Patient Privacy Notice

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Privacy Notice

Patient Information

Introduction

Dunstan Village Group Practice is committed to being transparent about how it handles your personal information, to protecting the privacy and security of your personal information and to meeting its data protection obligations under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. The purpose of this Privacy Notice is to make you aware of how and why we will collect and use your personal information.

Who Are We?

Dunstan Village Group Practice is an NHS GP surgery in Picton established in 1994 which caters to private and NHS patients.

The Practice has a statutory responsibility and public duty to provide health care services, as instructed and guided by the Department of Health and Social Care (a ministerial department of Government within the United Kingdom).

The Practice can be contacted at:

Address: Dunstan Village Group Practice, Earle Road Medical Centre, 131 Earle Road, Liverpool L7 6HD
Tel: 01517343535

Website: https://www.dunstanvillagegroupppractice.nhs.uk/

The Practice is a Data Controller and, as such, is registered with the Information Commissioner's Office. Its registration number is Z4720072.

The Practice's Data Protection Officer (DPO) is:

Head of Information Governance
NHS Informatics Merseyside
Information Governance Team
Hollins Park
Winwick
Warrington
WA2 8WA
DPO.IM@imerseyside.nhs.uk

Why does the Practice need your Information?

Dunstan Village Group Practice keeps records about your health and treatment to ensure the care you receive is effective, of good quality and meets your needs. The Practice needs information about you to create a care record that enables its staff to identify and contact you easily and to ensure appropriate services are offered to you. Information about you is used to help deliver care services to you, which includes sharing with external organisations, where appropriate, so that the care services are integrated.

Information will also be used to contribute to the management of the Practice, which means your information will be used to ensure the Practice is paid for the services it provides or is held accountable for the quality of its services.

Whilst the Practice receives information from you when you come into contact with it, it also receives information about you from other individuals or organisations, such as hospitals or community services, when you receive treatment from them. The Practice needs enough information to be able to provide you with appropriate healthcare services.

Looking after your Information

Dunstan Village Group Practice has put in place measures to protect the security of your personal information. It has internal policies, procedures and controls in place to prevent your personal information from being accidentally lost or destroyed, altered, disclosed or used or accessed in an unauthorised way. In addition, we limit access to your personal information to those employees, other workers, contractors and other third parties who have a business need to know in order to perform their duties and responsibilities. Everyone working for the NHS has a contractual and legal duty to protect your information.

Personal information is held in accordance with the requirements of current Data Protection legislation. Anyone who receives information from us is also under a legal duty to keep it confidential and secure in accordance with Data Protection legislation.

Dunstan Village Group Practice also have in place procedures to deal with a suspected data security breach and we will notify the Information Commissioner's Office (or any other applicable supervisory authority or regulator) and you of a suspected breach where we are legally required to do so.

What types of personal information do we collect about you?

There are two types of data that Dunstan Village Group Practice uses; personal and special category. Personal data means any information relating to a person who can be directly (e.g. by name or picture) or indirectly (e.g. by age, gender and post code) recognised. Special category data means:

- data concerning physical or mental health. (for example, details about your appointments or diagnosis)
- data revealing racial or ethnic origin.

- data concerning a person's sex life.
- data concerning a person's sexual orientation.
- genetic data. (for example, details about a DNA sample taken from you as part of a genetic clinical service)
- data revealing religious or philosophical beliefs.
- data relating to criminal or suspected criminal offences.

The Practice keeps data on you relating to who you are, where you live, what you do, your family, your emergency contacts, possibly your friends, your employers, your habits, organisations involved in your care, your symptoms, problems and diagnoses, the reasons you seek help, your appointments, where, when and by whom you are seen, referrals to other health and social care providers, tests carried out both by the Practice and in other places, investigations and scans, treatments and outcomes of treatments, your medical treatment history, the observations and opinions of other healthcare workers, within and outside the NHS, as well as comments and reminders reasonably made by health and social care professionals in the Practice who are appropriately involved in your health care.

The Practice will maintain a record of your care that consists of things such as:

- any contacts you have with staff (e.g. visits and appointments),
- notes or a summary of discussions,
- treatment/care plans and results of any tests,
- results of investigations such as laboratory tests, x-rays, etc,
- relevant information provided from other professionals, relatives or those who know or care for you, and
- information on medicines, side effects and allergies.

