Management Information and Service Planning

Privacy Notice

Summary

We use information from your medical record to manage and improve our services, for example to plan appointment capacity, check that registrations have been processed correctly, monitor our clinical registers, and make sure we are serving all our patients equally.

This is carried out on our behalf by Penrose Health Management Ltd, which acts only on our instructions and under a written contract. The information is held securely in the UK, is not used to make decisions about your individual care, and is not shared with anyone else for this purpose.

We keep it for as long as you are registered with us. If you leave the practice, information that identifies you is removed from our reports within two years. You can ask us what information is held about you and ask for inaccuracies to be corrected.

Details of processing

Purpose of the processing

We use the information to run our practices well. For example, to:

- plan appointment capacity, staffing and opening hours;
- check that new registrations and changes of address have been processed correctly;
- keep our clinical registers (for example for long-term conditions) complete and up to date;
- check that all groups of patients can get appointments and care equally, for example by age, ethnicity or the area you live in;
- understand how easy it is to reach us, such as how long callers wait on the phone.

Most of this work uses counts and summaries rather than looking at individual people. It is not used to make decisions about your individual care, and no decisions about you are made automatically.

Information we use

- Details from your GP record, such as your age, sex, ethnicity, the area you live in, your registration, appointments, and the conditions, treatments and prescriptions recorded.
- Details of calls and text messages from our phone system, such as when you called, how long you waited and which team answered. Our Phone Calls Recording privacy notice explains how we keep call recordings.

If you have registered a National Data Opt-out, your information is not included.

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Lawful basis for processing

The lawful justifications for this processing are:

> *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".*

and

> *Article 9(2)(h) "processing is necessary for the purposes of preventive or occupational medicine … the provision of health or social care or treatment or the management of health or social care systems and services", with Data Protection Act 2018, Schedule 1, Part 1, paragraph 2 (health or social care purposes).*

Recipient or categories of recipients of the shared data

The information is processed for us by Penrose Health Management Ltd, under a written contract and only on our instructions. It is held on secure systems in the UK (London), provided by Amazon Web Services under contract. Access is limited to authorised staff.

The information is not sold, not used for marketing or research, and not shared with anyone else for this purpose.

Retention period

We keep the information for as long as you are registered with us. If you leave the practice, information that identifies you is removed from our reports within two years.

Your rights

Right to object

You have the right under Article 21 of the UK GDPR to object to your personal information being processed. Please contact the Practice if you wish to object. Contact information can be found on the Privacy page of our website.

You should be aware that this is a right to raise an objection, which is not the same as having an absolute right to have your wishes granted in every circumstance.

Right to access and correct

You have the right to access any identifiable personal data that is being processed and to have any inaccuracies corrected.

Right to complain

You have the right to complain to the Information Commissioner's Office. Contact information can be found on the Privacy page of our website.

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