|  |  |
| --- | --- |
| Primary Care Networks (PCNs) are a key part of the NHS Long Term Plan, with all general practices being required to be in a network. This practice is part of the Hayes Wick Primary Care Network.  Hayes Wick Primary Care Network is made up of a number GP Practices and was created to work collaboratively to ensure the health care system within our area works effectively by sharing knowledge and resources.  The Primary Care Network provides an enhanced access service whereby telephone and face-to-face appointments are made available to the registered patients of the Hayes Wick PCN’s practices from 18:00-20:00 Monday-Friday and 9:00-17:00 on Saturdays.  This service will be provided by Bromley GP Alliance. To read more about Bromley GP Alliance please visit their website: [Bromley GP Alliance | Patient Centred Health Care in Bromley](https://bromleygpalliance.org/)  To enable us to provide our Enhanced Access Service to you, Bromley GP Alliance will at times have access to your full GP record but only when providing direct care to you.  People who have access to your information will only normally have access to that which they need to fulfil their roles, for instance admin staff will normally only see your name, address, contact details, appointment history and registration details in order to book appointments, the practice nurses will normally have access to your immunisation, treatment, significant active and important past histories, your allergies and relevant recent contacts whilst the GP you see or speak to will normally have access to everything in your record. | |
| 1**) Controller** contact details | Wickham Park Surgery  2 Manor Road  West Wickham  BR4 9PS |
| **2) Data Protection Officer** contact details | Danielle Gibbons  [gpdpo@selondonics.nhs.uk](mailto:gpdpo@selondonics.nhs.uk)  NHS South East London  South East London Integrated Care System |
| 3) **Purpose** of the processing | To provide our patients with direct care. |
| 4) **The Lawfulness Conditions and Special Categories** | 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…’.*  *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...”*  We will also recognise your rights established under UK case law collectively known as the “Common Law Duty of Confidentiality”\* |
| 5) **Recipient or categories of recipients** of the shared data | The data will be shared with  Bromley GP Alliance <https://bromleygpalliance.org> |
| 6) **Rights to object** | You have the right under Article 21 of the GDPR to object to your personal information being processed. Please contact the Practice if you wish to object to the processing of your data. You should be aware that this is a right to raise an objection which is not the same as having an absolute right to have your wishes granted in every circumstance.  GP Practices process personal data under Article 6(1)(c) on a lawful and legitimate basis where the organisation is obliged under law to comply with   * The General Data Protection Regulations (GDPR) * The Freedom of Information Act * The NHS Constitution * The Local Authority Social Services and National Health Service Complaints (England) Regulations 2009   By complying with these laws, the Practice has compelling legitimate grounds for the processing which override the interests, rights and freedoms in the right to object. |
| 7) **Right to access and correct** | Under GDPR and the Data Protection Act 2018, you have the right to see or be given a copy of any personal data we hold about you. To gain access to a copy of your information, you will need to make a Subject Access Request (SAR) to the Practice you are normally registered with.  You also have the right to have incorrect data held about you corrected. |
| 8**) Retention period** | The data will be retained for the period as specified in the national NHS records retention schedule. |
| 9) **Right to Complain**. | You have the right to complain to the Information Commissioner’s Office, you can use this link <https://ico.org.uk/global/contact-us/>  or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)  There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website) |