

How we use your information to provide you with healthcare

This Privacy Statement explains what Personal & Confidential Data (PCD) Salus Medical Services Limited (Salus) holds about you, why we hold it and how it is used.

Salus healthcare professionals who provide you with medical care maintain records about your health and about any treatment or care you have or have received previously. These records help to provide you with the best possible healthcare.

The information we hold is stored on secure NHS-approved computer systems and may include:

- Details about you, e.g. your address, carer, legal representative, emergency contact details.
- We may also record:
 - a) Any contact Salus has had with you
 - b) Notes and reports about your health
 - c) Details about your treatment, medication and care
 - d) Relevant information from other health professionals
 - e) Information from relatives or those who care for you
- Information held about you may be used to help protect the health of the public and to help us manage NHS services. Information may be used within Salus for clinical audit to monitor the quality of the service provided.
- Some of this information will be held centrally and used for statistical purposes. Where we do this, we take strict measures to ensure that individual patients cannot be identified.
- Our website gives you the opportunity to ask questions, send feedback or make a Subject Access Request. Any contact information you provide will only be used for the stated purpose.

How we ensure your records are held confidentially

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

- Data Protection Act 2018
- General Data Protection Regulations 2018
- Human Rights Act 1998
- Common Law Duty of Confidentiality
- Health and Social Care Act 2012
- NHS Codes of Confidentiality
- Information Security and Records Management
- Information: To Share or Not to Share Review
- Notice under Regulation 3(4) of the Health Service Control of Patient Information Regulations 2002 (until June 2022 in relation to supporting the Government's Covid-19 response)

Every member of staff who works for an organisation providing NHS services has a legal obligation to keep information about you confidential. All Salus staff have terms in their employment contract reinforcing that patient records must only ever be accessed for a legitimate purpose and

our computer records are fully auditable so when necessary we can check exactly who accessed your data and when.

We will only ever use or pass on information about you if 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 (e.g. life or death situations), where the law requires information to be passed on and in accordance with the information sharing principles set out in Dame Fiona Caldicott's information sharing review (Information: To share or not to share) which states that the duty to share information can sometimes be as important as the duty to protect patient confidentiality.

This means that health and social care professionals have the confidence to share information in the best interests of patients within the framework set out by the Caldicott principles. Salus has policies designed to help them do so.

It is your responsibility to tell us about any changes.

It is important that you tell us, or your GP Practice, if any of your details such as your telephone number, name or address have changed or if any of your details such as date of birth is incorrect in order for this to be amended. You have a responsibility to inform us of any changes so your record is accurate and up to date.

You have the right to object to our sharing your data in some circumstances, but we have an overriding responsibility to do what is in your best interests. Please see below.

Other important information about how your information is used to provide you with healthcare and improve the NHS:

Identifying patients who might be at risk of certain diseases

Your medical records may be searched by a computer program so that we can identify patients who might be at high risk from certain conditions such as heart disease or diabetes. This means we can offer patients additional care or support as early as possible.

This process may also involve linking information from your GP record with information from other health or social care services you have used. Information which identifies you will only be seen by ourselves, your GP practice and by limited individuals at our Data Processor (NHS South, Central and West Commissioning Support Unit). For more information please contact us.

Safeguarding

Sometimes we need to share information so that other people, including healthcare staff, children or others with safeguarding needs, are protected from risk of harm. These circumstances are rare, but we do not need your consent or agreement to do this. Please see our local policies for more information, these are available from our admin office.

Medlink

We may offer registered patients the option to conduct a secure online review via a system called Medlink. If you agree to this, your data will be made available in Medlink in order to conduct the review and on completion it will attach a review summary to your permanent medical record. If appropriate (e.g. completing a vaccine consent form), you can request a copy of the document be sent to your personal email – the email address will not be used for any other purpose. Any PCD remaining on the system is anonymised and then deleted after 1 month.

AccuRx

AccuRx handles most of the text/SMS messages you receive from Salus or your GP. AccuRx does not store any PCD but it does process your information when sending messages. After transmission AccuRx stores the text in our electronic record system. In some cases you may be invited to complete an online form called a Florey and again this is processed but not stored by AccuRx. A copy of any completed Florey is held only in your medical record.

CCTV

Patients and staff attending Mayfield Medical Practice or the Farnborough PCN's Southwood Hub may be picked up on routine CCTV, installed for safety and to prevent or detect crime. It may be reviewed for staff training, and only shared beyond the practice if there is a crime involved. Recordings are kept in secure local storage accessible only to relevant Salus personnel and unless exceptionally required, deleted after 31 days.

Integrated Care

If you or someone you care for has complex needs you may be referred to our Integrated Care Team (ICT) which brings together health and social care professionals from a range of local providers to assess your needs, create a care package, and monitor how we provide your care. The ICT includes Salus staff and representatives from local GPs, hospital, community nurses, mental health, social services, Family Action (who are commissioned by NHS Frimley ICS to provide social prescribing services), Phyllis Tuckwell Hospice, Red Cross etc.

Our ICT also works with Consultants from Frimley Health Foundation Trust and local GP Practices to try to identify patients who may benefit from early intervention before their condition deteriorates. This is known as an Anticipatory Intervention meeting (AIM) If you or someone you care for is offered support under this scheme your records will be held and managed by our ICT.

