

# Lister House Surgery

## Privacy Notice

We understand how important it is to keep your personal information safe and secure and we take this very seriously. We have taken steps to make sure your personal information is looked after in the best possible way and we review this regularly.

Please read this privacy notice ('Privacy Notice') carefully, as it contains important information about how we use the personal and healthcare information we collect on your behalf.

A children's and easy read version of our privacy notice is also available on our website and practice waiting areas.

### **1. WHY WE ARE PROVIDING THIS PRIVACY NOTICE**

We are required to provide you with this Privacy Notice by Law. It explains how we use the personal and healthcare information we collect, store and hold about you. If you are unclear about how we process or use your personal and healthcare information, or you have any questions about this Privacy Notice or any other issue regarding your personal and healthcare information, then please contact the practice Data Controller.

The Law says:

- A. We must let you know why we collect personal and healthcare information about you;
- B. We must let you know how we use any personal and/or healthcare information we hold on you;
- C. We need to inform you in respect of what we do with it;
- D. We need to tell you about who we share it with or pass it on to and why; and
- E. We need to let you know how long we can keep it for.

### **2. THE DATA PROTECTION OFFICER**

The contact details of the named responsible Data Controller at the practice is Kayleigh Rose-wood (Practice manager).

You can contact them at Lister House Surgery, The Common Hatfield, Hertfordshire, AL10 0NL if:

1. You have any questions about your information being held
2. You require access to your information or if you wish to make a change to your information
3. Any other query in relation to this Privacy Notice Policy and your rights as a patient.

***Data Protection Officer (DPO) function for this practice is provided by Hertfordshire, Bedfordshire and Luton ICT services, hosted by ENHCCG. If you wish to contact the DPO or have a concern about anything to do with the personal and healthcare information we hold about you (that was not resolved by your enquiry with the practice), please contact the Data Protection Officer at HBLICT***

hosted by ENHCCG at: [enhertscg.dpo-gp.hblict@nhs.net](mailto:enhertscg.dpo-gp.hblict@nhs.net) \* Address: Data Protection Officer, Charter House, Parkway, Welwyn Garden City, Herts, AL8 6JL

\*In this initial email, please only indicate you wish to raise a concern about how your personal information is being processed. Please do not provide any details at this stage. On receipt of this email you will be contacted and requested to provide adequate, relevant and limited information necessary in relation to the purposes for which your concern is being processed.

### **3. ABOUT US**

We, at Lister House Surgery (**'the Surgery'**) situated at Lister House Surgery, The Common, Hatfield, Hertfordshire, AL10 0NL, are a **Data Controller** of your information. This means we are responsible for collecting, storing and handling your personal and healthcare information when you register with us as a patient.

There may be times where we also process your information. That means we use it for a particular purpose and, therefore, on those occasions we may also be **Data Processors**. The purposes for which we use your information are set out in this Privacy Notice.

### **4. INFORMATION WE COLLECT FROM YOU**

The information we collect from you will include:

- A. Your contact details (such as your name and email address, including place of work and work contact details);
- B. Details and contact numbers of your next of kin;
- C. Your age range, gender, ethnicity;
- D. Details in relation to your medical history;
- E. The reason for your visit to the Surgery;
- F. Medical notes and details of diagnosis and consultations with our GPs and other health professionals within the Surgery involved in your direct healthcare.

Lister House Surgery uses this information for the following reasons:

To help inform the decisions that we need to make about your care

To ensure that your treatment is safe and effective, including any advice that may be provided as part of your care

To help us to work effectively with other organisations who may also be involved in your care

The information collected from you and others is collectively known as your 'health record'. Your health record may be held in hand written format (manual record) or on a computer system (electronic). Information held within your health record is used for your direct care purposes and to check and review the quality of care you have received. (This is called audit and clinical governance).

We may contact you using SMS messaging for appointment and other services on the mobile number you have provided and where you have given us permission to do so. If you no longer wish to receive messages via SMS, please contact the practice to let us know.

Your care providers will endeavour to ensure that your health record is kept up-to-date, accurate, secure and appropriately accessible to those providing your care and treatment. Please ensure you update us on any changes to your contact information or any other relevant details. You have the right to access information held about you.

## **5. INFORMATION ABOUT YOU FROM OTHERS**

We also collect personal information about you when it is sent to us from the following:

- A. a hospital, a consultant or any other medical or healthcare professional, or any other person involved with your general healthcare.
- B. Social services, court orders, and public health services and councils.
- C. Psychological services
- D. Solicitors, Department of working pensions and job centres

## **6. YOUR SUMMARY CARE RECORD**

Your summary care record is an electronic record of your healthcare history (and other relevant personal information) held on a national healthcare records database provided and facilitated by NHS England.

