

## City of Coventry NHS Healthcare Centre

# Patient Privacy Notice

This privacy notice explains what information we collect about you, how we store this information, how we share this information and how we keep it safe and confidential. We want you to be confident that your information is kept safe, secure and for you to understand how and why we use it to support your care. To find out more please click on the relevant hyperlink below:

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## 1. Definitions

**GDPR:** General Data Protection Regulation

**Personal data:** Any information relating to an identifiable individual such as your name, NHS number, contact details. It can also be location data or an online identifier.

**Special categories of personal data are defined as:** Racial or ethnic origin, politics, religious or philosophical beliefs, trade union membership, genetics, biometrics (where used for identification) information concerning your health, sex life or sexual orientation. [Click to return to start of document](#)

## 2. Who are we?

City of Coventry NHS Healthcare Centre services are provided by Virgin Care Services Limited on behalf of NHS England. As your registered GP Practice, we are the controller for any personal information we hold about you.

For more information, please visit our website: <http://cityofcoventrynhshealthcarecentre.nhs.uk/>

Virgin Care Services Ltd is a limited company registered in England and Wales, number 07557877. Registered office: Virgin Care Services Ltd, Lynton House, 7-12 Tavistock Square, London WC1H 9LT, part of the Virgin Care Group of companies. [Click to return to start of document](#)

## 3. Why do we collect personal information about you?

The staff caring for you need to collect and maintain information about your health, treatment and care, so that:

- Accurate and up to date information is available in order to provide the best possible care and treatment for you.
- The information is available should you need another form of care, for example a referral to another service.
- We can review the type and quality of care you received and make the necessary changes in order to provide the best care available.
- Your concerns can be properly looked into if you have a complaint.

This personal information can be held in a variety of formats including paper records, electronically on computer systems and in video and audio files. [Click to return to start of document](#)

## 4. What information we collect and how do we obtain it?

Personal information about you is collected in a number of ways. This can be from referral details from our staff, other 3<sup>rd</sup> parties or hospitals, directly from you or your authorised representative.

Once you register with us, we will collect basic **'personal data'** about you such as your name, address, contact details including next of kin or carer details and NHS number. We might also hold your email address, marital status, occupation, place of birth, preferred name or maiden name and Power of Attorney, advocate or carer information. This information is held in written form and/or in digital form.

In addition to the above we may also hold more sensitive personal data, called **'special category data'** which could include:

- Notes and reports about your health, treatment and care
- Medical condition
- Results of investigations, such as x-rays and laboratory tests
- Future care you may need
- Personal information from people who care for and know you, such as relatives and health or social care professionals
- Smoking status and any learning disabilities
- Your religion and ethnic origin
- Whether or not you are subject to any protection orders regarding your health, wellbeing and human rights (safeguarding status)
- Sexual history including partners, sexual orientation where relevant
- School information and information about your family health or social history
- Images and recordings
- Any special needs or preferences for receiving information

If you don't provide this information, your care will be compromised. [Click to return to start of document](#)

## 5. What is our legal basis for processing your information?

In order for City of Coventry NHS Healthcare Centre to legally process your information a 'lawful basis' needs to be identified. Data protection law recognises the difference between personal data and that of a more sensitive nature known as special categories of data; such as racial or ethnic origin, political opinions, religious beliefs, trade union activities and physical or mental health.

**Our legal basis for processing your personal information** falls under one of the following legal bases:

- Legitimate Interests of providing and managing health and care services to our patients, service users and clients
- Performance of a task carried out in the public interest or in the exercise of official authority
- Necessary for a legal obligation such as responding to a request from a coroner
- Necessary for reasons in the area of public health such as in the event of an outbreak of a disease

**Our legal basis for processing special category data** falls under one of the following legal bases:

- The provision of health or social care
- Social protection law for safeguarding purposes.

- Where it is necessary to protect your vital interests when you are physically or legally incapable of providing consent.

Therefore, City of Coventry NHS Healthcare Centre does not require your consent to process your personal data. However, you do have the right to say “no” to our use of your information but this could have an impact on our ability to provide you with care. [Click this link for more information regarding opting out of us using your information.](#)

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## 6. How do we use and share your information?

Your records are used:

- By healthcare professionals to make care decisions with and about you.
- To make sure your care is safe and effective.
- To support working with others who provide your care.