A regional information sharing agreement is in place to ensure that all parties attending ICT meetings and AIM reviews are fully aware of their data security obligation to protect your PCD and have systems in place that satisfy the NHS data security standards. This document also covers the Community Single Point of Access described below.

Community Single Point of Access (CSPA)

Salus provides the CSPA for North East Hampshire and Farnham, meaning that if any medical professional makes a referral to a community-based service that is not accessible via the NHS Electronic Referral Service, the details will be processed and maintained by our CSPA hub. This simplifies the referral process for an increasingly diverse range of community-based services.

National Audits

We contribute to national clinical audits so that healthcare can be checked and reviewed. Information from medical records can help doctors and other healthcare workers measure and check the quality of care which is provided to you. The results of the checks or audits can show where services are doing well and where they need to improve.

The results of the checks or audits are used to recommend improvements to patient care. Data are sent to NHS Digital, a national body with legal responsibilities to collect data.

The data will include information about you, such as your NHS Number and date of birth and information about your health which is recorded in coded form, for example the code for diabetes or high blood pressure.

We will only share your information for national clinical audits or checking purposes when the law allows. For more information about national clinical audits see the Healthcare Quality Improvements Partnership website:

<https://www.hqip.org.uk/> or phone 020 7997 7370.

You have the right to object to your identifiable information being shared for national clinical audits. Please contact us if you wish to object.

Public Health

We are required to share information with Public Health England if we become aware that you, a member of your family or people you have been in contact with are suffering from certain conditions known as Notifiable Diseases - often diseases that are rare in the UK such as Anthrax, Malaria or Leprosy but also Food Poisoning, Measles and Scarlet Fever. The law requires us to share your information to prevent the spread of these conditions and organisms that cause them.

Pinnacle/Covid-19 Vaccinations

Staff employed by Salus on behalf of Local GPs manage and operate Covid-19 vaccination centres at Southwood in Farnborough and Princes Hall in Aldershot. Staff working at these location have access to your PCD stored in an NHS National System called Pinnacle which records your Covid-19 vaccination details and feeds information to the NHS App and to your GP Practice.

Salus also employs a small number of staff who run a service called Covid Oximetry at Home. This service is provided with information about newly diagnosed Covid-19 patients via your GP and we may contact you to offer support. Your PCD is held electronically for no more than 28 days from the date of your diagnosis.

The General Data Protection Regulations (GDPR) requires to provide you with the following information:

Data Controller	Salus Medical Services Limited Aldershot Centre for Health Hospital Hill ALDERSHOT GU11 1AY
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Data Protection Officer	DPO: Laura Taw Email: GP-IGEnquiries.scwcsu@nhs.net
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Purpose of the processing	<ul style="list-style-type: none">• To give direct health or social care to individual patients. For example, when a patient agrees to a direct care referral, such as to a hospital, relevant patient information will be shared with other health/care staff to enable them to appropriately advise, investigate, treat and/or care.• For checks and reviews of quality of care (audits and clinical governance.)
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Lawful basis for processing	<p>The processing of personal data in the delivery of direct care and for providers' administrative purposes in this surgery and in support of direct care elsewhere is supported under the following Article 6 and 9 conditions of the GDPR:</p> <p><i>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</i></p> <p><i>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...'</i></p> <p>We will also recognise your rights established under UK case law collectively known as the "Common Law Duty of Confidentiality"</p>
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Recipient or categories of recipients of the processed data	<p>The data will be shared with:</p> <ul style="list-style-type: none">• healthcare professionals and staff in this organisation• local hospitals• out of hours services• members of the Integrated Care Team• diagnostic and treatment centres or other organisations involved in the provision of direct care to individual patients• organisations providing National Screening Programmes or NHS audits <p>We also share data with NHS South, Central and West Commissioning Support Unit who extract data from our systems and combine it with information from other sources such as local hospitals to undertake 'risk stratification', a process intended to help us identify patients most likely to need additional support and plan for that eventuality.</p>
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Rights to object

- You have the right to object to some or all the information being processed under Article 21. Please contact the Data Controller. You should be aware that this is a right to raise an objection; that is not the same as having an absolute right to have your wishes granted in every circumstance.
- 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.
- You cannot object to us sharing data with the Care Quality Commission if they need it for their regulatory function.

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 'Data Subject Access Request Form' on the website.
- We are not aware of any circumstances in which you will have the right to delete correct information from your medical record; although you are free to obtain your own legal advice if you believe there is no lawful purpose for which we hold the information and contact us if you hold a different view.

Retention period

Salus medical records will be kept in line with the law and national guidance. Information on how long records are kept can be found in the:

[Records Management Code of Practice](#)

or speak to the Data Protection Officer.

Right to complain

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 have any concerns about how your data is shared, then please contact Salus. In the first instance please contact the Data Controller via:

Sarah ROBERTS hr@salusmedical.co.uk

You have the right to complain to the Information Commissioner's Office. If you wish to complain follow this link:

<https://ico.org.uk/global/contact-us/> or call the helpline 0303 123 1113

Data we get from other organisations

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 medical record is kept up-to date when you receive care from other parts of the health service.