Privacy Notice

Your information, what you need to know

This Privacy Notice explains why we collect information about you, how that information may be used, how we keep it safe and confidential and what your rights are around the data we collect and use.

NHS North West London was Formed on 1 July 2022. It covers the London boroughs of Brent, Ealing, Hammersmith & Fulham, Harrow, Hillingdon, Hammersmith & Fulham, Hounslow, Kensington & Chelsea and Westminster. Two of our borough based teams are not coterminous with borough boundaries with West London covering Kensington and Chelsea and Queen's Park and Paddington in Westminster and Central London covering the rest of Westminster. For more information about who we are, please visit the about us page on our website.

Why we collect information about you

NHS North West London is responsible for commissioning health services from healthcare providers such as hospitals, as well as directly providing some health services such as continuing healthcare and Individual Funding Requests.

We do not provide healthcare services like a GP practice or hospital. Our role is to make sure the appropriate NHS care is in place for the people in our community within our available budget.

As an NHS organisation, NHS North West London process your personal data for various purposes. This can range from processing personal data in order to function as an organisation to delivering services to the public.

We act as a data controller when it comes to our employees’ personal data and those working on behalf of, or with our organisation, but it can also cover the services we provide NHS patients.

In carrying out our role and responsibilities as a commissioner of services for people living within the community, it is essential that the NHS North West London has an understanding of the health and social care needs of our community. The only way that we can achieve this is by using information your GP, clinician or social worker has entered into your care record, as well as some information that is provided via external public sources. These records help us to provide you with the best possible healthcare and protect your safety. It also helps us monitor the quality of care that we provide. We may also collect information about you which helps us respond to your queries or secure specialist services.

Information we may collect about you

Health care professionals who provide you with care are legally required to maintain records about your health and any treatment or care you have received within any NHS
organisation. This information may exist on paper or in electronic format and NHS North West London ensures that these are kept safe and secure with appropriate technical and organisational controls.

The records may include basic details about you, such as your name and address. They may also contain more sensitive information about you, such as your health and social care services and also information such as outcomes of needs assessments. We may also collect information about you which helps us to respond to your queries and help us to design services to improve the health needs and outcomes of local people.

In addition, NHS North West London holds and uses limited patient data for complaints, processing your subject access requests (SARs), and if you make a freedom of information FOI request. We collect and store information that has been received directly from you or organisations such as Local Authorities and GP Practices if you are a patient with the Continuing Healthcare, Individual Funding Requests, or Medicines Optimisation Team.

**Children and Families**

We use the data we gather from children, young people and families we are supporting for the sole purpose of providing the best care and support that we can provide to them. This might also include being able to evaluate the quality of support we have given and audit our practices in order to improve our services.

We will share information where we believe that the sharing of that information is in the best interests of supporting a child or young person. Where it is legally required to do so, and prior to the sharing of any information, we will obtain the necessary consent of relevant parent/guardian.

We take our responsibility to safeguard the welfare of children, young people and vulnerable adults very seriously. We are legally obliged to pass on personal information to the relevant authority if we thought a child, young person or vulnerable adult was at risk. When you begin to receive a service, you will be notified of how your personal data will be used and under what circumstances shared. We will also continue to update you through privacy notices such as this one.

If you are receiving a service from us, we would collect your personal data as part of receiving that service. This might include quite sensitive information relating to the support we are providing to you.

If you are under 13, we will need to get consent, when required by law, from the relevant adult/s who act as your parent/guardian to hold your personal information.

Sometimes another agencies (like a school, GP or local authority) might have information that they want to pass onto us, but we would only take that data where we have a lawful basis to do so.

**How we keep your information confidential and safe**

Everyone working for our organisation is subject to the Common Law Duty of Confidence. Information provided in confidence will only be used for the purposes advised with consent given by the patient unless there are other legal bases covered by the law. The NHS Digital Code of Practice on Confidential Information applies to all NHS staff and they are required to protect your information, inform you of how your information will be used, and allow you to decide if and how your information can be shared.

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All our staff are expected to make sure information is kept confidential and receive regular training on how to do this.

The health records we use may be electronic, on paper, or a mixture of both. We use a combination of working practices and technology to ensure that your information is kept confidential and secure. Your records are backed up securely in line with NHS standard procedures. We ensure that the information we hold is kept in secure locations, is protected by appropriate security and access is restricted to authorised personnel.

