

Privacy Notice

Your information, what you need to know

This privacy notice explains why we collect information about you, how that information may be used, how we keep it safe and confidential and what your rights are in relation to this.

Why we collect information about you

NHS Ealing Clinical Commissioning Group (CCG) is responsible for 'commissioning health services from healthcare providers such as hospitals, as well as directly providing some health services such as continuing healthcare and Individual Funding Requests.

We do not provide healthcare services like a GP practice or hospital. Our role is to make sure the appropriate NHS care is in place for the people within our community within our available budget.

As an NHS organisation, Ealing CCG operates at a number of different levels in regards to the processing of personal data. We act as a Data Controller primarily for the management of data relating to our employees and those working on behalf of or with our organisation and also covering some NHS patient provider functions.

In carrying out our role and responsibilities as a commissioner of services for people living within the community, it is essential that the CCG has an understanding of the health and social care needs of our community. The only way that we can achieve this is by using information your GP, your clinician or your social worker has entered into your care record, as well as some information that is provided via external public sources such as, hospitals. These records help to provide you with the best possible healthcare, help us to protect your safety and monitor the quality of care that we provide. We may also collect information about you which helps us respond to your queries or secure specialist services.

Information we may collect about you

Health care professionals who provide you with care are required by law to maintain records about your health and any treatment or care you have received within any NHS organisation. This information may exist on paper or in electronic format and Ealing CCG ensures that these are kept safe and secure in an appropriate way.

The records may include basic details about you, such as your name and address. They may also contain more sensitive information about your health and social care usage and also information such as outcomes of needs assessments. We may also collect information about you which helps us to respond to your queries and help us to design services to improve the health needs and outcomes of local people.

In addition, the CCG holds and uses limited patient data for Complaints, Subject Access Requests, and Freedom of Information Requests. We collect and store information that has been received directly from you or organisations such as Local Authority and GP Practices if you are a patient with the Continuing Healthcare, Individual Funding Requests, or Medicines Optimisation Team.

Children and Families

We use the data we gather from children, young people and families we are supporting for the sole purpose of providing the best care and support that we can to them. This might also include being able to evaluate the quality of support we have given and audit our practices.

Where we believe sharing the information we have been given with other agencies is in the best interests of supporting the child or young person, then we would do that with consent.

We take our responsibility to safeguard the welfare of children, young people and vulnerable adults very seriously. We are legally obliged to pass on personal information to the relevant authority if we thought a child, young person or vulnerable adult was at risk. When you begin to receive a service this will all be covered in the process of giving your consent for us to hold and process your personal information.

You might be receiving a service from us in which case we would collect your data as part of receiving that service. This might include quite sensitive information relating to the support we are providing to you.

If you are under 13, we will need to get consent from the relevant adults to hold your personal information.

Sometimes another agency (like a school, GP or local authority) might have information that they want to pass onto us, but we would only take that data with your consent. In any case, before you started receiving support from us we would have explained all of this to you and asked you to give us your specific permission (your 'consent') to gather, hold and process this information for a defined period of time, unless there are other circumstances covered by the law.

How we keep your information confidential and safe

Everyone working for our organisation is subject to the Common Law Duty of Confidence. Information provided in confidence will only be used for the purposes advised with consent given by the patient unless there are other circumstances covered by the law. The NHS Digital [Code of Practice on Confidential Information](#) applies to all NHS staff and they are required to protect your information, inform you of how your information will be used, and allow you to decide if and how your information can be shared.

All our staffs are expected to make sure information is kept confidential and receive regular training on how to do this.

The health records we use may be electronic, on paper or a mixture of both, and we use a combination of working practices and technology to ensure that your information is kept confidential and secure; your records are backed up securely in line with NHS standard procedures. We ensure that the information we hold is kept in secure locations, is protected by appropriate security and access is restricted to authorised personnel.

We also make sure external data processors that support us are legally and contractually bound to operate and prove security arrangements are in place where data that could or does identify a person are processed.

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

- Data Protection Act 2018
- General Data Protection Regulation (GDPR) 2016
- Human Rights Act
- Common Law Duty of Confidentiality
- NHS Codes of Confidentiality and Information Security
- Health and Social Care Act 2015
- And all applicable legislation

We maintain our duty of confidentiality to you at all times. We will only ever use or pass on information about you if we reasonably believe that 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 (such as a risk of serious harm to yourself or others) or where the law requires information to be passed on.

