

Direct Care Privacy Notice

We use your information to provide you with healthcare. Claremont Clinic keeps medical records confidential and complies with data protection legislation. We hold your medical record so that we can provide you with safe care and treatment. We are required by law to provide you with the following information about how we handle your information.

Data Controller	Claremont Clinic
Purpose of the processing	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
Information we collect and use	<ul style="list-style-type: none">• Special data information including racial or ethnic origin; religious or philosophical beliefs; genetic data; biometric data (where used for identification purposes); data concerning health; data concerning a person’s sex life; and data concerning a person’s sexual orientation.• Demographics: name, address, date of birth, postcode, and NHS number• Medical history• Adult and Children safeguarding information• Third party identifying data: basic details about other individuals that may be involved in providing your care and support services, e.g. emergency contacts, relatives, mobility services providers, home care support
Lawful basis for processing	<p>These purposes are supported under the following sections of the UK General Data Protection Regulations:</p> <p>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</p> <p>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...’</p> <p>Schedule 1, Part 1(2) Health and Social Care Purposes, Data Protection Act 2018</p> <p>The legal obligation relies on the Health and Social Care Act 2012 s251(b) (as amended by the Health and Social Care (Safety and Quality) Act 2015 which created a statutory ‘duty to share’).</p> <p>We will also recognise your rights established under UK case law collectively known as the “Common Law Duty of Confidentiality” to keep information about you confidential.</p>
Recipient or categories of recipients of the processed data	<p>Please see the main privacy notice a full list of organisations we share information with.</p> <p>Claremont Clinic may also receive information about your health from these organisations who are involved in providing you with</p>

health and social care.
This means your GP medical record is kept up-to date when you receive care from other parts of the health service.

NHS Summary Care Record

All patients registered with a GP have a Summary Care Record, unless they have chosen not to have one.

The information held in your Summary Care Record gives registered and regulated healthcare professionals, away from Claremont Clinic, access to information to provide you with safer care, reduce the risk of prescribing errors and improve your patient experience. It is often used if you temporarily register at another practice as “immediately necessary” by NHS 111 services, out of hours providers, pharmacy first providers and ambulance services. Hospitals have access to your summary care record via the NHS spine.

Your Summary Care Record can contain basic (Core) information including contact information and information about allergies, medications and any reactions that you have had to medication in the past.

It can contain fuller additional information including:

- significant medical history (past and present)
- reason for medication
- anticipatory care information (such as information about the management of long-term conditions)
- end of life care information (from the [SCCI1580](#) national dataset)
- immunisations

By default, your summary care record will contain both core and additional information.

You can choose how much information is shared in your summary care record with three main options:

1. Choose to have a Summary Care Record with all information shared. This means that any authorised, registered and regulated health and care professionals will be able to see a detailed Summary Care Record, including Core and Additional Information, if they need to provide you with direct care.
2. Choose to have a Summary Care Record with Core information only. This means that any authorised, registered and regulated health and care professionals will be able to see limited information about allergies and medications in your Summary Care Record if they need to provide you with direct care.
3. Choose to opt-out of having a Summary Care Record altogether. This means that you do not want any information shared

	<p>with other authorised, registered and regulated health and care professionals involved in your direct care. You will not be able to change this preference at the time if you require direct care away from your GP practice. This means that no authorised, registered and regulated health and care professionals will be able to see information held in your GP records if they need to provide you with direct care, including in an emergency. To make these changes, you should inform your GP practice or complete this form and return it to your GP practice.</p>
<p>The NHS App</p>	<p>We use the NHS Account Messaging Service provided by NHS England to send you messages relating to your health and care.</p> <p>You need to be an NHS App user to receive these messages. Further information about the service can be found at the privacy notice for the NHS App managed by NHS England.</p>
<p>Population Health Management</p>	<p>Your information is passed, with all identifiers removed to NHS North East London ICB for public health management. This enables the Practice to identify the appropriate level of care and services for distinct groups of patients. It is the process of assigning a risk status to patients, then using this information to direct care and improve overall health outcomes.</p>
<p>The London Care Record (known locally as the East London Patient Record, eLPR) , The Universal Care Plan & The London Secure Data Environment (SDE) run by OneLondon</p>	<p>The London Care Record allows health and care professionals involved in your care see important details about your health when and where they need them.</p> <p>It can show doctors, nurses and other care professionals any conditions you have, your test results, medicines you take, anything you're allergic to, plans for your care and other important information.</p> <p>Having a single, secure view of your information helps speed up communication between care professionals and helps inform the decisions they make about your care. This helps them to provide the best possible joined up care more quickly and can save lives.</p> <p>To see how data is shared and detailed privacy notices then click here.</p> <p>You have the right to object to your data being used in the London SDE for planning or improving health and care services, and research purposes. There are a number of ways of doing this.</p> <p>You can use the Local Data Opt-Out to stop your information being used by the London SDE for planning and improving health and care services, and research purposes. Details about how to do this are available on this page.</p> <p>If you have a complaint about how your request has been handled you can email us via NELondonicb.oneLondon.opt-out@nhs.net and include 'complaint' in the subject.</p>