We also make sure external organisations who process your personal information in order to support us are contractually required to have appropriate organisation and technical measures to protect your personal data.

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

- Data Protection Act 2018;
- UK GDPR;
- General Data Protection Regulation (GDPR) 2016;
- Human Rights Act 1998;
- Common Law Duty of Confidentiality;
- NHS Codes of Confidentiality and Information Security;
- Health and Social Care Act 2012 and 2015;
- And all other applicable legislation.

We will 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 your permission unless 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.

**How we use your information**

**Direct Care (Routine Care and Referrals)**

Direct Care is care delivered to the individual. 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 specialists, 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.

NHS North West London keeps identifiable and clinical data on you relating to both the Continuing Health Care and Individual Funding Request services where you have been referred for these services. This data is used to assess whether you meet the criteria for funding for these services and to enable the provision of services thereafter. 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 comply with our legal obligations. Please see Table 1 below for more information, including the lawful bases we rely on to collect and use your data.

The data will be shared with Health and care professionals and support staff in your GP Practice, at hospitals and diagnostic and treatment centres who contribute to your personal care:

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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 is set out in the law. These purposes are explained below.

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.

**Incident Management**

NHS North West London takes every measure to ensure that personal data is only accessed or shared with individuals that are authorised or organisations that are authorised. On the rare occasion that we suffer a breach, it is our duty to investigate what may have caused such an incident and any consequences of the breach. In these circumstances, we may process your personal data in order to establish any risks to your rights and freedoms. NHS North West London will always ensure the information obtained is not excessive and is in line with the UK GDPR Data Protection principles. NHS North West London will ensure that it will comply UK GDPR Article 5(1)(c), which states that personal data shall be 'adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ("data minimisation").'

**Medicine Management**

NHS North West London has a Medicines Management Function to support patients and also help to deliver cost effective changes at GP Practices. The processing takes place under a national Service Level Agreement, the National Tariff Excluded Drugs Service. Personal data is used for both care outcomes and monitoring. Any reports based on this do not contain personal data. We collect and store information that has been received directly from the patient or the following organisations: GP Practices, NHS Trusts, Providers and Care Homes. We may share information with the following organisations with your explicit consent or when the law allows: GP Practices within our community (data is only shared with patient’s relevant GP Practice); Acute Trust (where the patient has had an episode of care); Care/Nursing Homes (where a patient may be a resident).

You have the right to object to your identifiable information being used or shared for this purpose. Please speak to the NHS North West London if you no longer wish to have your data used by the Medicines Management Team.

**Patient Communication**

NHS North West London may contact patients (with their consent) in relation to services, feedback and new initiatives in the area that they have registered an interest in. We collect and store information that has been received directly from you when you have consented to this process. We may share information with the NHS North West London Communications Team with your explicit consent or when the law allows. You have the right to withdraw your consent, please speak to NHS North West London if you no longer wish to have your data used or be contacted by the NHS North West London in future.

**Clinical audit**

Information may be used by NHS North West London for clinical audits in order to monitor the quality of the service provided to patients with long term health conditions. Some of this information may 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.

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Clinical Research

Your de-identified information may be requested to be used for research purposes. De-identified information protects your confidentiality because you cannot be identified from the data. If we are ever asked to release information which identifies you for research purposes, then we will either ask your permission before it is released, or we will do so when specifically allowed by law.

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 NHS North West London has agreed to commission for the local population.

An Individual Funding Request is considered when a case can be presented by a patient’s clinician to evidence that there are exceptional clinical circumstances which make the patient’s case different to that of other patients with the same condition.

Relevant considerations can include comparing patients who are at the same stage of their disease/condition, 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.

Invoice Validation

Invoice validation is an important process. It involves using your NHS number to confirm that NHS North West London 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. 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.