How we use your information

Direct Care (Routine Care and Referrals)

Direct Care is care delivered to the individual. After a patient agrees to a referral for direct care elsewhere, such as a referral to a specialist in a hospital, necessary and relevant information about the patient, their circumstances and their problem will need to be shared with the other healthcare workers, such as specialists, therapists, technicians etc. The information that is shared is to enable the other healthcare workers to provide the most appropriate advice, investigations, treatments, therapies and or care.

The CCG keeps identifiable and clinical data on you relating to both the Continuing Health Care and Individual Funding Request services where you have been referred for these services. This data is used to assess whether you meet the criteria for funding for these services and to enable provision of services thereafter. People who have access to your information will only normally have access to that which they need to fulfil their roles. You have the right to object to our sharing your data in these circumstances, but we have an overriding responsibility to comply with our legal obligations. Please see table 1 below.

The data will be shared with Health and care professionals and support staff in your GP Practice, at hospitals and diagnostic and treatment centres who contribute to your personal care:

Under the powers of the Health and Social Care Act 2015, NHS Digital can request personal confidential data from GP Practices without seeking patient consent for a number of specific purposes, which is set out in the law. These purposes are explained below.

To ensure you receive the best possible care, your records are used to facilitate the care you receive. Information held about you may be used to help protect the health of the public and to help us manage the NHS.

Incidence Management

The CCG takes every measure to ensure that no identifiable personal data is accessed or shared without complying with necessary regulations. On the rare occasion that the CCG or one of our providers may breach these regulations, it is our duty to investigate what may have caused such an incident and the consequences of this. In these circumstances, the CCG may be required to obtain and process information relating to the patients in order to fully investigate and inform the individual of the outcome of their enquiries. The CCG will always ensure the information obtained is not excessive, is in line with the Data Protection Principles of GDPR Article 5(1)(c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation').

Medicine Management

The CCG has a Medicines Management Function to support patients and also help to deliver cost effective changes at GP Practices. The processing takes place under a national Service Level Agreement, the National Tariff Excluded Drugs Service. Personal data is used for both care outcomes and monitoring. Any reports based on this do not contain personal data. We collect and store information that has been received directly from the patient or the following organisations: GP Practices, NHS Trusts, Providers and Care Homes. We may share information with the following organisations with your explicit consent or when the law allows: GP Practices in within our community – data is only shared with patient's relevant GP Practice; Acute Trust where the patient has had an episode of care; Care/Nursing Homes where a patient may be a resident.

You have the right to object to your identifiable information being used or shared for this purpose. Please speak to the Clinical Commissioning Group if you no longer wish to have your data used by the Medicines Management Team.

Patient Communication

The CCG may contact patients at times (with their consent) in relation to services, feedback and new initiatives in the area that they have registered an interest in. We collect and store information that has been received directly from you when you have consented to this process. We may share information with the following organisations with your explicit consent or when the law allows: NWL Communication's Team. You have the right to object to your identifiable information being used or shared for this purpose. Please speak to the CCG if you no longer wish to have your data used or be contacted by the CCG in future.

Clinical audit

Information may be used by the CCG for clinical audit to monitor the quality of the service provided to patients with long terms conditions. Some of this information may be held centrally and used for statistical purposes (e.g. the National Diabetes Audit). When this happens, strict measures are taken to ensure that individual patients cannot be identified from the data.

Clinical Research

Sometimes your information may be requested to be used for research purposes. We will always ask your permission before releasing your information for this purpose.

Individual Funding Request

An 'Individual Funding Request' is a request made on your behalf, with your consent, by a clinician, for funding of specialised healthcare which falls outside the range of services and treatments that CCG has agreed to commission for the local population.

An Individual Funding Request is taken under consideration when a case can be set out by a patient's clinician that there are exceptional clinical circumstances which make the patient's case different from other patients with the same condition.

Who are at the same stage of their disease, or when the request is for a treatment that is regarded as new or experimental and where there are no other similar patients who would benefit from this treatment. A detailed response, including the criteria considered in arriving at the decision, will be provided to the patient's clinician.

Invoice Validation

Invoice validation is an important process. It involves using your NHS number to check which CCG is responsible for paying for your treatment. Section 251 of the NHS Act 2006 provides a statutory legal basis to process data for invoice validation purposes; we can also use your NHS number to check whether your care has been funded through specialist commissioning, which NHS England will pay for. The process makes sure that the organisations providing your care are paid correctly.

