes District Nurses, Specialist Nurses, Paramedic practitioners and Physiotherapists.

District Nurses include the Community Matron, Registered Nurses and Healthcare Assistants, and are employed by the Kent Community Health Trust. They see patients in the surgery but most commonly visit them in their homes.

Paramedic Practitioners are employed by our Local Care Group to visit and treat patients at home.

Physiotherapists are supplied through EKTRA Ltd who have an NHS contract to deliver services. They provide Physiotherapy services within the surgery.

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.	
1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
3) Purpose of the processing	To enable full access to GP records by healthcare professionals not employed by Dr Molony & Partners, but working within the surgery. This is a Direct Care purpose, Special category of data (health) No data is extracted or uploaded out of the GP record
4) Lawful basis for processing	Lawful basis under GDPR: Article 6(1)(e) – Official Authority Article 9(2)(h) – Provision of health
How does this comply with the Common Law Duty of Confidentiality? <ul style="list-style-type: none"> • Consent <ul style="list-style-type: none"> ○ Implied (e.g. direct care) ○ Explicit (e.g. 2^o uses) • Control of Patient 	Consent (implied) This means that it would be reasonable to infer that you agree to the use of the information as long as: <ul style="list-style-type: none"> • We are accessing the information to provide or support your direct care, or are satisfied that the person we are sharing the information with is accessing or receiving it

<p>Information Regulations 2002 (e.g. Reg 5 - “s251”)</p> <ul style="list-style-type: none"> • “overriding public interest” (to safeguard you or another person) • legal obligation (e.g. court order) 	<p>for this purpose</p> <ul style="list-style-type: none"> • Information is readily available to you, explaining how your information will be used and that you have the right to object • We have no reason to believe that you have objected • We are satisfied that anyone we disclose personal information to understands that we are giving it to them in confidence, which they must respect
<p>5) Recipient or categories of recipients of the shared data</p>	<p>Recipients include District Nurses, Dieticians, Specialist Nurses, Paramedic practitioners and Physiotherapists.</p>
<p>6) Rights to object</p>	<p>You have the right to object to this processing of your data and to some or all of the information being shared with the recipients. Contact the Data Protection Officer or the practice.</p>
<p>7) Right to access and correct</p>	<p>You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law.</p>
<p>8) Retention period</p>	<p>GP medical records will be kept in line with the law and national guidance. Information on how long records can be kept can be found at: https://digital.nhs.uk/article/1202/Records-Management-Code-of-Practice-for-Health-and-Social-Care-2016 .</p>
<p>9) Right to Complain.</p>	<p>You have the right to complain to the Information Commissioner’s Office, you can use this link https://ico.org.uk/global/contact-us/</p> <p>or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)</p> <p>There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)</p>

Multidisciplinary meetings – Privacy Notice

Explanation

Some patients have multiple needs, both medical and social, that make them vulnerable and at increased risk of harm.

The Local Care Team hold weekly meetings where clinicians from the GP surgeries, hospitals, community services and social services meet in order to co-ordinate care for the most vulnerable. Each GP surgery in the Local Care Team identifies patients who have multiple or challenging needs and these patients are then discussed to identify any gaps in care and improvements that could be made.

Access to the GP record at the patient’s surgery is given during these meetings to enable a full history to be available and to write back any outcomes.

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.	
1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
3) Purpose of the processing	To enable read/write access to the full GP electronic record to professionals from health and social care to identify vulnerable patients who are at risk of harm and to provide them with the appropriate support. This is a Direct Care purpose, Special category of data (health)
4) Lawful basis for processing	Lawful basis under GDPR: Article 6(1)(e) – Official Authority Article 9(2)(h) – Provision of health
How does this comply with the Common Law Duty of Confidentiality? <ul style="list-style-type: none"> • Consent <ul style="list-style-type: none"> ○ Implied (e.g. direct care) ○ Explicit (e.g. 2^o uses) • Control of Patient Information Regulations 2002 (e.g. Reg 5 - “s251”) • “overriding public interest” (to safeguard you or another 	Consent (explicit) This means that we actively seek and record your agreement to the use or disclosure of your information, before any such processing takes place. We are satisfied that anyone we disclose personal information to understands that we are giving it to them in confidence, which they must respect

<p>person)</p> <ul style="list-style-type: none"> • legal obligation (e.g. court order) 	
<p>5) Recipient or categories of recipients of the shared data</p>	<p>The data will be shared with Healthcare professionals from GP surgeries, local hospitals, community services and social services for the duration of the multi-professional meeting.</p> <p>No data is extracted or uploaded from the GP record.</p>
<p>6) Rights to object</p>	<p>You have the right to object to some or all of the information being shared with the recipients. Contact the Data Protection Officer or the practice.</p>
<p>7) Right to access and correct</p>	<p>You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law. If we share or process your data in an emergency when you have not been able to consent, we will notify you at the earliest opportunity.</p>
<p>8) Retention period</p>	<p>The data will be retained in line with the law and national guidance. https://digital.nhs.uk/article/1202/Records-Management-Code-of-Practice-for-Health-and-Social-Care-2016</p>
<p>9) Right to Complain.</p>	<p>You have the right to complain to the Information Commissioner's Office, you can use this link https://ico.org.uk/global/contact-us/</p> <p>or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)</p> <p>There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)</p>

Remote Consultations – Privacy Notice

Explanation

The Local Care Team, consisting of Sturry Surgery, Northgate Medical Practice, Canterbury Health Centre and Old School Surgery are providing centralised appointments for GPs, Paramedics and Musculoskeletal services. These appointments run from a single site but are open to all of the surgeries in the Local Care Team, and the clinician holding the surgery can access the full GP record of the patient regardless of where they are registered.

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.	
1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
3) Purpose of the processing	To enable read/write access to the full GP electronic record to healthcare professionals during remote consultations. This is a Direct Care purpose, Special category of data (health)
4) Lawful basis for processing	Lawful basis under GDPR: Article 6(1)(e) – Official Authority Article 9(2)(h) – Provision of health
How does this comply with the Common Law Duty of Confidentiality? <ul style="list-style-type: none"> • Consent <ul style="list-style-type: none"> ○ Implied (e.g. direct care) ○ Explicit (e.g. 2^o uses) • Control of Patient Information Regulations 2002 (e.g. Reg 5 - “s251”) • “overriding public interest” (to safeguard you or another person) • legal obligation (e.g. court order) 	Consent (explicit) This means that we actively seek and record your agreement to the use or disclosure of your information, before any such processing takes place. We are satisfied that anyone we disclose personal information to understands that we are giving it to them in confidence, which they must respect
5) Recipient or categories of recipients of the shared data	Healthcare professionals due to see, or seeing the data subject in the appointment, can access the full GP electronic

	<p>record in real time.</p> <p>No data is extracted or uploaded from the GP record</p>
6) Rights to object	<p>You have the right to object to some or all of the information being shared with the recipients. Contact the Data Protection Officer or the practice.</p>
7) Right to access and correct	<p>You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law. If we share or process your data in an emergency when you have not been able to consent, we will notify you at the earliest opportunity.</p>
8) Retention period	<p>The data will be retained in line with the law and national guidance. https://digital.nhs.uk/article/1202/Records-Management-Code-of-Practice-for-Health-and-Social-Care-2016</p>
9) Right to Complain.	<p>You have the right to complain to the Information Commissioner's Office, you can use this link https://ico.org.uk/global/contact-us/</p> <p>or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)</p> <p>There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)</p>

Medical Interoperability Gateway (MIG) – Privacy Notice

Explanation

A Medical Interoperability Gateway (MIG) operates in East Kent which enables clinicians to securely share up-to-date patient data regardless of what software systems they use. This is intended to improve patient care by increasing the amount of information available to clinicians involved in your care.

For example, if you were under the care of a hospital consultant at the Kent and Canterbury Hospital the consultant would, with your permission, be able to view detailed information about your medical history from your GP records.

For more information see <https://healthcaregateway.co.uk/>

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.	
1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
3) Purpose of the processing	To enable healthcare professionals in East Kent Hospitals NHS Trust, SECAMB ambulance service and IC24 Out of Hours service to view relevant information from the GP record. No data is extracted or uploaded outside of the GP record, merely viewed in real time This is a Direct Care purpose, Special category of data (health)
4) Lawful basis for processing	Lawful basis under GDPR: Article 6(1)(e) – Official Authority Article 9(2)(h) – Provision of health
How does this comply with the Common Law Duty of Confidentiality? <ul style="list-style-type: none"> • Consent <ul style="list-style-type: none"> ○ Implied (e.g. direct care) ○ Explicit (e.g. 2^o uses) • Control of Patient Information Regulations 2002 (e.g. Reg 5 - “s251”) • “overriding public interest” (to safeguard you or another 	Consent (explicit) (sought and recorded at the time of access) This means that we actively seek and record your agreement to the use or disclosure of your information, before any such processing takes place.

person) • legal obligation (e.g. court order)	
5) Recipient or categories of recipients of the shared data	Healthcare Professionals providing direct medical care to the data subject, with contemporaneous explicit consent. This includes East Kent Hospitals NHS Trust, SECAMB ambulance service and IC24 Out of Hours service.
6) Rights to object	You have the right to object to some or all of the information being shared with the recipients. Contact the Data Protection Officer or the practice.
7) Right to access and correct	You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law. If we share or process your data in an emergency when you have not been able to consent, we will notify you at the earliest opportunity.
8) Retention period	The data will be retained in line with the law and national guidance. https://digital.nhs.uk/article/1202/Records-Management-Code-of-Practice-for-Health-and-Social-Care-2016
9) Right to Complain.	You have the right to complain to the Information Commissioner's Office, you can use this link https://ico.org.uk/global/contact-us/ or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate) There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)

Medicines Management – Privacy Notice

Explanation

The Medicines Management team are part of the Canterbury & Coastal CCG. One element of their role is to monitor the prescribing of medicines by GP surgeries to ensure safe and appropriate prescribing.

For this purpose they will run searches from the GP medical records to identify medications that have been prescribed and in some cases the reason for prescribing them. These searches may be run from within the surgery or remotely. Data is pseudonymised so that individuals cannot be identified from outside the surgery, and accumulated data from across the CCG is reported back to all of the surgeries to advise on prescribing rates and compliance with guidelines.