We may also use, or share, your information for the following purposes:

- If it is in your best interests.
- Looking after the health of the general public.
- To ensure that our services can meet patient needs in the future.
- Preparing statistics on NHS performance and activity.
- Investigating concerns, complaints or legal claims.
- Helping colleagues review the care they provide to make sure it is of the highest standards.
- Training and educating staff.
- For research purposes. (we will always ask your consent for this)
- Recommendations for special arrangements at home.
- To manage incidents that you have been involved in.
- Requests for information from official authorities or your representative.
- Your records if the service is transferring to us under contract or if you are moving out of the area.
- The prevention and detection of crime.
- Funding requests or payments.
- Integrated care initiatives.
- Legal advice or proceedings.
- Responding to legal requests and court orders.
- Public health notifications. [Click to return to start of document](#)

## 7. Who do we share your information with?

We may need to share relevant personal information with other NHS organisations for healthcare purposes along with information from your health records with other non-NHS organisations from which you are also receiving care, such as Social Services or private care homes. However, we will not disclose any health information to third parties without your explicit consent unless there are circumstances, such as when the health or safety of others is at risk or current legislation permits or requires it. The following provide you with an overview of the types of sharing:

### **Local Information Sharing to support your direct care**

Your GP electronic patient record is held securely and confidentially on an electronic system managed by your registered GP Practice. However, if you require attention from a health professional such as an Emergency Department, Minor Injury Unit or Out Of Hours service, the professionals treating you are better able to give you safe and effective care if relevant information from your GP record is available to them.

Where available, this information can be shared electronically with other local health and care providers via a secure system designed for this purpose. Depending on the service you are using and your health and care needs, this may involve the professional accessing a secure system that enables them to view relevant parts of your GP electronic patient record.

In all cases, your information is only accessed and used by authorised health and social care professionals in locally based organisations who are involved in providing or supporting your direct care.

Your permission will be asked before the information is accessed, other than in exceptional circumstances (e.g. emergencies) if the healthcare professional is unable to ask you and this is deemed to be in your best interests (which will then be recorded in your record).

Under the powers of the Health and Social Care Act 2015, NHS Digital can request personal confidential data from GP Practices without seeking patient consent for a number of specific purposes, which are set out in law. These purposes are explained below.

You can choose to withdraw your consent to your personal data being shared for these purposes. Before we participate in a new data-sharing project we will display prominent notices in the Practice and on our website at least four weeks before the scheme is due to start. Instructions will be provided to explain what you have to do to 'opt-out' of the new scheme. Please be aware that it may not be possible to opt out of one scheme and not others, so you may have to opt out of all the schemes if you do not wish your data to be shared.

You can object to your personal information being shared with other healthcare providers. However, you should be aware that this may, in some instances, affect your care as important information about your health might not be available to healthcare staff in other organisations. If this limits the treatment that you can receive then the practice staff will explain this to you at the time you object.

To ensure you receive the best possible care, your records are used to facilitate the care you receive. Information held about you may be used to help protect the health of the public and to help us manage the NHS.

### **Clinical audit**

Information will be used by the Clinical Commissioning Group (CCG) for clinical audit to monitor the quality of the service provided to patients with long terms conditions. When required, information will be held centrally and used for statistical purposes (e.g. the National Diabetes Audit). When this happens, strict measures are taken to ensure that individual patients cannot be identified from the data.

### **Clinical Research**

If we receive requests from organisations to use health information for research purposes - we will always ask your permission before releasing any information for this purpose.

### **Improving Diabetes Care**

Information that does not identify individual patients is used to enable focussed discussions to take place at practice-led local diabetes review meetings between health care professionals. This enables the professionals to improve the management and support of these patients.

### **Individual Funding Request**

An 'Individual Funding Request' is a request made on your behalf, with your consent, by a clinician, for funding of specialised healthcare which falls outside the range of services and treatments that the CCG has agreed to commission for the local population. An Individual Funding Request is taken under consideration when a case can be set out by a patient's clinician that there are exceptional clinical circumstances which make the patient's case different from other patients with the same condition who are at the same stage of their disease, or when the request is for a treatment that is regarded as new or experimental and where there are no other similar patients who would benefit from this treatment. A detailed response, including the criteria considered in arriving at the decision, will be provided to the patient's clinician.

### **National Registries**

National Registries (such as the Learning Disabilities Register) have statutory permission under Section 251 of the NHS Act 2006, to collect and hold service user identifiable information without the need to seek informed consent from each individual service user.

### **Risk Stratification**

'Risk stratification for case finding' is a process for identifying and managing patients who have or may be at-risk of health conditions (such as diabetes) or who are most likely to need healthcare services (such as people with frailty). Risk stratification tools used in the NHS help determine a person's risk of suffering a particular condition and enable us to focus on preventing ill health before it develops.

Information about you is collected from a number of sources including NHS Trusts, GP Federations and your GP Practice. A risk score is then arrived at through an analysis of your de-identified information. This can help us identify and offer you additional services to improve your health.

