

Privacy Policy - Patients

1. Introduction.

This privacy policy sets out the way the Greater Manchester Urgent Primary Care Alliance processes your personal information. It deals with how we collect information, what we do with it, how we protect it and what controls or rights you have.

The Greater Manchester Urgent Primary Care Alliance consists of three organisations who, in isolation, provide many out of hospital health services across Greater Manchester. They are Bardoc, *gtd healthcare* and Mastercall Healthcare.

We are committed to protecting the privacy of our patients and anyone who interacts with us and will treat all information you give us with care.

We promise to:

- Tell you why we collect personal information, how we do this and what we use it for.
- Only collect the information we need to deliver the service to you.
- Keep the personal information up to date and ensure it is safe and secure.

Please read this Privacy Policy carefully to understand how we process your personal data. By providing your personal data to us or by using our services or this website you are accepting or consenting to the practices in this Privacy Policy.

We may change this policy from time to time. The date this policy was last updated is shown at the end of this document.

As a data controller, we are registered with the Information Commissioner's Office and fully comply with the Data Protection Act 2018, the Privacy and Electronic Communications Regulations 2003 and the General Data Protection Regulations (EC Directive) 2016 (GDPR). We will also comply with all applicable clinical confidentiality guidelines.

In addition, each organisation within the Alliance is independently registered with the ICO under the following registration numbers:

- Bardoc Z7013457;
- *gtd healthcare* Z1280507;
- Mastercall Healthcare Z9315209.

2. Who we are.



In this policy references to 'Greater Manchester Urgent Primary Care Alliance' or 'GMUPCA' refers to:

Greater Manchester Urgent Primary Care Alliance
International House
Pepper Road
Stockport
SK7 5BW
Registered Company: 11726007

Greater Manchester Urgent Primary Care Alliance is a 'Community Interest Company' preserving the three organisations (Bardoc, *gtd healthcare* and Mastercall Healthcare) 'social enterprise', and 'not for profit' status. As an Alliance and individually the three organisations provide primary care, urgent care and dental helpline services across Greater Manchester, Cheshire and Merseyside.

3. What information we collect.

We collect your personal information mainly directly from you and/or your representative to enable us to provide the services or fulfil a role with us. This may include:

- Name and address (including location data when taking part in virtual consultations over the internet/application), marital status, family history and details of any lasting power of attorney.
- Email address and telephone numbers.
- The country you live in, date of birth, national insurance number, passport number and where relevant the language you speak.
- Details of your employment.
- The name and contact details of your next of kin. It is your responsibility to ensure that if you provide us with any information about another person that they are aware of the terms of this privacy policy.
- details of any educational establishment you attend.
- Recordings of telephone calls we receive or make.
- Your photograph (Please note. In relation to virtual consultations the visual element of the consultation (and any photographs) via the internet/application are not recorded/stored although the audio element is, as with all standard telephone calls).
- Details of services and treatments you may have received from us.
- Reports or notes on your health or any treatment and care you have received or need.
- Patient feedback and treatment outcome information, you provide.
- Information about complaints and incidents.



- When you visit our website, we collect information about your IP address and pages you visit. This does not tell us who you are or your address, unless you choose to provide that information.
- Information from customer surveys or promotions that you take part in.

We will also collect Special category data, sometimes called sensitive personal information, particularly where this is relevant to your presenting medical/dental condition. This includes:

- Information about your race, ethnic origin and religion.
- Information about your physical or mental health, genetic data or biometric data.
- Information about your sex life or sexual orientation.
- Information about risk and safeguarding.

4. How do we collect Personal Information?

We collect the personal information in the following ways:

- When you enquire about one of our services or treatments.
- When you correspond with us by email, phone or other ways.
- During the course of the provision of services to you.
- Contact us by email, telephone, social media or in any other way.
- When you visit our website.
- Fill in a form or survey for us.
- Information from emergency services, local authority and other public organisations.
- Information from third parties including business partners, service providers, technical sub-contractors, payment and delivery services, advertisers when you have given permission to share it with us
- From publicly available services to keep your information up to date for example the NHS national data base.
- When you participate in discussion forums or other social media on our site or sites managed by us.
- When you take part in a social event
- Enter a competition, promotion or survey

5. Personal Information Provided by other Sources

We may collect personal data about you from other sources and these can include:

- From your next of kin or other family member.
- Provided by doctors, other clinicians and health care professional, hospitals, clinics and other health care providers.



