

Privacy Notice – Wallington PCN Complex Multidisciplinary Team

Background

The primary purpose of the Wallington PCN Complex Multidisciplinary Team is to bring organisations and services together to provide the best care possible for you. In order to do this, we need to collect, store and share information about you.

This privacy notice is designed to explain what happens to any personal data that you give any one of our partner organisations within the team, or any information concerning you that they have collected. This includes how your data is held and/or processed by us.

This notice includes:

- Who we are, how we use your information and why
- The kinds of information we hold and process
- The legal grounds for processing your personal data, including when it is shared with others
- The length of time that your information is stored and retained by us
- Information about your rights under the 2018 Data Protection Act incorporating the General Data Protection Regulations (GDPR)
- Information about our Data Protection Officer and Caldicott Guardian how to contact them

Who are we?

Wallington PCN Complex Multidisciplinary Team consists of representatives from the following organisations:

- GPs, Nurses and Pharmacists from your GP Surgery
- Social Prescribers from Social Prescribing Sutton
- Nurses and other specialisms clinicians from Sutton Health and Care
- London Borough of Sutton Adult Social Care and Childrens Services
- Epsom and St Helier University Hospital Adult Community Nursing and Community Therapies
- South West London and St Georges Mental Health NHS Trust Sutton Uplift or Dementia services
- Community Pharmacists

Under the 2018 Data Protection Act, each member of the Complex Multidisciplinary Team is known as the Data Controller for the data that it holds on you. As such, we are responsible for keeping your data up to date and accurate, as well as storing it and sharing it securely. If you have a question or a problem, please contact your MDT Coordinator via Sarah.Kavanagh@swlondon.nhs.uk in the first instance. The Act stipulates also that public sector organisations should provide access to an independent Data Protection Officer and these contact details are provided in the summary below.

The information we hold on you

Each organisation keeps data on you relating to who you are, where you live, your contact details. They may also hold details of any employment, your family, possibly your employers, your habits, your health problems and diagnoses, the reasons you seek help, your appointments, if you have a carer, and a record of where and when you had contact with that organisation, who by, referrals to specialists and other health and social care providers, tests

carried out there and in other places, investigations and treatments and outcomes of treatments, your treatment history, the observations and opinions of other health and social care workers, as well as comments and aide memoires reasonably made by healthcare professionals in this practice who are appropriately involved in your care. All of this data helps us in providing you with the best possible care.

All health and social care-data is seen as 'special category' or 'sensitive data' under the 2018 Data Protection Act which means that it is shared and processed with particular care. This applies to your data whether it is in electronic formats or on paper.

Why we hold and process your data

The Neighbourhood Team holds and processes your data in order to provide you with direct care. The members of the team meet regularly to discuss how they might together provide you with a care package that best meets a number of needs at once. These meetings are known as Multi-Disciplinary Meetings.

Who we share information with

Each partner organisation, separately, cannot meet all of your needs and there will be times also when your data will need to be made available to other organisations outside of the core team.

Details of these organisations and the purpose for sharing your information will be made clear to you on each occasion. The Neighbourhood Team will only share the minimum information necessary to fulfil the specific purpose.

Once you have seen any outside care provider, they will normally send us details of actions they have taken and the care they have provided.

The Neighbourhood Team has an overriding responsibility to do what is in your best interests under the 2018 Data Protection Act 'in performance of a public task' (see legal bases in the summary below). Each employee of the Neighbourhood Team (e.g. clinicians, social workers, administrators and reception staff) will only access the information they need to allow them to perform their function and fulfil their roles. The summary also contains details of your rights in relation to your data under the Act and how to exercise them.

Your data is NOT shared for any marketing purpose.

Communication with you

The Neighbourhood team will use your contact details in order to inform you of progress in your care and to work with you in managing any specific issue.

Because we can communicate and get data to you more quickly and more securely, we prefer to use email and text messaging services. **Please ensure that we have your current email address and mobile telephone so that we can do this.**

Safeguarding

The Neighbourhood Team is dedicated to safeguarding all the people it comes in contact with, including children and vulnerable adults. This means that information will be shared by the members of the team in their best interests.