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.	
1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
3) Purpose of the processing	To enable the Medicines Management team to produce, analyse and feed back data relating to prescribing activity within the surgery. This is a Direct Care purpose, Special category of data (health)
4) Lawful basis for processing	Lawful basis under GDPR: Article 6(1)(e) – Official Authority Article 9(2)(h) – Provision of health
How does this comply with the Common Law Duty of Confidentiality? <ul style="list-style-type: none"> • Consent <ul style="list-style-type: none"> ○ Implied (e.g. direct care) ○ Explicit (e.g. 2^o uses) • Control of Patient Information Regulations 2002 (e.g. Reg 5 - “s251”) • “overriding public interest” (to safeguard you or another person) • legal obligation (e.g. court order) 	Consent (implied) This means that it would be reasonable to infer that you agree to the use of the information as long as: <ul style="list-style-type: none"> • We are accessing the information to provide or support your direct care, or are satisfied that the person we are sharing the information with is accessing or receiving it for this purpose • Information is readily available to you, explaining how your information will be used and that you have the right to object • We have no reason to believe that you have objected • We are satisfied that anyone we disclose personal information to understands that we are giving it to them in confidence, which they must respect

5) Recipient or categories of recipients of the shared data	Medicines Management within the Canterbury & Coastal CCG. Pseudonymised data will be shared with all practices within the CCG.
6) Rights to object	You have the right to object to some or all of the information being shared with the recipients. Contact the Data Protection Officer or the practice.
7) Right to access and correct	You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law. If we share or process your data in an emergency when you have not been able to consent, we will notify you at the earliest opportunity.
8) Retention period	The data will be retained in line with the law and national guidance. https://digital.nhs.uk/article/1202/Records-Management-Code-of-Practice-for-Health-and-Social-Care-2016
9) Right to Complain.	<p>You have the right to complain to the Information Commissioner's Office, you can use this link https://ico.org.uk/global/contact-us/</p> <p>or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)</p> <p>There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)</p>

National Summary Care Record (basic) – Privacy Notice

Explanation

The Summary Care Record is an English NHS development. It consists of a basic medical record held on a central government database on every patient registered with a GP surgery in England. The basic data is automatically extracted from your GP's electronic record system and uploaded to the central system run by NHS Digital. GPs are required by their contract with the NHS to allow this upload. The basic upload consists of current medication, allergies and details of any previous bad reactions to medicines, the name, address, date of birth and NHS number of the patient

As well as this basic record additional and more detailed information can be added, and this is known as an Enriched record. Whereas the basic data is uploaded automatically any additional data will only be uploaded if you specifically request it and with your consent.

Summary Care Records can only be viewed within the NHS on NHS smartcard controlled screens or by organisation, such as pharmacies, contracted to the NHS.

You can find out more about the SCR here <https://digital.nhs.uk/summary-care-records>

You have the right to object to our sharing your data in these circumstances and you can ask your GP to block uploads.

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.	
1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
3) Purpose of the processing	To enable healthcare professionals, authorised with an NHS smartcard, to view relevant information extracted from the GP record, limited to allergies and medication . This is a Direct Care purpose, Special category of data (health)
4) Lawful basis for processing	Lawful basis under GDPR: Article 6(1)(e) – Official Authority Article 9(2)(h) – Provision of health
How does this comply with the Common Law Duty of Confidentiality? <ul style="list-style-type: none"> • Consent <ul style="list-style-type: none"> ○ Implied (e.g. direct care) ○ Explicit (e.g. 2^o uses) • Control of Patient 	Consent (implied) This means that it would be reasonable to infer that you agree to the use of the information as long as: <ul style="list-style-type: none"> • We are accessing the information to provide or support your direct care, or are satisfied that the person we are sharing the information with is accessing or receiving it for this purpose • Information is readily available to you, explaining how your

<p>Information Regulations 2002 (e.g. Reg 5 - “s251”)</p> <ul style="list-style-type: none"> • “overriding public interest” (to safeguard you or another person) • legal obligation (e.g. court order) 	<p>information will be used and that you have the right to object</p> <ul style="list-style-type: none"> • We have no reason to believe that you have objected • We are satisfied that anyone we disclose personal information to understands that we are giving it to them in confidence, which they must respect
<p>5) Recipient or categories of recipients of the shared data</p>	<p>NHS Digital (who becomes the data controller for the uploaded information)</p> <p>Staff in this surgery and at NHS hospitals, diagnostic and treatment centres who contribute to your personal care and with contemporaneous explicit consent. This will include East Kent Hospitals NHS Trust but also any other hospital in England that you may attend.</p> <p>This is a transfer of data from one data controller (Dr Molony & Partners) to another (NHS Digital)</p>
<p>6) Rights to object</p>	<p>You have the right to object to some or all of the information being shared with the recipients. Contact the Data Protection Officer or the practice.</p>
<p>7) Right to access and correct</p>	<p>You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law. If we share or process your data in an emergency when you have not been able to consent, we will notify you at the earliest opportunity.</p>
<p>8) Retention period</p>	<p>The data will be retained in line with the law and national guidance. https://digital.nhs.uk/article/1202/Records-Management-Code-of-Practice-for-Health-and-Social-Care-2016</p>
<p>9) Right to Complain.</p>	<p>You have the right to complain to the Information Commissioner’s Office, you can use this link https://ico.org.uk/global/contact-us/</p> <p>or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)</p> <p>There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)</p>

National Summary Care Record (enriched) – Privacy Notice

Explanation

The Summary Care Record is an English NHS development. It consists of a basic medical record held on a central government database on every patient registered with a GP surgery in England. The basic data is automatically extracted from your GP's electronic record system and uploaded to the central system run by NHS Digital. GPs are required by their contract with the NHS to allow this upload. The basic upload consists of current medication, allergies and details of any previous bad reactions to medicines, the name, address, date of birth and NHS number of the patient

As well as this basic record additional and more detailed information can be added, and this is known as an Enriched record. Whereas the basic data is uploaded automatically any additional data will only be uploaded if you specifically request it and with your consent.

Summary Care Records can only be viewed within the NHS on NHS smartcard controlled screens or by organisation, such as pharmacies, contracted to the NHS.

You can find out more about the SCR here <https://digital.nhs.uk/summary-care-records>

You have the right to object to our sharing your data in these circumstances and you can ask your GP to block uploads.

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.	
1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
3) Purpose of the processing	To enable healthcare professionals, authorised with an NHS smartcard, to view relevant information extracted from the GP record, beyond that of allergies and medication (i.e. over and above the basic SCR). This is a Direct Care purpose, Special category of data (health)
4) Lawful basis for processing	Lawful basis under GDPR: Article 6(1)(e) – Official Authority Article 9(2)(h) – Provision of health
How does this comply with the Common Law Duty of Confidentiality? <ul style="list-style-type: none">• Consent<ul style="list-style-type: none">○ Implied (e.g. direct care)○ Explicit (e.g. 2^o uses)	Consent (explicit) This means that we actively seek and record your agreement to the use or disclosure of your information, before any such processing takes place.

<ul style="list-style-type: none"> • Control of Patient Information Regulations 2002 (e.g. Reg 5 - “s251”) • “overriding public interest” (to safeguard you or another person) • legal obligation (e.g. court order) 	
<p>5) Recipient or categories of recipients of the shared data</p>	<p>NHS Digital (who becomes the data controller for the uploaded information) Staff in this surgery and at NHS hospitals, diagnostic and treatment centres who contribute to your personal care and with contemporaneous explicit consent. This will include East Kent Hospitals NHS Trust but also any other hospital in England that you may attend. This is a transfer of data from one data controller (Dr Molony & Partners) to another (NHS Digital)</p>
<p>6) Rights to object</p>	<p>You have the right to object to some or all of the information being shared with the recipients. Contact the Data Protection Officer or the practice.</p>
<p>7) Right to access and correct</p>	<p>You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law. If we share or process your data in an emergency when you have not been able to consent, we will notify you at the earliest opportunity.</p>
<p>8) Retention period</p>	<p>The data will be retained in line with the law and national guidance. https://digital.nhs.uk/article/1202/Records-Management-Code-of-Practice-for-Health-and-Social-Care-2016</p>
<p>9) Right to Complain.</p>	<p>You have the right to complain to the Information Commissioner’s Office, you can use this link https://ico.org.uk/global/contact-us/</p> <p>or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)</p> <p>There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)</p>

Open Exeter – Privacy Notice

Explanation

Open Exeter is an online tool that gives access to patient data held on the National Health Application and Infrastructure Services (NHAIS) systems. This includes cervical screening, breast screening, organ donor, blood donor and home oxygen.

For users in GP practices, Open Exeter also provides access to GP financial information.

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.	
1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
3) Purpose of the processing	To enable healthcare professionals and admin staff working for Dr Molony & Partners to access the Open Exeter database, thereby providing relevant information about patients and finance. This is a Direct Care purpose, Special category of data (health)
4) Lawful basis for processing	Lawful basis under GDPR: Article 6(1)(e) – Official Authority Article 9(2)(h) – Provision of health
How does this comply with the Common Law Duty of Confidentiality? <ul style="list-style-type: none"> • Consent <ul style="list-style-type: none"> ○ Implied (e.g. direct care) ○ Explicit (e.g. 2^o uses) • Control of Patient Information Regulations 2002 (e.g. Reg 5 - “s251”) • “overriding public interest” (to safeguard you or another person) • legal obligation (e.g. court order) 	Consent (implied) This means that it would be reasonable to infer that you agree to the use of the information as long as: <ul style="list-style-type: none"> • We are accessing the information to provide or support your direct care, or are satisfied that the person we are sharing the information with is accessing or receiving it for this purpose • Information is readily available to you, explaining how your information will be used and that you have the right to object • We have no reason to believe that you have objected • We are satisfied that anyone we disclose personal information to understands that we are giving it to them in confidence, which they must respect.
5) Recipient or categories of recipients of the shared data	Healthcare Professionals and administrative staff from Dr Molony & Partners
6) Rights to object	You have the right to object to some or all of the information

	being shared with the recipients. Contact the Data Protection Officer or the practice.
7) Right to access and correct	You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law. If we share or process your data in an emergency when you have not been able to consent, we will notify you at the earliest opportunity.
8) Retention period	The data will be retained in line with the law and national guidance. https://digital.nhs.uk/article/1202/Records-Management-Code-of-Practice-for-Health-and-Social-Care-2016
9) Right to Complain.	<p>You have the right to complain to the Information Commissioner's Office, you can use this link https://ico.org.uk/global/contact-us/</p> <p>or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)</p> <p>There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)</p>

East Kent Hospitals NHS Trust DART-OCM – Privacy Notice

Explanation

DART-OCM is a Pathology electronic orders and results system that is used by East Kent Hospitals NHS Trust. It allows test requests to be ordered directly by the surgery and also allows access to test results that were ordered both by the GP surgery and by the hospital.

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.	
1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
3) Purpose of the processing	To enable healthcare professionals working for Dr Molony & Partners to access East Kent Hospitals’ DART-OCM database, thereby allowing online ordering of blood tests and other investigations and the viewing of test results requested by clinicians working for East Kent Hospitals. This is a Direct Care purpose, Special category of data (health)
4) Lawful basis for processing	Lawful basis under GDPR: Article 6(1)(e) – Official Authority Article 9(2)(h) – Provision of health
How does this comply with the Common Law Duty of Confidentiality? <ul style="list-style-type: none"> • Consent <ul style="list-style-type: none"> ○ Implied (e.g. direct care) ○ Explicit (e.g. 2^o uses) • Control of Patient Information Regulations 2002 (e.g. Reg 5 - “s251”) • “overriding public interest” (to safeguard you or another person) • legal obligation (e.g. court order) 	Consent (implied) This means that it would be reasonable to infer that you agree to the use of the information as long as: <ul style="list-style-type: none"> • We are accessing the information to provide or support your direct care, or are satisfied that the person we are sharing the information with is accessing or receiving it for this purpose • Information is readily available to you, explaining how your information will be used and that you have the right to object • We have no reason to believe that you have objected • We are satisfied that anyone we disclose personal information to understands that we are giving it to them in confidence, which they must respect.
5) Recipient or categories of recipients of the shared data	Healthcare Professionals and administrative staff from Dr Molony & Partners
6) Rights to object	You have the right to object to some or all of the information being shared with the recipients. Contact the Data Protection

	Officer or the practice.
7) Right to access and correct	You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law. If we share or process your data in an emergency when you have not been able to consent, we will notify you at the earliest opportunity.
8) Retention period	The data will be retained in line with the law and national guidance. https://digital.nhs.uk/article/1202/Records-Management-Code-of-Practice-for-Health-and-Social-Care-2016
9) Right to Complain.	<p>You have the right to complain to the Information Commissioner's Office, you can use this link https://ico.org.uk/global/contact-us/</p> <p>or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)</p> <p>There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)</p>

Patient Online Services – Privacy Notice

Explanation

Patient online services enable you to do the following online (or via a smartphone app):

- Book appointments
- Order repeat prescriptions
- Update your contact details (address, phone numbers etc.)
- Access your full electronic GP record securely online

This facility is free, both to the surgery and to patients. To apply for online access ask at reception for a registration form, or download one from our website www.sturrysurgery.co.uk

When you return your registration form you will be asked for some photographic ID (passport or drivers licence) and proof of address such as a utility bill. This is to ensure that access to sensitive confidential information is only given to the correct person.

