



NHS Patient Privacy Notice

Distribution: All staff and clinical partners
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Owner - Barny Guthrie, CEO



NHS PATIENT PRIVACY NOTICE

Policy summary

For the purposes of the contract between Clinical Partners and your referring Clinical Commissioning Group (CCG), the following information constitutes Clinical Partners Privacy Statement for you or your child.

Data protection is an absolute priority for Clinical Partners and this document serves to provide you with all of the information you need as regards to how Clinical Partners processes your information.

Clinical Partners are committed to the key principles of data protection ensuring that we always:

- Process your data lawfully, fairly, and transparently
- Collect your data only for explicit, specified, legitimate purposes and do not further process this data
- Only collect data that is adequate, relevant and limited in scope
- Collect accurate data and take actions to ensure the ongoing accuracy of this data
- Keep the data for no longer than absolutely necessary for the stated purposes
- Process your data in a secure manner



POLICY

The contact details of Clinical Partners data controller and data protection officer

The CEO Barny Guthrie has ultimate responsibility for all elements of governance, including information governance for Clinical Partners.

Address

Clinical Partners
Unit 6 Chaldicott Barns
Tokes Lane
Semley
SP7 9AW

Contact details

governancenoreply@clinical-partners.co.uk

0203 326 9160

What are the purposes of the processing for which your or your child's personal data are intended as well as the legal basis for the processing

- We are processing your data as part of an agreement between Clinical Partners and your CCG to provide a clinical referral.
- Consent: you have given clear consent for Clinical Partners to process your personal data for a specific purpose.
- Contract: the processing is necessary for a contract we have with you and your referring CCG.

The categories of personal data concerned with this contract

- We receive contact information for you and/or your child from the NHS.
- Medical report prepared by a clinician.

Who is in receipt of your information?

Your data will be seen and processed by members of Clinical Partners administration team and Clinical Partners Clinicians.

Further, if you have provided consent, this will be passed to the child's educational establishment (school etc).

Where do we store your data?

- All Clinical Partners data storage is subcontracted. Your data is held on servers hosted by Microsoft and Salesforce.
- All data processing is done in-house. Neither Clinical Partners Limited nor any third party subcontractor's process data outside of the EEA.



How long do we keep your information?

We will keep your data in a form that permits identification for no longer than necessary or legally required.

- In the case of medical records this is 20 years from the date of your last appointment with Clinical Partners Ltd or 10 years after your death, whichever is sooner.
- In the case of children this is until you attain the age of 25 or 26 if you were 17 at the time of your last appointment with Clinical Partners Ltd.

How do we use your data?

- To carry out our obligations arising from any contracts entered into between your referring NHS Trust, you and Clinical Partners relating to psychiatry, psychotherapy and psychologist appointments.
- To provide you with the information and services that you have consented to receive from us.

What are your rights?

- You have the right to access to the personal data we hold about you, free of charge. However, we hold the right to refuse requests that are unfounded or excessive.
- The correction of your personal data when incorrect, out of date or incomplete. Please contact Clinical Partners or your referring CCG for any corrections.
- That we stop holding your personal data for direct marketing purposes.
- That we stop any consent-based processing of your personal data after you withdraw consent. You are free to withdraw consent at any time.
- You have the right to ask the controller for the erasure of personal data concerning you or your child without undue delay and the controller shall have the obligation to erase personal data without undue delay, unless required to be kept by other legislation.
- You have the right to object to our processing of your data.
- You have the right to ask for the data we process on you to be provided to you in a portable, accessible format.

If any of your details change, if you would like to request action on any of your above rights, or have concerns about the data we hold please email governancenoreply@clinical-partners.co.uk or call 0203 326 9160. Please note that we may need to verify your identity prior to actioning any requests in order to protect privacy.



Contacting the Regulator

If you feel that your data has not been handled correctly, or you are unhappy with our response to any request you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office

You can contact them by calling 0303 123 1113

Or you can go online to www.ico.org.uk/concerns (this will open in a new window – please note we cannot be responsible for the content of external websites).

Security of Processing

The security of your data is our top priority.

We work with industry leading companies, using best working practices and consult with IT and security experts in order to ensure that any processing of your data is done in the most secure and privacy-focused way possible.

Wherever possible, we make use of at-rest and in-transit encryption to ensure that your data cannot be read by unauthorised entities and make use of the best available technology sets.

Clinical Partners are Cyber Essentials Plus certified, providing extra reassurance that our systems and processes are secure and in line with the best available practices.

The source of the personal data held by us

- We have received information about you or your child from your referring CCG that we are working closely with for the delivery of our service to you. This may include information from other medical practitioners if you have agreed to medical records being sent to us and information from other business partners.
- We hold data on you or your child for explicit and legitimate purposes. The data we collect will be adequate, relevant and limited to the purposes for which it is to be used.

Automated decision-making, including profiling

Clinical Partners does not use any form of automated decision making tool including profiling.

Further processing of any information we hold on you

Clinical Partners will not use your data for any purpose other than that for which it was obtained without your written consent.

Changes to this privacy notice

An up to date copy of this privacy notice is maintained here: www.clinical-partners.co.uk/policies

Please check this regularly to ensure you are informed of any changes.