National Fraud Initiative - Cabinet Office

The use of data by the Cabinet Office for data matching is carried out with statutory authority under Part 6 of the Local Audit and Accountability Act 2014. It does not require the consent of the individuals concerned under the Data Protection Act 2018. Data matching by the Cabinet Office is subject to a Code of Practice. For further information see: https://www.gov.uk/government/publications/code-of-data-matching-practice-for-national-fraud-initiative

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 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 then help your health provider 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 NHS North West London. 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/ourwork/td/ig/risk-stratification/

As risk stratification is undertaken on de-identified data, it does not identify you in any way. You are not able to opt-out of risk stratification in line with the conditions set out in the National Data Opt-Out, which does not apply to de-identified data used for secondary purposes.

Safeguarding

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

Summary Care Record (SCR)

NHS England uses a national electronic record called the Summary Care Record (SCR) to support patient care. It contains key information from your GP record. Your SCR provides authorised healthcare staff with faster secure access to essential information about you in an emergency or when you need unplanned care, where such information would otherwise be unavailable.

SCRs are there to improve the safety and quality of your care. SCR core information includes your allergies, adverse reactions and medications. An SCR with additional information can also include reason for medication, vaccinations, significant diagnoses/problems, significant procedures, anticipatory care information and end of life care information. Additional information can only be added to your SCR with your agreement.

Please be aware that if you choose to opt-out of SCR, NHS healthcare staff caring for you outside of this surgery may not be aware of your current medications, allergies you suffer from and any bad reactions to medicines you have had. This may affect their ability to treat you safely in an emergency situation. Your records will stay as they are now with information being shared by letter, email, fax or phone. If you wish to opt-out of having an SCR please return a completed opt-out form to your practice. You can find more information on SCRs and how to opt-out here: https://digital.nhs.uk/services/summary-care-records- scr/summary-care-records-scr-information-for-patients

Supporting Medicines Management

NHS North West London uses 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

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cost-effective. Where specialist prescribing support is required, the NHS North West London medicines management team may provide relating to obtaining medications on behalf of your GP Practice to support your care.

Supporting Locally Commissioned Services

NHS North West London supports GP practices by auditing de-identified 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.

Suspected Cancer

Data may be analysed in cases of suspected cancer by The Royal Marsden NHS Trust, The Royal Brompton Hospital, Imperial College Healthcare NHS Trust, Chelsea and Westminster Hospital NHS Foundation Trust, London North West Healthcare NHS Trust and University College London Hospitals NHS Foundation Trust to facilitate the prevention, early diagnosis and management of illness. Measures are taken to ensure the data for analysis does not identify individual patients.

HR, Staffing, Employment, Recruitment & Training

NHS North West London collects and stores information pertaining to staff for the purposes of HR, Employment, Recruitment and Training. Information is collected and stored about prospective, current and past employees, including self-employed and temporary staff. Data is collected for purposes including recruitment, occupational health, vetting checks, staff training and payroll.

Data Retention

We manage patient records in line with the Records Management NHS Code of Practice for Health and Social Care which sets the required standards of practice in the management of records for those who work within or under contract to NHS organisations in England, based on current legal requirements and professional best practice.

Who are our partner organisations?

We may also have to share your information, subject to strict agreements on how it will be used, with the following organisations:

- NHS Trusts;
- Specialist Trusts;
- GP Federations;
- Independent Contractors such as dentists, opticians, pharmacists;
- Private Sector Providers;
- Voluntary Sector Providers;
- Ambulance Trusts;
- Integrated Care Boards;
- Social Care Services;
- Local Authorities;
- Education Services;
- Fire and Rescue Services;
- Police;
- Other ‘data processors’.

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Specific details of the organisations with which we share your data can be seen on our website.

We will never share your information outside of health partner organisations without your explicit consent unless there are exceptional circumstances such as when the health or safety of others is at risk, where the law requires it or to carry out a statutory function.

Within the health partner organisations (NHS and Specialist Trusts) and in relation to the above mentioned themes - Risk Stratification, Invoice Validation, Supporting Medicines Management, and Summary Care Record - where this is done for purposes other than delivering you with direct care then you are able to opt-out of such uses, you choose to opt-out (see below).

We are required by law to report certain information to the appropriate authorities; this is only provided after formal permission has been given by a qualified health professional. There are occasions when we must pass on information, such as notification of new births, where we encounter infectious diseases which may endanger the safety of others, such as meningitis or measles (but not HIV/AIDS), and where a formal court order has been issued. Our guiding principle is that we will always protect your confidentiality and only disclose information in line with our legal obligations and where permitted by law.