Once registered, you can logon to your chosen website on a computer, tablet or via a smartphone app to access the online services.

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.	
1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
3) Purpose of the processing	To enable patients to securely access their GP record online and be able to book appointments, request repeat medication and view (read-only) their medical information. Sensitive data (health)
4) Lawful basis for processing	Lawful basis under GDPR: Article 6(1)(e) – Official Authority Article 9(2)(h) – Provision of health
How does this comply with the Common Law Duty of Confidentiality? <ul style="list-style-type: none">• Consent<ul style="list-style-type: none">○ Implied (e.g. direct care)○ Explicit (e.g. 2^o uses)• Control of Patient	Consent (explicit) This means that we actively seek and record your agreement to the use or disclosure of your information, before any such processing takes place.

<p>Information Regulations 2002 (e.g. Reg 5 - “s251”)</p> <ul style="list-style-type: none"> • “overriding public interest” (to safeguard you or another person) • legal obligation (e.g. court order) 	
5) Recipient or categories of recipients of the shared data	The data subject (you)
6) Rights to object	You have the right to object to some or all of the information being shared with the recipients. Contact the Data Protection Officer or the practice.
7) Right to access and correct	You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law. If we share or process your data in an emergency when you have not been able to consent, we will notify you at the earliest opportunity.
8) Retention period	N/A
9) Right to Complain.	<p>You have the right to complain to the Information Commissioner’s Office, you can use this link https://ico.org.uk/global/contact-us/</p> <p>or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)</p> <p>There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)</p>

Care Quality Commission – Privacy Notice

Explanation

The Care Quality Commission (CQC) is the independent regulator of health care and adult social care services in England. CQC also protects the interests of people whose rights are restricted under the Mental Health Act.

Under the Health and Social Care Act 2008, the CQC has the power to request access to a patient’s medical records for the purposes of an investigation into, or assessment of, an organisation.

Requests for information should be proportionate and the minimum necessary for the intended use.

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.	
1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
3) Purpose of the processing	To allow the CQC access to a patient’s medical records for the purposes of their assessment or investigation. Sensitive data (health)
4) Lawful basis for processing	Lawful basis under GDPR: Article 6(1)(c) – Legal Obligation Article 9(2)(h) – Provision of Health
How does this comply with the Common Law Duty of Confidentiality? <ul style="list-style-type: none"> • Consent <ul style="list-style-type: none"> ○ Implied (e.g. direct care) ○ Explicit (e.g. 2^o uses) • Control of Patient Information Regulations 2002 (e.g. Reg 5 - “s251”) • “overriding public interest” (to safeguard you or another person) • legal obligation (e.g. court order) 	Legal obligation This means that we are compelled by law to share your data in this way

5) Recipient or categories of recipients of the shared data	The CQC
6) Rights to object	N/A
7) Right to access and correct	N/A
8) Retention period	If is data provided to the CQC, then it is retained in line with CQC policies on storing identifiable data (see CQC Code of Practice)
9) Right to Complain.	<p>You have the right to complain to the Information Commissioner's Office, you can use this link https://ico.org.uk/global/contact-us/</p> <p>or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)</p> <p>There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)</p>

The Courts – Privacy Notice

Explanation

The courts, both civil and criminal, have powers to order disclosure of information in various circumstances. We are required to disclose information if ordered to do so by a judge or presiding officer of a court.

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.	
1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
3) Purpose of the processing	To enable healthcare professionals working with Dr Molony & Partners to provide all necessary information about individuals to the courts, when instructed (“court order”). Sensitive data (health)
4) Lawful basis for processing	Lawful basis under GDPR: Article 6(1)(c)– Legal Obligation Article 9(2)(h) – Management of Health
How does this comply with the Common Law Duty of Confidentiality? <ul style="list-style-type: none"> • Consent <ul style="list-style-type: none"> ○ Implied (e.g. direct care) ○ Explicit (e.g. 2^o uses) • Control of Patient Information Regulations 2002 (e.g. Reg 5 - “s251”) • “overriding public interest” (to safeguard you or another person) • legal obligation (e.g. court order) 	Legal obligation This means that we are compelled by law to share your data in this way
5) Recipient or categories of recipients of the shared data	The Courts
6) Rights to object	N/A
7) Right to access and correct	N/A
8) Retention period	Data retained in line with judiciary policies on storing identifiable data

<p>9) Right to Complain.</p>	<p>You have the right to complain to the Information Commissioner's Office, you can use this link https://ico.org.uk/global/contact-us/</p> <p>or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)</p> <p>There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)</p>
-------------------------------------	---

Driver & Vehicle Licensing Agency (DVLA)– Privacy Notice

Explanation

Applicants and licence holders have a legal duty to notify the DVLA of any injury or illness that would have a likely impact on safe driving ability.

GPs are obliged to notify the DVLA when fitness to drive requires notification but an individual cannot or will not notify the DVLA themselves, and if there is concern for road safety, which would be for both the individual and the wider public.

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.	
1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
3) Purpose of the processing	To advise DVLA of circumstances when fitness to drive requires notification. Data disclosed is personal data. Under some circumstances, this might also include special category data
4) Lawful basis for processing	Lawful basis under GDPR: Lawful bases: Article 6(1)(d) – Vital Interests Article 9(2)(h) – Official Authority
How does this comply with the Common Law Duty of Confidentiality? <ul style="list-style-type: none"> • Consent <ul style="list-style-type: none"> ○ Implied (e.g. direct care) ○ Explicit (e.g. 2^o uses) • Control of Patient Information Regulations 2002 (e.g. Reg 5 - “s251”) • “overriding public interest” (to safeguard you or another person) • legal obligation (e.g. court order) 	Overriding public interest Where we can disclose your data, without your consent, to save your life or that of others
5) Recipient or categories of recipients of the shared data	The DVLA

6) Rights to object	N/A
7) Right to access and correct	N/A
8) Retention period	<p>Data retained in line with DVLA policies on storing identifiable data</p> <p>https://www.gov.uk/government/organisations/driver-and-vehicle-licensing-agency/about/personal-information-charter</p>
9) Right to Complain.	<p>You have the right to complain to the Information Commissioner's Office, you can use this link</p> <p>https://ico.org.uk/global/contact-us/</p> <p>or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)</p> <p>There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)</p>

The General Medical Council (GMC)– Privacy Notice

Explanation

There may be occasions where a doctor’s fitness to practice needs to be investigated by the GMC to ensure they are practicing safely.

Under the Medical Act 1983, the GMC has the power to request access to a patient’s medical records for the purposes of an investigation into a doctor’s fitness to practise. Further information can be found at:

<https://www.gmc-uk.org/about/what-we-do-and-why/our-mandate>

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.	
1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
3) Purpose of the processing	To enable The GMC access to a patient’s medical records for the purposes of an investigation into a doctor’s fitness to practise. Sensitive data (health)
4) Lawful basis for processing	Lawful basis under GDPR: Article 6(1)(c) – Legal Obligation Article 9(2)(h) – Provision of Health
How does this comply with the Common Law Duty of Confidentiality? <ul style="list-style-type: none"> • Consent <ul style="list-style-type: none"> ○ Implied (e.g. direct care) ○ Explicit (e.g. 2^o uses) • Control of Patient Information Regulations 2002 (e.g. Reg 5 - “s251”) • “overriding public interest” (to safeguard you or another person) • legal obligation (e.g. court order) 	Legal obligation This means that we are compelled by law to share your data in this way
5) Recipient or categories of recipients of the shared data	The GMC

6) Rights to object	N/A
7) Right to access and correct	N/A
8) Retention period	<p>Data retained in line with GMC policies on storing identifiable data</p> <p>https://www.gmc-uk.org/privacy_policy.asp</p>
9) Right to Complain.	<p>You have the right to complain to the Information Commissioner's Office, you can use this link</p> <p>https://ico.org.uk/global/contact-us/</p> <p>or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)</p> <p>There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)</p>

The Health Service Ombudsman– Privacy Notice

Explanation

The Health Service Ombudsman was set up by Parliament to provide an independent complaint handling service for complaints that have not been resolved by the NHS in England and UK government departments.

They share findings to help Parliament scrutinise public service providers and also more widely to help drive improvements in public services and complaint handling.

The Health Service Ombudsman has the power to request access to a patient’s medical records for the purposes of an investigation.

Further information about the legislation can be found at:

<http://www.legislation.gov.uk/ukpga/1993/46/section/12>

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.	
1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
3) Purpose of the processing	To enable the HSO to receive information concerning a patient for the purposes of an investigation. Sensitive data (health)
4) Lawful basis for processing	Lawful basis under GDPR: Article 6(1)(c) – Legal Obligation Article 9(2)(h) – Provision of health
How does this comply with the Common Law Duty of Confidentiality? <ul style="list-style-type: none"> • Consent <ul style="list-style-type: none"> ○ Implied (e.g. direct care) ○ Explicit (e.g. 2^o uses) • Control of Patient Information Regulations 2002 (e.g. Reg 5 - “s251”) • “overriding public interest” (to safeguard you or another person) • legal obligation (e.g. court 	Legal obligation This means that we are compelled by law to share your data in this way

order)	
5) Recipient or categories of recipients of the shared data	The Health Service Ombudsman
6) Rights to object	N/A
7) Right to access and correct	N/A
8) Retention period	Data retained in line with HSO policies on storing identifiable data
9) Right to Complain.	<p>You have the right to complain to the Information Commissioner's Office, you can use this link https://ico.org.uk/global/contact-us/</p> <p>or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)</p> <p>There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)</p>

HM Revenue & Customs (HMRC)– Privacy Notice

Explanation

HMRC has the power to request access to a patient’s medical records for the purposes of an investigation into an individual’s tax affairs.

