

Addendum to GP Practice Privacy Notices: October 1 2023

1. Introduction:

In addition to how we use your data within the GP Practice, this Privacy Notice explains how Four Elms Surgery and other practices in the local area (Cluster) use your personal data when working with the newly developed South East Cardiff Wellbeing Centre (SEWEC).

2. The South East Cardiff Wellbeing Centre (SEWEC)

The SEWEC is based in Cardiff Royal Infirmary. It is a collaboration between health, social care and the third sector.

The Hub Team includes:

- Administrators employed by the Health Board
- An Occupational Therapist employed by the Health Board
- Cluster pharmacists employed by the Health Board
- Managerial Support Staff employed by the Health Board

These staff undertake 3 main functions on behalf of the Practices within the local area:

a) Welfare Checks to Patients Post Hospital Discharge

There is evidence to suggest that by following up patients who have been discharged from hospital, there is an opportunity to reduce the likelihood of another admission. Therefore, staff from SEWEC are notified of all hospital discharges so that they can provide a welfare check to those who may need some additional support to help them recover from their hospital stay. These calls are made on behalf of the GP Practice and information gathered and/or arrangements for support are then fed back to the GP practice. The staff from SEWEC may decide in discussion with a patient, to make an onward referral to another service or third sector agency to provide the required support.

b) Medications Checks

The Administration Staff identify patients whose medication has been changed whilst they were in hospital and this information is given to the Pharmacist who works in SEWEC, who will then contact the patient for a discussion about their medication plan.

c) Multi-Disciplinary Meetings

There are occasions, where patients may have a range of needs that would be best served through bringing a range of services together so as to ensure a coordinated approach.

This involves a GP/other member of the Practice bringing details of your needs to a Multi-Disciplinary Meeting with wider organisations (as listed in section 3)

The MDT is designed to bring efficiency to a whole systems approach with effective multi-organisation working to improve patient care and referrals to other healthcare providers. The

purpose of the MDT is to discuss and recommend the best form of treatment and care based on each individual patient's circumstances. As our patient we can refer you into the MDT meeting for further assessment in relation to your care.

3. Our Partners include:

The work of SEWEC is based on the ability to collaborate with a range of partner organisation to provide you with direct care and additional support to maintain your health and wellbeing at home. This enables us to provide you with the right level of care, from the right professional, and at the right time and also use health care resources wisely.

Via SEWEC, the Practice works with a number of Health Service Teams/Staff, Council Departments and Third Sector Organisations within the Area.

- **Administration and Clinical Staff employed by the Health Board who work in support of GP practices in the local area:** These staff support practices by making contact, on behalf of the Practice, with patients who may require additional support post hospital discharge, changes to their medication after hospital treatment and/or may require a home visit to assess their needs
- **Cardiff Council Independent Living Service:** This service provides a range of information and access to community- based services aimed at helping you to remain independent and well at home
- **UHB District Nurse Teams:** This service provides nursing care to people who are housebound and cannot attend for GP Practice nursing care
- **UHB Mental Health Services:** This service aims to provides people with access to specialist mental health support in support of/ as an alternative to GP care
- **UHB Community Resource Team:** This service aims to help people regain and maintain their independence in the community
- **Age Connects, Care and Repair, MIND, Red Cross*:** These are third sector organisations who can provide a range of wellbeing support to individuals in the community ranging from providing adaptations providing information on local support/interest groups which may help with isolation, advocacy and financial concerns

***If you do not want your information to be shared with the third sector organisations listed above, please contact the Practice reception, your GP at your consultation or a member of the SEWEC staff.**

What information do we collect about you/may be shared as part of the work of SEWEC?

For the purposes of providing your direct care and treatment, we collect/may share the following personal information:

- Your name
- Address
- NHS No.

- Date of Birth
- Gender
- Racial / ethnic origin
- Relevant medical information pertaining to your physical and/or mental health
- Reason(s) for referral
- Criminal offences
- Employment, school, social services, housing records

How is your personal information collected?

