

The Peninsula Practice









Privacy / Transparency Notice

In response to receiving a completed Processing Activities Log which The Peninsula Practice has confirmed is an accurate and complete record of processing carried out by the practice, the following suggested Privacy / Transparency Notice has been drafted.

It is intended to satisfy all the requirements for privacy notices listed by the Information Commissioner and set out below.

What information must be supplied?	Data obtained directly from data subject	Data obtained from a third party or sharing partner
Identity and contact details of the controller (and where applicable, the controller's representative) and the data protection officer	✓	✓
Purpose of the processing and the lawful basis for the processing	✓	✓
The legitimate interests of the controller or third party, where applicable	✓	✓
Categories of personal data		✓
Any recipient or categories of recipients of the personal data	✓	✓
Details of transfers to third country and safeguards	✓	✓
Retention period or criteria used to determine the retention period	✓	✓
The existence of each of data subject's rights	✓	✓

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The right to withdraw consent at any time, where relevant		
The right to lodge a complaint with a supervisory authority		
The source the personal data originates from and whether it came from publicly accessible sources		
Whether the provision of personal data part of a statutory or contractual requirement or obligation and possible consequences of failing to provide the personal data		
The existence of automated decision making, including profiling and information about how decisions are made, the significance and the consequences.		

The Peninsula Practice and Your Information

The Peninsula Practice takes your privacy very seriously. We are registered with the Information Commissioner's Office as a Data Controller and our registration number is Z4729790.

If you have any questions or wish to make a request in relation to your information, please contact us at;

The Peninsula Practice
Mill Hoo Alderton
Woodbridge
Suffolk
IP12 3DA

The Peninsula Practice aims to provide you with the highest quality health care. To do this we must keep records about you, your health and the care we have provided or plan to provide to you.

Your doctor and other health professionals caring for you, such as nurses or physiotherapists, keep records about your health and treatment so that they are able to provide you with the best possible care.

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These records are called your 'health care record' and may be stored in paper form or on computer and electronic systems and may include **Personal Data**;

- basic details about you, such as address, date of birth, NHS number, and next of kin
as well as **Sensitive Personal Data**;
- contact we have had with you, such as clinical visits
- notes and reports about your health
- details and records about your treatment and care
- results of x-rays, laboratory tests etc.

Healthcare providers are permitted to collect, store, use and share this information under Data Protection Legislation which has a specific section related to healthcare information.

What do we do with your information?

- Refer you to other healthcare providers when you need other service or tests
- Share samples with laboratories for testing (like blood samples)
- Share test results with hospitals or community services (like blood test results)
- Allow out of hours or extended hours GPs to look at your health record when you are going to an appointment
- Send prescriptions to a pharmacy
- Patients are texted in relation to healthcare services
- Samples are provided to the courier for delivery to pathology
- Share reports with the coroner
- Receive reports of appointments you have attended elsewhere such as with the community nurse or if you have had a stay in hospital

Follow [this link](#) to see a list of the partners that we usually share with.

The Peninsula Practice has signed a Suffolk Wide Information Sharing Agreement which allows health and social care providers to agree a secure and lawful way to share your information.

What else do we do with your information?

Along with activities related directly to your care, we also use information in ways which allow us to check that care is safe and provide data for the improvement and planning of services.

- Quality / payment / performance reports are provided to service commissioners

Commented [EC1]: Link should take reader to the list at Appendix A

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- As part of clinical research – information that identifies you will be removed, unless you have consented to being identified
- Undertaking clinical audits within the practice
- Supporting staff training

Sharing when Required by Law

Sometimes we will be required by law to share your information and will not always be able to discuss this with you directly. Examples might be for the purposes of detection or prevention of crime, where it is in the wider public interest, to safeguard children or vulnerable adults, reporting infectious diseases or where required by court order.

CCTV

CCTV is NOT in place in our practice.

Information Access and Rights

Data protection law provides you with a number of rights that the practice is committed to supporting you with;

Right to Access

You have the right to obtain:

- confirmation that your information is being used, stored or shared by the practice
- a copy of information held about you

If you only require a particular part of your record, tell us and this may mean we can respond quicker.