Further information on legislation can be found at:

http://www.hmrc.gov.uk/gds/ch/attachments/sch_36_v2.htm

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.	
1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
3) Purpose of the processing	To provide HMRC with information from the GP record, or documents, for the purpose of checking the tax position of another person whose identity is known to the investigating officer (“the taxpayer”). Sensitive data (health)
4) Lawful basis for processing	Lawful basis under GDPR: Article 6(1)(c) – Legal Obligation Article 9(2)(b) – Employment & Social Security
How does this comply with the Common Law Duty of Confidentiality? <ul style="list-style-type: none"> • Consent <ul style="list-style-type: none"> ○ Implied (e.g. direct care) ○ Explicit (e.g. 2^o uses) • Control of Patient Information Regulations 2002 (e.g. Reg 5 - “s251”) • “overriding public interest” (to safeguard you or another person) • legal obligation (e.g. court order) 	Legal obligation This means that we are compelled by law to share your data in this way
5) Recipient or categories of recipients of the shared data	HMRC
6) Rights to object	N/A

7) Right to access and correct	N/A
8) Retention period	Data retained in line with HMRC policies on storing identifiable data https://www.gov.uk/government/publications/data-protection-act-dpa-information-hm-revenue-and-customs-hold-about-you/data-protection-act-dpa-information-hm-revenue-and-customs-hold-about-you
9) Right to Complain.	You have the right to complain to the Information Commissioner's Office, you can use this link https://ico.org.uk/global/contact-us/ or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate) There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)

NHS Counter Fraud– Privacy Notice

Explanation

NHS Counter Fraud is responsible for combating fraud in the NHS in England. This includes, for example, people illegally accessing services that they are not entitled to e.g. hospital services and prescriptions.

The investigators have the power to require the disclosure of the relevant parts of a patient’s record, should they believe that this is important to the investigation.

Further information on legislation can be found at:

<https://www.legislation.gov.uk/ukpga/2006/41/part/10>

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.	
1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
3) Purpose of the processing	Under the NHS Act 2006, investigations into fraud in the NHS may require access to confidential patient information. Sensitive data (health)
4) Lawful basis for processing	Lawful basis under GDPR: Article 6(1)(c) – Legal Obligation Article 9(2)(h) – Provision of Health
How does this comply with the Common Law Duty of Confidentiality? <ul style="list-style-type: none"> • Consent <ul style="list-style-type: none"> ○ Implied (e.g. direct care) ○ Explicit (e.g. 2^o uses) • Control of Patient Information Regulations 2002 (e.g. Reg 5 - “s251”) • “overriding public interest” (to safeguard you or another person) • legal obligation (e.g. court order) 	Legal obligation This means that we are compelled by law to share your data in this way

5) Recipient or categories of recipients of the shared data	NHS Counter Fraud authorities
6) Rights to object	N/A
7) Right to access and correct	N/A
8) Retention period	Data retained in line with NHS Counter Fraud policies on storing identifiable data https://cfa.nhs.uk/privacy
9) Right to Complain.	You have the right to complain to the Information Commissioner's Office, you can use this link https://ico.org.uk/global/contact-us/ or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate) There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)

NHS Digital – The National Diabetes Audit– Privacy Notice

Explanation

The NDA collects information about diabetes care from GP practices and hospitals to help the NHS to improve care. The use of NDA information is controlled by law and strict rules of confidentiality.

The NDA is managed by NHS Digital (formerly known as the Health and Social Care Information Centre (HSCIC)), working with Diabetes UK and Public Health England.

The NDA collects information on: How many people with diabetes are registered at the GP practice or clinic, whether people with diabetes are receiving the annual healthcare checks, whether people with diabetes achieve the national targets for glucose control, blood pressure and cholesterol, whether people with diabetes with a learning disability receive the same level of care, whether people with diabetes who have a severe and enduring mental health problem receive the same level of care, how many people use an insulin pump, why they use a pump and how well it is working.

Your NHS number, date of birth and postcode are also collected. Your name and address are not collected.

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.	
1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
3) Purpose of the processing	This is a national monitoring system, auditing the care of patients with diabetes. Data extracted includes NHS number, date of birth and postcode, as well as clinical parameters related to diabetes The National Diabetes Audit (NDA) is a mandatory data extraction under s254 of the HSCA 2012.
4) Lawful basis for processing	Lawful basis under GDPR: Article 6(1)(c) – Legal Obligation Article 9(2)(h) – Provision of Health
How does this comply with the Common Law Duty of Confidentiality? <ul style="list-style-type: none"> • Consent <ul style="list-style-type: none"> ○ Implied (e.g. direct care) ○ Explicit (e.g. 2^o uses) 	Legal obligation This means that we are compelled by law to share your data in this way

<ul style="list-style-type: none"> • Control of Patient Information Regulations 2002 (e.g. Reg 5 - “s251”) • “overriding public interest” (to safeguard you or another person) • legal obligation (e.g. court order) 	
5) Recipient or categories of recipients of the shared data	NHS Digital
6) Rights to object	Whilst there is no right to object under 6(1)(c), NHS Digital respects Type 1 objections (9Nu0) present in the GP record and no data will be extracted and uploaded if so.
7) Right to access and correct	N/A
8) Retention period	Data retained in line with NHS Digital policies on storing identifiable data https://digital.nhs.uk/keeping-patient-data-safe/how-we-look-after-your-health-and-care-information
9) Right to Complain.	You have the right to complain to the Information Commissioner’s Office, you can use this link https://ico.org.uk/global/contact-us/ or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate) There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)

NHS Digital Individual GP Level Data- – Privacy Notice

Explanation

NHS Digital provide General Practitioners (GPs) and general practices with information on the care provision for their patients. To support this NHS Digital collect clinical data at individual GP level and report these data back to GPs and general practices only. GPs and general practices will receive non-identifiable data for their own patients; they will not receive any identifiable data or data for patients from other general practices.

The data extracted includes the NHS number which is the only person identifiable data collected.

The NHS Digital Privacy Notice can be found at:

<http://content.digital.nhs.uk/article/7754/Privacy-Notice---individual-GP-level-data>

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.	
1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
3) Purpose of the processing	A national monitoring system to enable NHS Digital to provide GPs with clinical information on the care provision for their patients This is a mandatory data extraction under s254 of the HSCA 2012 The only person identifiable data extracted is the NHS number.
4) Lawful basis for processing	Lawful basis under GDPR: Article 6(1)(c)– Legal Obligation
How does this comply with the Common Law Duty of Confidentiality? <ul style="list-style-type: none"> • Consent <ul style="list-style-type: none"> ○ Implied (e.g. direct care) ○ Explicit (e.g. 2^o uses) • Control of Patient Information Regulations 2002 (e.g. Reg 5 - “s251”) • “overriding public interest” (to safeguard you or another person) • legal obligation (e.g. court 	Legal obligation This means that we are compelled by law to share your data in this way

order)	
5) Recipient or categories of recipients of the shared data	NHS Digital
6) Rights to object	Whilst there is no right to object under 6(1)(c), NHS Digital respects Type 1 objections (9Nu0) present in the GP record and no data will be extracted and uploaded if so.
7) Right to access and correct	N/A
8) Retention period	Data retained in line with NHS Digital policies on storing identifiable data https://digital.nhs.uk/keeping-patient-data-safe/how-we-look-after-your-health-and-care-information
9) Right to Complain.	You have the right to complain to the Information Commissioner's Office, you can use this link https://ico.org.uk/global/contact-us/ or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate) There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)

NHS Digital – Female Genital Mutilation– Privacy Notice

Explanation

Female Genital Mutilation (FGM) is an illegal and extremely harmful practice. It is a form of child abuse and violence against women and girls and the government is working to stop this practice.

When you discuss FGM with a health professional, the information you provide will be used in two ways:

- Firstly, to provide you with care and support, and;
- To support work to stop FGM and help prevent it happening to other women and girls. Your identity is removed when your information is used for this purpose.

Personal information such as name, date of birth, NHS number and country of origin is collected. Information specific to FGM is also collected including the type of FGM, age when FGM occurred, the country where the FGM took place and any family history of FGM.

All personal confidential data is removed from the final report before it is published or used.

GPs and other healthcare providers are legally required to provide this information.

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.	
1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
3) Purpose of the processing	NHS Digital collects data on Female Genital Mutilation (FGM) within the NHS in England on behalf of the Department of Health (DH). The data collected is used to produce information that helps to: <ul style="list-style-type: none"> • improve how the NHS supports women and girls who have had or who are at risk of FGM • plan the local NHS services needed both now and in the future • help other organisations e.g. local authorities to develop plans to stop FGM happening in local communities
4) Lawful basis for processing	Lawful basis under GDPR: Article 6(1)(c) – Legal Obligation Article 9(2)(h) – Provision of Health
How does this comply with the Common Law Duty of	Legal obligation This means that we are compelled by law to share your data

<p>Confidentiality?</p> <ul style="list-style-type: none"> • Consent <ul style="list-style-type: none"> ○ Implied (e.g. direct care) ○ Explicit (e.g. 2^o uses) • Control of Patient Information Regulations 2002 (e.g. Reg 5 - “s251”) • “overriding public interest” (to safeguard you or another person) • legal obligation (e.g. court order) 	<p>in this way</p>
<p>5) Recipient or categories of recipients of the shared data</p>	<p>NHS Digital</p>
<p>6) Rights to object</p>	<p>Whilst there is no right to object under 6(1)(c), NHS Digital respects Type 1 objections (9Nu0) present in the GP record and no data will be extracted and uploaded if so.</p>
<p>7) Right to access and correct</p>	<p>N/A</p>
<p>8) Retention period</p>	<p>Data retained in line with NHS Digital policies on storing identifiable data https://digital.nhs.uk/keeping-patient-data-safe/how-we-look-after-your-health-and-care-information</p>
<p>9) Right to Complain.</p>	<p>You have the right to complain to the Information Commissioner’s Office, you can use this link https://ico.org.uk/global/contact-us/</p> <p>or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)</p> <p>There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)</p>

Statutory Disclosure to the Police – Privacy Notice

Explanation

There are situations in which it is legal to release information to the police without your consent. These include the detection or prevention of serious crime and situations in which it could save your life or the lives of others.

As with any disclosures to the police, there must be:

- a legal duty to disclose, or
- a sufficiently important reason to disclose AND a legal basis for doing so

Areas of legislation that require health professionals to disclose information include:

Prevention of Terrorism Act (1989) and Terrorism Act (2000)

An obligation to inform the Police if you have information (including personal information) that may assist them in preventing an act of terrorism, or help in apprehending or prosecuting a terrorist.

The Road Traffic Act (1988)

A statutory duty to inform the Police, when asked, of any information that might identify any driver who is alleged to have committed an offence under the Act. We are not required to disclose clinical or other confidential information.

The Female Genital Mutilation Act (2003)

A statutory duty to report to the police under Section 5B of this Act where it appears that a girl under the age of 18 has been subject to genital mutilation.

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.	
1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
3) Purpose of the processing	To provide information to law enforcement services for the purposes of crime detection / prevention or in situations of overriding public interest.
4) Lawful basis for processing	Lawful basis under GDPR: Article 6(1)(c) – Legal Obligation Article 9(2)(g) – Public Interest
How does this comply with the	Legal obligation

<p>Common Law Duty of Confidentiality?</p> <ul style="list-style-type: none"> • Consent <ul style="list-style-type: none"> ○ Implied (e.g. direct care) ○ Explicit (e.g. 2^o uses) • Control of Patient Information Regulations 2002 (e.g. Reg 5 - “s251”) • “overriding public interest” (to safeguard you or another person) • legal obligation (e.g. court order) 	<p>This means that we are compelled by law to share your data in this way</p> <p>and</p> <p>Overriding public interest</p> <p>Where we can share your data, without your consent, to save your life or that of others</p>
<p>5) Recipient or categories of recipients of the shared data</p>	<p>The police (or other judicial authorities)</p>
<p>6) Rights to object</p>	<p>N/A</p>
<p>7) Right to access and correct</p>	<p>N/A</p>
<p>8) Retention period</p>	<p>Data retained in line with police policies https://www.kent.police.uk/getmedia/278b00e7-2a6b-4196-803f-47e8071a3fa9/Data-privacy-notice.pdf</p>
<p>9) Right to Complain.</p>	<p>You have the right to complain to the Information Commissioner’s Office, you can use this link https://ico.org.uk/global/contact-us/</p> <p>or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)</p> <p>There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)</p>

Public Health – Privacy Notice

Explanation

There are circumstances when personal sensitive data is required to be provided by Dr Molony & Partners to Public Health England (PHE) on a mandatory basis .

