group policies and procedures

# tRANSPARENCY pOLICY

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| Category | Transparency Policy |
| Author | James Leyland |
| Responsible Director | Dominic Hennessey |
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**Related policies and guidance**



**Document revision and approval history**

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| Version | Date | Author | Approved by | Comments |
| V1 | 14.12.18 | James Leyland | Castleman Healthcare Ltd. |  |
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|  | Sept 21 |  |  | Reviewed JL |

Castleman Healthcare Ltd. takes your privacy very seriously. We are registered with the Information Commissioner’s Office as a Data Controller and our registration number is **ZA189517**

If you have any questions or wish to make a request in relation to your information, please contact us at;

Castleman Healthcare Ltd.

8 Kirkway

Broadstone

Dorset

BH18 8EE

marked for the attention of the Data Protection Officer.

Castleman Healthcare Ltd. aims to provide you with the highest quality health care. To do this we must keep records about you, your health and the care we have provided or plan to provide to you.

Your doctor and other health professionals caring for you, such as nurses or physiotherapists, keep records about your health and treatment so that they are able to provide you with the best possible care.

These records are called your ‘health care record’ and may be stored in paper form or on computer and electronic systems and may include Personal Data;

* basic details about you, such as address, date of birth, NHS number, and next of kin

as well as Sensitive Personal Data;

* contact we have had with you, such as clinical visits
* notes and reports about your health
* details and records about your treatment and care
* results of x-rays, laboratory tests etc.

Healthcare providers are permitted to collect, store, use and share this information under Data Protection Legislation which has a specific section related to healthcare information.

# What do we do with your information?

Our member practices may:

* Refer you to other healthcare providers when you need other service or tests
* Share samples with laboratories for testing (like blood samples)
* Share test results with hospitals or community services (like blood test results)
* Allow out of hours GPs to look at your practice record when you go to an appointment
* Send prescriptions to a pharmacy
* Patients are texted in relation to healthcare service
* Samples are provided to the courier for delivery to pathology
* Share reports with the coroner
* Receive reports of appointments you have attended elsewhere such as with the community nurse or if you have had a stay in hospital

Please see Appendix A at the end of this document to see a list of the partners that we share with. Castleman Healthcare Ltd has Information Sharing Agreements in place with its member practices and they in turn have agreements in place with those who they share information with which allows health and social care providers to agree a secure and lawful way to share your information.

# What else do we do with your information?

Along with these activities that allow us to provide health care to you, we use information in other ways which allow us to ensure that care is safe and to provide data for the improvement and planning of services.

* Quality / payment / performance reports are provided to service commissioners
* As part of clinical research – information that identifies you will be removed, unless you have consented to being identified
* Undertaking clinical audits within the Centre
* Supporting staff training

# Sharing when Required by Law

Sometimes we will be required by law to share your information and will not always be able to discuss this with you directly. Examples might be for the purposes of detection or prevention of crime, where it is in the wider public interest, to safeguard children or vulnerable adults or where required by court order.

# Information Access and Rights

Data protection law provides you with a number of rights that the practice must support you with.

## **Right to Access**

You have the right to obtain:

* confirmation that your information is being used, stored or shared by the practice
* a copy of information held about you

You should contact your registered GP practice (details of which can be found on the home page of the Castleman Website) in the first instance for access to your medical records. If you wish further information you should then contact the Data Protection Officer for Castleman Healthcare Ltd at the address above.

We will respond to your request within one month of receipt or will tell you when it might take longer.

We are required to validate your identity including the identity of someone making a request on your behalf.

## **Right to Correction**

If information about you is incorrect, you are entitled to request that we correct it

There may be occasions, where we are required by law to maintain the original information – our Data Protection Officer will talk to you about this and you may request that the information is not used during this time

We will respond to your request within one month of receipt or will tell you when it might take longer.

## **Complaints**

You also have the right to make complaints and request investigations into the way your information is used. Please contact our Data Protection Officer.

# Case Finding

Sometimes your information will be used to identify whether you need particular support from us. Those involved in your care might look at particular indicators and contact you or take action for healthcare purposes such as preventing you from having to visit accident and emergency by supporting you in your own home or in the community.

We will use automated technology to help us to identify people that might require support but ultimately, the decision about how to support you is made by those involved in your care.

Our Data Protection Officer will be happy to speak to you about this if you have concerns or objections.

# Information Technology

Your registered practice will use third parties to provide services that involve your information such as;

* Removal and destruction of confidential waste
* Provision of clinical systems
* Provision of connectively and servers

Data analytics or warehousing (these allow us to make decisions about care or see how effectively the practice is run – personal data will never be sold or made available to organisations not related to your care delivery)

We have contracts in place with these third parties that prevent them from using it in any other way that instructed. These contracts also require them to maintain good standards of security to ensure your confidentiality.

# How do we Protect your Information?

We are committed to ensuring the security and confidentiality of your information. There are a number of ways we do this;

* Staff receive annual training about protecting and using personal data.
* Policies are in place for staff to follow and are regularly reviewed.
* We check that only the minimum amount of data is shared or accessed.
* We use ‘smartcards’ to access systems, this helps to ensure that the right people are accessing data – people with a ‘need to know’.
* We use encrypted emails and storage which would make it difficult for someone to ‘intercept’ your information.
* We report and manage incidents to make sure we learn from them and improve.
* We put in place contracts that require providers and suppliers to protect your data as well.
* We do not send your data outside of the EEA.