

Patient Privacy Notice

The Isle of Man Primary Care Network LLC (“the Network”)

This Privacy Notice explains who we are, what we mean by personal data, why we collect it, how we use it, how long we keep it, your rights, and how to contact us.

Who are we?

The Network is a collaboration of ten GP practices (“the Practices”) across the Island:

- Ballasalla Medical Centre
- Finch Hill Health Centre
- Kensington Group Practice
- Hailwood Medical Centre
- Laxey and Village Walk Health Centres
- Palatine Group Practice
- Peel Medical Centre
- Ramsey Group Practice
- Snaefell Surgery
- Southern Group Practice

By collaborating and operating as a network, we can develop a more comprehensive range of services and improve the way we work by using our collective expertise to support and give you the best possible care.

We also work closely with Castletown Medical Centre.

Please refer to the **Contact Us** section below for our contact details.

What is personal data?

Personal data is any data that might allow you to be identified, such as:

- Your name
- Your address

- Identifier (e.g. NHS Number, Hospital Number)
- Online identifier (e.g. IP address, email address)
- Or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person (e.g. patient/service user)

Sensitive, or special category personal data, requires additional protection and the need to collect store and use such data must be justified. This includes information relating to:

- Racial or ethnic origin
- Religious or philosophical beliefs
- Trade union membership
- Genetic data
- Biometric data
- Data concerning health
- Data concerning a natural person's sex life or sexual orientation

Why do we collect information about you?

It is important that we have a complete picture of any information relating to your health, treatment and care, to assist us in planning and delivering appropriate treatment and care plans that meet your needs.

What information do we collect about you?

We will collect personal data, such as your name, address, next of kin, and contact details. In addition, to enable us to deliver effective medical care, sensitive information about you, such as the following, will, be held on record:

- notes and reports about your health, treatment and care such as your medical conditions
- the results of any investigations, such as X-rays or test results
- details of any future care you might need
- your religion and ethnic origin
- personal information from your carers, such as relatives or care professionals
- other personal information, such as your smoking status and details of any learning disabilities
- whether or not you are subject to any protection order regarding your health and wellbeing
- details of any safeguarding matters

Legal basis for processing information

We will only process your personal data if a lawful basis exists. Article 6(1)(e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller e.g. to provide you with Health interventions, which by law we are required to do.

Most commonly, we will use your personal information in the following circumstances:

- We have your consent
- We need to fulfil a request you have made for information or a service
- There's a need to prevent or investigate suspected or actual violations of law e.g. to assist the IOM Police for the prevention of a crime
- To protect yours, or someone else's, interest e.g. an Adult or Child's safeguarding issue

If we rely on your consent to process your data, you may withdraw your consent at any time by contacting your Practice Manager or the Network's Data Protection Officer (DPO). Please refer to the **Contact Us** section below.

How we use your information

Your records are used to directly, manage and deliver healthcare to you to ensure that the staff involved in your care have accurate and up to date information to assess and advise on the most appropriate care for you.

The personal information we collect about you may also be used, for example, to:

- provide a good basis for any care or advisory services we provide to you
- allow you to work with us when we provide care or advice
- make sure your care is safe and effective, and the advice we provide is appropriate and relevant to you
- work effectively with others providing you with care or advice and make sure that appropriate information is available if you see another Doctor or clinician
- deal with your enquiries, requests, complaints and compliments
- remind you about your appointments and send you relevant correspondence
- review the care we provide to ensure it is of the highest standard and quality, e.g. through audit or service improvement
- help to train and educate healthcare professionals
- report and investigate complaints, claims and untoward incidents
- contact you with regards to patient satisfaction surveys to assist us in improving our services to patients

Where possible, we will always look to use data that you cannot be identified from to protect your confidentiality. For example, we use anonymised data to help us plan health services, for training, research and public health.

If we need to use your personal information for any reasons beyond those stated above, we will discuss this with you and ask for your explicit consent. Where we do rely on your consent, you may withdraw it as any time by contacting your Practice Manager or the Network's Data Protection Officer. Please refer to the **Contact Us** section below.

Who do we share your information with and why?

We would never share information that identifies you unless we have a fair and lawful basis to do so, for example:

- You ask us to do so
- We ask and you give us specific permission to do so e.g. to see another clinician, such as a First Contact Practitioner
- We have to do so by law e.g. when sharing information with the police may prevent a serious crime, or prevent harm to you or other people
- We have special permission because we believe that the reasons for sharing are so important that they override our obligation of confidentiality e.g. when an infectious disease such as meningitis or measles may endanger the safety of others
- To protect children and vulnerable adults e.g. safeguarding
- When a formal court order has been served upon us to release specific information

Where possible, we will always look to use data that you cannot be identified from to protect your confidentiality. For example, we use anonymised data to help us plan health services, for training, research and public health.

There may be other occasions where we are obliged to share your information, for example, sharing with any Care/Quality Inspection body that may be appointed by the Department of Health and Social Care.