National Fraud Initiative - Cabinet Office

The use of data by the Cabinet Office for data matching is carried out with statutory authority under Part 6 of the Local Audit and Accountability Act 2014. It does not require the consent of the individuals concerned under the Data Protection Act 2018. Data matching by the Cabinet Office is subject to a Code of Practice. For further information see: <https://www.gov.uk/government/publications/code-of-data-matching-practice-for-national-fraud-initiative>

National Registries

National Registries (such as the Learning Disabilities Register) have statutory permission under Section 251 of the NHS Act 2006, to collect and hold service user identifiable information without the need to seek informed consent from each individual service user.

Risk Stratification

'Risk stratification for case finding' is a process for identifying and managing patients who have, or may be at risk of, health conditions (such as diabetes) or who are most likely to need healthcare services (such as people with frailty). Risk stratification tools used in the NHS help determine a person's risk of suffering a condition and enable us to focus on preventing ill health before it develops.

Information about you is collected from a number of sources including NHS Trusts, GP Federations and your GP Practice. A risk score is then arrived at through an analysis of your de-identified information. This can help us identify and offer you additional services to improve your health.

Risk-stratification data may also be used to improve local services and commission new services, where there is an identified need. In this area, risk stratification may be commissioned by the Clinical Commissioning Groups. Section 251 of the NHS Act 2006 provides a statutory legal basis to process data for risk stratification purposes. Further information about risk stratification is available from: <https://www.england.nhs.uk/ourwork/tsd/ig/risk-stratification/>

If you do not wish information about you to be included in any risk stratification programmes, please let us know. We can add a code to your records that will stop your information from being used for this purpose. Please be aware that this may limit the ability of healthcare professionals to identify if you have or are at risk of developing certain serious health conditions.

Safeguarding

To ensure that adult and children's safeguarding matters are managed appropriately, access to identifiable information will be shared in some limited circumstances where it's legally required for the safety of the individuals concerned.

Summary Care Record (SCR)

The NHS in England uses a national electronic record called the Summary Care Record (SCR) to support patient care. It contains key information from your GP record. Your SCR provides authorised healthcare staff with faster, secure access to essential information about you in an emergency or when you need unplanned care, where such information would otherwise be unavailable.

Summary Care Records are there to improve the safety and quality of your care. SCR core information comprises your allergies, adverse reactions and medications. An SCR with additional information can also include reason for medication, vaccinations, significant diagnoses/problems, significant procedures, anticipatory care information and end of life care information. Additional information can only be added to your SCR with your agreement.

Please be aware that if you choose to opt-out of SCR, NHS healthcare staff caring for you outside of this surgery may not be aware of your current medications, allergies you suffer from and any bad reactions to medicines you have had, in order to treat you safely in an emergency. Your records will stay as they are now with information being shared by letter, email, fax or phone. If you wish to opt-out of having an SCR please return a completed opt-out form to the practice.

Supporting Medicines Management

The CCG uses pharmacist and prescribing advice services to support local GP practices with prescribing queries, which may require identifiable information to be shared. These pharmacists work with your usual GP to provide advice on medicines and prescribing queries, and review prescribing of medicines to ensure that it is appropriate for your needs, safe and cost-effective. Where specialist prescribing support is required, the CCG medicines management team may provide relating to obtaining medications on behalf of your GP Practice to support your care.

Supporting Locally Commissioned Services

CCGs support GP practices by auditing anonymised data to monitor locally commissioned services, measure prevalence and support data quality. The data does not include identifiable information and is used to support patient care and ensure providers are correctly paid for the services they provide.

Suspected Cancer

Data may be analysed in cases of suspected cancer by [The Royal Marsden NHS Trust](#), [The Royal Brompton Hospital](#), [Imperial College Healthcare NHS Trust](#), [Chelsea and Westminster Hospital NHS Foundation Trust](#), [London North West Healthcare NHS Trust](#) and [University College London Hospitals NHS Foundation Trust](#) to facilitate the prevention, early diagnosis and management of illness. Measures are taken to ensure the data for analysis does not identify individual patients.

