

Privacy Notice: Enhanced Access

Streatham PCN is made up of a number of GP Practices and has been created for members practices to work collaboratively to deliver the requirements of the PCN Directed Enhanced Service Contract.

The following practices are part of Streatham PCN:

Palace Road Surgery
Streatham Hill Group Practice
Valley Road Surgery
The Exchange Surgery
Streatham Common Practice
The Vale Surgery

As part of the PCN DES service, we are required to provide Enhanced Access to patients registered with practices in the PCN. Enhanced Access is patient appointments outside core practice hours – that is between 6.30-8.00 pm on weekdays, and on Saturdays 9.00 am till 5.00pm. We have chosen to also offer some appointments between 7.00 am-8.00 am on weekdays. We have also chosen to subcontract some of the provision of these appointments to our local GP federation (Lambeth GP Federation), who have previously provided access hubs in the area.

The Enhanced Access service for our patients requires the following:

- An interoperable Clinical IT solution and
- Data Sharing between the PCN practices and the GP Federation

To enable us to provide our Enhanced Access Service to you, clinicians from other practices in our PCN and working for our local Federation 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 information that they need to fulfil their roles. For example, 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 any GP you see or speak to will normally have access to everything in your record.

1) Controller contact details	<p>The controller of your data when it is in your practice clinical record will be your registered GP practice. Valley Road Surgery, 139 Valley Road, Streatham, SW16 2XT</p> <p>The controller of your data when it is in the GP Federation clinical record system is Lambeth GP Federation, 1 Alleyn Park, London, SE21 8AU</p>
2) Data Protection Officer contact details	<p>Danielle Gibbons GP Data Protection Officer gpdpo@selondonics.nhs.uk</p>
3) Purpose of the processing	<p>To provide our patients with direct care.</p>
4) The Lawfulness Conditions and Special Categories	<p>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:</p>

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	<p><i>Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’.</i></p> <p><i>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...’</i></p> <p>We will also recognise your rights established under UK case law collectively known as the “Common Law Duty of Confidentiality”*</p>
5) Recipient or categories of recipients of the shared data	<p>The data will be shared with:</p> <p>Palace Road Surgery https://www.palaceroadsurgery.co.uk/ Streatham Hill Group Practice https://shgp.co.uk/ Valley Road Surgery https://www.valleyroadsurgery.co.uk/ The Exchange Surgery https://www.theexchangesurgery.com/ Streatham Common Practice https://www.streathamcommonpractice.co.uk/ The Vale Surgery https://www.thevalesurgery.co.uk/ Lambeth GP Federation https://www.lambethgpfederations.nhs.uk/access-hubs/</p>
6) Rights to object	<p>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.</p> <p>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</p> <ul style="list-style-type: none"> • 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 <p>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.</p>
7) Right to access and correct	<p>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.</p> <p>You also have the right to have incorrect data held about you corrected.</p>
8) Retention period	<p>The data will be retained for the period as specified in the national NHS records retention schedule.</p>

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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 call their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)
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