This record may be shared with other healthcare professionals and additions to this record may also be made by relevant healthcare professionals and organisations involved in your direct healthcare.

You may have the right to demand that this record is not shared with anyone who is not involved in the provision of your direct healthcare. If you wish to enquire further as to your rights in respect of not sharing information on this record then please contact the practice Data Controller.

To find out more about the wider use of confidential personal information and to register your choice to opt out if you do not want your data to be used in this way, please visit [www.nhs.uk/my-data-choice](http://www.nhs.uk/my-data-choice).

Note if you do choose to opt out, you can still consent to your data being used for specific purposes. However, if you are happy with this use of information you do not need to do anything. You may however change your choice at any time.

## **7. WHO WE MAY PROVIDE YOUR PERSONAL INFORMATION TO, AND WHY**

Whenever you use a health or care service, such as attending Accident & Emergency or using Community Care Services, important information about you is collected to help ensure you get the best possible care and treatment. This information may be passed to other approved organisations where there is a legal basis, to help with planning services, improving care, research into developing new treatments and preventing illness. All of this helps in providing better care to you and your family and future generations. However, as explained in this privacy notice, confidential information about your health and care is only used in this way where allowed by law and would never be used for any other purpose without your clear and explicit consent.

We may pass your personal information on to the following people or organisations, because these organisations may require your information to assist them in the provision of your direct healthcare

needs. It, therefore, may be important for them to be able to access your information in order to ensure they may properly deliver their services to you:

- A. Hospital professionals (such as doctors, consultants, nurses, etc);
- B. Other GPs/Doctors;
- C. Pharmacists;
- D. Nurses and other healthcare professionals;
- E. Dentists;
- F. Any other person that is involved in providing services related to your general healthcare, including mental health professionals.

## 8. OTHER PEOPLE WHO WE PROVIDE YOUR INFORMATION TO

- A. Commissioners;
- B. Clinical Commissioning Groups;
- C. Local authorities;
- D. Community health services;
- E. For the purposes of complying with the law e.g. Police, Solicitors, Insurance Companies;
- F. Anyone you have given your consent to, to view or receive your record, or part of your record. **Please note, if you give another person or organisation consent to access your record we will need to contact you to verify your consent before we release that record. It is important that you are clear and understand how much and what aspects of, your record you give consent to be disclosed.**
- G. **Extended Access** – this service is part of the My Care Record initiative of electronic health record sharing, and provides you with access to GP appointments outside of our regular practice hours. We provide extended access services to our patients which means you can access medical services outside of our normal working hours. In order to provide you with this service, we have formal arrangements in place with the Clinical Commissioning Group and with other practices whereby certain key “**hub**” practices offer this service on our behalf for you as a patient to access outside of our opening hours. This means, those key “**hub**” practices will have to have access to your medical record to be able to offer you the service. Please note to ensure that those practices comply with the law and to protect the use of your information, we have very robust data sharing agreements and other clear arrangements in place to ensure your data is always protected and used for those purposes only.

The key **Hub** practices are as follows:

Spring House Medical Centre Spring House Medical Centre, Ascots Lane, Welwyn Garden City, Hertfordshire, AL7 4HL

- H. **Data Extraction/ Risk stratification by the Clinical Commissioning Group** – the clinical commissioning group at times extracts medical information about you, but the information we pass to them via our computer systems **cannot identify you to them**. This information only refers to you by way of a code that only your practice can identify (it is pseudo-anonymised). This therefore protects you from anyone who may have access to this information at the Clinical Commissioning Group from **ever** identifying you as a result of seeing the medical information and we will **never** give them the information that would enable them to do this.

There are good reasons why the Clinical Commissioning Group may require this pseudo-anonymised information, these are as follows:

- To assist in analysing current health services and proposals for developing future services.
- To develop risk stratification models to help GP's to identify and support patients with long term conditions and to help to prevent un-planned hospital admissions or reduce the risk of certain diseases developing, such as diabetes.
- Using risk stratification to help the CCG to understand the health needs of the local population in order to plan and commission the right services.

