

## **Privacy Notice for Patients**

### **Dr Egerton & Partners**

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### **Introduction**

Dr Egerton & Partners is committed to protecting your privacy and ensuring that your personal information is kept safe, secure and used appropriately. This Privacy Notice explains how we collect, use, share and protect your personal data, including your medical information, in accordance with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Common Law Duty of Confidentiality
- NHS Codes of Practice on Confidentiality and Information Security

This notice is not exhaustive. If you require further information, please contact the Practice Manager using the details above.

Dr Egerton & Partners is the Data Controller for the personal data we process. This means we are legally responsible for deciding how and why your personal information is used.

### **Why We Collect and Use Your Information**

To provide you with safe and effective healthcare, we must keep records about you and your health. These records are used to:

- Provide direct patient care and treatment
- Ensure decisions about your care are appropriate and safe
- Work effectively with other organisations involved in your care
- Send appointment reminders and relevant practice communications (e.g. text messages)
- Monitor and improve the quality of care we provide
- Support clinical audit, service planning and NHS performance monitoring
- Investigate complaints, incidents or legal claims

- Train and educate healthcare professionals
- Support approved research (with consent where required)

Your identifiable health information is only accessed by authorised staff where there is a genuine need to do so.

### **Lawful Basis for Processing**

We process personal data in accordance with UK GDPR and the Data Protection Act 2018.

Article 6 (Lawful basis):

- Public task – 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 practice
- Legal obligation – where we are required to process information by law

Article 9 (Special category – health data):

- Processing is necessary for medical diagnosis, the provision of health or social care or treatment, and the management of health and social care systems
- Processing is necessary for reasons of public interest in public health

Where consent is required for specific purposes (for example, some research activities), this will be made clear and you may withdraw consent at any time.

### **Who We May Share Your Information With**

To support your care, we may share relevant information with:

- Other NHS GP practices and NHS hospitals
- NHS Fife and NHS Scotland services
- Out of Hours services, NHS 24 and the Scottish Ambulance Service
- Community services, pharmacists and allied health professionals
- Social care services and local authorities (where appropriate)
- Approved voluntary or private sector providers directly involved in your care

Information is shared on a need-to-know basis and only where there is a lawful reason to do so.

### **Emergency Care Summary (ECS) and Key Information Summary (KIS)**

#### **Emergency Care Summary (ECS)**

Your ECS includes key information such as medications, allergies and adverse reactions. It is used by NHS staff providing unscheduled care when the practice is closed. Staff will normally ask for your consent before accessing your ECS, unless this is not possible in an emergency.

### **Key Information Summary (KIS)**

KIS supports patients with long-term conditions or complex care needs by sharing important information (such as care plans and preferences) with NHS services involved in unscheduled care. You can discuss the content of your KIS with your GP and can choose to restrict access.

### **Scottish Primary Care Information Resource (SPIRE)**

NHS Scotland uses information from GP records via SPIRE to help plan and improve health and care services. This information is pseudonymised where possible. You have the right to opt out of SPIRE data use at any time by contacting the practice or visiting [www.spire.scot](http://www.spire.scot).

### **Risk Stratification and Population Health**

NHS Scotland may use de-identified information from GP records to support risk prediction tools. These tools help clinicians identify patients who may benefit from additional support or preventative care.

### **Online Services and Digital Communications**

Online services may be provided through approved third-party systems acting as data processors on our behalf. These providers are contractually required to protect your information and may only process it in accordance with our instructions.

### **Call Recording**

Telephone calls to and from the practice may be recorded for training, quality assurance and patient safety. Recordings are kept securely and accessed only where there is a legitimate business need.

### **CCTV**

CCTV may be used on practice premises for the purposes of safety and security. Images are retained securely and accessed only where there is a legitimate need.

### **How We Keep Your Information Secure**

We use a combination of physical, technical and organisational measures to keep your information secure, including:

- Secure clinical computer systems
- Role-based access controls

- Staff confidentiality agreements
- Regular data protection training

All staff are legally bound to maintain confidentiality.

### **How Long We Keep Your Information**

We only keep your personal information for as long as necessary to meet legal, regulatory and clinical requirements.

GP medical records are retained in line with NHS Scotland Records Management Code of Practice and relevant legislation. Further information on retention periods is available on request.

### **Access by Non-Clinical Staff**

Your information may be accessed by trained non-clinical staff where necessary for practice administration, including:

- Processing referrals and correspondence
- Scanning and filing documents
- Managing appointments and prescriptions
- Handling medico-legal and insurance reports

### **Your Rights**

Under data protection law, you have the right to:

- Access your personal data (Subject Access Request)
- Request correction of inaccurate information
- Request restriction of processing in certain circumstances
- Object to certain types of processing
- Withdraw consent where consent is the lawful basis
- Request transfer of your information to another provider where applicable

Requests to access your personal data (Subject Access Requests) should be made in writing to the Practice Manager.

We may need to verify your identity before releasing information. Requests are normally provided free of charge and responded to within one month, unless an extension is permitted by law.

## **Children's Records**

In Scotland, children aged **12 and over** are generally assumed to have the capacity to make decisions about access to their health records. Access to a child's record will be considered on an individual basis.

## **Sharing Information Without Consent**

There are limited circumstances where we may share information without your consent, including:

- Where there is a serious risk of harm to you or others
- To prevent or investigate serious crime
- Where required by law or court order
- To protect public health

Only the minimum necessary information will be shared.

## **Complaints and Concerns**

If you have concerns about how your information is used, please contact the Practice Manager in the first instance.

If you remain dissatisfied, you may contact:

Information Commissioner's Office (ICO)

Website: [www.ico.org.uk](http://www.ico.org.uk)

## **Keeping Your Information Accurate**

Please inform us promptly if your personal details change (e.g. name, address, telephone number) so that our records remain accurate and up to date.

**Privacy Notice review date:** March 2027