You can also opt-out of your data being used for planning and improving health and care services, and research purposes across NHS England using the National Data Opt-Out service. More information is available on the [NHS Digital website](#).

Local Data Opt-Out Service

You can use the Local Data Opt-Out service to stop your information being used by the London SDE for planning and improving health and care services, and for research purposes by:

- writing to us via **email**: NELondonicb.oneLondon.opt-out@nhs.net (Please use the subject line “Opting-Out”)
- writing to us via **post**: OneLondon Service Desk, NHS North East London, 9th Floor, 20 Churchill Place, London, E14 5HJ
- **calling** us: 0203 182 2900 A voicemail service operates 24 hours a day 7 days a week. Please leave a message providing us with your contact name, telephone number and the fact that you would like to opt-out of your data being used for secondary purposes. We will contact you to process your request within office hours (Monday – Friday 09:00 – 17:00)

National Data Opt-Out

The National Data opt-out is a service that enables patients to opt-out of their confidential information being used for research and planning.

The National Data opt-out can be applied [here](#).

It is worth noting that in a small number of exceptional circumstances, where senior health care professionals can decide to share information based on public interest, and in these cases the National Data Opt-out does not apply.

The [Confidentiality Advisory Group](#) (CAG) considers applications for the use of patient data without consent under the following regulations of Control of Patient Information Regulations 2002 , Section 251 of the NHS Act 2006:

Regulation 2 – for diagnosis and treatment of cancer

Regulation 5 – for general medical and research purpose

Specific exemptions to the national data opt-out policy have been made for disclosure of data for:

- Public Health England National Disease Registers
- Assuring Transformation
- National patient experience surveys

There are also [specific policy considerations for NHS Digital](#), as the national safe haven of health and care data with specific powers under the Health and Social Care Act 2012.

National data opt-outs do not apply where NHS Digital indicate data should be provided to them under s259 of the Health and

	Social Care Act 2012.
Your rights	For further details on your rights and how to complain please see the main privacy notice

Commissioning, Planning, Risk Stratification and Research Privacy Notice

Claremont Clinic uses data insightfully for research, auditing and healthcare planning (population health management).

Data Controller	Claremont Clinic
Purpose of the processing	<p>If data from many patients are linked up or pooled, Researchers and Doctors can look for patterns in the data, helping them to develop new ways of predicting illness, and identify ways to improve clinical care.</p> <p>This information can be used to help:</p> <ul style="list-style-type: none"> • Understand more about disease risk and causes • Improve diagnosis • Develop new treatments and prevent diseases • Plan NHS and GP Services • Improve patient safety • Evaluate Government and NHS Policy
Information we collect and use	<ul style="list-style-type: none"> • Pseudonymised data: information about individuals but with identifying details (such as name or NHS number) replaced with a unique code • Anonymised data: information about individuals but with identifying details removed • Aggregated data: anonymised information grouped together so that it does not identify individuals <p>In certain circumstances, where we have a lawful basis it may be necessary to use:</p> <ul style="list-style-type: none"> • Demographics: name, address, date of birth, postcode, and NHS number • Medical history
Lawful basis for processing	<p>These purposes are supported under the following sections of the UK General Data Protection Regulations:</p> <p>Article 6(1)(c) ... ‘necessary for compliance with a legal obligation to which the controller is subject</p> <p>Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’;</p> <p>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...’</p> <p>Article 9(2)(g) processing is necessary for reasons of substantial public interest, on the basis of domestic 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 the interests of the data subject;’</p> <p>Article 9(2)(i) ‘processing is necessary for reasons of public interest in the area of public health, such as protecting against</p>