HR, Staffing, Employment, Recruitment & Training

The CCG collects and stores information pertaining to staff for the purposes of HR, Employment, Recruitment and Training. Information is collected and stored about prospective, current and past employees, including self-employed and temporary staff. Data is collected for purposes including recruitment, occupational health, vetting checks, staff training and payroll.

Data Retention

We manage patient records in line with the [Records Management NHS Code of Practice for Health and Social Care](#) which sets the required standards of practice in the management of records for those who work within or under contract to NHS organisations in England, based on current legal requirements and professional best practice.

Who are our partner organisations?

We may also have to share your information, subject to strict agreements on how it will be used, with the following organisations:

- NHS Trusts
- Specialist Trusts
- GP Federations
- Independent Contractors such as dentists, opticians, pharmacists
- Private Sector Providers
- Voluntary Sector Providers
- Ambulance Trusts
- Clinical Commissioning Groups
- Social Care Services
- Local Authorities
- Education Services
- Fire and Rescue Services
- Police
- Other 'data processors'

Specific details of the organisations with which we share your data can be seen on our website.

We will never share your information outside of health partner organisations without your explicit consent unless there are exceptional circumstances such as when the health or safety of others is at risk, where the law requires it or to carry out a statutory function.

Within the health partner organisations (NHS and Specialist Trusts) and in relation to the above-mentioned themes – Risk Stratification, Invoice Validation, Supporting Medicines Management, and Summary Care Record – we will assume that you are happy to for your information to be shared unless you choose to opt-out (see below).

This means you will need to express an explicit wish not to have your information shared with the other organisations; otherwise, it will be automatically shared. We are required by law to report certain information to the appropriate authorities; this is only provided after formal permission has been given by a qualified health professional. There are occasions when we must pass on information, such as notification of new births, where we encounter infectious diseases which may endanger the safety of others, such as meningitis or measles (but not HIV/AIDS), and where a formal court order has been issued. Our guiding principle is that we are holding your records in strictest confidence.

Will my information be shared with anyone else?

1. We share your information with other health and social care organisations directly involved in your care. We will always have a legal agreement in place with these organisations and ensure that your information will be held securely:
 - **NHS organisations involved in your case** – we share your information with other NHS trusts, GP surgeries and other care providers involved in your treatment.
 - **Non-NHS health and social care professionals** – we share your information with local authorities and social workers concerned with your care. Our aim is to ensure that other health and social care providers have access to information that supports your care.
2. We share your information with organisations involved in planning and improving your care. We provide anonymised information or require legal justification if they request information that may identify you.
 - **NHS bodies** – your information may be requested by NHS bodies concerned with the planning and commissioning of healthcare services, such as clinical commissioning groups
 - **Regulatory, audit and inspection bodies** – these organisations are concerned with regulating aspects of care and deciding where improvements may be made.
3. In some situations, we use other organisations to help us process your information to help us deliver your care. We will always have a legal agreement in place with these organisations which ensures that they can only use your information as we instruct.
4. We share staff information with HM Revenue and Customs, department of Work and Pensions. Information may also be shared with occupational Health and payroll service provider.

Your rights

The data that we keep about you is your data, and we ensure that we keep it confidential and that it is used appropriately. You have the following rights when it comes to your data:

1. You have the right to request a copy of all of the data we keep about you. Generally, we will not charge for this service;
2. You have the right to ask us to correct any data we have, which you believe to be inaccurate or incomplete. You can also request that we restrict all processing of your data while we consider your rectification request;
3. You have the right to ask that we erase any of your personal data which is no longer necessary for the purpose we originally collected it for. We retain our data in line with the Information Governance Alliance's guidelines (<https://digital.nhs.uk/data-and-information/looking-after-information/data-security-and-information-governance/codes-of-practice-for-handling-information-in-health-and-care/records-management-code-of-practice-for-health-and-social-care-2016>) You may also request that we restrict processing if we no longer require your personal data for the purpose we originally collected it for, but you do not wish for it to be erased.
4. You can ask for your data to be erased if we have asked for your consent to process your data. You can withdraw consent at any time – please contact us to do so.
5. If we are processing your data as part of our legitimate interests as an organisation or in order to complete a task in the public interest, you have the right to object to that processing. We will restrict all processing of this data while we look into your objection.

You may need to provide adequate information for our staff to be able to identify you, for example, a passport or driver's license. This is to make sure that data is not shared with the wrong person inappropriately. We will always respond to your request as soon as possible and at the latest within one month.

