

Privacy Policy

2018/19

Summary:	
Enter Name	Hammersmith & Fulham GP Federation (HFGPF)
Approved by	Governance Committee
Approval Date	March 2019
Next Review Date	March 2020
Responsibility for Review	Information Governance Team
Audience	All Hammersmith & Fulham GP Federation staff (which includes temporary staff, contractors and seconded staff).
<i>All staff at the Hammersmith and Fulham GP Federation and staff in the Community Education Provider Network (CEPN) comply with GDPR procedures and policies.</i>	



HAMMERSMITH & FULHAM GP FEDERATION

Hammersmith and Fulham GP Federation take confidentiality and privacy rights very seriously. This notice explains how we collect, process, transfer and store your personal information and forms part of our duty of accountability and transparency under the General Data Protection Regulation (GDPR) and Data Protection Act (2018) (DPA).

We're registered with the Information Commissioner's Office. Our registration number is [ZA089082](#).

1. How we meet the principles of the General Data Protection Regulations and Data Protection Act (2018)

We will always process your personal information lawfully and fairly by;

a) Only using your information when we have a lawful reason to do so. We have to let you know how we intend to use your information, and make you aware of your rights.

Under the General Data Protection Regulations (GDPR), we need a legal basis to process (or use) your information.

We do not always rely on consent to use your information because there are rules in articles six and nine of GDPR that allows us to process your information based on:

"...a task carried out in the public interest or in the exercise of official authority vested in the Controller" i.e. the Health and Social Care Act 2015

This means we can lawfully use your personal information to care for you without your consent. You always have the right to say "no". At any time, you can:

- Refuse to give us your consent to use your information
- Withdraw consent you've given us to use your information

b) We only collect employee information for employment, HR, Payroll or pension purposes. We will not use your information for anything else that is not considered, by law, to be for this purpose.

c) Only using the personal information that will be deemed relevant and necessary to HR, purposes only.

d) Keeping your information accurate and up to date when using it and, if we find errors or omissions, we will correct your information as soon as we can.

e) Only keeping your information in a way that it will identify you for as long as we are legally required to, while ensuring your rights are protected.

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f) Keeping your personal information safe when it is being used, shared and stored.

2. How we collect your information

We keep records about you, for employment purposes or for the time you have with the federation. Most of your information is stored electronically on secure computer systems, which includes:

- Basic details such as:
 - Name
 - Address
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 - Date of birth
 - Phone number
 - and email address (where you've provided an email address and allowed us to communicate with you by email)
- The contact details of your next of kin
- Notes and information details about your pension, student loan, HR or any other information relevant to HMRC
- We also have emergency contact details about you

Your rights

Under GDPR and the Data Protection Act (2018), you are classed as a data subject.

Your rights, as a data subject, are set out in chapter three of GDPR in five sections:

1. Transparency and modalities – rights ensuring data subjects are informed about how personal data is being used
 - **You have a right to be kept informed about how your personal information is being used.**
2. Information and access - rights ensuring data subjects can see what personal data is being held about them
 - **You have a right to be able to see your information that we hold.**
3. Rectification and erasure - rights ensuring data subjects can correct or permanently remove personal data held about them
 - **You have a right to correct, or permanently remove, your information.**
4. Right to object and automated decision-making - rights ensuring data subjects can object to how personal data about them is processed (e.g. marketing)
 - **You have a right to decide how your information is used (for example, marketing purposes)**

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5. Restrictions – special exemptions allow the above rights to be limited for justified purposes, these include health research – but conditions and safeguards apply.
 - **Sometimes, we can use your information without your consent.**

Your right to confidentiality

Your right to confidentiality does not cover all circumstances. There may be times when we must share your information with other organisations.

We don't need your consent if:

- We're concerned that you are putting yourself at risk of serious harm
- We're concerned that you are putting another person at risk of serious harm
- We're concerned that you are putting a child at risk of harm
- We've been instructed to do so by a court
- The information is needed for the investigation of a serious crime
- You are subject to the Mental Health Act (1983) we may need to inform your nearest relative, even if you object
- If you have an infectious disease and we have to inform Public Health England

Sometimes, we can use your information without your consent. For example, we can use your information for health research, but we have to do so safely and legally.

3. Why do we collect your personal information?

We record information about you so we can give you the right to work with the H&F GP Federation. It's important we:

- Have enough information to help you make the right decision about your role and responsibilities when selecting right candidates
- Record the times we've spoken to you, sent you a letter, or seen you prior to your employment
- Are able to learn from your experience, and improve for our staff
- Are able to investigate your complaints or concerns.

More information

- Find out how to request access to your information

4. Who we share your information with

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We do not share your information with any range of public and private companies or charities. We'll never share your information for insurance or marketing purposes.

We will only share your information if:

- We have your consent to do so
- It's in your best interest
- The welfare of others is involved.

You always have the right to say "no". At any time, you can:

- Refuse to give us your consent to share your information
- Withdraw consent you've given us to share your information.

Data sharing agreements

A data sharing agreement is a contract between us and another organisation that clearly shows:

- What data is being shared
- How the data can be used
- Where the data is being stored or held

Often, when we share your information, we take out anything that can identify you as a person. If that is not the case, we'll ask for your consent.

We're required by law to share certain information with authorities. For example:

- Registry of births and deaths
- The Health Protection Agency
- courts
- The Driver and Vehicle Licensing Agency (DVLA)
- The Department of Work and Pensions (DWP)

5. How we keep your information safe

However we keep, use, or share your information – in electronic or paper form – we have a legal duty to keep your information safe.