	<p>serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of domestic law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject, in particular professional secrecy’</p> <p>Article (9)(2)(j) ‘processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) (as supplemented by section 19 of the 2018 Act) based on domestic 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 the interests of the data subject.</p> <p>Schedule 1, Part 1(2) Health and Social Care Purposes, Data Protection Act 2018</p> <p>Schedule 1, Part1(3) Public Health, Data Protection Act 2018</p> <p>Schedule 1, Part 1(4) Research etc, Data Protection Act 2018</p> <p>Schedule 1 Part 2(6) Statutory etc and government purposes, Data Protection Act 2018</p> <p>Health and Social Care Act 2012.</p> <p>Claremont Clinic recognises your rights established under UK case law collectively known as the “Common Law Duty of Confidentiality” to keep information about you confidential. Even though consent is not the legal basis for processing personal data for secondary purposes such as service evaluations and audit, the common law duty of confidentiality is not changing, therefore consent is still needed for people outside the care team to access and use confidential patient information for clinical audit, unless you have support under the Health Service (Control of Patient Information Regulations) 2002 (‘section 251 support’) applying via the Confidentiality Advisory Group in England and Wales or similar arrangements elsewhere in the UK.</p>
<p>Recipient or categories of recipients of the processed data</p>	<p>Please see the main privacy notice for a full list of organisations we share information with.</p>
<p>Population Health Management</p>	<p>Your information is passed, with all identifiers removed, to NHS North East London ICB for public health management. This enables the Practice to identify the appropriate level of care and services for distinct groups of patients. It is the process of assigning a risk status to patients, then using this information to direct care and improve overall health outcomes.</p>
<p>NHS England General Practice Extract Service (GPES) via NHS Digital</p>	<p>NHS Digital, collects data from Practices to support vital health and care planning and research. This information is used insightfully to better understand what causes ill health and, importantly, what we can do to prevent or treat it and provide better care.</p> <p>NHS England is a national body which has legal responsibilities to collect information about health and social care services. It collects information from across the NHS in England and provides reports on how the NHS is performing. These reports help to plan and improve services to patients. Claremont Clinic must comply with the law and will send data to NHS England, for</p>

	<p>example, when it is told to do so by the Secretary of State for Health under the Health and Social Care Act 2012.</p> <p>More information about NHS England and how it uses information can be found at:</p> <p>NHS England » Health and care data</p> <p>Some data is collected under the NHS GPES. Some data will be included even where a Type1 opt-out has been made. The identifiers extracted are: NHS number, date of birth, postcode and gender which will allow patients' GP data to be linked to their hospital data. No free text will be extracted, only coded information, NHS prescriptions and other clinical data. This data is used to analyse uptakes into screening programmes, immunisation programmes and for national planning purposes. For more information on the GP Data extraction service (including information on the level of data, frequency of extraction and the status of a Type 1 Opt Out) see:</p> <p>GPES extracts and benefits - NHS England Digital</p>
<p>Clinical Practice Research Datalink (CPRD)</p>	<p>Clinical Practice Research Datalink (CPRD) collects de-identified patient data from a network of GP practices across the UK. Primary care data are linked to a range of other health related data to provide a longitudinal, representative UK population health dataset.</p> <p>You can opt out of your information being used for research purposes at any time, full details can be found here: https://cprd.com/transparency-information.</p>
<p>Barts Health AI Lung Cancer Screening Programme</p>	<p>This initiative involves the sharing of pseudonymised patient data for all patients aged 40-80, who have previously received care at a Barts Health NHS Trust Hospital, from NEL ICB Data Service to Barts Health (Life Science Team). The key aspects of this collaboration include data sharing. NEL ICB will provide Barts Health (BLST) access to a regularly updated feed of primary care data of patients that meet the inclusion criteria of the study. Proactive contact with at-risk patients by the secondary care team to determine lung cancer status should result in earlier diagnoses, resulting in improved treatment responses, thereby providing a cost benefit to the NHS and ensuring more efficient use of healthcare resources.</p>
<p>OpenSAFELY secure COVID-19 research platform</p>	<p>NHS England has been directed by the government to establish and operate the OpenSAFELY COVID-19 Service and the OpenSAFELY Data Analytics Service. These services provide a secure environment that supports research, clinical audit, service evaluation and health surveillance for COVID-19 and other purposes.</p> <p>Claremont Clinic remains the controller of its own GP patient data but is required to let approved users run queries on</p>

pseudonymised patient data. This means identifiers are removed and replaced with a pseudonym.