- Your employer when they provide information.
- Translators and interpreters.
- Any health professional or organisation who provides information for the continuity of your care.
- Information from a Local Authority or the Police.

GP Connect:

We also use a facility called ‘GP Connect’ to support your direct care. 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 Trusts, Social Care Clinicians are able to access the GP records of the patients they are treating via a secure NHS Digital service called GP connect.

The NHS 111 service (and other services determined locally e.g. some services provided by Mastercall and other GP practices in a Primary Care Network) will be able to book appointments for patients at GP practices and other local services.

Legal basis for sharing this data

In order for your Personal Data to be shared or processed, an appropriate “legal basis” needs to be in place and recorded. The legal bases for direct care via GP Connect is the same as the legal bases for the care you would receive from your own GP, or another healthcare provider:

- for the processing of personal data: Article 6.1 (e) of the UK GDPR: “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 processing of “Special Category Data” (which includes your medical information): Article 9.2 (h) of the UK GDPR: “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”.

Your rights

Because the legal bases used for your care using GP Connect are the same as used in other direct care situations, the legal rights you have over this data



under UK GDPR will also be the same- these are listed elsewhere in our privacy notice.

[Find out more about GP Connect.](#)

6. How we use the information and why we need it.

We use the personal information to provide the direct health, or social care services to individual patients and to meet our contractual commitments to you. This may include:

- **Processing** – this will include using the information to fulfil any request made by you or someone on your behalf to receive one of our health or care services or receive an email newsletter
- **Contract** – if we have a contract with you we will process your personal information to fulfil that contract.
- **Consent** – generally we will only ask for your consent to process your personal information if there is no other legal ground to process (As an organisation providing NHS services we already have a legal basis for processing the information we require to provide your care. Where we need your consent, we will ensure you are as fully informed as possible and use that consent solely for the reason you have given it to us. You will be able to change your mind at any time by contacting us at the address in paragraph 14. Any email or text to you will have a link to let you do so.
- **Public task** – we will process your personal information when carrying out the performance of a task in the public interest which includes the provision of direct health care or social care.
- **Necessary for the purpose of preventative or occupational medicine** – to assess whether you are able to work, the provision to you of health or social care, a medical diagnosis, or the management of health and social care systems.
- **Necessary to defend legal claims or a court action.**
- **Vital interests** – where it is necessary to protect your vital interests or those of another person.
- **Public interest** – this is usually in line with any applicable laws such as protecting against dishonesty, malpractice or other seriously improper behaviour.

- **Information you have made public.** Eg Social media or NHS Choices
- **Marketing** – in addition to processing we will use your personal information to provide you with information about services you have requested or would reasonably expect to receive from us. You will be able to change your mind at any time and we will keep your preferences up to date.
- **Profiling** – we may make use of profiling and screening methods to provide a better service to patients. Profiling helps us target resources more effectively through gaining an insight into the background of patients and helping us build relationships that are appropriate to their needs.

7. Legitimate interests

Greater Manchester Urgent Primary Care Alliance also processes your data when it is in our legitimate interest to do this and when these interests do not override your rights. These legitimate interests include: -

- providing you with information on services products and feedback.
- Keeping our records up to date.
- For statistical research and analysis and to enable us to monitor and improve services.
- To monitor how we are meeting our clinical and non-clinical performance in the case of health care providers.
- Sharing your personal information with people or organisations in order to comply with any legal or regulatory obligations or to enable us to run our organisation.
- To fulfil laws that apply to us and the third parties we work with.
- To take part in or be the subject of any merger
- Managing our relationships with you and third parties who assist us to provide the services to you.

8. Who will see the information?

Your information will only be accessible to our staff and only where it is appropriate in respect of the role they are carrying out. We will never sell your information or let other organisations use it for their own purpose.