Your information will primarily be held electronically. When registering for NHS care, all patients who receive NHS care are registered on a national database. This database is held by NHS England, a national organisation which has legal responsibilities to collect NHS data. Some of the Practice's databases also connect to this national database to ensure your details remain up-to-date. This means if you change your address with the Practice, the new address will be automatically uploaded to the national database and will be available to other health and social care providers involved in your care. The Practice also uses other databases that it is responsible for, either directly or through legal contracts with suppliers.

Some records are still held in paper format, particularly historical care records. These are stored securely and may be transferred to electronic format at some point.

What is the purpose of processing data?

Dunstan Village Group Practice processes your data in order to:

- provide the appropriate services to you,
- review its standards of care to ensure they are safe and effective,
- teach or train healthcare professionals,
- review your suitability for and/or carry out audits and research,

- undertake service evaluation,
- participate in national health screening programmes to ensure only those who should be called for screening are called and those at highest risk are prioritised,
- ensure security and safety (e.g. for the prevention and detection of fraud and other serious crimes, assisting in the prevention and control of diseases, or recording images on CCTV cameras),
- manage complaints, concerns, legal claims and incidents, and/or
- make sure the Practice is paid for the services that it provides.

Lawful Basis for Processing

Under the National Health Service Act 2006 and the Health and Social Care Act 2012, Dunstan Village Group Practice is required by law to process your personal data in order to provide you with direct care. Therefore, under current Data Protection legislation (the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) the processing of your **personal data** is necessary under:

- **UK GDPR 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."*

Where we process **special categories** of sensitive information relating to your physical and/or mental health, racial or ethnic origin, etc, we do so under:

- **UK GDPR 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 and services…."*

The Practice has an obligation to protect the health of the general public and where this is done your **personal data** will be processed under:

- **UK GDPR 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."*

Where we process **special categories** of sensitive information relating to protecting the health of the general public, we do so under:

- **UK GDPR Article 9(2)(i)** "*processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Domestic Law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject, in particular professional secrecy."*

As a healthcare provider there are occasions where we need to process **personal and/or special category data** because someone is at risk of serious harm (e.g. life or death situations in emergencies or major incidents) and, where we do this, we will process the information under:

- **UK GDPR Article 6(1)(d)** *"processing is necessary in order to protect the vital interests of the data subject or of another natural person."*

  and

- **UK GDPR Article 9(2)(c)** *"processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent."*

Sometimes there are occasions when we are obliged to process information to comply with a court order, coroner's instruction, to prevent or detect crime or to comply with the law (e.g. to provide the Secretary of State with information and reports on the status, activity, and performance of the Practice). If we must do this with your information, we will ensure there is a legal justification for such processing, for example under:

- **UK GDPR Article 6(1)(c)** *"processing is necessary for compliance with a legal obligation to which the controller is subject."*

  and

  UK GDPR Article 9(2)(f) *"processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity"*

Meeting the Duty of Confidentiality

Consent is not required when recording information about individual patients. Dunstan Village Group Practice has a professional requirement to keep clear, accurate, and legible records, as set out by registered bodies.

Implied consent

Relevant information is be shared to ensure that patients receive safe and effective care. Consent can be implied when sharing relevant information with those who are directly involved in providing care to a patient unless they have indicated an objection. This is because it is reasonable to assume that a patient would consent if asked, and that a patient would expect relevant information to be shared with those caring for them on a need-to-know basis.

If we process your information for other purposes that are not described above, then we will seek your consent to do so before we process it.

Sharing Your Information

Dunstan Village Group Practice shares information with a range of organisations or individuals for a variety of lawful purposes, this may include:

- other healthcare professionals (e.g. hospitals, community services, ambulance services, etc),
- partner organisations who contribute to your long-term care (e.g. Primary Care Networks, NHS organisations, Integrated Care Systems, social services/local authorities, education, etc),
- Private, Voluntary Sector and/or Charity Providers who contribute to your care,
- parents, carers or guardians with parental responsibilities or legal responsibilities,
- NHS managers and the Department of Health & Social Care/NHS England for the purposes of planning, commissioning, managing, and auditing healthcare services.
- organisations that are contracted to provide services to or on behalf of the Practice,
- community pharmacists who will provide patients with their medication following discharge from hospital,
- bodies with statutory investigative powers (e.g. NHS Resolution, the Care Quality Commission, General Medical Council, Nursing and Midwifery Council, Audit Commission or the Parliamentary and Health Service Ombudsman),
- Government departments for national screening programmes and other national initiatives (e.g. NHS England, UK Health Security Agency, or the Home Office), and
- Police and other emergency services, out-of-hours services, courts (including coroner's court), solicitors and tribunals and national inquiries.

