

# KAFICO

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## Privacy / Transparency Notice

In response to receiving a completed Processing Activities Log that The Acle Medical Partnership has confirmed is an accurate and complete record of processing carried out by the practice, the following suggested Privacy / Transparency Notice has been drafted.

It is intended to satisfy all the requirements for privacy notices listed by the Information Commissioner and set out below.

What information must be supplied?	Data obtained directly from data subject	Data obtained from a third party or sharing partner
Identity and contact details of the controller (and where applicable, the controller's representative) and the data protection officer	✓	✓
Purpose of the processing and the lawful basis for the processing	✓	✓
The legitimate interests of the controller or third party, where applicable	✓	✓
Categories of personal data		✓
Any recipient or categories of recipients of the personal data	✓	✓
Details of transfers to third country and safeguards	✓	✓
Retention period or criteria used to determine the retention period	✓	✓

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The existence of each of data subject's rights		
The right to withdraw consent at any time, where relevant		
The right to lodge a complaint with a supervisory authority		
The source the personal data originates from and whether it came from publicly accessible sources		
Whether the provision of personal data part of a statutory or contractual requirement or obligation and possible consequences of failing to provide the personal data		
The existence of automated decision making, including profiling and information about how decisions are made, the significance and the consequences.		

## The Acle Medical Partnership and Your Information

The Acle Medical Partnership takes your privacy very seriously. We are registered with the Information Commissioner's Office as a Data Controller and our registration number is Z4698852.

If you have any questions or wish to make a request in relation to your information, please contact us at;

Acle Medical Partnership  
Bridewell Lane  
Acle  
Norwich  
Norfolk  
NR13 3RA

Our DPO is Emma Cooper and her email is:

[Emma.Cooper35@nhs.net](mailto:Emma.Cooper35@nhs.net)

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The Acle Medical Partnership aims to provide you with the highest quality health care. To do this we must keep records about you, your health and the care we have provided or plan to provide to you.

Your doctor and other health professionals caring for you, such as nurses or physiotherapists, keep records about your health and treatment so that they are able to provide you with the best possible care.

These records are called your 'health care record' and may be stored in paper form or on computer and electronic systems and may include **Personal Data**;

- basic details about you, such as address, date of birth, NHS number, and next of kin  
as well as **Sensitive Personal Data**;
- contact we have had with you, such as clinical visits
- notes and reports about your health
- details and records about your treatment and care
- results of x-rays, laboratory tests etc.

Healthcare providers are permitted to collect, store, use and share this information under Data Protection Legislation which has a specific section related to healthcare information.

## What do we do with your information?

- Refer you to other healthcare providers when you need other service or tests
- Share samples with laboratories for testing (like blood samples)
- Share test results with hospitals or community services (like blood test results)
- Allow out of hours or extended hours GPs to look at your health record when you are going to an appointment
- Send prescriptions to a pharmacy
- Patients are texted in relation to healthcare services
- Samples are provided to the courier for delivery to pathology
- Share reports with the coroner

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- Receive reports of appointments you have attended elsewhere such as with the community nurse or if you have had a stay in hospital

Follow [this link](#) to see a list of the partners that we usually share with.

The Acle Medical Partnership has signed a Suffolk Wide Information Sharing Agreement which allows health and social care providers to agree a secure and lawful way to share your information.

## What else do we do with your information?

Along with activities related directly to your care, we also use information in ways which allow us to check that care is safe and provide data for the improvement and planning of services.

- Quality / payment / performance reports are provided to service commissioners
- As part of clinical research – information that identifies you will be removed, unless you have consented to being identified
- Undertaking clinical audits within the practice
- Supporting staff training

## CCTV

CCTV is in place covering the outside areas of our practice.

It has been installed solely for the safety and security of our patients and staff, to prevent and deter crime.

Images are recorded 24 hours a day and stored on the hard drives of the recording devices that are situated in secure areas and only the practice managers and those delivering technical support services will have access to the system.

The CCTV only records images and does not record audio.

All CCTV recordings are stored on our recording devices for 14 days before being deleted.

There are signs in the practice telling you that CCTV is in place.

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We will only ever share information with the relevant authorities in connection with the safety and security of patients and staff and will not share with any other third parties.

Visitors to the practice have the right to request to see images of themselves on CCTV as part of a request made under the privacy legislation. Like all subject access requests, it must be made in writing.

We have followed the CCTV guidelines produced by the Information Commissioners' Office.