Right to withdraw consent to share personal information (Opt-Out)

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 do not want your information to be used for any purpose beyond providing your care you can choose to opt-out. If you wish to do so, please let us know so we can code your record appropriately. We will respect your decision if you do not wish your information to be used for any purpose other than your care, but in some circumstances we may still be legally required to disclose your data.

There are two main types of opt-out.

Type 1 Opt-Out

If you do not want information that identifies you to be shared outside the practice, for purposes beyond your direct care, you can register 'Type 1 Opt-Out'. This prevents your personal confidential information from being used other than in particular circumstances required by law, such as a public health emergency like an outbreak of a pandemic disease.

National Data Opt-Out

NHS Digital has created a new opt-out system named the National Data Opt-Out which allows individuals to opt-out of their information being used for planning and research purposes. From 25 May 2018, NHS Digital has had to apply this opt-out for all their data flows, and from 2021 all health and care organisations will have to ensure the opt-out is respected. Individuals who previously opted out with a 'Type 2' objection will not have to do anything as you will be automatically be opted out. If you wish to apply the National Opt-Out, please go to NHS Digital's website here <https://www.nhs.uk/your-nhs-data-matters/>

Access to your information

Under the Data Protection Act 2018 you have the right to see or have a copy, of data we hold that can identify you, with some exceptions. You do not need to give a reason to see your data. If you want to access your data, you may make a Subject Access Request verbally or in writing. Under special circumstances, some information may be withheld. If you wish to have a copy of the information we hold about you, please contact: The Data Protection Officer (DPO) at: nwlccgs.subjectaccessrequest@nhs.net

Freedom of Information

Under the Freedom of Information Act 2000, you have the right to request copies of non-personal information held by the Clinical Commissioning Group. To gain access to a copy of this information, you will need to make a Freedom of Information (FOI) Request to the Clinical Commissioning Group at: nwlccgs.ccg.foi@nhs.net or by writing to:

Freedom of Information Team
Ealing CCG
15 Marylebone Road
London
NW1 5JD

Change of Details

It is important that you tell the person treating you if any of your details, such as your name or address have changed or if any of your details are incorrect in order for this to be amended. Please inform us of any changes so our records for you are accurate and up to date.

Notification

The Data Protection Act 2018 requires organisations to register notification with the Information Commissioner to describe the purposes for which they process personal and sensitive information.

We are registered as a data controller and our registration (ZA008047); can be viewed online in the public register at: <https://ico.org.uk/ESDWebPages/Search> Any changes to this notice will be published on our website and in a prominent area at the Organisation.

Complaints

If you have concerns or are unhappy about any of our services, please contact the Complaints Manager at: Nwlccgs.complaints@nhs.net

For independent advice about data protection, privacy, and data-sharing issues or to make a complaint, you can contact The Supervisory Authority at the address below:

The Information Commissioner

Wycliffe House
Water Lane
Wilmslow Cheshire
SK9 5AF

Phone: 0303 123 1113

Website: www.ico.org.uk

Table 1

Information we are required to provide you

<p>Data Controller contact details</p>	<p>3rd Floor, Orange Wing Perceval House 14/16 Uxbridge Road Ealing W5 2HL</p>
<p>Data Protection Officer contact details</p>	<p>Felicia Ayo-Ajala nwlccgs.subjectaccessrequest@nhs.net</p>
<p>Purpose of the processing for the provision of your healthcare</p>	<ul style="list-style-type: none"> • To give direct health or social care to individual patients. • For example, when a patient agrees to a referral for direct care, such as to a hospital, relevant information about the patient will be shared with the other healthcare staff to enable them, to give appropriate advice, investigations, treatments and/or care. • To check and review the quality of care. (This is called audit and clinical governance).
<p>Lawful basis for processing for the provision of your healthcare</p>	<p>These purposes are supported under the following sections 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...’;</i> <i>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>Healthcare staff will also respect and comply with their obligations under the common law duty of confidence.</p>
<p>Purpose of the processing for medical research and to measure quality of care</p>	<p>Medical research and to check the quality of care which is given to patients (this is called National clinical audit).</p>