Examples include notification of certain diseases and the provision of information, in the public interest, in cases such as epidemics, pandemics and other public health emergencies.

Relevant legislation includes:

- [the Health Protection \(Notification\) Regulations 2010 \(SI 2010/659\)](#)
- [the Health Protection \(Local Authority Powers\) Regulations 2010 \(SI 2010/657\)](#)
- [the Health Protection \(Part 2A Orders\) Regulations 2010 \(SI 2010/658\)](#)
- [Public Health \(Control of Disease\) Act 1984](#)
- [Public Health \(Infectious Diseases\) Regulations 1988](#)
- [The Health Service \(Control of Patient Information\) Regulations 2002](#)

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.	
1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
3) Purpose of the processing	To enable healthcare professionals working at Dr Molony & Partners to provide all necessary information about individuals to Public Health England, when medically required in the public interest. Sensitive data (health)
4) Lawful basis for processing	Lawful basis under GDPR: Article 6(1)(c)– Legal Obligation Article 9(2)(i) – Public interest – Public health
How does this comply with the Common Law Duty of Confidentiality? <ul style="list-style-type: none"> • Consent <ul style="list-style-type: none"> ○ Implied (e.g. direct care) ○ Explicit (e.g. 2^o uses) • Control of Patient Information Regulations 2002 (e.g. Reg 5 - “s251”) 	Legal obligation This means that we are compelled by law to share your data in this way or Regulation 3 of Control of Patient Information 2002

<ul style="list-style-type: none"> • “overriding public interest” (to safeguard you or another person) • legal obligation (e.g. court order) 	<p>Where an application of law exists that allows sharing of your data without your consent</p>
<p>5) Recipient or categories of recipients of the shared data</p>	<p>Public Health England</p>
<p>6) Rights to object</p>	<p>N/A</p>
<p>7) Right to access and correct</p>	<p>N/A</p>
<p>8) Retention period</p>	<p>Data retained in line with PHE policies on storing identifiable data https://www.gov.uk/government/organisations/public-health-england/about/personal-information-charter</p>
<p>9) Right to Complain.</p>	<p>You have the right to complain to the Information Commissioner’s Office, you can use this link https://ico.org.uk/global/contact-us/</p> <p>or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)</p> <p>There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)</p>

S29 Child Protection Disclosures to Local Authority – Privacy Notice

Explanation

There is a legal obligation to provide information from GP records when there is any reasonable concern that children or young people are at risk of abuse or neglect, when that is in a child's best interests or necessary to protect other children or young people.

This relates to any member of staff within Dr Molony & Partners who may need to disclose information to the Local Authority following a safeguarding concern.

Relevant legislation:

s29 of the Data Protection Act (prevention of crime)

<https://www.legislation.gov.uk/ukpga/1998/29/section/29>

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.	
1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
3) Purpose of the processing	The provision of information from GP records when there is any reasonable concern that children or young people are at risk of abuse or neglect, when that is in a child's best interests or necessary to protect other children or young people. The information provided will be both personal and sensitive data
4) Lawful basis for processing	Lawful basis under GDPR: Article 6(1)(c) – Legal Obligation Article 9(2)(b) - Social Protection Law
How does this comply with the Common Law Duty of Confidentiality? <ul style="list-style-type: none"> • Consent <ul style="list-style-type: none"> ○ Implied (e.g. direct care) ○ Explicit (e.g. 2^o uses) • Control of Patient Information Regulations 2002 (e.g. Reg 5 - "s251") • "overriding public interest" (to safeguard you or another 	Legal obligation This means that we are compelled by law to share your data in this way and Overriding public interest Where we can your data, without your consent, to save your life or that of others

<p>person)</p> <ul style="list-style-type: none"> • legal obligation (e.g. court order) 	
<p>5) Recipient or categories of recipients of the shared data</p>	<p>Children’s Services– Kent County Council Health Visitors - Kent Community Health NHS Trust</p>
<p>6) Rights to object</p>	<p>N/A</p>
<p>7) Right to access and correct</p>	<p>You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law. If we share or process your data in an emergency when you have not been able to consent, we will notify you at the earliest opportunity.</p>
<p>8) Retention period</p>	<p>Data retained in line with local authority policies on storing identifiable data https://www.kent.gov.uk/about-the-council/about-the-website/privacy-statement#</p>
<p>9) Right to Complain.</p>	<p>You have the right to complain to the Information Commissioner’s Office, you can use this link https://ico.org.uk/global/contact-us/</p> <p>or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)</p> <p>There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)</p>

S47 Disclosures to Children’s Services– Privacy Notice

Explanation

Under Section 47 of the Children Act 1989 it is mandatory for GP’s to provide information from GP records concerning children and families where a child is taken into Police Protection, is the subject of an Emergency Protection Order or there are reasonable grounds to suspect that a child is suffering or is likely to suffer Significant Harm

Relevant Legislation:

s47 of The Children Act 1989 : <https://www.legislation.gov.uk/ukpga/1989/41/section/47>

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.	
1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
3) Purpose of the processing	The provision of information from GP records concerning children and families where a child is taken into Police Protection, is the subject of an Emergency Protection Order or there are reasonable grounds to suspect that a child is suffering or is likely to suffer Significant Harm This is a mandatory provision of information under Section 47 of the Children Act 1989 The information provided will be both personal and sensitive data
4) Lawful basis for processing	Lawful basis under GDPR: Article 6(1)(c) – Legal Obligation Article 9(2)(b) - Social Protection Law
How does this comply with the Common Law Duty of Confidentiality? <ul style="list-style-type: none"> • Consent <ul style="list-style-type: none"> ○ Implied (e.g. direct care) ○ Explicit (e.g. 2^o uses) • Control of Patient Information Regulations 2002 (e.g. Reg 5 - “s251”) • “overriding public interest” (to safeguard you or another person) 	Legal obligation This means that we are compelled by law to share your data in this way

<ul style="list-style-type: none"> • legal obligation (e.g. court order) 	
5) Recipient or categories of recipients of the shared data	Children’s Services – Kent County Council
6) Rights to object	N/A
7) Right to access and correct	N/A
8) Retention period	Data retained in line with local authority policies on storing identifiable data https://www.kent.gov.uk/about-the-council/about-the-website/privacy-statement#
9) Right to Complain.	You have the right to complain to the Information Commissioner’s Office, you can use this link https://ico.org.uk/global/contact-us/ or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate) There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)

Disclosures to the Safeguarding Adults Board– Privacy Notice

Explanation

In situations where adults are considered to be at risk of harm (abuse or neglect) there is a mandatory requirement for GP's to provide information to the Safeguarding Adults Board.

Relevant legislation:

s45 of the Care Act 2014

<http://www.legislation.gov.uk/ukpga/2014/23/section/45/enacted>

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.	
1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
3) Purpose of the processing	The provision of information from GP records about adults who may be at risk of harm (abuse or neglect) This is a mandatory provision of information under Section 45 of the Care Act 2014 The information provided will be both personal and sensitive data
4) Lawful basis for processing	Lawful basis under GDPR: Article 6(1)(c) – Legal Obligation Article 9(2)(b) - Social Protection Law
How does this comply with the Common Law Duty of Confidentiality? <ul style="list-style-type: none"> • Consent <ul style="list-style-type: none"> ○ Implied (e.g. direct care) ○ Explicit (e.g. 2^o uses) • Control of Patient Information Regulations 2002 (e.g. Reg 5 - “s251”) • “overriding public interest” (to safeguard you or another person) • legal obligation (e.g. court order) 	Legal obligation This means that we are compelled by law to share your data in this way and Overriding public interest Where we can share your data, without your consent, to save your life or that of others
5) Recipient or categories of	Safeguarding Adults Board – Kent County Council

recipients of the shared data	
6) Rights to object	N/A
7) Right to access and correct	N/A
8) Retention period	Data retained in line with local authority policies on storing identifiable data https://www.kent.gov.uk/about-the-council/about-the-website/privacy-statement#
9) Right to Complain.	You have the right to complain to the Information Commissioner's Office, you can use this link https://ico.org.uk/global/contact-us/ or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate) There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)

Non-Mandatory Disclosures to the Police– Privacy Notice

Explanation

There are situations where the police may request information in relation to a crime but the nature of the crime is not classed as serious and it is unclear whether there is an overriding public interest. In most cases the police will obtain consent from the individual themselves before requesting information, but where this has not happened Dr Molony & Partners will always assess the need before releasing any information.

As with any disclosures to the police, there must be:

- a legal duty to disclose, or
- a sufficiently important reason to disclose AND a legal basis for doing so

Permissive disclosures to the police can be made under:

- s29(3) of the Data Protection Act
<https://ico.org.uk/media/for-organisations/documents/1594/section-29.pdf>
- Police and Criminal Evidence Act 1984
- Crime and Disorder Act 1988

Section 29 does not provide a duty to disclose information, nor does it override the requirements of the common law duty of confidentiality which must be met prior to disclosure being lawful – it does no more than relax the DPA requirements that need to be met.

We will need to have your consent, or determine that in the absence of your consent, the disclosure would nonetheless be in the public interest “if the benefits to an individual or to society outweigh both the public and the patient's interest in keeping the information confidential”.

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.	
1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
3) Purpose of the processing	For the detection and prevention of crime Data disclosed is personal data. Under some circumstances, this might also include special category data
4) Lawful basis for processing	Lawful basis under GDPR: Article 6(1)(e) – Official Authority

	Article 9(2)(g) – Public Interest
<p>How does this comply with the Common Law Duty of Confidentiality?</p> <ul style="list-style-type: none"> • Consent <ul style="list-style-type: none"> ○ Implied (e.g. direct care) ○ Explicit (e.g. 2^o uses) • Control of Patient Information Regulations 2002 (e.g. Reg 5 - “s251”) • “overriding public interest” (to safeguard you or another person) • legal obligation (e.g. court order) 	<p>Consent (explicit)</p> <p>This means that we actively seek and record your agreement to the use or disclosure of your information, before any such processing takes place.</p> <p>Or</p> <p>Overriding public interest</p> <p>Where we can share your data, without your consent, to save your life or that of others</p>
5) Recipient or categories of recipients of the shared data	The police (or other judicial authorities)
6) Rights to object	You have the right to object to some or all of the information being shared with the recipients. Contact the Data Protection Officer or the practice.
7) Right to access and correct	You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law.
8) Retention period	Data retained in line with police policies https://www.kent.police.uk/getmedia/278b00e7-2a6b-4196-803f-47e8071a3fa9/Data-privacy-notice.pdf
9) Right to Complain.	You have the right to complain to the Information Commissioner’s Office, you can use this link https://ico.org.uk/global/contact-us/ or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate) There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)

S17 Disclosures to Children’s Services– Privacy Notice

Explanation

Section 17 of the Children’s Act relates to the care of children who are considered to be “in need”.