## Sharing when Required by Law

Sometimes we will be required by law to share your information and will not always be able to discuss this with you directly. Examples might be for the purposes of detection or prevention of crime, where it is in the wider public interest, to safeguard children or vulnerable adults, reporting infectious diseases or where required by court order.

## Information Access and Rights

Data protection law provides you with a number of rights that the practice is committed to supporting you with;

### Right to Access

You have the right to obtain:

confirmation that your information is being used, stored or shared by the practice

a copy of information held about you

The Acle Medical Partnership will impose a charge of £50 to cover the administration as an entire health record can be very large. If you only require a particular part of your record, tell us and we will amend the charge accordingly.

We will respond to your request within one month of receipt or will tell you when it might take longer.

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We are required to validate your identity including the identity of someone making a request on your behalf

## Right to Object or Withdrawn Consent

We mainly use, store and share your information because we are permitted in order to deliver your healthcare but you do have a right to object to us doing this.

Where we are using, storing and sharing your information based on explicit consent you have provided, you have a right to withdraw that consent at any time.

Our Data Protection Officer will be happy to speak with you about any concerns you have.

## Right to Correction

If information about you is incorrect, you are entitled to request that we correct it

There may be occasions, where we are required by law to maintain the original information – our Data Protection Officer will talk to you about this and you may request that the information is not used during this time

We will respond to your request within one month of receipt or will tell you when it might take longer.

## Complaints

You also have the right to make complaints and request investigations into the way your information is used. Please contact our Data Protection Officer or visit the link below for more information.

For more detailed information on your rights visit <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

## Case Finding

Sometimes your information will be used to identify whether you need particular support from us.

Those involved in your care might look at particular ‘indicators’ (such as particular conditions) and contact you or take action for healthcare purposes. For example, this might

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be to prevent you from having to visit accident and emergency by supporting you in your own home or in the community.

We will use automated technology to help us to identify people that might require support but ultimately, the decision about how or whether to provide extra support you is made by those involved in your care.

Our Data Protection Officer will be happy to speak to you about this if you have concerns or objections.

## Information Technology

The practice will use third parties to provide services that involve your information such as;

- Removal and destruction of confidential waste
- Provision of clinical systems
- Provision of connectivity and servers

Data analytics or warehousing (these allow us to make decisions about care or see how effectively the practice is run – personal data will never be sold or made available to organisations not related to your care delivery)

We have contracts in place with these third parties that prevent them from using it in any other way that instructed. These contracts also require them to maintain good standards of security to ensure your confidentiality.

Please visit [this link](#) to find out more about our sharing partners and providers.

## How do we Protect your Information?

We are committed to ensuring the security and confidentiality of your information. There are a number of ways we do this;

Staff receive annual training about protecting and using personal data

Policies are in place for staff to follow and are regularly reviewed

We check that only the minimum amount of data is shared or accessed

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We use 'smartcards' to access systems, this helps to ensure that the right people are accessing data – people with a 'need to know'

We use encrypted emails and storage which would make it difficult for someone to 'intercept' your information

We report and manage incidents to make sure we learn from them and improve

We put in place contracts that require providers and suppliers to protect your data as well

We do not send your data outside of the EEA

## How Long Do We Keep Your Information?

In line with the Department of Health Code, we will retain / store your health record for your lifetime. When a patient dies, we will review the record and generally it will be destroyed 10 years later, unless there is a reason to keep it for longer.

If you move away or register with another practice, we will send your records to the new practice.

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## Appendix A – Acle Medical Partnership’s Routine Sharing Partners