Risk-stratification data may also be used to improve local services and commission new services, where there is an identified need. In this area, risk stratification may be commissioned by the. Section 251 of the NHS Act 2006 provides a statutory legal basis to process data for risk stratification purposes. Further information about risk stratification is available from: <https://www.england.nhs.uk/ig/risk-stratification/>

If you do not wish information about you to be included in any risk stratification programmes, please let us know. We can add a code to your records that will stop your information from being used for this purpose. Please be aware that this may limit the ability of healthcare professionals to identify if you have or are at risk of developing certain serious health conditions.

### **Safeguarding**

To ensure that adult and children's safeguarding matters are managed appropriately, access to identifiable information will be shared in circumstances where it's legally required for the safety of the individuals concerned.

### **Supporting Medicines Management**

CCGs operate pharmacist and prescribing advice services to support local GP Practices with prescribing queries, which may require identifiable information to be shared. These pharmacists work with your usual GP to provide advice on medicines and prescribing queries, and review prescribing of medicines to ensure that it is appropriate for your needs, safe and cost-effective. Where specialist prescribing support is required, the CCG medicines optimisation team may order medications on behalf of your GP Practice to support your care.

### **Supporting Locally Commissioned Services**

CCGs support GP Practices by auditing anonymised data to monitor locally commissioned services, measure prevalence and support data quality. The data does not include identifiable information

and is used to support patient care and ensure providers are correctly paid for the services they provide.

### **Invoice Validation**

Invoice validation enables us to identify which CCG is responsible for paying for your treatment. Section 251 of the NHS Act 2006 provides a statutory legal basis to process data for invoice validation purposes and uses your NHS number to validate payment. We can also use your NHS number to check whether your care has been funded through specialist commissioning, which NHS England will pay for. The process makes sure that the organisations providing your care are paid correctly.

### **Our partners and other recipients:**

- We work in partnership with commissioners, other health and care providers such as other primary care services, local authorities, NHS trusts, pathology providers etc.
- Prison service relating to prison healthcare.
- Local Safeguarding Boards (MASH)
- Regulators.
- We may use trusted providers to host our IT, archiving, email and texting services and survey Community Services such as district nurses and rehabilitation services.
- Child health services that undertake routine treatment or health screening.
- Urgent care organisations, minor injury units or out of hours' services.
- Community and palliative care hospitals.
- Care Home.
- Mental Health Trusts.
- Dentists, opticians, pharmacists.
- Private Sector Providers.
- Voluntary Sector Providers.
- Ambulance Trusts.
- Clinical Commissioning Groups (CCG)
- NHS England (NHSE) and NHS Digital (NHSD)
- Local Authorities.
- Education Services.
- Police or other law enforcement agencies.
- Virgin Care Support teams. [Click to return to start of document](#)

## **8. How do you opt-out of sharing?**

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

### **National Data Opt-out**

You can choose whether your confidential patient information is used for research and planning. To find out more visit [nhs.uk/your-nhs-data-matters](https://nhs.uk/your-nhs-data-matters)

You do not need to do anything if you are happy about how your confidential patient information is used. You can change your choice at any time.

The following types of Opt Outs are being phased out this year and replaced by the National Data Opt-out. You can read more about it [here](#).

### **Type 1 opt-out: medical records held at your GP Practice**

You can also tell your GP Practice if you do not want your confidential patient information held in your GP medical record to be used for purposes other than your individual care. This is commonly called a type 1 opt-out. This opt-out request can only be recorded by your GP surgery.

### **Type 2 opt-out: information held by NHS Digital (now the National Data Opt-out)**

Previously you could tell your GP surgery if you did not want, NHS Digital, to share confidential patient information that we collect from across the health and care service for purposes other than your individual care. This was called a type 2 opt-out.

From 25 May 2018 the type 2 opt-out has been replaced by the National Data Opt-out. Type 2 opt-outs that have been recorded previously have been automatically converted to National Data Opt-outs.

As of October 2018 the National Data Opt-out can only be set by NHS Digital and there are three options:

**Online** – via the following link:

<https://www.nhs.uk/your-nhs-data-matters/manage-your-choice/>

You must have an email address or mobile phone number registered with an NHS Service to use this method.

**Telephone** – via 0300 303 5678. The NHS Digital Contact Centre will verify your identity and discuss your data sharing choices. The Contact Centre may be able to guide you through the online service or set a choice on your behalf.