Under this section of the Children’s Act a child is taken to be in need if—

- (a) They are unlikely to achieve or maintain, or to have the opportunity of achieving or maintaining, a reasonable standard of health or development without the provision of services by a local authority;
- (b) Their health or development is likely to be significantly impaired, or further impaired, without the provision for him of such services; or
- (c) They are disabled

Explicit consent from parents is required before disclosure of information under s17 can be made to social services.

Relevant legislation:

s17 Children’s Act 1989: <https://www.legislation.gov.uk/ukpga/1989/41/section/17>

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.	
1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
3) Purpose of the processing	The provision of information from GP records concerning children and families in order to safeguard and promote the welfare of those who are “in need” The information provided will be both personal and sensitive data
4) Lawful basis for processing	Lawful basis under GDPR: Article 6(1)(e) – Official Authority Article 9(2)(b) - Social Protection Law
How does this comply with the Common Law Duty of Confidentiality? • Consent <ul style="list-style-type: none"> ○ Implied (e.g. direct care) ○ Explicit (e.g. 2^o uses) 	Consent (explicit) (Obtained by local authority) This means that we actively seek and record your agreement to the use or disclosure of your information, before any such processing takes place.

<ul style="list-style-type: none"> • Control of Patient Information Regulations 2002 (e.g. Reg 5 - “s251”) • “overriding public interest” (to safeguard you or another person) • legal obligation (e.g. court order) 	
5) Recipient or categories of recipients of the shared data	Children’s Services, Kent County Council
6) Rights to object	You have the right to object to some or all of the information being shared with the recipients. Contact the Data Protection Officer or the practice.
7) Right to access and correct	You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law.
8) Retention period	Data retained in line with local authority policies on storing identifiable data https://www.kent.gov.uk/about-the-council/about-the-website/privacy-statement#
9) Right to Complain.	You have the right to complain to the Information Commissioner’s Office, you can use this link https://ico.org.uk/global/contact-us/ or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate) There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)

Other Third Parties– Privacy Notice
(Solicitors, Employers, Insurance companies etc)

Explanation

There are occasions where other organisations require information about you in order to provide their service, such as solicitors (e.g. personal injury claims), insurance companies (e.g. life assurance), employers, etc.

In these situations your explicit consent must be obtained and demonstrable before the release of any such information.

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.	
1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
3) Purpose of the processing	To enable healthcare professionals working for Dr Molony & Partners to safely and legally provide patient identifiable information to other third parties
4) Lawful basis for processing	Lawful basis under GDPR: Article 6(1)(a) – Consent Article 9(2)(a) – Explicit Consent
How does this comply with the Common Law Duty of Confidentiality? <ul style="list-style-type: none"> • Consent <ul style="list-style-type: none"> ○ Implied (e.g. direct care) ○ Explicit (e.g. 2^o uses) • Control of Patient Information Regulations 2002 (e.g. Reg 5 - “s251”) • “overriding public interest” (to safeguard you or another person) • legal obligation (e.g. court order) 	Consent (explicit) This means that we actively seek and record your agreement to the use or disclosure of your information, before any such processing takes place.
5) Recipient or categories of recipients of the shared data	The requesting organisation

6) Rights to object	You have the right to withdraw consent at any time.
7) Right to access and correct	You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law.
8) Retention period	Data retained in line with the third party organisation's policies on storing identifiable data
9) Right to Complain.	<p>You have the right to complain to the Information Commissioner's Office, you can use this link https://ico.org.uk/global/contact-us/</p> <p>or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)</p> <p>There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)</p>

Emis Health Ltd – Privacy Notice

Explanation

This privacy notice covers the collection and recording of information within the patient GP electronic record. The software used by this practice is called Emis Web and is provided by Emis Health Ltd.

The majority of information recorded arises from consultations (face to face, telephone, email, etc.) with the patient. It includes data added to the record manually (typed), added electronically (e.g. results), as well as letters and other documents that are scanned, or photographs that are taken, and subsequently added to the record.

Dr Molony & Partners records such information in line with Article 5 of the GDPR, ensuring that it is:

- “adequate, relevant and limited to what is necessary”
- “accurate and, where necessary, kept up to date”
- “processed in a manner that ensures appropriate security of the personal data”

Information is stored within our EMIS Web database, as hosted by EMIS Health Ltd (who are acting as the data processor). The database servers are located in Leeds.

The “right to erasure” does not apply to the keeping of electronic GP records in this way as:

- processing is necessary in the exercise of official authority, Article 6(1)(e)
- processing is necessary for the provision of health or social care, Article 9(2)(h)

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.	
1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
3) Purpose of the processing	To record all relevant information about our patients (the data subjects) within their GP electronic record This is a Direct Care purpose Special category of data (health)
4) Lawful basis for processing	Lawful basis under GDPR: Article 6(1)(e) – Official Authority Article 9(2)(h) – Provision of health
How does this comply with the Common Law Duty of	Consent (implied)

<p>Confidentiality?</p> <ul style="list-style-type: none"> • Consent <ul style="list-style-type: none"> ○ Implied (e.g. direct care) ○ Explicit (e.g. 2^o uses) • Control of Patient Information Regulations 2002 (e.g. Reg 5 - “s251”) • “overriding public interest” (to safeguard you or another person) • legal obligation (e.g. court order) 	<p>This means that it would be reasonable to infer that you agree to the use of the information as long as:</p> <ul style="list-style-type: none"> • We are accessing the information to provide or support your direct care, or are satisfied that the person we are sharing the information with is accessing or receiving it for this purpose • Information is readily available to you, explaining how your information will be used and that you have the right to object • We have no reason to believe that you have objected • We are satisfied that anyone we disclose personal information to understands that we are giving it to them in confidence, which they must respect
<p>5) Recipient or categories of recipients of the shared data</p>	<p>All information about patients, both clinical and demographic, are recorded in their GP electronic record. That information is then available to others with a legitimate relationship to the patient (see other relevant privacy notices)</p> <p>EMIS Health Ltd acts as the data processor for this, hosting the patient records database at their secure servers in Leeds.</p>
<p>6) Rights to object</p>	<p>You have the right to object to some or all of the information being shared with the recipients. Contact the Data Protection Officer or the practice.</p>
<p>7) Right to access and correct</p>	<p>You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law.</p>
<p>8) Retention period</p>	<p>Standard NHS data retention policy:</p> <p>“GP records should be retained until 10 years after the patient's death or after the patient has permanently left the country, unless they remain in the European Union.</p> <p>Electronic patient records must not be destroyed or deleted for the foreseeable future.”</p> <p>https://www.nhs.uk/chq/Pages/1889.aspx?CategoryID=68</p>
<p>9) Right to Complain.</p>	<p>You have the right to complain to the Information Commissioner’s Office, you can use this link https://ico.org.uk/global/contact-us/</p> <p>or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)</p> <p>There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)</p>

Paper Records (Lloyd George) – Privacy Notice

Explanation

Most recording of information at Dr Molony & Partners, generated from within the practice, is now electronic. However, information from before 2002 was recorded manually on paper records and stored in containers known as Lloyd George folders. These records are now stored securely within the surgery so that they can be accessed if historic information is needed.

When a patient moves out of the area these paper records are transported by Primary Care Support England to the new surgery, or if the patient does not register at a new surgery they are put into storage by PCSE.

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.	
1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
3) Purpose of the processing	To maintain a complete medical record for each patient with both paper and electronic records This is a Direct Care purpose Special category of data (health)
4) Lawful basis for processing	Lawful basis under GDPR: Article 6(1)(e) – Official Authority Article 9(2)(h) – Provision of health
How does this comply with the Common Law Duty of Confidentiality? <ul style="list-style-type: none"> • Consent <ul style="list-style-type: none"> ○ Implied (e.g. direct care) ○ Explicit (e.g. 2^o uses) • Control of Patient Information Regulations 2002 (e.g. Reg 5 - “s251”) • “overriding public interest” (to safeguard you or another person) • legal obligation (e.g. court order) 	Consent (implied) This means that it would be reasonable to infer that you agree to the use of the information as long as: <ul style="list-style-type: none"> • We are accessing the information to provide or support your direct care, or are satisfied that the person we are sharing the information with is accessing or receiving it for this purpose • Information is readily available to you, explaining how your information will be used and that you have the right to object • We have no reason to believe that you have objected • We are satisfied that anyone we disclose personal information to understands that we are giving it to them in confidence, which they must respect

<p>5) Recipient or categories of recipients of the shared data</p>	<p>All historic information about patients, both clinical and demographic, is recorded in their GP paper record. That information is then available to others with a legitimate relationship to the patient (see other relevant privacy notices)</p>
<p>6) Rights to object</p>	<p>You have the right to object to some or all of the information being shared with the recipients. Contact the Data Protection Officer or the practice.</p>
<p>7) Right to access and correct</p>	<p>You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law.</p>
<p>8) Retention period</p>	<p>Standard NHS data retention policy: “GP records should be retained until 10 years after the patient's death or after the patient has permanently left the country, unless they remain in the European Union.</p> <p>Electronic patient records must not be destroyed or deleted for the foreseeable future.”</p> <p>https://www.nhs.uk/chq/Pages/1889.aspx?CategoryID=68</p>
<p>9) Right to Complain.</p>	<p>You have the right to complain to the Information Commissioner’s Office, you can use this link https://ico.org.uk/global/contact-us/</p> <p>or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)</p> <p>There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)</p>

Docman 10 – Privacy Notice

Explanation

Docman provides Dr Molony & Partners with software and cloud-based storage for electronic documents regarding our patients.

This includes letters that we receive, scan and upload to the patient record, as well as letters that we receive in an electronic format. In particular we receive all of our discharge notifications from the local hospitals electronically directly into Docman

Docman stores the letters in their servers and Dr Molony & Partners workflow and access the correspondence as required.

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.	
1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
3) Purpose of the processing	To enable Dr Molony & Partners to digitise all correspondence, and receive digital information, about patients. This is a Direct Care purpose Special category of data (health)
4) Lawful basis for processing	Lawful basis under GDPR: Article 6(1)(e) – Official Authority Article 9(2)(h) – Provision of health
How does this comply with the Common Law Duty of Confidentiality? <ul style="list-style-type: none"> • Consent <ul style="list-style-type: none"> ○ Implied (e.g. direct care) ○ Explicit (e.g. 2^o uses) • Control of Patient Information Regulations 2002 (e.g. Reg 5 - “s251”) • “overriding public interest” (to safeguard you or another person) • legal obligation (e.g. court order) 	Consent (implied) This means that it would be reasonable to infer that you agree to the use of the information as long as: <ul style="list-style-type: none"> • We are accessing the information to provide or support your direct care, or are satisfied that the person we are sharing the information with is accessing or receiving it for this purpose • Information is readily available to you, explaining how your information will be used and that you have the right to object • We have no reason to believe that you have objected • We are satisfied that anyone we disclose personal information to understands that we are giving it to them in

	confidence, which they must respect
5) Recipient or categories of recipients of the shared data	Docman Ltd Acting as a data processor.
6) Rights to object	You have the right to object to some or all of the information being shared with the recipients. Contact the Data Protection Officer or the practice.
7) Right to access and correct	You have the right to access your data and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law.
8) Retention period	Standard NHS data retention policy: “GP records should be retained until 10 years after the patient's death or after the patient has permanently left the country, unless they remain in the European Union. Electronic patient records must not be destroyed or deleted for the foreseeable future.” https://www.nhs.uk/chq/Pages/1889.aspx?CategoryID=68
9) Right to Complain.	You have the right to complain to the Information Commissioner’s Office, you can use this link https://ico.org.uk/global/contact-us/ or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate) There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)

NHS Health Checks – Privacy Notice

Explanation

The NHS Health Check is a health check-up for adults in England aged 40-74. It is designed to spot early signs of vascular disease, kidney disease, heart disease, type 2 diabetes or dementia. The serviced is delivered by Dr Molony & Partners but is provided by Kent County Council using software called Health Options from Health Diagnostics Ltd.