Processing Activities	Sharing Partners (including any third party providers of services)	Link
Referrals / Test Results / Discharges	Queen Elizabeth Hospital	<a href="http://www.gehkl.nhs.uk/">www.gehkl.nhs.uk/</a>
	North Cambridgeshire Hospital	<a href="http://www.cambscommunityservices.nhs.uk/">www.cambscommunityservices.nhs.uk/</a>
	Addenbrookes Hospital.	<a href="https://www.cuh.nhs.uk/addenbrookes-hospital">https://www.cuh.nhs.uk/addenbrookes-hospital</a>
	Papworth Hospital	<a href="http://www.royalpapworth.nhs.uk/">www.royalpapworth.nhs.uk/</a>
	Norwich Community Hospital	<a href="http://norfolkcommunityhealthandcare.nhs.uk/">norfolkcommunityhealthandcare.nhs.uk/</a>
	James Paget Hospital	<a href="http://jpaget.nhs.uk/">jpaget.nhs.uk/</a>
	Hellesdon Hospital	<a href="http://nsft.nhs.uk/">nsft.nhs.uk/</a>
	Chatterton House	<a href="http://nsft.nhs.uk/">nsft.nhs.uk/</a>
	Thurlow House	<a href="http://nsft.nhs.uk/">nsft.nhs.uk/</a>
	Swaffham Community Hospital	<a href="http://norfolkcommunityhealthandcare.nhs.uk/">norfolkcommunityhealthandcare.nhs.uk/</a>
	Guy's & St Thomas	<a href="https://www.guysandstthomas.nhs.uk/Home.aspx">https://www.guysandstthomas.nhs.uk/Home.aspx</a>
	Moorfield Eye Hospital	<a href="http://moorfields.nhs.uk/">moorfields.nhs.uk/</a>
	Royal Orthopaedic Hospital	<a href="http://rnoh.nhs.uk/">rnoh.nhs.uk/</a>
	Great Ormond Street	<a href="http://www.gosh.nhs.uk/">www.gosh.nhs.uk/</a>
	West Suffolk Hospital	<a href="http://www.ipswichhospital.nhs.uk/">http://www.ipswichhospital.nhs.uk/</a>
	Norfolk and Norwich Hospital.	<a href="http://www.nnuh.nhs.uk/">http://www.nnuh.nhs.uk/</a>
	Royal Marsden Hospital	<a href="https://www.royalmarsden.nhs.uk/">https://www.royalmarsden.nhs.uk/</a>
	Express Diagnostics (24hr ECGS)	<a href="http://www.expressdiagnostics.co.uk/patients/heart-tests/24-hour-holter-ecg/">www.expressdiagnostics.co.uk/patients/heart-tests/24-hour-holter-ecg/</a>
	The Pathology Partnership	<a href="https://www.healthwatchsuffolk.co.uk/.../the-pathology-partnership-riverside-clinic-ip...">https://www.healthwatchsuffolk.co.uk/.../the-pathology-partnership-riverside-clinic-ip...</a>
	St Nicholas Endoscopy Unit	<a href="http://stjamesmp.co.uk/services/st-nicholas-endoscopy-unit/">stjamesmp.co.uk/services/st-nicholas-endoscopy-unit/</a>
	Bartram Wheelchair Service	<a href="http://bartrams.net/wheelchair-services-contracts/">bartrams.net/wheelchair-services-contracts/</a>
	Norfolk & Suffolk ME/CFS	<a href="http://ecch.org/ourservices">ecch.org/ourservices</a>
	Change Grow Live	<a href="http://changegrowlive.org">changegrowlive.org</a>
ACES	<a href="http://aces-eyeclinic.co.uk/">aces-eyeclinic.co.uk/</a>	
Norfolk Community Eating Disorder Service	<a href="http://cpft.nhs.uk/">cpft.nhs.uk/</a>	
St James Clinic	<a href="http://norfolkcommunityhealthandcare.nhs.uk/">norfolkcommunityhealthandcare.nhs.uk/</a>	
Nuffield Hospitals	<a href="http://nuffieldhealth.com/">nuffieldhealth.com/</a>	
Global Diagnostics	<a href="http://globaldiagnostics.co.uk">globaldiagnostics.co.uk</a>	
Spire Norwich Hospital	<a href="http://spirehealthcare.com/">spirehealthcare.com/</a>	