**Will my information be sold?**

We will never sell your personal data.

**Where is my data stored?**

Your data is processed and stored on Microsoft Azure and UK Public Cloud servers based in the United Kingdom. These are secured by state-of-the-art data centre facilities, with robust technical and organisational controls in place and all of them operate under strict contracts with us. The facilities and services we use are audited annually to make sure the highest standards are maintained.

**Will my information be shared with anyone else?**

1. We share your information with other health and social care organisations directly involved in your care. We will always have a legal relationship with these organisations and ensure that your information will be held securely:

   - **NHS organisations involved in your case** – we share your information with other NHS trusts, GP surgeries and other care providers involved in your treatment;

   - **Non-NHS health and social care professionals** – we share your information with local authorities and social workers concerned with your care. Our aim is to ensure that other health and social care providers have access to information that supports your care.

2. We share your information with organisations involved in planning and improving your care. We provide de-identified information or require legal justification if they request information that may identify you, those organisations can include:

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• **NHS bodies** – your information may be requested by NHS bodies concerned with the planning and commissioning of healthcare services, such as Integrated Care Boards;

• **Regulatory, audit and inspection bodies** – these organisations are concerned with regulating aspects of care and deciding where improvements may be made.

3. In some situations, we use other organisations to help us process your information to help us deliver your care. We will always have a legal agreement in place with these organisations which ensures that they can only use your information as we instruct.

4. We share staff information with HM Revenue and Customs department of Work and Pensions. Information may also be shared with Occupational Health and payroll service provider.

**Your rights**

The data that we keep about you is your data, and we ensure that we keep it confidential and that it is used appropriately. You have the following rights when it comes to your data:

• **Your right of access** - You have the right to request a copy of all the data we keep about you. Generally, we will not charge for this service.

• **Your right to rectification** - You have the right to ask us to correct any data we have, which you believe to be inaccurate or incomplete. You can also request that we restrict all processing of your data while we consider your rectification request.


You may also request that we restrict processing if we no longer require your personal data for the purpose we originally collected it for, but you do not wish for it to be erased.

You can ask for your data to be erased if we have asked for your consent to process your data. You can this by simply withdrawing consent at any time – please contact us to do so.

• **Your right to restriction of processing** – You have the right to ask us to restrict the processing of your information, in certain circumstances.

• **Your right to object to processing** - If we are processing your data as part of our legitimate interests as an organisation or in order to complete a task in the public interest, you have the right to object to that processing. We will restrict all processing of this data while we look into your objection.
• **Your right to data portability** – You have the right to ask that we transfer the information you gave us to another organisation, or you, in certain exceptional circumstances.

You may need to provide adequate information for our staff to be able to identify you, for example, a passport or driver’s license. This is to make sure that data is not shared with the wrong person inappropriately. Please note that you are not required to pay any charges for exercising your rights. We will always respond to your request as soon as possible and usually within one month.

Please contact us at either of the below addresses should you wish to make a data subject request.

**Email:** nhsnwlicb.subjectaccessrequest@nhs.net

**In writing:** Freedom of Information Team, 15 Marylebone Road, London, NW1 5JD

**Right to withdraw consent to share personal information (Opt-Out)**

If you are happy for your data to be extracted and used for the purposes described in this Privacy Notice, then you do not need to do anything. If you do not want your information to be used for any purpose beyond providing your care you can choose to opt-out. If you wish to do so, please let us know so we can code your record appropriately. We will respect your decision if you do not wish your information to be used for any purpose other than your care, but in some circumstances we may still be legally required to disclose your data.

**National Data Opt-Out**

A new National Data Opt-Out was introduced in May 2018, following recommendations from the National Data Guardian. The National Data Opt-Out only concerns data being used for secondary purposes. This is because the legal basis for which data is processed in primary care purposes is not based on consent. Health care trusts as a data controller do not need to rely upon consent in order to process that data, as it is specifically required to provide an immediate and direct care for that individual’s health.

Where the National Data Opt-Out does apply is in respect of secondary care purposes, which are purposes beyond the immediate and direct aspect of the care for that individual. A key example of secondary care purposes is research and planning.