We will respond to your request within one month of receipt or will tell you when it might take longer.

We are required to validate your identity including the identity of someone making a request on your behalf

Right to Object or Withdrawn Consent

We mainly use, store and share your information because we are permitted in order to deliver your healthcare but you do have a right to object to us doing this.

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Where we are using, storing and sharing your information based on explicit consent you have provided, you have a right to withdraw that consent at any time.

Our Data Protection Officer will be happy to speak with you about any concerns you have.

Right to Correction

If information about you is incorrect, you are entitled to request that we correct it

There may be occasions, where we are required by law to maintain the original information – our Data Protection Officer will talk to you about this and you may request that the information is not used during this time

We will respond to your request within one month of receipt or will tell you when it might take longer.

Complaints

You also have the right to make complaints and request investigations into the way your information is used. Please contact our Data Protection Officer or visit the link below for more information.

For more detailed information on your rights visit <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

Case Finding

Sometimes your information will be used to identify whether you need particular support from us.

Those involved in your care might look at particular 'indicators' (such as particular conditions) and contact you or take action for healthcare purposes. For example, this might be to prevent you from having to visit accident and emergency by supporting you in your own home or in the community.

We will use automated technology to help us to identify people that might require support but ultimately, the decision about how or whether to provide extra support you is made by those involved in your care.

Our Data Protection Officer will be happy to speak to you about this if you have concerns or objections.

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Information Technology

The practice will use third parties to provide services that involve your information such as;

- Removal and destruction of confidential waste
- Provision of clinical systems
- Provision of connectivity and servers

Data analytics or warehousing (these allow us to make decisions about care or see how effectively the practice is run – personal data will never be sold or made available to organisations not related to your care delivery)

We have contracts in place with these third parties that prevent them from using it in any other way that instructed. These contracts also require them to maintain good standards of security to ensure your confidentiality.

Please visit [this link](#) to find out more about our sharing partners and providers.

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How do we Protect your Information?

We are committed to ensuring the security and confidentiality of your information. There are a number of ways we do this;

Staff receive annual training about protecting and using personal data

Policies are in place for staff to follow and are regularly reviewed

We check that only the minimum amount of data is shared or accessed

We use 'smartcards' to access systems, this helps to ensure that the right people are accessing data – people with a 'need to know'

We use encrypted emails and storage which would make it difficult for someone to 'intercept' your information

We report and manage incidents to make sure we learn from them and improve

We put in place contracts that require providers and suppliers to protect your data as well

We do not send your data outside of the EEA

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How Long Do We Keep Your Information?

In line with the Department of Health Code, we will retain / store your health record for your lifetime. When a patient dies, we will review the record and generally it will be destroyed 10 years later, unless there is a reason to keep it for longer.

If you move away or register with another practice, we will send your records to the new practice.

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Appendix A – The Peninsula Practice Routine Sharing Partners

Processing Activities	Sharing Partners (including any third party providers of services)	Link
Referral / Test Results	Ipswich Hospital	http://www.wsh.nhs.uk/Home.aspx
	West Suffolk Hospital	http://www.ipswichhospital.nhs.uk/
	Norfolk and Norwich Hospital.	http://www.nnuh.nhs.uk/
	InHealth	https://www.inhealthgroup.com/
	Colchester Hosital	http://www.colchesterhospital.nhs.uk/
	Aldeburgh Hospital	http://www.suffolkcommunityhealthcare.co.uk/ourservices/communityhospitals.aspx
	Addenbrookes Hospital.	https://www.cuh.nhs.uk/addenbrookes-hospital
	West Suffolk Disability Resource Centre Papworth Trust	www.papworthtrust.org.uk/locations/west-suffolk-disability-resource-centre
	Guy's & St Thomas	https://www.guysandstthomas.nhs.uk/Home.aspx
	Great Ormond Street	www.gosh.nhs.uk/
	Ipswich Hospital	http://www.wsh.nhs.uk/Home.aspx
	West Suffolk Hospital	http://www.ipswichhospital.nhs.uk/
	Norfolk and Norwich Hospital.	http://www.nnuh.nhs.uk/
	Addenbrookes Hospital.	https://www.cuh.nhs.uk/addenbrookes-hospital
	West Suffolk Disability Resource Centre Papworth Trust	www.papworthtrust.org.uk/locations/west-suffolk-disability-resource-centre
	Hartismere Place Care Home	http://www.careuk.com/care-homes/hartismere-place-eye
	CareUK	www.careuk.com/care-homes/our-care-homes/our.../improving-services-in-suffolk
	Express Diagnostics (24hr ECGS)	www.expressdiagnostics.co.uk/patients/heart-tests/24-hour-holter-ecg/
	Glebe House	https://www.glebehousecarehome.co.uk/