Only approved users are allowed to run these queries, and they will not be able to access information that directly or indirectly identifies individuals.

Patients who do not wish for their data to be used as part of this process can register a [type 1 opt out](#) with Claremont Clinic.

Here you can find [additional information about OpenSAFELY](#).

NEL Data Discovery Service run by OneLondon & The London Secure Data Environment (SDE)

The Discovery Data Service (DDS) is a core system for clinicians to support the local population in North East London. It may be used to support local service evaluation, improve efficiency of how care is delivered and provide an effective resource for research (where legitimate and in line with national legislation)

To see how data is shared and detailed privacy notices then click [here](#).

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- writing to us via **post**: OneLondon Service Desk, NHS North East London, 9th Floor, 20 Churchill Place, London, E14 5HJ
- **calling** us: 0203 182 2900 A voicemail service operates 24 hours a day 7 days a week. Please leave a message providing us with your contact name, telephone number and the fact that you would like to opt-out of your data being used for secondary purposes. We will contact you to process your request within office hours (Monday – Friday 09:00 – 17:00)

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Your rights	For further details on your rights and how to complain please see the main privacy notice

Statutory Disclosure Privacy Notice

Where there is a statutory requirement Claremont Clinic will share personal data with a range of organisations and agencies.

Data Controller	Claremont Clinic
Purpose of the processing	<ul style="list-style-type: none"> • Safeguarding: to prevent serious abuse or neglect or death of a child or vulnerable adult from taking place • Regulatory bodies: such as the Care Quality Commission, who undertake audits to ensure the Practice comply with standards and provide safe health care • Law enforcement: prevention and detection of crime or apprehension and prosecution of offenders • Medico-legal: where the Practice are defending a legal claim • Complaint management: sometimes it is necessary to share information with NHS England or the Health Service Ombudsman or Information Commissioners Office • Planning and Research: information may be shared for securing, planning, and paying for primary care or and specialised NHS Services • Health Protection: information may be shared with Public Health bodies for the management of certain health condition, epidemics, and infections • Cancer pathways: the Practice participates in the National Cancer Diagnosis Audit
Information we collect and use	<ul style="list-style-type: none"> • Demographics: name, address, date of birth, postcode, and NHS number • Medical history
Lawful basis for processing	<p>These purposes are supported under the following sections of the UK General Data Protection Regulation:</p> <p>Article 6(1)(c) ... ‘necessary for compliance with a legal obligation to which the controller is subject</p> <p>Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’;</p> <p>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...”</p> <p>Article 9(2)(g) processing is necessary for reasons of substantial public interest, on the basis of domestic 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 the interests of the data subject;’</p> <p>Article 9(2)(i) ‘processing is necessary for reasons of public interest in the area of public health, such as protecting against serious crossborder threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of domestic law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject, in particular professional secrecy’</p>

	<p>Schedule 1, Part 1(2) Health and Social Care Purposes, Data Protection Act 2018</p> <p>Schedule 1, Part1(3) Public Health, Data Protection Act 2018</p> <p>Schedule 1 Part 2(6) Statutory etc and government purposes, Data Protection Act 2018</p> <p>Health and Social Care Act 2012.</p>
Recipient or categories of recipients of the processed data	<p>Please see the main privacy notice for a full list of organisations we share information with.</p> <p>Where required the Practice will share your information with:</p> <ul style="list-style-type: none"> Care Quality Commission Public Health England Police Courts of Justice HM Revenue and Customs Local Authorities Coroner's Office Medical Examiner Service General Medical Council (GMC) Royal College of nursing (RCN) NHS England/Digital Health Service Ombudsman Information Commissioners Office
Your rights	<p>For further details on your rights and how to complain please see the main privacy notice</p>