Our staff, partners, and suppliers have the same legal responsibility, too.

Our staff and on-site contractors are given information governance training so they know their responsibilities to you.

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- Any data breach is taken seriously and
 - reported to the Information Commissioner's Office
 - disciplinary action taken, including up to dismissal
- Our information systems are designed, planned and implemented with a focus on security

Data protection impact assessments

Whenever we do something new with your data, we have to understand if there are any risks involved.

By law, we have to complete a data protection impact assessment which:

- Helps us find any security risks
- Identifies the legal basis for the collection, use, and sharing of your information.

We assess the risk right at the beginning of a project. If we need to buy something new, our assessment takes place before we go out to tender.

All assessments are sent to our Data Protection Officer for approval, and if approval is given, we go ahead with our project.

We also regularly undertake data flow mapping exercises, where we note:

- What the information is
- Where the information is stored
- How the information is shared (if at all)

For more information about our data protection impact assessments, [email our Information Governance Officer \(caroline.durack@nhs.net\)](mailto:caroline.durack@nhs.net)

Our Caldicott Guardian

The person who is responsible for making sure we comply with the Caldicott Principles is known as a Caldicott Guardian. They make sure we:

1. Justify the purpose of sharing your information
2. Don't use identifiable information unless it is necessary...
3. ...If it is necessary, we use the minimum amount of information
4. Make sure only people who need to know have access to your information
5. Are aware of our responsibilities
6. Understand and comply with the law
7. Share information when it's in your best interest.

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Our Caldicott Guardian is [Dr Laurie Slater](#).

6. How long we keep your information

Your records are subject to the Records Management Code of Practice for Health and Social Care Act (2016) (or the Code).

The Code sets out best practice guidance on how long we should keep your information before we are able to review and securely dispose of it.

7. Your right to see your information

Under the Data Protection Act (2018), you have a right to see the information we hold about you. You can see your records by submitting a subject access request (SAR).

We cannot give you access to information that:

- Has been provided about you by someone else if they haven't given permission for you to see it
- Relates to criminal offences
- Is used to detect or prevent crime
- Could cause physical or emotional harm to you or someone else.

More information

- Find out how to request access to your information

8. How we use your information for research and planning

Research

The Hammersmith and Fulham GP Federation are working together with the [Clinical Research Network \(CRN\)](#), and [The National Institute for Health Research \(NIHR\)](#) to conduct studies/research within Hammersmith and Fulham GP practices. The NIHR fund health care research and translate discoveries into practical products, treatments, devices and procedures, involving patients and the public in all our work. We do not access information relation to patients registered at our individual practices.

GP Practices in Hammersmith and Fulham have their own privacy policies relating to research.

9. Consent to treatment

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H&FGP Federation does not require individual consent as smaller business unit. Practices Consent directly with their patients.

10. Suppliers (including subcontractors and individuals associated with our suppliers and subcontractors)

Why we collect personal data

We collect and process personal data about our suppliers including:

- Subcontractors and
- People associated with our suppliers and subcontractors.

We collect information to:

- Manage our contracts and relationships with our suppliers
- To receive services from our suppliers
- Develop our services – for example, we may work with a supplier to improve our care
- To provide professional services or education to our clients
- Help us manage our digital systems, including our websites, clinical systems, and applications

We use, protect, and safeguard our supplier's information in the same way outlined in this agreement.

We also have:

- Security procedures in place to protect information which involve detecting, investigating and resolving security threats,
 - Personal data may be processed as part of the security monitoring that we undertake; for example, automated scans to identify harmful emails.
- Policies and procedures in place to monitor the quality of our services and manage risks in relation to our suppliers,
 - We collect and hold personal data as part of our supplier contracting procedures.
 - We monitor the services we use for quality purposes, which may involve processing personal data.

11. Social Media

Our social media policy outlines the way we expect you to behave online.

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Above all, we ask you remain civil, and not to say or do something that could cause offense or upset to our organisation

We will never ask for your passwords. We will never ask you for personal information.

Our website may feature social sharing buttons that help you share web content to your social media account. You:

- Use our social sharing buttons at your own risk
- Accept that using our social sharing buttons may publish web content on your social profile, feed, or page.

12. Our website

Our website provides the public with information about the work that we do as a GP Federation and Community Education Provider Network (CEPN). Details about staff members in reference to the role that they have in the organisation may be shared on the website.

Website analytics

We use Google Analytics, a web analytics service provided by Google, Inc. Our analytics help us improve:

- The information we publish
- Our website's performance
- User experience of our site

You can opt out of Google Analytics by installing an add-on to your browser.

More information

- [Find out which cookies we use](#)

13. Contact information and how to raise a concern

Senior Information Risk Owner	Dr Anna Phelon
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HAMMERSMITH & FULHAM GP FEDERATION

Caldicott Guardian	Dr Laurie Slater
HFGPF IG Champion	Caroline Durack, Director of Operations
Head of Information Governance	Caroline Durack, Director of Operations
IG Lead	Caroline Durack, Director of Operations
FOI Lead	Caroline Durack, Director of Operations
Information Governance Adviser	Caroline Durack, Director of Operations

If you have any feedback about your privacy, you can [contact our Head Office](#).

[Dawes Road Hub, 20 Dawes Road, Fulham, SW6 7EN](#).

If you have a complaint about the way your data has been handled, you can contact our Deputy Senior Information Risk Owner or Caldicott Guardian – email hf.gpfed@nhs.net

Alternatively, you can [report a concern directly to the Information Commissioner's Office](#).