Further details on how the NHS East and North Hertfordshire CCG uses information to support their roles and responsibilities can be found on the CCG website: <http://www.enhertsccg.nhs.uk/how-we-use-information-about-you-fair-processing-notice>

- I. **MJOG – MJOG** is cloud-based text messaging service used by GPs to communicate with their patients. The source of the information shared in this way is your electronic GP record for the purposes of direct administrative patient care.
- J. **System 1** - Are responsible for the provision of a clinical system, software and IT services used by the Practice to securely store and process your medical record. All information about your personal health records are stored in your GP electronic record. This information is then available to practice staff & external bodies as outlined in this document.
- K. **Open Exeter** - Open Exeter is a web-enabled viewer which provides the facility for healthcare professionals to share/access patient data held on the National Health Application and Infrastructure Services (NHAIS) systems, including cervical screening, breast screening, organ donor, blood donor and home oxygen. Access to Open Exeter is only possible on the N3 network, and via authorised logons/passwords provided by NHS Digital. The source of the information shared in this way is your electronic GP record.
- L. **National NHS Digital Services “Spine including:**
  - Patient Demographics Service
  - e-Referral Service
  - Electronic Prescription Service
  - GP2GP
  - Summary Care Record

**Spine** supports the IT infrastructure for health and social care in England, joining together over 23,000 healthcare IT systems in 20,500 organisations.

It hosts 5 key services to support the delivery of your care. They enable healthcare professionals, authorised with an NHS smartcard, to view relevant information about you as follows

**Patient Demographics Service** – The Personal Demographics Service (PDS) is the national electronic database of NHS patient details such as name, address, date of birth and NHS Number (known as demographic information). It helps healthcare professionals to identify patients and match them to their health records. It also allows them to contact and communicate with patients.

**My Care Record** - This is a local record sharing initiative that promotes the safe, transparent sharing of your healthcare records for the purpose of your direct care needs. The My Care Record currently allows the sharing of patient records with local partner organisations. To ensure that those partner

organisations comply with the law and to protect the use of your information, we have very robust data sharing agreements and other clear arrangements in place to ensure your data is always protected and used for those intended purposes only. For more information of the My Care Record initiative and a list of the organisations who have signed data sharing agreements to promote this integrated care model, please follow the link: <https://www.enhertscg.nhs.uk/mcr>

**Summary Care Record (SCR)** – is an electronic record of important patient information, created from GP medical records. The record is held on a national healthcare records database provided and facilitated by NHS Digital. This allows other healthcare professionals who we do not have data sharing agreements with, but who you have a direct care relationship with, to access your electronic record when they are providing you with direct care services. This is particularly helpful if you are visiting another part of the country and require healthcare services. It can be seen and used by authorised staff in other areas of the health and care system involved in the patient's direct care.

When your personal health records on your GP Record is uploaded to the spine, NHS Digital becomes the data controller for the uploaded information.

The source of the information shared in this way is your electronic GP record.

At a minimum, the SCR holds important information about;

- current medication
- allergies and details of any previous bad reactions to medicines
- the name, address, date of birth and NHS number of the patient

The patient can also choose to include additional information in the SCR, such as details of long-term conditions, significant medical history, or specific communications needs.

This record may be accessed with your permission by relevant healthcare professionals involved in your direct healthcare. If you do not wish to have your SCR available to be shared, please contact the practice so we can update your records. <https://digital.nhs.uk/summary-care-records>

**Summary Care Record with Additional information (Enhanced SCR)**- The inclusion of additional information on a SCR is particularly useful for people with complex or long term conditions. Due to the sensitivity of more detailed information being accessible on your SCR, you will be asked for your permission to allow additional information to be added to, and accessible on, your SCR.

**Referrals such as Hospital Appointments/Specialists/Dentists/Continuing Health Care Services, Community Services (including Mental Health), and CCG approvals for certain NHS health services:**

When referrals are made for patients to an NHS or private healthcare provider, a summary of the patient's health history is typically included to assist the receiving healthcare professional to make a holistic assessment and/decision. This is important, because removal of areas of the history that could be considered relevant may affect the outcome of referrals and treatment. If there are areas of your healthcare history that you do not want shared, please raise this with your GP or healthcare professional.

**E -Referral Service** - The NHS e-Referral Service (e-RS) combines electronic booking with a choice of place, date and time for first hospital or clinic appointments. Patients can choose their initial hospital or clinic appointment, book it in the GP surgery at the point of referral, or later at home on the phone or online.

**Electronic Prescription Service** - The Electronic Prescription Service (EPS) sends electronic prescriptions from GP surgeries to pharmacies. Eventually EPS will remove the need for most paper prescriptions.

