

How we collect, look after your DATA.

This notice explains how Roundhay Road Surgery will collect, look after, use or otherwise process your personal data. “Personal data” is information relating to you as a living, identifiable individual.

HOW IS MY INFORMATION COLLECTED AND LOOKED AFTER?

Who is responsible for my information?

Dr Paul is the data controller for your information and is responsible for looking after your record while you are a registered patient. The person with the key responsibility for data protection and security is Davinder Sandall

The Data Protection Officer for Dr Paul (Tel: 0113 235 0379)

Any queries or concerns should be raised with the Practice Manager in the first instance.

Why do we collect information about you?

As health professionals, we maintain records about you in order to support your care. By registering with the practice, your existing records will be transferred to us from your previous practice so that we can keep them up to date while you are our patient. If you do not have a previous medical record (a new-born child or coming from overseas, for example), we will create a medical record for you. We take great care to ensure that your information is kept securely, that it is up to date, accurate and used appropriately. All of our staff are trained to understand their legal and professional obligations to protect your information and will only look at your information if they need to.

What information do we hold about you?

- Details about you, such as your name, address, carers, biological gender, gender identity, ethnic origin, date of birth, legal representatives and emergency contact details
- Any contact the surgery has had with you, such as appointments, clinic visits, emergency appointments, etc.
- Notes and reports about your health
- Details about your treatment and care
- Results of investigations such as laboratory tests, x-rays, etc.
- Relevant information from other health professionals, relatives or those who care for you

How is my information stored?

Our practice uses a clinical records programme called SystemOne which is where any electronic information about you will be stored. Any information held in paper records is stored securely at the practice. We use a combination of working practices and technology to ensure that your information is kept confidential and secure.

What is the legal basis that we use to process your information?

We are required to tell you the legal basis that is used for the various ways we process and use your data. The following table sets the main ways your personal data may be used and the corresponding legal basis and category of data. Each purpose is covered in more detail within this notice to explain what these mean in more practical terms.

Purpose of using personal data	Legal basis of processing	Special category of data
Provision of direct care and related administrative purposes e.g., e-referrals to hospitals or other care providers	GDPR Article 6(1)(e) – the performance of a task carried out in the public interest	GDPR Article 9(2)(h) – medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems.
For commissioning and healthcare planning purposes e.g., collection of mental health data set via NHS Digital or local	GDPR Article 6(1)(c) – compliance with a legal obligation	GDPR Article 9(2)(h) – medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems. Special category 9(2)(i) – public interest in the area of public health
For planning and running the NHS (other mandatory flow) e.g., CQC powers to require information and records	GDPR Article 6(1)(c) – compliance with a legal obligation (the GP practice) Regulation 6(1)(e) – the performance of a task carried out in the public interest (CQC)	GDPR Article 9(2)(h) – medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems. Special category 9(2)(i) – public interest in the area of public health
For planning & running the NHS – national clinical audits	GDPR Article 6(1)(e) – the performance of a task carried out in the public interest	GDPR Article 9(2)(h) – medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems. Special category 9(2)(i) – public interest in the area of public health
For research	GDPR Article 6(1)(f) – legitimate interests...except where such interests are overridden by the interest or fundamental rights and freedoms of the data subject. GDPR Article 6(1)(e) – the performance of a task carried out in the public interest	GDPR Article 9(2)(j) – scientific or historical research purposes or statistical purposes

	GDPR Article 6(1)(a) – explicit consent	
For safeguarding or other legal duties	GDPR Article 6(1)(e) – the performance of a task carried out in the public interest Regulation 6(1)(c) – compliance with a legal obligation	GDPR Article 9(2)(b) – purposes of carrying out the obligations of ..social protection law.
When you request us to share your information e.g., subject access requests	GDPR Article 6(1)(a) – explicit consent	GDPR Article 9(1)(a) – explicit consent

When is my information shared?

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

- Data Protection legislation
- Human Rights Act 1998
- Common Law Duty of Confidentiality
- Health and Social Care Act 2012
- NHS Codes of Confidentiality, Information Security and Records Management
- Information: To Share or Not to Share Review

How long does the practice hold my information?

As long as you are registered as a patient with Roundhay Road Surgery your paper records are held at the practice along with your GP electronic record. If you register with a new practice, they will initiate the process to transfer your records. The electronic record is transferred to the new practice across a secure NHS data-sharing network and all practices aim to process such transfers within a maximum of 8 working days. The paper records are then transferred via Primary Care Services England (operated on behalf of NHS England by Capita) which can take longer. Primary Care Services England also look after the records of any patient not currently registered with a practice and the records of anyone who has died.

Once your records have been forwarded to your new practice (or after your death forwarded to Primary Care Services England), a cached version of your electronic record is retained in the practice and classified as “inactive”. If anyone has a reason to access an inactive record, they are required to formally record that reason and this action is audited regularly to ensure that all access to inactive records is valid and appropriate. We may access this for clinical audit (measuring performance), serious incident reviews, or statutory report completion (e.g., for HM Coroner).

Change of Details

It is important that you tell the person treating you if any of your details such as your name or address have changed or if any of your details such as date of birth is incorrect in order for this to be amended. You have a responsibility to inform us of any changes so our records are accurate and up to date for you.

How can I see what information you hold about me?

You have a right under data protection legislation to request to see what information the practice holds about you. You also have the right to ask for inaccuracies to be corrected and in some circumstances you have the right to request that we stop processing your data. Some of these rights are not automatic and we reserve the right to discuss with you why we might not comply with a request from you to exercise them.

If you make a Subject Access Request, we will:

- describe the information we hold about you
- tell you why we are holding that information
- tell you who it might be shared with
- at your request, provide a copy of the information in an easy to read form.

In order to request this, you need to do the following:

- Your request must be made in writing – for information from the hospital you should write direct to them
- We will provide electronic copies (via online access, by email or on CDROM) free of charge.
- We are required to respond to you within 1 month.

You will need to give enough information (for example full name, address, date of birth, NHS number and details of your request) so that your identity can be verified and your records located.

In some circumstances there may be a charge to have a printed copy of the information held about you. If this is the case, this will be discussed with you before any charge is made.

If you would like to make a Subject Access Request or have any further questions, please contact our Practice Manager