We may also share information, with third parties such as:

- Pharmacists
- The Wellbeing Partnership
- Other social care and voluntary sector organisations involved in your care
- UK NHS Trusts (if you are referred off Island for specialist treatment)

Where we rely on your consent, you may withdraw it as any time by contacting your Practice Manager or the Network's Data Protection Officer.

Please refer to the **Contact Us** section below.

Maintaining confidentiality

Everyone working for the Network, and/or a Member Practice has a legal duty to keep information about you secure and confidential. Anyone who receives information from us also has a legal duty to keep it confidential.

We are committed to maintaining confidentiality and protecting the information we hold about you and treating it with respect. We will only process your personal data in accordance with the Data Protection Legislation, the Common Law Duty of Confidentiality, the Human Rights Act 2001, and in keeping with any relevant professional codes of conduct.

Automated Decision Making

Whilst Automated Decision Making is not used as all decisions involve human intervention, on occasion, we will use profiling tools to evaluate certain things about a patient or group of patients e.g. to identify patients matching specific criteria, who may be at risk of a particular health condition or benefit from other interventions.

Your rights

You have the right to:

- Know how we will use your personal information
- Request access to the personal data we hold about you, e.g. in health records. via a Subject Access Request ("SAR")
- Request the correction of inaccurate or incomplete information
- Ask us to erase your personal information
- Object to the processing of your personal information
- Restrict the processing of your data
- Transfer your data to a local GP, or to a UK GP if you re-locate to the UK
- Withdraw any previous consent to share or process data
- Right to complain

There are some circumstances where these rights may be restricted. Further details are available on the Information Commissioner's website at <https://inforights.im/individuals/data-protection/>.

If you wish to exercise any of your rights as detailed above, please contact your Practice Manager or the Network's Data Protection Officer. Please refer to the **Contact Us** section below.

Subject Access Requests ("SAR")

You have the right to ask for a copy of your health records and any such request will be dealt with as a subject access request under Data Protection legislation. We will ordinarily provide this within one calendar month. If we need to extend this timeline, we will notify you, advising the reason for the extension and the revised deadline for responding.

To assist us in locating the information you need, please specify the personal information you require, and any time periods. Please ensure you include proof of identity such as a formal document or bill with your name and address on it, together with your driving licence or passport.

Your Practice Manager or the Network's Data Protection Officer can provide a Subject Access Request Form to assist you in detailing your request.

Retention periods

In accordance with local requirement, your healthcare records will be retained for 10 years after death, or if a patient emigrates, for 10 years after the date of emigration. We may anonymise your personal information, instead of destroying or erasing it, to ensure that it cannot be associated with, or tracked back, to you.

What to do if you have any questions

Please **Contact Us** if you have any questions about our privacy policy or the information we hold about you, by:

1. Writing or speaking to your Practice Manager
2. Contacting the Network's Data Protection Officer

Complaints

If you wish to raise a complaint relating to the way in which we've handled your personal data, please contact your Practice Manager or the Network's Data Protection Officer at the address detailed in **Contact Us**.

In the unlikely event that you are unhappy with any element of our data-processing methods, or the explanation offered to your complaint, or you don't not want to raise the matter with us first, you have the right to lodge a complaint with the ICO:

Isle of Man Information Commissioner
Po Box 69
Douglas
IM99 1EQ

☎ 01624 693260

Or

Go to www.inforights.im and select Making a Complaint.

Contact Us

The Data Protection Officer
Isle of Man Primary Care Network LLC
Burleigh Manor
Peel Road
Douglas IM1 5EP

✉ DPOIOMPCN@gov.im

The Practice Manager
Ballasalla Medical Centre
Main Road
Ballasalla IM9 2RP

☎ 01624 823243

The Practice Manager
Finch Hill Health Centre
Level 2 Chester Street Car Park
Chester Street
Douglas IM1 2PG

☎ 01624 656050

The Practice Manager
Hailwood Medical Centre
Hailwood Court
Governors Hill
Douglas IM2 7EA

☎ 01624 686949

The Practice Manager
Kensington Group Practice
Westmoreland Road
Douglas IM1 4QA

☎ 01624 642333

The Practice Manager
Laxey and Village Walk Health
Centres
1 Village Walk
Onchan IM3 4EA

☎ 01624 656020

The Practice Manager
Palatine Group Practice
Strang Corner Field
Braddan IM2 3TD

☎ 01624 623931

The Practice Manager
Peel Medical Centre
Albany Road
Peel IM5 1HU

☎ 01624 686968

The Practice Manager
Ramsey Group Practice
Bowring Road
Ramsey IM8 3EY

☎ 01624 813881

The Practice Manager
Snaefell Surgery
Cushag Road
Douglas IM2 2BZ

☎ 01624 686960

The Practice Manager
Southern Group Practice
Castletown Road
Port Erin IM9 6BD

☎ 01624 686979