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	BMI The Sandringham Hospital	<a href="http://bmihealthcare.co.uk/">bmihealthcare.co.uk/</a>
	Macmillan	<a href="https://www.macmillan.org.uk/fundraising/inyourarea/england/suffolk/suffolk.aspx">https://www.macmillan.org.uk/fundraising/inyourarea/england/suffolk/suffolk.aspx</a>
	Priscilla Bacon Lodge	<a href="http://priscillabaconhospice.org">priscillabaconhospice.org</a>
	Tapping House	<a href="http://norfolkhospice.org.uk">norfolkhospice.org.uk</a>
	Swaffham & Litcham Home Hospice	<a href="http://swaffhamandlitchamhomehospice.co.uk">swaffhamandlitchamhomehospice.co.uk</a>
	Social Services	<a href="http://norfolk.gov.uk/care-support-and-health/">norfolk.gov.uk/care-support-and-health/</a>
	Everybody Health & Fitness	<a href="http://everybodyhealthandfitness.co.uk/">everybodyhealthandfitness.co.uk/</a>
	Slimming World	<a href="http://slimmingworld.co.uk">slimmingworld.co.uk</a>
	Ascenti Physio	<a href="https://www.ascenti.co.uk/">https://www.ascenti.co.uk/</a>
GP Federation	Iceni Healthcare	<a href="http://www.icenihealthcare.co.uk/">www.icenihealthcare.co.uk/</a>
	North Norfolk CCG	<a href="http://www.northnorfolkccg.nhs.uk/">http://www.northnorfolkccg.nhs.uk/</a>
	North Norfolk Primary Care NNPC	<a href="http://www.cqc.org.uk/provider/1-4641844637">www.cqc.org.uk/provider/1-4641844637</a>
EPS	Pharmacy determined by patient	NA
Discharge Notices	West Suffolk Hospital	<a href="http://www.ipswichhospital.nhs.uk/">http://www.ipswichhospital.nhs.uk/</a>
	Norfolk and Norwich Hospital.	<a href="http://www.nnuh.nhs.uk/">http://www.nnuh.nhs.uk/</a>
	Addenbrookes Hospital.	<a href="https://www.cuh.nhs.uk/addenbrookes-hospital">https://www.cuh.nhs.uk/addenbrookes-hospital</a>
	Guy's & St Thomas	<a href="https://www.guysandstthomas.nhs.uk/Home.aspx">https://www.guysandstthomas.nhs.uk/Home.aspx</a>
	Great Ormond Street	<a href="http://www.gosh.nhs.uk/">www.gosh.nhs.uk/</a>
Confidential waste removal	Avena Confidential	<a href="https://www.avenaconfidential.co.uk/">https://www.avenaconfidential.co.uk/</a>
CCTV	PanaEpos	<a href="http://www.panaepos.com/">www.panaepos.com/</a>
Patient Texts	MJOG	<a href="https://www.mjog.com/">https://www.mjog.com/</a>
Pathology Courier	ISS	<a href="https://www.uk.issworld.com/">https://www.uk.issworld.com/</a>
PCSE Notes	City Sprint	<a href="https://www.citysprint.co.uk/">https://www.citysprint.co.uk/</a>
Coroner Reports	Norfolk Coroners	<a href="https://www.norfolk.gov.uk/births-ceremonies-and-deaths/deaths/the-coroner">https://www.norfolk.gov.uk/births-ceremonies-and-deaths/deaths/the-coroner</a>
Commissioner Reports	North Norfolk CCG	<a href="http://www.northnorfolkccg.nhs.uk/">http://www.northnorfolkccg.nhs.uk/</a>
Provision of IT Systems and Support	Arden and Greater East Midlands Commissioning Support Unit	<a href="https://www.ardengemcsu.nhs.uk/">https://www.ardengemcsu.nhs.uk/</a>
Provision of clinical system	EMIS	<a href="http://www.emishealth.com/">www.emishealth.com/</a>
Infectious Diseases	Anglia Health Protection Team	<a href="https://www.gov.uk/guidance/contacts-phe-health-protection-teams">https://www.gov.uk/guidance/contacts-phe-health-protection-teams</a>
Document Management System	Docman	<a href="http://www.docman.com/">www.docman.com/</a>
Care Homes	Broadlands Park	<a href="https://www.hollymancarehomes.co.uk/broadlandspark/">https://www.hollymancarehomes.co.uk/broadlandspark/</a>

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	Joseph House	<a href="http://www.josephousereedham.co.uk/">http://www.josephousereedham.co.uk/</a>
	The Old Rectory	<a href="http://pearlcare.co.uk/old-rectory-care-home-norfolk/">http://pearlcare.co.uk/old-rectory-care-home-norfolk/</a>
	Burlingham House	<a href="https://www.burlinghamhouse.co.uk/">https://www.burlinghamhouse.co.uk/</a>
	The Meadows Oak Farm	<a href="http://www.beeshawcareltd.co.uk/">http://www.beeshawcareltd.co.uk/</a>
Medicines Management	Norfolk Medicines Support	<a href="http://www.norfolk.gov.uk/norfolk-county-council/support">www.norfolk.gov.uk/norfolk-county-council/support</a>
HR	HR Online	<a href="https://w2.hronline.co.uk/Account/Login?ReturnUrl=%2f">https://w2.hronline.co.uk/Account/Login?ReturnUrl=%2f</a>