Patient information will only be shared if it is for the provision of your care or required for our statutory function and legal obligations.

The Practice is involved in integrated care programmes working with other NHS, Local Authority, private, voluntary and charity organisations. Information about you may be shared with partners in these programmes where it is legal to do so and for the purposes of direct care.

Any disclosures will be considered on a case-by-case basis to determine if they are appropriate and what the legal basis is for sharing. If the sharing goes ahead, only the minimum personal data necessary for the specific purposes and circumstances will be shared, with all suitable security controls in place. Any organisations receiving person-identifiable information from us are legally obligated to protect it.

The Practice will not share your information for marketing, social media, or insurance purposes unless it has your consent to do so. If you do consent to this, you have the right to withdraw your consent to the processing at any time.

Information provided under the Freedom of Information Act 2000 will not include person-identifiable details about patients.

GP Connect Service

GP Connect makes patient information available to all appropriate clinicians when and where they need it, to support direct patients care, leading to improvements in both care and outcomes. GP Connect is not used for any purpose other than direct care.

Authorised Clinicians such as GPs, NHS 111 Clinicians, Care Home Nurses (if you are in a Care Home), Secondary Care (Hospital) Trusts, Social Care Clinicians are able to access the GP records of the patients they are treating via a secure NHS England (previously NHS Digital) service called GP connect.

The NHS 111 service and Picton Primary Care Network will be able to book appointments for patients at GP practices and other local services.

National Care Records Services

National Care Records Service (NCRS) replaced Summary Care Record (SCR) during 2023, NCRS is a service that allows health and social care professionals to access and update a range of patient and safeguarding information across regional Integrated Care Services (ICS) boundaries.

NCRS enables healthcare professionals, in any health or care setting, to access a summary of health and care information to support that patient's direct care.

Primary Care Networks

The objective of Primary Care Networks (PCNs) is to group practices together to create more collaborative workforces that ease the pressure on GPs, leaving them better able to focus on patient care. All areas within England are covered by a PCN.

PCNs form a key building block of the NHS Long Term Plan. Bringing practices together to work at scale has been a policy priority for some years for a range of reasons, including improving the ability of practices to recruit and retain staff, to manage financial and estates pressures, to provide a wider range of services to patients and to integrate with the wider health and care system more easily.

PCNs have been formed in geographical networks. The Practice is part of Picton Primary Care Network This means that Dunstan Village Group Practice may share your information with other practices within Picton Primary Care Network to provide you with your care and treatment.

Risk Stratification

Risk stratification is a process that we use in the Practice to assist in identifying and caring for patients with long term health conditions e.g. cancer, chronic obstructive pulmonary disease (COPD), diabetes, etc and patients who are at high risk of emergency hospital admission.

The Practice performs in-house risk stratification using various systems to analyse data and produce risk scores. These risk scores are available to authorised Practice staff who are responsible for providing direct care for you. This will help the Practice make better decisions about your future care, for example we may invite you in for a review or if we think you may benefit from a referral to a new service, we will discuss this with you.

Your information is also shared with NHS Cheshire and Merseyside (the Integrated Care Board (ICB) for the region) who will undertake some risk stratification on behalf of the Practice.

Information is also shared with NHS Cheshire and Merseyside for the following:

- Shared Care Record (ShCR) Direct Patient Care
- Data into Action (previously known as Combined Intelligence for Population Health (CIPHA))
- <Secure Data Environment (SDE) (for research purposes)>
- Invoice Validation

For further information, please see NHS Cheshire and Merseyside's Privacy Notice and Privacy Notices: Digital and Data Programmes which are available at How we work - NHS Cheshire and Merseyside

Safeguarding

Some members of society are recognised as needing protection, for example children and vulnerable adults. If a person is identified as being at risk from harm Dunstan Village Group Practice staff are expected as professionals to do what they can to protect them. In addition, they are bound by specific laws that exist to protect individuals. This is called "Safeguarding."

