



Privacy Notice – GP Online Consultation Services

Plain English explanation

Online consultation services allow patients to contact the Practice without having to wait on the phone or take time to come into the practice in person, especially if patient is not sure whether they need a face-to-face consultation.

Online consultation services enable patients to use secure online systems to:

- book appointments
- request prescriptions
- ask questions
- check and report symptoms
- view medical information
- set or change data sharing preferences
- set or change organ donation preferences
- have a telephone or video consultation with a clinician.

Eleanor Cross Healthcare has engaged specialised online consultation suppliers to provide the online consultation services on our behalf.

This service is provided in the form of our website (www.eleanorcrosshealthcare.co.uk) and different apps (DoctorLink, NHS App, SystemOnline, Livi).

Upon receipt of the query from the patient, we can respond or signpost them to the right person or to the appropriate service or support.

Because this service is online, we need to properly identify you, accurately note both your request and our responses. This information includes: your name, gender, date of birth, NHS number, email address, telephone number, postal address, health information such as symptoms, conditions, medication, other information which is held in your GP records and/or which you provide through the online consultation process.

When you make contact with providers outside the practice but within the NHS it is usual for them to send us information relating to that encounter. We will retain

part or all of those reports.

In some cases automated clinical algorithms are used to reduce the need for contact with clinicians, enabling patients to seek clinical support without delay.

Some online consultation services require registration or accounts set up by the practice. Please contact us for further information.

We are required by Articles in the UK GDPR to provide you with the information in the following 9 subsections:

<p>1) Data Controller contact details</p>	<p>Eleanor Cross Healthcare Delapre Medical Centre Gloucester Avenue Northampton NN4 8QF</p>
<p>2) Data Protection Officer contact details</p>	<p>Hayley Gidman Midlands and Lancashire CSU FAO: Delapre Medical Centre Gloucester Avenue Northampton NN4 8QF</p>
<p>3) Purpose of the processing</p>	<p>The purpose of processing is to provide access to the medical information without having to wait on the phone or take time to come into the practice in person or when the services are closed.</p>
<p>4) Lawful basis for processing</p>	<p>The processing of personal data in the delivery of online consultation services is supported under the following Article 6 and 9 conditions of the UK GDPR:</p> <p><i>Article 6(1)(a) 'the data subject has given consent to the processing of his or her personal data for one or more specific purposes'.</i></p> <p><i>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'.</i></p> <p><i>Article 9(2)(h) 'processing is necessary for the purposes of preventive 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'.</i></p> <p>We will also recognise your rights established under UK case law collectively known as the "Common Law Duty of Confidentiality"*.</p>

<p>5) Recipient or categories of recipients of the processed data</p>	<p>The data will be shared with health and care professionals and support staff in this surgery and with your suppliers who contribute to your personal care:</p> <ul style="list-style-type: none"> - TPP SystemOnline - AccuRx - DoctorLink - NHS Digital and eConsult Health Limited (NHS App) - Livi
<p>6) Right to object</p>	<p>You have the right to object to some or all the information being processed under Article 21. Please contact the Data Controller or the practice.</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>You can stop the processing by closing your accounts. This can be done by contacting the practice or the provider.</p>
<p>7) Right to access and correct</p>	<p>You have the right to access the data that is being shared and have any inaccuracies corrected.</p> <p>There is no right to have accurate medical records deleted except when ordered by a court of Law.</p>
<p>8) Retention period</p>	<p>The data will be retained in line with the law and national guidance. Further information can be found at https://digital.nhs.uk/article/1202/Records-Management-Code-of-Practice-for-Health-and-Social-Care-2016 or speak to the practice.</p> <p>Suppliers will retain information as it is set out in our agreement with them.</p>
<p>9) Right to complain</p>	<p>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).</p>

* “Common Law Duty of Confidentiality”, common law is not written out in one document like an Act of Parliament. It is a form of law based on previous court cases decided by judges; hence, it is also referred to as 'judge-made' or case law. The law is applied by reference to those previous cases, so common law is also said to be based on precedent.

The general position is that if information is given in circumstances where it is expected that a duty of confidence applies, that information cannot normally be disclosed without the information provider's consent.

In practice, this means that all patient information, whether held on paper, computer, visually or audio recorded, or held in the memory of the professional, must not normally be disclosed

without the consent of the patient. It is irrelevant how old the patient is or what the state of their mental health is; the duty still applies.

Three circumstances making disclosure of confidential information lawful are:

- where the individual to whom the information relates has consented;
- where disclosure is in the public interest; and
- where there is a legal duty to do so, for example a court order.