When a health check is performed the information is entered into the Health Options software by a nurse, and this information is written back into the GP record by the software on completion.

Dr Molony & Partners inform KCC of the patients who are eligible for a health check, and KCC then send out the invitations on our behalf.

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.	
1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
3) Purpose of the processing	To enable Kent County Council to invite patients (on our behalf) to undergo an NHS Health Check at the surgery. This is a Direct Care purpose. Personal data only (name, address, month of birth).
4) Lawful basis for processing	Lawful basis under GDPR: Article 6(1)(e) – Official Authority
How does this comply with the Common Law Duty of Confidentiality? <ul style="list-style-type: none"> • Consent <ul style="list-style-type: none"> ○ Implied (e.g. direct care) ○ Explicit (e.g. 2^o uses) • Control of Patient Information Regulations 2002 (e.g. Reg 5 - “s251”) • “overriding public interest” (to safeguard you or another person) • legal obligation (e.g. court 	Consent (implied) This means that it would be reasonable to infer that you agree to the use of the information as long as: <ul style="list-style-type: none"> • We are accessing the information to provide or support your direct care, or are satisfied that the person we are sharing the information with is accessing or receiving it for this purpose • Information is readily available to you, explaining how your information will be used and that you have the right to object • We have no reason to believe that you have objected • We are satisfied that anyone we disclose personal

order)	information to understands that we are giving it to them in confidence, which they must respect
5) Recipient or categories of recipients of the shared data	Kent County Council Health Diagnostics Ltd
6) Rights to object	You have the right to object to some or all of the information being shared with the recipients. Contact the Data Protection Officer or the practice.
7) Right to access and correct	You have the right to access your data and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law.
8) Retention period	Data retained in line with local authority policies on storing identifiable data https://www.kent.gov.uk/about-the-council/about-the-website/privacy-statement#
9) Right to Complain.	You have the right to complain to the Information Commissioner’s Office, you can use this link https://ico.org.uk/global/contact-us/ or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate) There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)

Webpost – Privacy Notice

Explanation

Webpost are a company who process mail by printing, folding, enveloping and stamping letters before delivering them to the Royal Mail for the final delivery. Dr Molony & Partners provide Webpost with names & addresses and a template letter (e.g. an invitation for flu vaccination), and they then perform a mail merge and post out the letter to those patients.

The least amount of sensitive data necessary (as derived from the GP record) is provided to Webpost and this information is not shared with any other third parties.

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.	
1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
3) Purpose of the processing	To enable Dr Molony & Partners to send out letters to patients regarding their medical care. This is a Direct Care purpose Special category of data (health)
4) Lawful basis for processing	Lawful basis under GDPR: Article 6(1)(e) – Official Authority Article 9(2)(h) – Provision of health
How does this comply with the Common Law Duty of Confidentiality? <ul style="list-style-type: none"> • Consent <ul style="list-style-type: none"> ○ Implied (e.g. direct care) ○ Explicit (e.g. 2^o uses) • Control of Patient Information Regulations 2002 (e.g. Reg 5 - “s251”) • “overriding public interest” (to safeguard you or another person) • legal obligation (e.g. court order) 	Consent (implied) This means that it would be reasonable to infer that you agree to the use of the information as long as: <ul style="list-style-type: none"> • We are accessing the information to provide or support your direct care, or are satisfied that the person we are sharing the information with is accessing or receiving it for this purpose • Information is readily available to you, explaining how your information will be used and that you have the right to object • We have no reason to believe that you have objected • We are satisfied that anyone we disclose personal information to understands that we are giving it to them in confidence, which they must respect
5) Recipient or categories of	Kent County Council

recipients of the shared data	Webpost Ltd Acting as a data processor
6) Rights to object	You have the right to object to some or all of the information being shared with the recipients. Contact the Data Protection Officer or the practice.
7) Right to access and correct	N/A
8) Retention period	Webpost delete all personal/sensitive data provided to them under the agreement within 30 days.
9) Right to Complain.	<p>You have the right to complain to the Information Commissioner's Office, you can use this link https://ico.org.uk/global/contact-us/</p> <p>or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)</p> <p>There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)</p>

Electronic Prescription Service (EPS) – Privacy Notice

Explanation

The Electronic Prescription Service sends prescriptions electronically from the GP surgery directly to a Pharmacy, removing the need for a paper prescription.

Consent to “nominate” a pharmacy to receive electronic prescriptions can be obtained by both a pharmacy and the surgery

Where the prescription cannot be sent by EPS (e.g. a Controlled Drug), the nomination allows the pharmacist to collect the printed FP10 prescription from the surgery.

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.	
1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
3) Purpose of the processing	To enable the electronic transmission of prescriptions to community pharmacies This is a Direct Care purpose Special category of data (health)
4) Lawful basis for processing	Lawful basis under GDPR: Article 6(1)(e) – Official Authority Article 9(2)(h) – Provision of health
How does this comply with the Common Law Duty of Confidentiality? <ul style="list-style-type: none"> • Consent <ul style="list-style-type: none"> ○ Implied (e.g. direct care) ○ Explicit (e.g. 2^o uses) • Control of Patient Information Regulations 2002 (e.g. Reg 5 - “s251”) • “overriding public interest” (to safeguard you or another person) • legal obligation (e.g. court order) 	Consent (explicit) Recorded either by the surgery or the pharmacist This means that we actively seek and record your agreement to the use or disclosure of your information, before any such processing takes place.

5) Recipient or categories of recipients of the shared data	Community pharmacists providing a direct service to the data subject
6) Rights to object	You have the right to object to some or all of the information being shared with the recipients. Contact the Data Protection Officer or the practice.
7) Right to access and correct	The source of the information shared in this way is your electronic GP record, and you have rights directly related to that (see EMIS Health – EMIS Web).
8) Retention period	N/A
9) Right to Complain.	<p>You have the right to complain to the Information Commissioner’s Office, you can use this link https://ico.org.uk/global/contact-us/</p> <p>or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)</p> <p>There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)</p>

Pharmacy collections of prescriptions – Privacy Notice

Explanation

When a prescription is requested it can either be picked up in person from the surgery or else a Pharmacy can be nominated to pick it up. This privacy notice covers situations where a patient nominates a pharmacy to either:

- Collect the prescription directly from the surgery, or
- For the surgery to post the prescription to the service/pharmacy (e.g. for appliances)

Not consenting to this processing (nominating a pharmacy to collect/be posted to, on their behalf) would then require the data subject to collect the prescription from the surgery in person.

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.	
1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
3) Purpose of the processing	To enable community pharmacies to collect prescriptions (FP10s) from the surgery on behalf of patients where that patient has not chosen to enable EPS This is a Direct Care purpose Special category of data (health)
4) Lawful basis for processing	Lawful basis under GDPR: Article 6(1)(e) – Official Authority Article 9(2)(h) – Provision of health
How does this comply with the Common Law Duty of Confidentiality? <ul style="list-style-type: none"> • Consent <ul style="list-style-type: none"> ○ Implied (e.g. direct care) ○ Explicit (e.g. 2^o uses) • Control of Patient Information Regulations 2002 (e.g. Reg 5 - “s251”) • “overriding public interest” (to safeguard you or another person) 	Consent (explicit) This means that we actively seek and record your agreement to the use or disclosure of your information, before any such processing takes place.

<ul style="list-style-type: none"> • legal obligation (e.g. court order) 	
5) Recipient or categories of recipients of the shared data	Community pharmacists providing a direct service to the data subject
6) Rights to object	You have the right to object to some or all of the information being shared with the recipients. Contact the Data Protection Officer or the practice.
7) Right to access and correct	The source of the information shared in this way is your electronic GP record, and you have rights directly related to that (see EMIS Health – EMIS Web).
8) Retention period	N/A
9) Right to Complain.	<p>You have the right to complain to the Information Commissioner’s Office, you can use this link https://ico.org.uk/global/contact-us/</p> <p>or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)</p> <p>There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)</p>

Telephone Calls – Privacy Notice

Explanation

We record our telephone calls for two reasons, firstly to protect patients and staff and other health workers. Patients are protected by our having a record of our conversations with you, staff and other health workers are protected from potential abuse. Secondly we record some calls, because they can contain clinical information that can become part of your medical records. We also occasionally use recordings for staff training and quality control.

When you register with us we will make this clear to you and we will also make this clear to you each time you contact us and via our web site and other sources of information

Calls, transcripts of calls or elements of the discussion you have with the clinicians that contain clinical information may be added to your medical records.

The recordings are stored within the surgery and are encrypted for protection. They will not usually be shared outside the practice.

If we hold recordings that have not been deleted you can ask for copies by contacting the Practice Manager.

If you object to your call being recorded we can delete it immediately afterwards.

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.	
1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
3) Purpose of the processing	To facilitate your access to care and in the case of telephone consultations for your direct care. Also for resolution of complaints and staff training. This is a Direct Care purpose Special category of data (health)
4) Lawful basis for processing	Lawful basis under GDPR: Article 6(1)(e) – Official Authority Article 9(2)(h) – Provision of health
How does this comply with the Common Law Duty of Confidentiality? <ul style="list-style-type: none"> • Consent <ul style="list-style-type: none"> ○ Implied (e.g. direct care) ○ Explicit (e.g. 2^o uses) • Control of Patient Information Regulations 2002 	Consent (implied) This means that it would be reasonable to infer that you agree to the use of the information as long as: <ul style="list-style-type: none"> • We are accessing the information to provide or support your direct care, or are satisfied that the person we are sharing the information with is accessing or receiving it for this purpose • Information is readily available to you, explaining how your

<p>(e.g. Reg 5 - “s251”)</p> <ul style="list-style-type: none"> • “overriding public interest” (to safeguard you or another person) • legal obligation (e.g. court order) 	<p>information will be used and that you have the right to object</p> <ul style="list-style-type: none"> • We have no reason to believe that you have objected • We are satisfied that anyone we disclose personal information to understands that we are giving it to them in confidence, which they must respect.
<p>5) Recipient or categories of recipients of the shared data</p>	<p>Necessary data will be shared with Health and care professionals and support staff in this surgery. Clinical data or records of consultations may be transcribed or appended to the records we hold on you and may therefore be subsequently shared at hospitals, diagnostic and treatment centres who contribute to your personal care. Actual recordings will not be shared with anyone outside the practice. Please see our Privacy Notice for Direct Care. The actual recordings are stored onsite in our server room.</p>
<p>6) Rights to object</p>	<p>You have the right to object to some or all of the information being shared with the recipients. Contact the Data Protection Officer or the practice.</p>
<p>7) Right to access and correct</p>	<p>You have the right to access the data that is being shared and have any inaccuracies corrected. We can provide copies of recordings if required. There is no right to have accurate medical records deleted except when ordered by a court of Law.</p>
<p>8) Retention period</p>	<p>We will keep for 12 months. Clinical data transcribed from your telephone or other electronic consultations becomes part of your clinical record and is retained according to relevant rules and regulations, see Privacy Notice on Direct Care.</p>
<p>9) Right to Complain.</p>	<p>You have the right to complain to the Information Commissioner’s Office, you can use this link https://ico.org.uk/global/contact-us/</p> <p>or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)</p> <p>There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)</p>

SMS Text Messages – Privacy Notice

Explanation

Text messages are a quick and efficient way for the surgery to communicate with patients. Patients are free to provide Dr Molony & Partners with their mobile phone number and consent will be recorded to allow staff to use SMS if needed or if preferred by the patient.