Where there is a suspected or actual safeguarding issue the Practice will share relevant information that it holds with other relevant agencies, regardless of whether or not the individual or their representative agrees. The laws that allow this processing to be undertaken without consent are the Children Act 1989 (Section 47) and the Care Act 2014 (Section 45).

Research

Research in the NHS is essential in helping to improve the health and wellbeing of the population and is included within the NHS Constitution. There is also evidence to suggest that when healthcare organisations engage in research, it is likely to have a positive impact on their performance and patient outcomes. As such, Dunstan Village Group Practice is dedicated to supporting clinical research. Practice staff may view care records in order to offer new research opportunities to patients and carers, to support the development of treatments and improve the way the Practice delivers healthcare.

The Practice only participates in research where there is an agreed, clearly defined reason for the research and that it is likely to benefit healthcare and patients. Such proposals will normally have a consent process, ethics committee approval and will be in line with the principles of Article 89(1) of UK GDPR.

Identifiable data will be ***shared*** with researchers under:

- **UK GDPR 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."*

  and

- **UK GDPR Article 9(2)(j)** *"processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes…"*

Where identifiable patient information is used for research, the common law duty of confidentiality is normally met by explicit consent, however, where the law allows, this may be without consent, for example under Section 251 support, Control of Patient Information Notice (COPI), etc

For further information, please go to https://www.hra.nhs.uk/information-about-patients/.

General Practice Extraction Service

General Practice Extraction Service (GPES) is a centrally managed, primary care, data extraction service that is in place across England, and is managed by NHS England.

GPES can collect 2 different types of information:

- effectively anonymised data that does not reveal an individual's identity.
- Patient-identifiable data (PID), that may identify an individual, such as a name, date of birth or postcode.

PID data is only used when information is permitted by law or supports direct benefits to patient care.

The purpose of GPES is to extract and compare data from across the NHS, allowing data to be turned into accurate and usable management information; this in turn leads to improvements in patient care and greater efficiency across the service as a whole.

For further information please see NHS England general practice extraction service.

National Data Opt-Out

Whenever you use a health or care service, such as attending Accident & Emergency or using Community Services, important information about you is collected in a patient record for that service. Collecting this information helps to ensure you get the best possible care and treatment.

The information collected about you when you use these services can also be used and provided to other organisations for purposes beyond your individual care, for instance to help with:

- improving the quality and standards of care provided
- research into the development of new treatments
- preventing illness and diseases
- monitoring safety
- planning services

This may only take place when there is a clear legal basis to use this information. All these uses help to provide better health and care for you, your family and future generations. Confidential patient information about your health and care is **only used** like this were allowed by law.

Most of the time, anonymised data is used for research and planning so that you cannot be identified in which case your identifiable confidential patient information isn't needed.

You have a choice about whether you want your confidential patient information to be used in this way. If you are happy with this use of information you do not need to do anything. If you do choose to opt out your confidential patient information will still be used to support your individual care.

To find out more or to register your choice to opt out, please visit www.nhs.uk/your-nhs-data-matters.

You can also find out more about how patient information is used at:

- General Practice Data for Planning and Research (GPDPR) - NHS England Digital

- https://understandingpatientdata.org.uk/what-you-need-know (which covers how and why patient information is used, the safeguards and how decisions are made)

You can change your mind about your choice at any time.

Data being used or shared for purposes beyond individual care does not include your data being shared with insurance companies or used for marketing purposes and data would only be used in this way with your specific agreement.

Dunstan Village Group Practice has systems and processes in place so we can be compliant with the national data opt-out and apply your choice to any confidential patient information we use or share for purposes beyond your individual care. Dunstan Village Group Practice is compliant with the national data opt-out policy.

You can also opt-out of some of the national screening programmes. For further information, please go to https://www.gov.uk/government/publications/opting-out-of-the-nhs-population-screening-programmes.

Type 1 Opt Out

The data held in your GP medical records is shared with other healthcare professionals for the purposes of your individual care. It is also shared with other organisations to support health and care planning and research.

If you do not want your personally identifiable patient data to be shared outside of the GP Practice for purposes except your own care, you can register an opt-out with us. This is known as a Type 1 Opt-out. You can contact the Practice to:

- Register a Type 1 Opt-out, for yourself or for a dependent (if you are the parent or legal guardian of the patient)
- Withdraw an existing Type 1 Opt-out, for yourself or a dependent (if you are the parent or legal guardian of the patient) if you have changed your preference (Opt-in)

Communicating with you

By providing Dunstan Village Group Practice with your contact details, we will communicate with you about your healthcare. This may be via a variety of ways e.g.