**Print and post** – if you are unable to use the online or telephone service, you can use a paper print-and-post form to set a choice instead via the following link:

[https://assets.nhs.uk/prod/documents/Non-Digital\\_Opt-Out\\_Form\\_v15.pdf](https://assets.nhs.uk/prod/documents/Non-Digital_Opt-Out_Form_v15.pdf)

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## **9. Your Summary Care Record (SCR)**

Your Summary Care Record is a short summary of your GP medical records. It tells other health and care staff who care for you about the medicines you take and your allergies. This means they can give you better care if you need health care away from your usual doctor's surgery:

- In an emergency.
- When you're on holiday.
- When your surgery is closed.
- At out-patient clinics.
- When you visit a pharmacy.

### **Ask your doctor to include additional information on your SCR**

You can add more information to your SCR by asking your doctor. They can add extra details from your medical notes, including:

- Health problems like dementia or diabetes.
- Details of your Carer.
- Your treatment preferences.
- Communication needs, for example if you have hearing difficulties or need an interpreter.



This will help medical staff care for you properly, and respect your choices, when you need care away from your GP surgery. This is because having more information on your SCR means they will have a better understanding of your needs and preferences.

When you are treated away from your usual doctor's surgery, the health care staff there can't see your GP medical records. Looking at your SCR can speed up your care and make sure you are given the right medicines and treatment.

### **Protecting your SCR information**

Staff will ask your permission to look at your SCR (except in an emergency where you are unconscious, for example) and only staff with the right levels of security clearance can access the system, so your information is secure. You can ask an organisation to show you a record of who has looked at your SCR - this is called a Subject Access Request.

### **Opting out**

SCRs improve care, but if you don't want to have one you can opt out. Tell your GP or fill in a [SCR Opt-out form](#) and give it to your GP Practice. [Click to return to start of document](#)

## **10. How do we keep your information secure?**

We take the security of your personal data very seriously. We have operational policies and procedures in place to protect your information whether it is in hard copy or electronic format. We protect your information in the following ways:

**Training:** Staff are trained to understand their duty of confidentiality and their responsibilities regarding the security of patient data; this includes their mandatory annual training in data security and confidentiality to demonstrate they understand and are complying with Practice policies on confidentiality.

**Access Controls:** Any member of staff who has access to personal confidential data will have a username and unique password. This will reduce the risk of unauthorised access to your personal data and all access is auditable.

**Technical measures:** We complete due diligence and impose contractual obligations on our trusted providers and persons working under our instruction.

We have a duty to:

- Maintain full and accurate records of the care we provide to you.
- Keep records about you confidential and secure.
- Provide information in a format that is accessible to you.

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

- Data Protection Act 2018.
- General Data Protection Regulation 2016
- Human Rights Act 1998.
- Common Law Duty of Confidentiality.
- NHS Codes of Confidentiality and Information Security.
- Health and Social Care Act 2015.
- And all applicable legislation.

We maintain our duty of confidentiality to you at all times. We will only ever use or pass on information about you if we reasonably believe that others involved in your care have a genuine need for it.

We will not disclose your information to any third party without an appropriate legal basis and there are exceptional circumstances (such as a risk of serious harm to yourself or others) or where the law requires information to be passed on. [Click to return to start of document](#)

## 11. How long do we keep your information?

Your personal information is held in both paper and electronic forms for specified periods of time as the NHS Records Management Code of Practice for Health & Social Care 2016 and National Archives requires. Please click on the link for the retention periods of the various medical records we hold. [Records retention schedules](#)

We usually retain health records for children from discharge / service user last seen until their 25<sup>th</sup> birthday (or if the patient was 17 at the conclusion of the treatment, until their 26<sup>th</sup> birthday). Care records with non-standard retention periods could be kept up to 30 years depending on the record type. Please consult the Records Management Code of Practice for Health and Social Care 2016 for more details on this, the link has been provided below.

These are the minimum times for which we keep information; we may keep it for longer if we believe doing so will be of benefit to you or we are not able to delete it due to a technical issue.

We have a duty to:

- Maintain full and accurate records of the care we provide to you
- Keep records about you confidential and secure

Further details can be found in [The Records Management Code of Practice for Health and Social Care 2016](#). Please note that the independent inquiry into Child Sexual Abuse (IICSA) has requested that large parts of the health and social care sector to not destroy any records that are, or may fall into, the remit of the inquiry. Therefore **Virgin Care is currently not destructing any children's records** until further notice (please consult the website [www.iicsa.org.uk](http://www.iicsa.org.uk) for more details). [Click to return to start of document](#)

## 12. Social Media and our Website

When you contact us through social media such as Facebook and Twitter, we hold your information and reason for contact in our social media management portal to enable us to easily access and manage our engagement with you. This may result in us sharing your information with other parties within the Virgin Care Group e.g. individuals involved in your care, managing your complaint etc.