The information the SEWEC uses to provide you with care is collected through various routes; these may include:

- Direct interactions with you as our patient and direct input by the clinician involved in your direct care and treatment.
- Indirectly from other health care providers, such as Cardiff and Vale University Health Board.
- When you attend other organisations providing health or social care services for example out of hours GP appointments or visits to A&E and some interactions with Social Care, they will let us know so that your GP record is kept up to date.

How do we use your information?

The information we collect about you, for the purposes of SEWEC, is used for your direct care and treatment, but may also be used for:

- The management of healthcare services
- To contact you about patient surveys
- Anonymised reporting for the purposes of service evaluation and performance

Access and security of your personal information

The sharing of your information between the Practice and SEWEC and vice versa is managed in such a way to assure that it remains confidential, and any organisation that either shares or receives your information has a duty of confidentiality and to ensure that the personal data of patients is shared and stored securely.

Your information is securely stored on the practice's IT systems. All users accessing our systems will use a secure username and password to access the system, and all activity performed is fully audited. If any of your information needs to be communicated by email, this is done so using secure NHS Wales email addresses where all information is protected via secure web communication channels.

Referrals to third sector organisations listed above are made via our secure social prescribing system, Elemental, and our secure emailing system.

Retaining and storing your information

We are required by UK law to keep your information and data for a defined period, often referred to as a retention period. The Practice will keep your information in line with the [Records Management Code of Practice for Health and Social Care 2022](#).

Legal basis for processing your information

The legal basis used to process your personal information via SEWEC relates to your direct care and treatment. We rely on the following condition to lawfully process your information:

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.*

For the purposes of MDT, we also process special category information, for example data concerning your health. We rely on the following condition to lawfully process your information:

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 service.*

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.*

Your rights in relation to the Practices use of SEWEC

The UK GDPR includes a number of rights for individuals. We must generally respond to requests in relation to your rights within one month, although there are some exceptions to this. The availability of some of these rights depends on the legal basis that applies in relation to the processing of your personal data. For this Service, the following rights are listed and how they apply are described below.

Right to be Informed

Your right to be informed is met by the provision of this privacy notice, and similar information when we communicate with you directly – at the point of contact.

Right of Access

You have the right to obtain a copy of personal data that we hold about you and other information specified in the UK General Data Protection Regulation (UK GDPR), although there are exceptions to what we are obliged to disclose. A situation in which we may not provide all the information is where in the opinion of an appropriate health professional disclosure would be likely to cause serious harm to your, or somebody else's physical or mental health.

Right to Rectification

You have the right to ask us to rectify any inaccurate data that we hold about you.

Right to Erasure ('right to be forgotten')

You have the right to request that we erase personal data about you that we hold. This is not an absolute right, and depending on the legal basis that applies, we may have overriding legitimate grounds to continue to process the data.

Right to Restriction of Processing

You have the right to request that we restrict processing of personal data about you that we hold. You can ask us to do this for example where you contest the accuracy of the data.

Right to Object

You have the right to object to processing of personal data about you on grounds relating to your particular situation. The right is not absolute, and we may continue to use the data if we can demonstrate compelling legitimate grounds, unless your object relates to marketing.

How to Contact us

Please contact the Practice if you have any questions about our privacy notice or information, we hold about you.

Practice Manager, Mrs Angela Way.

Contact Details of our Data Protection Officer

The Practice is required to appoint a data protection officer (DPO). This is an essential role in facilitating practice accountability and compliance with UK Data Protection Law.

Our Data Protection Officer is:

Digital Health and Care Wales,
Information Governance, Data Protection Officer Support Service
4th Floor, Tŷ Glan-yr-Afon
21 Cowbridge Road East
Cardiff
CF11 9AD
Email: DHCWGMPDPO@wales.nhs.uk

Right to complain to the Information Commissioner

You have the right to complain to the Information Commissioner if you are not happy with any aspect of practices processing of personal data or believe that we are not meeting our responsibilities as a data controller. The contact details for the Information Commissioner are:

Information Commissioner's Office
Wycliffe House

Water Lane,
Wilmslow SK9 5AF

Website: www.ico.org.uk

Tel: 0303 123 1113

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