Following from the guidance by the National Data Guardian, the National Data Opt-Out only allows patients to have the option to opt-out of personally identifiable data being used for purposes other than direct care. This means that organisations can use patient data if it has gone through a de-identification process (in line with the current ICO code of practice for anonymisation) and no longer identifies an individual.

This decision was made following a review of the National Data Guardian, which heard that the public were satisfied that if the data is anonymous and used for secondary purposes. The National Data Guardian also found that the majority of purposes beyond those of direct care do not actually require personal confidential data to identify individuals, and that it is of considerable benefit to commissioners, planners, and researchers. It was considered that the
possibly for an opt-out where the dataset would be removed entirely would have a negative impact on health services ability to use the information for research and planning.

With the above in mind, although the majority of data being used for secondary purposes is already anonymised, patients have the option to opt-out of having their confidential patient information shared for reasons beyond their individual care, for example for research and planning. However, this will not affect their de-identified data being used for such purposes. **Find out more about the national data opt-out and how to set up your choices.**

**Access to your information**

Under the Data Protection Act 2018 you have the right to see or have a copy, of data we hold that can identify you, with some exceptions. You do not need to give a reason to see your data. If you want to access your data, you may make a Subject Access Request verbally or in writing. Under special circumstances, some information may be withheld. If you wish to have a copy of the information we hold about you, please contact the Data Protection Officer (DPO) at: **nhsnwlibc.subjectaccessrequest@nhs.net**

**Freedom of Information**

Under the Freedom of Information Act 2000, you have the right to request copies of nonpersonal information held by NHS North West London. To gain access to a copy of this information, you will need to make a Freedom of Information (FOI) Request to HS North West London at: **nhsnwlcg.foi@nhs.net** or by writing to: **nhsnwlibc.foi@nhs.net**

Freedom of Information Team
NHS North West London
15 Marylebone Road
London
NW1 5JD

**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 are incorrect in order for this to be amended. Please inform us of any changes so our records for you are accurate and up to date.

**Registration with the Information Commissioner’s Office (ICO)**

We are registered with the ICO and our registration number will be confirmed imminently. Any changes to this notice will be published on our website and in a prominent area at the Organisation.

**Complaints**

If you have concerns or are unhappy about any of our services, please contact the Complaints Manager at: **nhsnwlibc.complaints@nhs.net**

For independent advice about data protection, privacy and data-sharing issues or to make a complaint, you can direct the Information Commissioner’s Office at the address below:

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### Table 1

**Information we are required to provide you**

| Data Controller contact details: | NHS North West London  
Ferguson House  
15 Marylebone Road  
London |
|--------------------------------|--------------------------------------------------|
| Data Protection Officer contact details: | Felicia Ayo-Ajala  
nhsnwlicb.dpo@nhs.net |

**Purpose of the processing for the provision of your healthcare:**

- To give direct health or social care to individual patients
- For example, when a patient agrees to a referral for direct care, such as to a hospital, relevant information about the patient will be shared with the other healthcare staff to enable them, to give appropriate advice, investigations, treatments and/or care.
- To check and review the quality of care. (This is called audit and clinical governance).

**Lawful basis for processing for the provision of your healthcare:**

These purposes are supported under the following sections of the GDPR/UK GDPR:

**Article 6(1)(e)** ‘…necessary for the performance of a task carried out in the public interest or in the exercise of official authority…’;

And

**Article 9(2)(h)** ‘necessary for the purposes of preventative or occupational medicine for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services…”

Healthcare staff will also respect and comply with their obligations under the common law duty of confidence.

**Purpose of the processing for medical research and to measure quality of care**

- Medical research is valuable in order to help us understand more about disease and to develop new treatments in order to improve patient care and outcomes.
- Measuring quality of care is important in order to monitor and improve on the quality of care which is given to patients (this is called clinical audit).
| Lawful basis for processing for medical research and to measure the quality of care | The following sections of the GDPR/UK GDPR allow us to lawful process personal data for the purposes of medical research and for clinical audits:  

**Article 6(1)(e)** – ‘processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller’.  

Either:  

**Article 9(2)(a)** – ‘the data subject has given explicit consent…’  

Or  

**Article 9(2)(j)** – ‘processing is necessary for… specific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member States law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and interests of the data subject’  