We will only share your personal information (under strict guidelines):

- If consent is necessary we will have taken your consent to us doing so and will provide information for the specific reason your consent was given. You will have the opportunity to withhold consent when you complete the form on which



we collect the data or you can do so by contacting us at the address in paragraph 14, at any time.

- Doctors, clinicians, hospitals, clinics, diagnostic and treatment centres and other health care providers to provide our services and continuity of health care.
- Your GP – where appropriate we will share your information with your GP. You can ask us not to do so and we will respect this unless legally required to provide the information or sharing the information is in your 'best interests'. You should be aware it may be detrimental to your health if your GP does not have your full medical history.
- First responders, ambulance service, safeguarding, undertakers, coroner and care homes.
- Where it is necessary to protect your vital interest (i.e. your life or health)
- Other organisations you belong to confirm your entitlement to our services.
- Organisations or people who by law or regulations we must share your personal information with. This can be national data bases, screening registers government authorities and NHS organisations.
- The police or other law enforcement agencies to assist them perform their duties if we must do this by law or under a court order.
- Where we use other organisations to provide services on our behalf for processing, mailing, delivering, answering patient's questions about services, sending mail and emails, data analysis, assessment and profiling or processing credit/debit card payments.
- To organisations who you have requested us to supply information so that they can provide services or products you have requested.
- Organisations providing IT systems, IT support and hosting in relation to IT systems on which information is stored.
- When using auditors and professional advisors.
- When we are legally required to, or because of a lawful request by a governmental or law enforcement authority.



- If we merge with another organisation or form a new entity.

Where a third-party data processor is used, we ensure they operate under a contract which includes confidentiality and security of personal data and their obligations under the Data Protection legislation.

9. Security.

The security of your personal information is very important to us. We protect all personal data we hold and ensure we have appropriate organisational and technical measures in place to prevent unauthorised access or unlawful processing of personal data and to prevent data being lost, destroyed or damaged.

All information you provide to us is stored on our secure servers. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

All the personal data is processed in the UK however for IT hosting and maintenance your information may be situated outside the European Economic Area (EEA).

You might find links to third party websites on our website. These websites should have their own privacy policies, which you should check. We do not accept any responsibility or liability for their policies whatsoever as we have no control over them.

10. Your rights.

You have the following rights:

- Transparency over how we use your personal information (right to be informed).
- To request a copy of the personal information we hold about you, which will be provided to you within one month (right of access).
- An update or amendment of the personal information we hold about you (right of rectification).
- To ask us to stop using personal information (right to restrict processing).
- Ask us to remove your personal information from our records (right to be forgotten).
- Request us to remove your personal information for marketing purposes (right to object).
- To obtain and reuse your personal data for your own purposes (right to portability).
- Not to be subject to a decision based on automated processing.
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Please note not all of the above are absolute rights and are subject to certain exemptions (particularly when processing information for direct care).



You can contact us about any of these rights on the below contact details (Section 13). To protect your privacy, we may ask you to prove your identity before we agree to respond to any request. There is no charge for a request and we will respond to the request within one month unless there are circumstances which prevent this, in which case we will keep you informed.

If you are not satisfied with the way in which we deal with your request you can contact the Information Commissioners Office on 0303 123 1113 or at their website www.ico.org.uk.

11. Cookies.

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website or make use of e-billing services.
- **Analytical/performance cookies.** These allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

12. Retention of information.

We hold your information only for as long as necessary for each purpose we use it.



We use the following guidelines: -

- Any time limits set by law or recommended by regulators professional bodies or associations.
- Time limits for making a claim.
- For as long as we have a reasonable need for managing our relationship with you or running our organisation.

CCTV

Our premises are monitored by CCTV for the safety of visitors and staff. Images are retained for 21 days and in accordance with ICO guidelines.

13. How to contact us.

If you have any questions about this privacy policy or your rights regarding processing your personal information, or wish to make a complaint please contact:

Data Protection Officer
Greater Manchester Urgent Primary Care Alliance
International House
Pepper Road
Stockport
SK7 5BW

gm.dentalenquiries@nhs.net
0333 332 3800

This policy was last updated on 16.02.2024