**GP2GP** - GP2GP allows patients' electronic health records to be transferred directly, securely, and quickly between their old and new practices, when they change GPs. This improves patient care by making full and detailed medical records available to practices, for a new patient's first and later consultations. The source of the information shared in all of the instances above in this way is your electronic GP record.

**People and Organisations involved in your care:** Health and Social Care Professionals, including support personnel who have, or will have a direct care relationship with you to meet your healthcare needs:

**Diagnostic Organisations:** Diagnostic testing organisations are provided with relevant information to allow contact with you and to book a test/procedure to assist in your direct healthcare needs.

**Pharmacies:** Pharmacists are provided with relevant information to allow contact with you and to provide relevant prescriptions and supporting advice, assisting in your direct healthcare needs.

**National Screening Programmes:** The NHS provides national screening programmes so that certain diseases can be detected at an early stage. These screening programmes currently include bowel cancer, breast cancer, cervical cancer, aortic aneurysms and a diabetic eye screening service. The law allows us to share your contact information with Public Health England so that you can be invited to the relevant screening programme. More information can be found at: <https://www.gov.uk/topic/population-screening-programmes>. For national screening programmes, you can opt out so that you no longer receive an invitation to a screening programme. See: <https://www.gov.uk/government/publications/opting-out-of-the-nhs-population-screening-programmes> or speak to your practice.

**Clinical Commissioning Group (CCG)** -The CCG manages the majority of contracts for primary care, in order for us to deliver healthcare services to you. At times, they may assist us in the administration of our direct care services through coordination or follow up with organisations about matters relating to your direct healthcare needs. This may include such functions as coordinating community pharmacy services, arranging continuing health care services, contacting a hospital about important discharge information, a diagnostic organisation about a test result, or other health or social care services involved in your care.

We have contracts in place with the CCG. This means that they cannot do anything with your personal information unless we have instructed them to. They will only share information about you that is relevant and necessary to fulfil the requirement of a particular service to you. Information about you is only shared with organisations that have a relationship with you or will have a relationship through a referral. They will hold your information securely and retain it for only as long as necessary. If you require further information please contact the practice or the DPO.

**Third Party Technical Support Processors** - We use data processors who are third parties (i.e. website, telephone, CCTV and waste management, scanning etc), who provide technical administration services for us to deliver health care services to you. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct. If you require further information please contact the practice or the DPO.

## **9. ANONYMISED INFORMATION**

Sometimes we may provide information about you in an anonymised form. If we do so, then none of the information we provide to any other party will identify you as an individual and cannot be traced back to you.

## **10. YOUR RIGHTS AS A PATIENT**

The Law gives you certain rights to your personal and healthcare information that we hold, as set out below:

### **A. Access and Subject Access Requests**

You have the right to see what information we hold about you and to request a copy of this information. Under special circumstances, which have an overriding legal basis, some information may be withheld.

Sometimes information about third parties mentioned by you or others may be recorded on your records. We are under an obligation to make sure we also protect that third party's rights as an individual and to ensure that references to them which may breach their rights to confidentiality, are removed before we send any information to any other party including yourself. Third parties can include, but not limited to: spouses, partners, and other family members.

A subject access request can be made in writing or verbally but we will need to verify who you are. For ease of use, please complete this online form available on our website or at reception. Alternatively, please use the following contact at the GP Practice to make your request to the practice administrator.

If you have consented to a third party to request a SAR on your behalf, we require the third party to supply us with your consent. Due to the confidentiality and sensitivity of health records, if we are unsure about the consent provided or think you may not be aware of the extent of what would be disclosed in the request, we may contact to review and confirm the request with you before the SAR is processed.

If online access is a service available at the practice, there are robust protocols necessary for security of this information. When we give you online access or provide you with a SAR via another means, the responsibility is yours to make sure that you keep your information safe and secure if you do not wish any third party to gain access to it.

If you would like a copy of the information we hold about you please email the practice Data Controller. We will provide this information free of charge however, we may in some **limited and exceptional** circumstances have to make an administrative charge for any extra copies if the information requested is excessive, complex or repetitive.

We have one month to reply to you and give you the information that you require. We would ask, therefore, that any requests you make are in writing and it is made clear to us what and how much information you require.

**Access Requests for Deceased Patient Records:** This is not managed under the data protection legislation. The Access to Health Records Act 1990 includes this access. Requests to access should be made to the Primary Care Services England. <https://pcse.england.nhs.uk/services/gp-records/accessing-medical-records/>

#### **B. Online Access**

You may ask us if you wish to have online access to your medical record. However, there will be certain protocols that we have to follow in order to give you online access, including written consent and production of documents that prove your identity.

