

HAMILTON MEDICAL GROUP

PRIVACY NOTICE

Our commitment

Hamilton Medical Group is committed to ensuring that your privacy is protected. We continually monitor compliance through implementing policies and procedures to safeguard data and by setting regular reviews to manage these policies and procedures.

Who do we collect information about?

We collect personal information from different stakeholders such as patients and those supporting our staff and patients, such as clinical colleagues, suppliers, contractors. The type of information and the lawful basis we use to collect data will depend on your relationship with us.

Our contact details

Telephone: 01224 562888

Letter: Hamilton Medical Group, 4 Queen's Road, Aberdeen AB15 4ZT

Email: gram.hamiltonadministrator@nhs.scot

The type of personal information we collect, why we have it and how we get it

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing your information will depend on our relationship with you and the processing taking place. We use consent, contractual obligation, legal obligation, vital interest, public task, legitimate interest.

Patients - We collect, process, and combine personal & special category information about you covering all aspects of your current and historic health and wellbeing provided by you directly through various communication methods such as patient registration, internal & external electronic patient systems, physical visits, telephone call recording, video consultations, emails, text messaging, and letters. Through these same communication methods, we also collect information indirectly from other practitioners about you, internal to the practice as well as those supporting you in the community such as community nursing, hospital consultants, clinical specialists, care managers, social work, carers, family members and friends involved in your care, we receive test and investigation results & recommendations on how best to support you or how you can support yourself.

Other - We also collect and process information in a professional capacity that may be considered personal or sensitive information about suppliers, professionals and family and friends in the course of supporting our patients, such as identity, relationship, Next of Kin information, due diligence verification, contact information, qualifications, experience, registrations that help us ensure our patients and staff are supported. This information may form part of a patient's medical record.

How we use it

- To provide clinical and administrative support, make assessments, appointments, referrals, recommendations in relation to treatment, medication, care provision for your healthcare and wellbeing.
- We use both direct and indirect information to interpret and make informed decisions around care delivery for patients.
- Send text notifications about appointment reminders, health promotion information, cancellation of appointment, to request that you contact us about results or a prescription and changes in service provision.
- We use inbound and outbound call recording records to review any agreed measures, around treatment, assessments, appointments, recommendations to support patients and clinical enquiries,

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investigation of concerns or complaints or in relation to legal claims, for training and learning purposes, and to improve our service delivery.

- Auditing - using patient health information to review and improve the quality of healthcare. Patient identifiable information is only used within the Practice. (Patients have the right to request that their health information is not included in audits).
- Helping staff to review the care they provide to make sure it is of the highest standards.
- Medication reviews
- Education & training to support continuous development of staff.
- Clinical research approved by the Local Research Ethics Committee (if anything, to do with the research would involve you personally, you will be contacted to provide consent).
- Investigating concerns, complaints, or legal claims.
- Statistical & analytical data will be used to identify patient trends, risk prediction which may include geographic catchment areas as well as being combined with other information around patient trends, future requirements and how services need to be delivered
- Making sure that our services can meet patient needs in the future.
- Preparing statistics on NHS performance and activity (where steps will be taken to ensure you cannot be identified).

How we store & protect your personal information

We continue to look for new ways to protect data and all significant decisions about data processing and policy implementation are made using UK GDPR. The information that we collect and process will not be transferred to countries outside the UK or European Economic Area (EEA) and we take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this notice.

Patient record systems - This Practice operates a clinical computer system and document management system, on which members of the Practice Team and NHS Staff record information securely. This information can then be shared with other clinicians and nursing staff so that everyone caring for you is fully informed about your relevant medical history.

Office & Telephone Systems - We operate a number of different office systems including hardware and software that processes and stores your information to allow you more choice in how you want to communicate with us, we have a secure telephone system that supports recording inbound and outbound calls. We use secure and encrypted Email internal to and supported by NHS Scotland, to communicate with colleagues. These systems alone carry minimum personal information that often require access to the patient recording systems or appointment systems to identify patients. In the event of a data breach, we will notify our Data Protection Officer (DPO) at NHS Grampian and take advice on whether the breach requires to be notified to the ICO (Information Commissioners Office), which would be within 72 hours of becoming aware of the breach. Where we do not yet have all the relevant details we will notify when we expect to have the results of the investigation. We take advice from our Data Protection Officer (DPO) at NHS Grampian and use the ICO guidance framework on managing a security breach to guide us.

Sharing your personal information

We work with other NHS and partner agencies to provide healthcare services to you. We may share your information with them subject to agreement on how it will be used. In most cases we will do this with your understanding and agreement. Occasionally there may be circumstances when we are required by law to share your information without your consent.

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Types of organisations we work with

- NHS Scotland, NHS hospitals, other GP Practices, dentists, opticians, pharmacists, Local Authorities, social work teams.
- Private Sector Providers (private hospitals, care homes, hospices, contractors providing services to or on behalf of the NHS or Local Authority)
- Voluntary Sector and third sector providers who are directly involved in your care
- Ambulance Service, Emergency service providers, eg Police
- Health and Social Care Clusters, Out of Hours medical service, education, and training services
- Judicial, legal, regulatory and compliance services

Emergency Care Summary (ECS)

Emergency care information such as your name, date of birth, the name of your GP, any medicines which your GP has prescribed, any medicines you are allergic to or react badly to, is shared with Out of Hours as this might be important if you need urgent medical care when the GP surgery is closed. NHS staff (eg Doctors, Nurses, Accident and Emergency, Ambulance control and crews) can look at your ECS if they need to treat you when the Practice is closed. They will ask for your consent before they look at your records. In an emergency and if you are unconscious, staff may look at your ECS without your agreement to let them give you the best possible care. Whenever NHS staff look at your ECS, a record will be kept so we can always check who has looked at your information.

Key Information Summary (KIS) & Palliative Care Summary (PCS)

Key information summary (KIS) has been designed to support patients who have complex care needs or long-term conditions and Palliative Care Summary (PCS) for palliative care. KIS & PCS allows vital information to be shared with health care professionals in unscheduled care in NHS 24, A&E, Scottish Ambulance Service, Out of Hours, hospital, and pharmacy environments. Information contained in KIS summary includes, future care plans, medications, allergies, diagnosis, your wishes, carer and next of kin details.

You have the right to say that you do not want health and care staff to see ECS/KIS/PCS. Please contact the Practice on 01224 562888 to let us know.

Scottish Primary Care Information Resource (SPIRE)

NHS Scotland uses information from GP patient records to help plan and improve health and care services in Scotland. You have a choice about the information from your GP records being used in this way. You can opt out from this at any time by contacting the Practice. For further information on SPIRE contact NHS Inform on 0800 22 44 88 or visit [spire.scot](https://www.nhs.uk/spire)

Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you or your representative.

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How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at:

gram.hamiltonadministrator@nhs.scot

You can also complain to the ICO if you are unhappy with how we have used your data.

ICO's address:

Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

Further information around your rights can be found at <https://ico.org.uk/your-data-matters>