When you visit our websites we collect standard internet log information and details of visitor behaviours. This is statistical data only which we collect in order to find out the numbers of visitors to the site and the pages visited. The information is collected in such a way that does not identify individuals and we do not make any attempts to identify visitors this way.

Where we do collect personal information on our website, this will be made obvious to you through the relevant pages. The following link will take you to our [Website Privacy Policy](#)

### 13. What are your rights?

If we need to use your personal information for any reasons beyond those stated above, we will discuss this with you and ask for your **explicit** consent. Under the Data Protection Act 2018 you have the following rights:

YOUR RIGHTS	FURTHER INFORMATION ABOUT YOUR RIGHTS
<b>The right to be informed</b>	As a controller, we are obliged to provide understandable and transparent information about the way we process your data (this is provided within this privacy notice)
<b>The right of access</b>	You are entitled to request a copy of the personal data we hold about you. (see the section below, how to request a copy of your record)
<b>The right to rectification</b>	Request the correction of inaccurate or incomplete information in your health record, subject to certain safeguards.
<b>The right to erasure</b>	Where no overriding legal basis or legitimate reason continues to exist for processing personal data, you may request that we delete the personal data.
<b>The right to restrict processing</b>	Under certain circumstances, you may ask us to stop processing your personal data. We will still hold the data, but will not process it any further.
<b>The right to data portability</b>	Subject to certain conditions, you may request a copy of your personal data to be transferred to another organisation.
<b>The right to object to processing</b>	<p>You have the right to object to our processing of your data where</p> <ul style="list-style-type: none"> <li>▪ Processing is based on legitimate interest.</li> <li>▪ Processing involves automated decision-making and profiling.</li> <li>▪ Processing would be for a purpose beyond your care and treatment, e.g. direct marketing and scientific or historic research; you can opt-out to the sharing of this information under the National Data Opt-Out. Further information can be found on the following website: <a href="https://digital.nhs.uk/national-data-opt-out/">https://digital.nhs.uk/national-data-opt-out/</a></li> </ul>

Please note that the above rights may not apply in all circumstances.

### Keep us updated of any changes

Please let us know if you change your address or contact details etc. so that we can keep your information accurate and up to date. [Click to return to start of document](#)

## 14. How to request a copy of your record?

You can request a copy of your records via our Data Subject Access Portal. Please click on the following link to request your record: [Coventry NHS Healthcare Centre Subject Access Portal](#)

Our portal supports the management of requests with regards to records and/or alterations/concerns. Your request will be directed to our Privacy Team who will ensure that the correct service receives your request promptly.

To progress the request, you will need proof of identity as follows:

- Driving licence or Passport or Work ID badge or Bus Pass or a witness to your signature by someone who is over 18 and is not a relative, (preferably by your doctor/solicitor on their headed business paper) as proof of identity and
- Bank statement or Pay slip or Utility bill or a Letter on headed paper from a local authority or similar as proof of residence.

If you are a Representative acting on a data subject's behalf you will need proof of your identity as well as proof that the data subject is freely giving consent to the request, or you have the appropriate legal authority. [Click to return to start of document](#)

## 15. Who can you contact regarding your personal information we hold?

If you have any questions or concerns about the information we hold about you, please do not hesitate to ask at the surgery reception or contact:

- **Practice Information Governance Lead**  
City of Coventry NHS Healthcare Centre  
Stoney Station Road  
Coventry  
CV1 4FS
- **Data Protection Officer**  
Sarah Murray  
Head of Information Governance  
Virgin Care Ltd  
6600 Daresbury Business Park  
Daresbury  
WA4 4GE  
Email: [information.governance@virginicare.co.uk](mailto:information.governance@virginicare.co.uk)

If you are not happy about the way your information is handled, or you are not satisfied with our response, you have the right to lodge a complaint with a supervisory authority. In the UK, this is the Information Commissioners Office (ICO).

- **Information Commissioner's Office**

Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
0303 123 1113  
Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

<https://ico.org.uk/global/contact-us/>

## **16. Disaggregation of Services**

In the event of the contract between City of Coventry NHS Healthcare Centre with Virgin Care Ltd coming to an end, all relevant documentation and records will be transferred to the new provider.

The transfer of records will be conducted in accordance with the current UK Data Protection Law. [Click to return to start of document](#)

## **17. Changes to our privacy notice**

We will update this privacy notice from time to time to reflect any changes to our ways of working. Please contact our Data Protection Officer if you would like more information. [Click to return to start of document](#)