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	St Elizabeths Hospice	https://www.stelizabethshospice.org.uk/
	The Pathology Partnership	https://www.healthwatchesuffolk.co.uk/.../the-pathology-partnership-riverside-clinic-ip...
	Macmillan	https://www.macmillan.org.uk/fundraising/inyourarea/england/suffolk/suffolk.aspx
	Allied Physios.	http://ahpsuffolk.co.uk/
GP+	Suffolk GP Federation	https://suffolkfed.org.uk/
EPS	Welbeing Pharmacy Diss	https://www.nhs.uk/Services/pharmacies/Overview/DefaultView.aspx?id=6418
	Pharmacy 2U	https://www.pharmacy2u.co.uk/
	Fresenius Homecare	www.freseniusmedicalcare.co.uk/
	Select Home Delivery	www.selecthomedelivery.co.uk/
	Fittleworth	www.fittleworth.net/
	Jade Euromed	www.jade-euro-med.co.uk/
	Salts Medilink	www.salts.co.uk/en-gb/home-delivery.aspx
	Charter Ltd	https://www.charter.co.uk/
	Alphamed	www.amcaregroup.co.uk/alphamed/
	NWOS	www.nwossurgical.co.uk/about.html
Discharge notices	Ipswich Hospital	http://www.wsh.nhs.uk/Home.aspx
	West Suffolk Hospital	http://www.ipswichhospital.nhs.uk/
	Norfolk and Norwich Hospital.	http://www.nnuh.nhs.uk/
	Addenbrookes Hospital.	https://www.cuh.nhs.uk/addenbrookes-hospital
	West Suffolk Disability Resource Centre Papworth Trust	www.papworthtrust.org.uk/locations/west-suffolk-disability-resource-centre
	Guy's & St Thomas	https://www.guysandstthomas.nhs.uk/Home.aspx
	Great Ormond Street	www.gosh.nhs.uk/
Confidential waste removal	Avena	https://www.avenaconfidential.co.uk/
Patient Texts	TPP System One	https://www.tpp-uk.com/
Pathology Courier	Ipswich Hospital	http://www.wsh.nhs.uk/Home.aspx
PCSE Notes	City Sprint	https://www.citysprint.co.uk/
Coroner reports	Ipswich Coroners	https://www.suffolk.gov.uk/births-deaths-and-ceremonies/the-coroner-service/

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	Norfolk Coroners	https://www.norfolk.gov.uk/births-ceremonies-and-deaths/deaths/the-coroner
Commissioner Reports	West Suffolk CCG	https://www.westsuffolkccg.nhs.uk/
	Ipswich and East Suffolk CCG	www.ipswichandeastsuffolkccg.nhs.uk/AboutUs.aspx
Provision of IT Systems and Support	North East London CCG	www.nelcsu.nhs.uk/
Provision of clinical system	TPP (SystemOne)	https://www.tpp-uk.com/
Infectious Diseases	Anglia Health Protection Team	https://www.gov.uk/guidance/contacts-phe-health-protection-teams
Research	BEST 3	https://www.mrc-cu.cam.ac.uk/research/rebecca-fitzgerald/clinical-studies/BEST3
	Iquit	www.phpc.cam.ac.uk
	Barack D	https://www.phc.ox.ac.uk/phctrials/trial-portfolio/barack-d