Please note that when we give you online access, the responsibility is yours to make sure that you keep your information safe and secure if you do not wish any third party to gain access.

#### **C. Correction**

We want to make sure that your personal information is accurate and up to date. You may ask us to correct any information you think is inaccurate. It is very important that you make sure you tell us if your contact details including your mobile phone number has changed.

#### **D. Removal**

You have the right to ask for your information to be removed however, if we require this information to assist us in providing you with appropriate medical services and diagnosis for your healthcare, then removal may not be possible.

#### **E. Objection**

We cannot share your information with anyone else for a purpose that is not directly related to your health, e.g. medical research, educational purposes, etc. We would ask you for your consent in order to do this however, you have the right to request that your personal and healthcare information is not shared by the Surgery in this way. Please note the Anonymised Information section in this Privacy Notice.

You have the right to object to your information being shared outside of the practice; however 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.

If you do not want your personal information to be shared and used for purposes other than your direct care and treatment, then you should contact the practice and ask for further information about how to register your objections. This should not affect the care and treatment you receive.

You can object to processing of your information at the practice; however this would prevent us from providing you with any further healthcare services.

Please note that there may be times where there are legitimate legal grounds that override the objection of an individual i.e.: a legal obligation that the data controller must comply with or for the establishment, exercise or defence of legal claims.

#### **F. Transfer**

You have the right to request that your personal and/or healthcare information is transferred, in an electronic form (or other form), to another organisation, but we will require your clear consent to be able to do this.

### **11. THIRD PARTIES MENTIONED ON YOUR MEDICAL RECORD**

Sometimes we record information about third parties mentioned by you to us during any consultation. We are under an obligation to make sure we also protect that third party's rights as an individual and to ensure that references to them which may breach their rights to confidentiality, are removed before we send any information to any other party including yourself. Third parties can include: spouses, partners, and other family members.

### **12. HOW WE USE THE INFORMATION ABOUT YOU**

We use your personal and healthcare information in the following ways:

- A. when we need to speak to, or contact other doctors, consultants, nurses or any other medical/healthcare professional or organisation during the course of your diagnosis or treatment or on going healthcare;
- B. when we are required by Law to hand over your information to any other organisation, such as the police, by court order, solicitors, or immigration enforcement.

***We will never pass on your personal information to anyone else who does not need it, or has no right to it, unless you give us clear consent to do so.***

### **13. LEGAL JUSTIFICATION FOR COLLECTING AND USING YOUR INFORMATION**

The Law says we need a **legal basis** to handle your personal and healthcare information.

**CONTRACT:** We have a contract with NHS England to deliver healthcare services to you. This contract provides that we are under a legal obligation to ensure that we deliver medical and healthcare services to the public.

**CONSENT:** Sometimes we also rely on the fact that you give us consent to use your personal and healthcare information so that we can take care of your healthcare needs.

Please note that you have the right to withdraw consent at any time if you no longer wish to receive services from us.

**NECESSARY CARE:** Providing you with the appropriate healthcare, where necessary. The Law refers to this as 'protecting your vital interests' where you may be in a position not to be able to consent.

**LAW:** Sometimes the Law obliges us to provide your information to an organisation (see above).

#### **14. SPECIAL CATEGORIES**

The Law states that personal information about your health falls into a special category of information because it is very sensitive. Reasons that may entitle us to use and process your information may be as follows:

**PUBLIC INTEREST:** Where we may need to handle your personal information when it is considered to be in the public interest. For example, when there is an outbreak of a specific disease and we need to contact you for treatment, or we need to pass your information to relevant organisations to ensure you receive advice and/or treatment;

**CONSENT:** When you have given us consent;

**VITAL INTEREST:** If you are incapable of giving consent, and we have to use your information to protect your vital interests (e.g. if you have had an accident and you need emergency treatment);

**DEFENDING A CLAIM:** If we need your information to defend a legal claim against us by you, or by another party;

**PROVIDING YOU WITH MEDICAL CARE:** Where we need your information to provide you with medical and healthcare services

#### **15. HOW LONG WE KEEP YOUR PERSONAL INFORMATION**

We carefully consider any personal information that we store about you, and we will not keep your information for longer than is necessary for the purposes as set out in this Privacy Notice.

In line with the most current NHS Digital Records Management Code of Practice for Health and Social Care, we will retain/store your health record for as long as necessary to provide the services set out in this Privacy Notice.