Article 9(2)(h) – ‘processing is necessary for the purpose of preventative… medicine… the provision of health or social care or treatment or the management of health or social care systems and services…’ |

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<th>Purpose of the processing to meet legal requirements</th>
<th>Compliance with legal obligations or court order.</th>
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| Lawful basis for processing to meet legal requirements | These purposes are supported under the following sections of the GDPR/UK GDPR:  

**Article 6(1)(c)** – ‘processing is necessary for compliance with a legal obligation to which the controller is subject…’  

**Article 9(2)(h)** – ‘processing is necessary for the purpose of preventative… medicine… the provision of health or social care or treatment or the management of health or social care systems and services…’ |

| Purpose of the processing for National screening programs |  

- The NHS provides several national health screening programs to processing detect diseases or conditions early such as cervical and breast cancer, aortic aneurysm and diabetes.  
- The information is shared so that the correct people are invited for screening. This means those who are most at risk can be offered treatment. |
| Lawful basis for processing for National Screening Programs | The following sections of the GDPR/UK GDPR allow us to contact patients for  
| Article 6(1)(e) – ‘processing is necessary in the exercise of official authority vested in the controller...’  
| Article 9(2)(h) – ‘processing is necessary for the purpose of preventative medicine...the provision of health or social care or treatment or the management of health or social care systems and services...’  
| Other Lawful base for processing Information e.g.  
| • Personnel,  
| • Financial, Internal audits,  
| • Complaints, non-contractual  
| • invoices | Article 6(1)(a) – Consent  
| Article 6(1)(b) - Performance of Contract  
| Article 6(1)(c) - Legal Obligation  
| Article 6(1)(e) - Public Task  
| Article 9(2)(a) - Explicit Consent  
| Article 9(2)(b) - Employment, Social Security or Protection Law  
| Article 9(2)(g) - Substantial Public Interest  
| Rights to object | • You have the right to object to information being shared between those who are providing you with direct care.  
| • This may affect the care you receive – please speak to the practice.  
| • You are not able to object to your name, address and other demographic information being sent to NHS Digital.  
| • This is necessary if you wish to be registered to receive NHS care.  
| • You are not able to object when information is legitimately shared for Safeguarding reasons.  
| • In appropriate circumstances it is a legal and professional requirement  
| • to share information for safeguarding reasons. This is to protect people from harm.  
| • The information will be shared with the local safeguarding service  
| Right to access and correct | You have the right to access your medical record and have any errors or mistakes corrected. Please speak to a member of staff or look at our 'subject access request' policy on our website at: www.nwlononics.nhs.uk or email us at: nhsnwlicb.subjectaccessrequest@nhs.net  
| Retention period | Records will be kept in line with the law and national guidance. Information on how long records are kept can be found at:  

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<th>Right to complain</th>
<th>You have the right to complain to the Information Commissioner’s Office. You may follow this link <a href="https://ico.org.uk/global/contact-us/">https://ico.org.uk/global/contact-us/</a> or call the helpline: 03031231113</th>
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<tbody>
<tr>
<td>Data we get from other</td>
<td>We receive information about your health from other organisations who are involved in providing you with health and social care. For example, if you go to hospital for treatment or an operation the hospital will send us a letter to let us know what happens. This means your GP medical record is kept up to date when you receive care from other parts of the health service.</td>
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**Further Information**

Further information about the way in which the NHS uses personal information and your rights in that respect can be found below:

**The NHS Constitution**

The NHS Constitution establishes the principles and values of the NHS in England. It sets out the rights patients, the public and staff are entitled to. These rights cover how patients access health services, the quality of care you’ll receive, the treatments and programs available to you, confidentiality, information and your right to complain if things go wrong. [https://www.gov.uk/government/publications/the-nhs-constitution-for-england](https://www.gov.uk/government/publications/the-nhs-constitution-for-england)

**NHS Digital**

NHS Digital collects health information from the records health and social care providers keep about the care and treatment they give, to promote health or support improvements in the delivery of care services in England. [https://digital.nhs.uk/about-nhs-digital](https://digital.nhs.uk/about-nhs-digital)

**Reviews of and Changes to our Privacy Notice**

We will keep our Privacy Notice under regular review. This notice was last reviewed in June 2022.