The duty to share data for the benefit and protection of individuals is even more important than the duty to protect confidentiality and actions taken as a result of safeguarding concerns will override data protection.

Research and Planning

The Neighbourhood Team does not take part in research

Anonymised or pseudonymised data held by the Neighbourhood Team may also be used to evaluate the services that provide care to you or to plan future ones across the local area as well as the London Borough of Sutton and the NHS in South West London.

How is your information transferred and stored?

Members of the Neighbourhood Team each stores information upon you within their own secure systems. Information may be shared between the members via Connect Your Care - using the local Health Information Exchange (HIE) by secure e-mail or paper referral form.

How long is the information retained ?

The Neighbourhood Team does not retain your data in any specific system, however, information about you is retained by each Neighbourhood Team member within its own systems and is subject to its own data retention regulations and policies. Please contact the individual organisation concerned for details.

Summary

Data Controller	The Wallington PCN
Data Protection Officer	Miles Dagnall via suttonpatients@jem-gdpr.co.uk
Purpose of Processing your personal information	To provide individuals and families in the Neighbourhood Team area with integrated direct care.
Lawful Basis for Processing your personal information	The processing of personal data in the delivery of direct care and for providers' administrative purposes in this surgery and in support of direct care elsewhere is supported under the following Article 6 and 9 conditions of the GDPR: 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>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>Under the Common Law Duty of Confidence information can be shared for direct care purposes with implied consent where there is a reasonable expectation that the care is in the best interests of the individual concerned.</p>
<p>Recipient or categories of recipients of your personal data</p>	<p>The data will be shared with health and care professionals and support staff who contribute to your personal care.</p> <ul style="list-style-type: none"> • GPs • Hospitals • Primary Care Network • Local GP provider organisation • NHS Commissioning Support Units • Social Care Services • Health and Social Care Information Centre (HSCIC) • Mental health trusts and support organisation • NHS pharmacists • Independent Contractors such as dentists, opticians, pharmacists • Private Sector Providers • Voluntary Sector Providers and social prescribers • Ambulance Trusts • Clinical Commissioning Groups • Local Authorities • Education Services • Fire and Rescue Services • Police & Judicial Services • Voluntary Sector Providers • Private Sector Providers
<p>Your right to object</p>	<p>You have the right to object to some or all the information being processed, which is detailed under Article 21 of the GDPR.</p> <p>Please contact the Neighbourhood Co-Ordinator in the first instance or the Data Protection Officer. Details of both are provided in this notice.</p> <p>You should be aware that this is a right to raise an objection, that is not the same as having an absolute right to have your wishes granted in every circumstance.</p>
<p>Your right to access and correction</p>	<p>You have the right to access your data by means of a Subject Access Request (SAR) and to have any inaccuracies corrected.</p> <p>There is no right to have accurate medical or social care records deleted except when ordered by a court of Law.</p>
<p>How long do we hold your personal data for?</p>	<p>Each member of the Neighbourhood Team retains your personal data in line with both national guidance, UK law, and sector regulations.</p>

Your right to complain	<p>If you have a question or wish to complain about the use of your data, you should approach the PCN at Sarah.Kavanagh@swlondon.nhs.uk</p> <p>or contact the Data Protection Officer, Miles Dagnall at: suttonpatients@jem-gdpr.co.uk.</p> <p>The use of personal data is overseen by the Information Commissioners Office, often known as the ICO.</p> <p>If you wish to complain or raise a concern with the ICO, they can be contacted via their website:</p> <p>https://ico.org.uk/global/contact-us/</p> <p>Or you can also call their helpline</p> <p>Tel: 0303 123 1113 (local rate) 01625 545 745 (national rate)</p> <p>Or you can write to them at</p> <p>The ICO, Wycliffe House, Water Ln, Wilmslow SK9 5AF</p>