The majority of SMS messages are automatically generated to remind patients of forthcoming surgery appointments that they have booked. Other uses include inviting eligible patients to attend for flu clinics or annual reviews (e.g. asthma, COPD) or in emergencies when surgeries have to be cancelled at short notice.

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.	
1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
3) Purpose of the processing	To enable staff at Dr Molony & Partners to communicate with patients via text (SMS). This is a Direct Care purpose Personal data being processed includes the mobile number Special category of data (health)
4) Lawful basis for processing	Lawful basis under GDPR: Article 6(1)(e) – Official Authority Article 9(2)(h) – Provision of health
How does this comply with the Common Law Duty of Confidentiality? <ul style="list-style-type: none"> • Consent <ul style="list-style-type: none"> ○ Implied (e.g. direct care) ○ Explicit (e.g. 2^o uses) • Control of Patient Information Regulations 2002 (e.g. Reg 5 - “s251”) • “overriding public interest” (to safeguard you or another person) • legal obligation (e.g. court order) 	N/A The information is being shared directly with the data subject (you)

5) Recipient or categories of recipients of the shared data	The data subject (you)
6) Rights to object	You have the right to object to some or all of the information being shared in this way. Contact the Data Protection Officer or the practice.
7) Right to access and correct	N/A
8) Retention period	N/A
9) Right to Complain.	<p>You have the right to complain to the Information Commissioner's Office, you can use this link https://ico.org.uk/global/contact-us/</p> <p>or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)</p> <p>There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)</p>

Email Messages (medical purposes) – Privacy Notice

Explanation

There are occasions when it may be convenient to relay information to and from patients by email.

Email can be used to respond to patient queries, provide information to a patient or receive information from a patient. You should be aware that anybody else who shares your email address will be able to access the information that is sent, and that there is the possibility of illegal interception of emails by cyber criminals if you do not use a secure email account.

We will only use the email address that you provide for direct medical care purposes, unless you provide us with your explicit consent to email you for other purposes as well (such as surgery newsletters).

At any time you can ask the surgery to remove your email address from your GP record and we will honour any such objection.

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.	
1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
3) Purpose of the processing	To enable staff at Dr Molony & Partners to communicate with patients via email. This is a Direct Care purpose Personal data being processed includes the email address Special category of data (health)
4) Lawful basis for processing	Lawful basis under GDPR: Article 6(1)(e) – Official Authority Article 9(2)(h) – Provision of health
How does this comply with the Common Law Duty of Confidentiality? <ul style="list-style-type: none"> • Consent <ul style="list-style-type: none"> ○ Implied (e.g. direct care) ○ Explicit (e.g. 2^o uses) • Control of Patient Information Regulations 2002 	N/A The information is being shared directly with the data subject (you)

<p>(e.g. Reg 5 - “s251”)</p> <ul style="list-style-type: none"> • “overriding public interest” (to safeguard you or another person) • legal obligation (e.g. court order) 	
<p>5) Recipient or categories of recipients of the shared data</p>	<p>The data subject (you)</p>
<p>6) Rights to object</p>	<p>You have the right to object to some or all of the information being shared in this way. Contact the Data Protection Officer or the practice.</p>
<p>7) Right to access and correct</p>	<p>N/A</p>
<p>8) Retention period</p>	<p>N/A</p>
<p>9) Right to Complain.</p>	<p>You have the right to complain to the Information Commissioner’s Office, you can use this link https://ico.org.uk/global/contact-us/</p> <p>or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)</p> <p>There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)</p>

Email Messages (non-medical purposes) – Privacy Notice

Explanation

With the explicit consent of patients, Dr Molony & Partners may periodically email patients to provide useful information about the surgery, such as newsletters and minutes of patient participation group meetings.

Such communication would be for non-medical purposes and as such falls under the Privacy and Electronic Communications Regulations (PECR) as well as the GDPR.

Patients may choose not to provide consent for this purpose, or withdraw consent for this at any time. Consent for email communication by the surgery for medical purposes may be either provided or withdrawn separately to this use.

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.	
1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
3) Purpose of the processing	To enable staff at OHG to communicate with patients via email for non-medical purposes Personal data being processed is the email address (only)
4) Lawful basis for processing	Lawful basis under GDPR: Article 6(1)(a) – Consent
How does this comply with the Common Law Duty of Confidentiality? <ul style="list-style-type: none"> • Consent <ul style="list-style-type: none"> ○ Implied (e.g. direct care) ○ Explicit (e.g. 2^o uses) • Control of Patient Information Regulations 2002 (e.g. Reg 5 - “s251”) • “overriding public interest” (to safeguard you or another person) • legal obligation (e.g. court order) 	N/A The information is being shared directly with the data subject (you)

5) Recipient or categories of recipients of the shared data	The data subject (you)
6) Rights to object	You have the right to withdraw consent at any time
7) Right to access and correct	N/A
8) Retention period	N/A
9) Right to Complain.	<p>You have the right to complain to the Information Commissioner's Office, you can use this link https://ico.org.uk/global/contact-us/</p> <p>or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)</p> <p>There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)</p>

GP's as Employers – Privacy Notice

Explanation

As employers we need to keep certain information so that we can remain your employer and manage payments. This is a combination of personal and financial information.

We are required by law to hold certain types of data on those we employ under the Health and Social Care Act and this data is examined during CQC inspection visits. For more information about the CQC see: <http://www.cqc.org.uk/>

We are also required to share information about you with NHS Digital under a submission known as the “Workforce Minimum Dataset”. To find out more visit <https://digital.nhs.uk/data-and-information/areas-of-interest/workforce/workforce-minimum-data-set-wmds>

We are also required by HMRC and various taxation laws, such as “The Income Tax (Pay As You Earn) Regulations 2003” to keep financial records.

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.	
1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
3) Purpose of the processing	To comply with the Health and Social Care Act and taxation law.
4) Lawful basis for processing	Lawful basis under GDPR: Article 6(1)(c) – Legal Obligation Article 9(2)(h) – Management of health or social care systems and services
How does this comply with the Common Law Duty of Confidentiality? <ul style="list-style-type: none">• Consent<ul style="list-style-type: none">○ Implied (e.g. direct care)○ Explicit (e.g. 2^o uses)• Control of Patient Information Regulations 2002 (e.g. Reg 5 - “s251”)	Legal obligation This means that we are compelled by law to share your data in this way

<ul style="list-style-type: none"> • “overriding public interest” (to safeguard you or another person) • legal obligation (e.g. court order) 	
<p>5) Recipient or categories of recipients of the shared data</p>	<p>The data will be shared with the Care Quality Commission, its officers and staff and members of the inspection teams that visit us from time to time. Financial data will also be shared with HMRC.</p>
<p>6) Rights to object</p>	<p>You have the right to object to some or all of the information being shared with CQC. Contact the Data Controller or the practice. There is no right to have UK taxation related data deleted except after certain statutory periods.</p>
<p>7) Right to access and correct</p>	<p>You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have records deleted except when ordered by a court of Law.</p>
<p>8) Retention period</p>	<p>The data will be retained for active use during the processing and thereafter according to NHS Policies, taxation and employment law.</p>
<p>9) Right to Complain.</p>	<p>You have the right to complain to the Information Commissioner’s Office, you can use this link https://ico.org.uk/global/contact-us/</p> <p>or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)</p> <p>There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)</p>

Payments to the Practice – Privacy Notice

Explanation

Contract holding GPs in the UK receive payments from their respective governments on a tiered basis. Most of the income is derived from baseline capitation payments made according to the number of patients registered with the practice on a quarterly basis. The amount paid per patient per quarter varies according to the age, sex and other demographic details for each patient.

There are also graduated payments made according to the practice's achievement of certain agreed national quality targets known as the Quality and Outcomes Framework (QOF), for instance the proportion of diabetic patients who have had an annual review.

Practices can also receive payments for participating in agreed national or local enhanced services, for instance opening early in the morning or late at night or at the weekends.

Practices can also receive payments for certain national initiatives such as immunisation programs and practices may also receive incomes relating to a variety of non-patient related elements such as premises.

Finally there are short term initiatives and projects that practices can take part in. Practices or GPs may also receive income for participating in the education of medical students, junior doctors and GPs themselves as well as research.

In order to make patient based payments basic and relevant necessary data about you needs to be sent to the various payment services. The release of this data is required by English laws

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.	
1) Data Controller contact details	Dr Molony & Partners Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
2) Data Protection Officer contact details	Mr Jeremy Lawrence, Practice Manager Sturry Surgery, 53 Island Road, Sturry, Canterbury, Kent. CT2 0EF. Tel. 01227 710372
3) Purpose of the processing	To enable GPs to receive payments. To provide accountability.)
4) Lawful basis for processing	Lawful basis under GDPR: Article 6(1)(c) – Legal Obligation Article 9(2)(h) – Management of health or social care

	systems and services
<p>How does this comply with the Common Law Duty of Confidentiality?</p> <ul style="list-style-type: none"> • Consent <ul style="list-style-type: none"> ○ Implied (e.g. direct care) ○ Explicit (e.g. 2^o uses) • Control of Patient Information Regulations 2002 (e.g. Reg 5 - “s251”) • “overriding public interest” (to safeguard you or another person) • legal obligation (e.g. court order) 	<p>Legal obligation</p> <p>This means that we are compelled by law to share your data in this way</p>
<p>5) Recipient or categories of recipients of the shared data</p>	<p>The data will be shared with Canterbury & Coastal CCG, NHS digital, Health and care professionals and support staff in this surgery and at hospitals, diagnostic and treatment centres who contribute to your personal care. This will include East Kent hospitals NHS Trust</p>
<p>6) Rights to object</p>	<p>You have the right to object to some or all the information being processed under Article 21. Please contact the Data Controller or the practice. 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</p>
<p>7) Right to access and correct</p>	<p>You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law.</p>
<p>8) Retention period</p>	<p>The data will be retained in line with the law and national guidance. https://digital.nhs.uk/article/1202/Records-Management-Code-of-Practice-for-Health-and-Social-Care-2016</p>
<p>9) Right to Complain.</p>	<p>You have the right to complain to the Information Commissioner’s Office, you can use this link https://ico.org.uk/global/contact-us/</p> <p>or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)</p> <p>There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)</p>