- Post
- Telephone (landline or mobile number)
- Text Message (mobile number)
- Secure Email
- Approved Patient Website / Apps e.g. NHS App

You are responsible for ensuring you provide the Practice with correct contact details. You must inform the Practice of any changes. This will ensure you don't miss any information.

You may inform the practice of your preferred communication methods and specify any means by which you do not wish to be contacted, such as text messages. Your preferences will be recorded, ensuring that practice staff are aware of how you prefer to be reached. You can change your preferences at any time by notifying the practice.

Telephone System

Surgery Connect our telephone system records incoming and outgoing telephone calls to:

- Review and improve services.
- Monitor and review the quality of care being provided.
- Check the accuracy and content of conversations, should a query arise later.
- Train and develop staff.
- Investigate and assist complaint investigations.
- Provide evidence of abusive behaviour should it occur.

When you register at the Practice, we will inform you that the Practice records telephone calls, we also make this clear to you via this Privacy Notice and other sources of information, such as a recorded message that will be played before inbound calls are answered

You do not have the right to opt out or object to the recording of telephone calls. If you object to this you will need to contact the practice using alternative methods. Alternative methods of communication available are; attend in person at the surgery or use the practice online consultation facility via the Practice website.

Sometimes calls may not be recorded if:

- There is a technical fault with the telephone system.
- The Practice member of staff is using equipment which does not allow call recording.

The Practice will process personal data in relation to telephone recordings in the delivery of direct care and for administrative purposes. The Practice will process personal data in relation to telephone recordings under:

- UK GDPR 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

- UK GDPR 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”

Call recordings may be linked to your patient record at the end of the call. Where this is the case, the recording will form an integral part of your NHS medical record and will therefore be stored as a permanent record.

Dunstan Village Group Practice retains call recordings for up to a period of 3 years.

Closed Circuit TV

Dunstan Village Group Practice has installed and uses Closed Circuit TV (CCTV) within its premises to help reduce the fear of crime for patients, staff, and visitors to our site and to protect our premises and assets from criminal activity. In addition, CCTV may be used to monitor difficult to observe areas where patient or public safety could be compromised. If an incident occurs, the CCTV footage may be shared with the police for the purposes of investigating a crime. The Practice ensures that the use of CCTV complies with all relevant regulatory acts of law. Dunstan Village Group Practice is the data controller for the CCTV installed and used at the Practice.

Dunstan Village Group Practice retains CCTV recordings for up to a period of 3 months.

Dunstan Village Group Practice is located within premises which are jointly owned by the Practice and Earle Road Medical Centre. CCTV is installed within the building and located within areas of the building used by Earle Road Medical Centre, however Dunstan Village Group Practice is the data controller for the CCTV.

Transferring Outside of the UK

Dunstan Village Group Practice does not routinely transfer information outside of the UK, but if there is a need to do so it will be done in a way that ensures the security of the information is to an equivalent standard as that used internally by the Practice when processing your information.

Use of Third-Party Companies

When we use a third-party service provider to process data on our behalf we will always have an appropriate agreement in place to ensure that they keep the data secure, that they do not use or share information other than in accordance with our instructions and that they are operating appropriately. An example of functions that may be carried out by third parties include, by limited to:

- companies that provide IT services and support, including our core clinical system
- systems which manage patient facing services such as our website and services accessed via the Practice website e.g. Register with a GP Surgery Service
- systems which facilitate appointment bookings or electronic prescription services
- document management services

Automated Decision Making

Dunstan Village Group Practice uses Artificial Intelligence (AI) for the following:

- automated decision making when signposting patients as part of its use of PATCHs software.

The Practice does not carry out any automated decision making where AI solely decides on what care or treatment a person should receive. A health and care professionals will always make the final decision. The Practice may also use instances of AI that use automated decision making to improve efficiency, which do not use personal data.

Anima

Dunstan Village Group Practice uses Anima AI-enabled primary care platform, supplied by Continuum Health Ltd (t/a Anima Health). The platform comprises four modules: (1) Anima Triage – online consultation and triage; (2) Anima Documents – AI-assisted processing of inbound clinical correspondence; (3) Anima Calls ("Andi") – AI-enabled voice agent for frontline reception calls; (4) Anima Scribe – ambient voice transcription of consultations with suggested clinical codes.