<p>Lawful basis for processing for medical research and to measure the quality of care</p>	<p>The following sections of the GDPR mean that we can use medical records for research and to check the quality of care (national clinical audits)</p> <p>Article 6(1)(e) – ‘processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller’.</p> <p>For medical research: there are two possible conditions.</p> <p>Either: Article 9(2)(a) – ‘the data subject has given explicit consent...’ Or: Article 9(2)(j) – ‘processing is necessary for... scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member States law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and interests of the data subject’</p> <p>To check the quality of care (clinical audit): Article 9(2)(h) – ‘processing is necessary for the purpose of preventative...medicine...the provision of health or social care or treatment or the management of health or social care systems and services...’</p>
<p>Purpose of the processing to meet legal requirements</p>	<p>Compliance with legal obligations or court order.</p>

<p>Lawful basis for processing to meet legal requirements</p>	<p>These purposes are supported under the following sections of the GDPR:</p> <p>Article 6(1)(c) – ‘processing is necessary for compliance with a legal obligation to which the controller is subject...’</p> <p>Article 9(2)(h) – ‘processing is necessary for the purpose of preventative...medicine...the provision of health or social care or treatment or the management of health or social care systems and services...’</p>
<p>Purpose of the processing for National screening programs</p>	<ul style="list-style-type: none"> • The NHS provides several national health screening programs to detect diseases or conditions early such as cervical and breast cancer, aortic aneurysm and diabetes. • The information is shared so that the correct people are invited for screening. This means those who are most at risk can be offered treatment.

<p>Lawful basis for processing for National screening programs</p>	<p>The following sections of the GDPR allow us to contact patients for screening.</p> <p>Article 6(1)(e) – ‘processing is necessary...in the exercise of official authority vested in the controller...’</p> <p>Article 9(2)(h) – ‘processing is necessary for the purpose of preventative...medicine...the provision of health or social care or treatment or the management of health or social care systems and services...’</p>
<p>Other Lawful bases for processing Information e.g. Personnel, Financial, Internal audits, Complaints, non-contractual invoices</p>	<p>Article 6(1)(a) - Consent Article 6(1)(b) - Contract Article 6(1)(c) - Legal Obligation Article 6(1)(e) - Public Task</p> <p>Article 9(2)(a) - Explicit Consent Article 9(2)(b) - Employment, Social Security or Protection Law Article 9(2)(g) - Substantial Public Interest Article 9(2)(f) - Legal Claims</p>
<p>Rights to object</p>	<ul style="list-style-type: none"> • You have the right to object to information being shared between those who are providing you with direct care. • This may affect the care you receive – please speak to the practice. • 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. • The information will be shared with the local safeguarding service
<p>Right to access and correct</p>	<ul style="list-style-type: none"> • 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 ‘subject access request’ policy on our website at: https://www.ealingccg.nhs.uk/ or email us at: nwlccgs.subjectaccessrequest@nhs.net
<p>Retention period</p>	<p>Records will be kept in line with the law and national guidance. Information on how long records are kept can be found at: https://digital.nhs.uk/article/1202/Records-Management-Code-of-Practice-for-Health-and-Social-Care-2016 or speak to the CCG</p>
<p>Right to complain</p>	<p>You have the right to complain to the Information Commissioner’s Office. You may follow this link https://ico.org.uk/global/contact-us/or-call-the-helpline 03031231113</p>
<p>Data we get from other organisations</p>	<p>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 GP medical record is kept up-to-date when you receive care from other parts of the health service.</p>

Further Information

Further information about the way in which the NHS uses personal information and your rights in that respect can be found here:

The NHS Care Record Guarantee

The NHS Care Record Guarantee for England sets out the rules that govern how patient information is used in the NHS, what control the patient can have over this, the rights individuals have to request copies of their data and how data is protected under the Data Protection Act 2018.

<http://systems.digital.nhs.uk/infogov/links/nhscrg.pdf>

The NHS Constitution

The NHS Constitution establishes the principles and values of the NHS in England. It sets out the rights patients, the public and staff are entitled to. These rights cover how patients access health services, the quality of care you'll receive, the treatments and programs available to you, confidentiality, information and your right to complain if things go wrong.

<https://www.gov.uk/government/publications/the-nhs-constitution-for-england>

NHS Digital

NHS Digital collects health information from the records health and social care providers keep about the care and treatment they give, to promote health or support improvements in the delivery of care services in England. <http://content.digital.nhs.uk/article/4963/What-we-collect>

Reviews of and Changes to our Privacy Notice

We will keep our Privacy Notice under regular review. This notice was last reviewed in October 2020.