



COMPANY PRIVACY NOTICE

Who We Are?

Primary Healthcare Darlington Ltd (PHD) is an independent healthcare provider treating patients within Darlington. We are approved by the NHS to provide non-emergency NHS services to NHS patients as well as Contraceptive and Sexual Health services to Darlington and out of area patients.

How We Use Your Information?

We care about your personal data and it is important that you know how we use it and how we keep it safe. This Privacy Notice covers how, when and why we use your information. It also explains the choices you can make about the way in which we use your information and how you have the right to change your mind at any time.

This Privacy Notice applies to all information held by PHD relating to individuals whether you are a patient, servicer user, member of staff, contractor or Director.

For further information on what information we may hold about you and the legal reasons for processing your information please refer to our 'How We Use Your Health Records' leaflet.

Information We Collect and Hold About You?

We need to use information about you in various forms and we will only use the minimum amount of information necessary for the purpose. Sometimes we will use information that does not identify you i.e. anonymised reports.

Definitions

PHD processes several different types of information:

1. Identifiable – containing details that identify an individual. This may include but is not limited to such information as name, address, NHS number, full postcode, date of birth
2. Pseudonymised – information where individuals can be identified by using a coded reference which does not show their actual identity
3. Anonymised – information about individuals with identifying details removed.
4. Aggregated – statistical information about a group of individuals that has been combined to show trends or used for benchmarking purposes.

Our records may be held on paper or in electronic form.

Legal Obligations to Collect and Use Information

In the circumstances where we are required to use personal identifiable data we will only do this if :

- The information is necessary for your direct healthcare
- We have received written consent from you to use your information for a specific purpose e.g. employment
- There is a legal requirement that will allow us to use or provide information e.g. a formal Court order
- We have permission to do so from the Secretary of State for Health & Social Care to use certain confidential patient identifiable information when it is necessary for our work
- Emergency Planning reasons such as protecting the health and safety of others. Typically these relate to severe weather, outbreaks of diseases and major emergency incidents.

Primary and Secondary Care Data

The NHS provides a wide range of services which involved the collection and use of information. Even though we are an independent provider we are also an NHS Partner as we provide a healthcare service. Different care settings are considered as either 'primary care' or secondary care'. Primary care settings include GP Practices, pharmacists and dentists. Secondary care settings include local hospitals, community & mental health services, urgent and emergency care. PHD is a primary care provider.

Within this Privacy Notice you may see reference to an organisation called NHS Digital who is the national provider of information, data and IT systems for commissioners, analysts and clinicians in health and social care. NHS Digital provides information based on identifiable information passed securely to them by Primary & Secondary Care Providers who are legally obliged to provide this information. The way in which NHS Digital collect and use your information can be found here:

<http://content.digital.nhs.uk/patientconf>

Our Commitment to Data Privacy and Confidentiality Issues

We are committed to protecting your privacy and will only process personal confidential data in accordance with the Data Protection Act 1998 (DPA) , the General Data Protection Regulation (GDPR) 2018, the Common Law Duty of Confidentiality and the Human Rights Act 1998. The various laws and rules about using and sharing confidential information, with which PHD will comply , are available in 'A guide to confidentiality in health and social care' which is published on the NHS Digital website. PHD also has a local policy on Confidentiality which can be made available on request.

PHD is a Data Controller and under the terms of the DPA (1998) and the GDPR (2018) we are legally responsible for ensuring that all personal confidential data that we collect and use i.e. hold, obtain, record, use or share about you is done in compliance with this legislation.

All data controllers must notify the Information Commissioner's Office (ICO) of all personal information processing activities. Our ICO Data Protection Register No is ZA099983 and our entry can be found in the Data Protection Register on the ICO website.

Everyone working for PHD has legal duty to keep information about you confidential. The NHS Care Record Guarantee and NHS Constitution provide a commitment that all NHS organisations and those providing care on behalf of the NHS will use records about you in ways that respect your rights and promote your health and wellbeing.