Anima as a data processor across all four modules, including: the recipients of data (Art. 13(1)(e)); the transfers to the EEA and US described at Q39 (Art. 13(1)(f)).

The Practice does not carry out any automated decision making where AI solely decides on what care or treatment a person should receive. A health and care professionals will always make the final decision. The Practice may also use instances of AI that use automated decision making to improve efficiency, which do not use personal data.

Your Rights

Data Protection laws give you rights in respect of the personal information that we hold about you. These are:

1. **To be informed why, where and how we use your information.**
   This is detailed in this Privacy Notice.

2. **To ask for access to your information.**
   You have a legal right to access the personal information held about you by the Practice. You can obtain this information at any time by making a Subject Access Request. The Practice has one calendar month to provide the information to you. However, you do not have the right to access information that:

   - has been provided in confidence by someone else without consenting for you to see it,
   - relates to serious criminal offences, and/or

- could cause physical or mental harm to you or someone else.

Parents/carers/legal guardians can make a request with respect to their child's data where the child is not considered mature enough to understand their rights over their own data (usually under the age of 12), or where the child has provided consent.

Anyone requesting access to records will be asked to provide copies of identification documents to verify the lawfulness of their request.

To request access to records the Practice holds, please contact the Practice.

Another way to access your records is through the NHS App (or other approved patient-facing services apps). For further information on this, please go to https://transform.england.nhs.uk/information-governance/guidance/access-to-patient-records-through-the-nhs-app/.

3. **To ask for your information to be corrected if it is inaccurate or incomplete.**
   You have the right to have any inaccuracies in the data we hold about you corrected. However, if the data we hold is accurate, but you disagree with it, you should note that there is no right to have accurate medical records deleted except when ordered by a court of law. For further information about correcting inaccuracies, please see the guidance on Requesting Amendments to Health and Social Care Records (see link below) or contact the Practice.

   https://transform.england.nhs.uk/information-governance/guidance/amending-patient-and-service-user-records/

4. **To ask for your information to be deleted or removed where there is no need for us to continue processing it.**
   You have the right to ask for your information to be removed, but if we require this information to provide you with appropriate medical services and diagnoses for your healthcare, then removal may not be possible. Please contact the Practice to discuss this further.

5. **To ask us to restrict the use of your information.**
   You have the right to ask that the Practice to restrict information processing

6. **To ask us to copy or transfer your information from one IT system to another in a safe and secure way, without impacting the quality of the information.**
   You have the right to request your information be transferred to another organisation. Please contact the Practice to discuss further.

7. **To object to how your information is used.**
   People who have access to your information will only have access to that which they need to fulfil their roles. You have the right to object to the Practice sharing your data in these circumstances, but the Practice has an overriding responsibility to do what is in your best interests and could still share the

information even if you have objected. This will only be done with a valid legal justification.

You have the right to object to some or all of your information being processed. However, please note that this is a right to raise an objection, which is different from having an absolute right to have your wishes granted in every circumstance. In certain circumstances the Practice will need to continue to process your information in order to provide you with the care you need

8. **To challenge any decisions made without human intervention (automated decision making)**
   See **Automated Decision Making** section above

How long do we retain your records?

All our records are retained and destroyed in line with the NHS Records Management Code of Practice which set out the appropriate length of time each NHS record is held for. We do not keep your records for longer than necessary.

All records are destroyed confidentially once their retention period has been met and Dunstan Village Group Practice has made the decision that the records are no longer required.

Changes to this Privacy Notice

Dunstan Village Group Practice reserve the right to update or amend this Privacy Notice at any time, including where Dunstan Village Group Practice intend to further process your personal information for a purpose other than that for which the personal information was collected or where we intend to process new types of personal information. We will update this Privacy Notice when we make significant updates or amendments. We may also notify you about the processing of your personal information in other ways.

This Privacy Notice was last updated 30th October 2026.

Right to Complain

The Practice aims to make sure that the services it delivers are provided to the highest standard. If you have any concerns about the way the Practice has handled its data, you can raise your concerns or make a complaint by contacting the practice.

Alternatively, you can complain to the Information Commissioner's Office by emailing casework@ico.org.uk or phoning 0303 123 1113.