If you move away and register with another practice, we will send your records to the new practice in accordance with NHS guidelines.

For further information, please contact the practice.

#### **16. UNDER 16s**

There is a separate privacy notice for patients under the age of 16, a copy of which may be obtained on request.

#### **17. IF ENGLISH IS NOT YOUR FIRST LANGUAGE**

If English is not your first language you can request a translation of this Privacy Notice. Please email our practice Data Controller.

#### **18. COMPLAINTS**

If you have a concern about the way we handle your personal data or you have a complaint about what we are doing, or how we have used or handled your personal and/or healthcare information, then please contact the Data Protection Officer at HBLICT hosted by ENHCCG\* on [enhertscg.dpo-gp.hblict@nhs.net](mailto:enhertscg.dpo-gp.hblict@nhs.net)

\*In this initial email, please only indicate you wish to raise a concern about how your personal information is being processed. Please do not provide any details at this stage. On receipt of this email you will be contacted and requested to provide adequate, relevant and limited information necessary in relation to the purposes for which your concern is being processed.

However, you have a right to raise any concern or complaint with the UK information regulator, at the Information Commissioner's Office: <https://ico.org.uk/>.

## **19. OUR WEBSITE**

The only website this Privacy Notice applies to is the Surgery's website. If you use a link to any other website from the Surgery's website then you will need to read their respective privacy notice. We take no responsibility (legal or otherwise) for the content of other websites.

## **20. Wi-Fi**

Is available on site for the use of our visitors via a third party provider as part of an NHS initiative. The practice has no access to the data held or control over Wi-Fi usage.

You will be provided with the access name and password if you wish to access the Wi-Fi, where terms and conditions of use will be available.

## **21. COOKIES**

The Surgery's website uses cookies. For more information on which cookies we use and how we use them, please see our Cookies Policy.

## **22. SECURITY**

We take the security of your information very seriously and we do everything we can to ensure that your information is always protected and secure. We regularly update our processes and systems and we also ensure that our staff are properly trained. We also carry out assessments and audits of the information that we hold about you and make sure that if we provide any other services, we carry out proper assessments and security reviews.

**CCTV** - CCTV is in place in our practice (supplied by AAA security). It has been installed solely for the safety and security of our patients and staff; to prevent and deter crime.

Images are recorded 24 hours a day and stored on the hard drives of the recording devices that are situated in secure areas and only those authorised at the practice and those delivering technical support services will have access to the system. The CCTV only records images and does not record audio. All CCTV recordings are stored on our recording devices for 28 days before being deleted. There are signs in the practice telling you that CCTV is in place.

We will only ever share information with the relevant internal personnel/authorities in connection with the safety and security of patients and staff and will not share with any other third parties.

Visitors to the practice have the right to request to see images of themselves on CCTV as part of a request made under the privacy legislation. Please refer to our Subject Access Request section '8 A' of this Privacy Notice for more information.

**Telephone Recordings** - We record both incoming and outgoing telephone calls at the practice for monitoring/ quality purposes and training needs of staff. All telephone recordings are stored on our recording devices for 28 days before being deleted. There are messages on the phone system indicating the use of voice recording.

We will only ever share information with the relevant personnel/ authorities in connection with the safety and security of patients and staff and will not share with any other third parties.

Individuals contacting the practice have the right to request access to audio of themselves as part of a request made under the privacy legislation. Please refer to our Subject Access Request section '8A' of this Privacy Notice for more information.

**Lawful Basis** - The purpose for processing the information is for quality, security and safety reasons. The lawful basis we rely on to process your personal data is article 6(1)(f) of the GDPR, which allows us to process personal data when it's necessary for the purposes of our legitimate interests.

### **23. TEXT MESSAGING AND CONTACTING YOU**

Because we are obliged to protect any confidential information we hold about you and we take this very seriously, it is imperative that you let us know immediately if you change any of your contact details.

We may contact you using SMS texting to your mobile phone in the event that we need to notify you about appointments and other services that we provide to you involving your direct care, therefore you must ensure that we have your up to date details. This is to ensure we are sure we are actually contacting you and not another person.

### **24. WHERE TO FIND OUR PRIVACY NOTICE**

You may find a copy of this Privacy Notice in the Surgery's reception, on our website, or a copy may be provided on request.

### **25. CHANGES TO OUR PRIVACY NOTICE**

We regularly review and update our Privacy Notice. This Privacy Notice was last updated on 19.03.2019 (previous dates 24.5.18).