All identifiable information that we hold about you will be held securely and confidentially. We use administrative and technical controls to do this. We use strict controls to ensure that only authorised staff have the ability to see information that identifies you where it is appropriate to their role.

All of our staff and Senior Management Team receive appropriate and on-going training to ensure they are aware of their personal responsibilities and have contractual obligations to uphold confidentiality, enforceable through disciplinary procedures. All staff are trained to ensure they understand how to recognise and report an incident ensuring that the organisations procedures for investigation, managing and learning lessons from incidents.

We will only retain information in accordance with the schedules set out the Records Management Code of Practice for Health & Social Care 2016. PHD's Records Management Policy includes guidance around the secure destruction of information in line with the code of practice.

Your information will not be sent outside of the European Economic Area where the laws do not protect your privacy to the same extent as the law in the UK.

We will never sell any information about you.

Confidentiality Advice & Support

PHD has a Caldicott Guardian who is a senior person responsible for protecting the confidentiality of service user and service user information and enabling appropriate and lawful information sharing.

Your Rights

You have certain legal rights, including a right to have your information processed fairly and lawfully and a right to access any identifiable information we hold about you.

You have the right to privacy and to expect PHD to keep your information confidential and secure.

You also have right to request that your confidential information is not used beyond your own care and treatment and to have your objections considered.

If we do hold identifiable information about you and you have any queries about the information we hold please contact the Data Protection Officer using the details:

Primary Healthcare Darlington Ltd, Dr Piper House, King St., Darlington, DL3 6JL
Email: primaryhealthcare.darlington@nhs.net

You have the right to refuse/withdraw consent to information sharing at any time by using the contact details about. If there are any consequences to withdrawing consent these will be fully explained and discussed with you first.

Complaints

PHD aims to meet the highest standard when collecting and using personal information. For this reason, we take any complaints we received about this very seriously. We encourage people to bring concerns to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. Contact details for complaints regarding the processing of information should be directed to :

The Data Protection Officer, Primary Healthcare Darlington Ltd, Dr Piper House, King St., Darlington, DL3 6JL

Email: primaryhealthcare.darlington@nhs.net

You can also raise a concern directly with the ICO although our aim is to resolve your complaint swiftly ourselves in the first instance.

Details of Information Collected and Used for Specific Purposes

Detailed information on our purposes for processing information, the type of information used, the legal basis identified for the collection and use of information, how we collect and use the information required, data processing activities – listing any third parties we may use for each purpose and information on how to opt out of information being used for each purpose are contained in our 'How We Use Your Health Records' leaflets.

Mobile Telephone

If you provide us with your mobile phone number we may use this to send you reminders about any appointments or other health screening information being carried out.

Cookies

Most websites you visit will use cookies in order to improve your user experience by enabling that website to remember you. Cookies do lots of different jobs, like letting you navigate between pages efficiently, storing your preference and general improving your experience of a website. Cookies make the interaction between you and the website faster and easier.

Cookies may be set by the website you are visiting or they may be set by other websites who run content on the page you are viewing.

What is in a Cookie?

A cookie is a simple text file that is stored on your computer or mobile device by a website's server and only that server will be able to retrieve or read the contents of that cookie. Each cookie is unique to your web browser. It will contain some anonymous information such as a unique identifier and the suite name and some digits and numbers. It allows a website to remember things like your preference or login.

Most websites you visit will use cookies in order to improve your user experience by enabling that website

What to do if you don't want Cookies to be set?

Some people find the idea of a website storing information on their computer or mobile device a bit intrusive, particularly when this information is stored and used by a third party without them knowing. Although this is generally quite harmless you may not, for example, want to see advertising that has been targeted to your interest. If you prefer, it is possible to block some or all cookies or even to delete cookies that have already been set, but you need to be aware that you may lose some functions of that website.