Greater Manchester
Urgent Primary Care Alliance

V4.1

Privacy Policy

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 the following organisations who, in isolation, provide a number of urgent and primary healthcare services across Greater Manchester and other areas. These are Bardoc, *gtd healthcare*, Mastercall Healthcare, Salford Primary Care Together and Wigan GP Alliance.

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 fully comply with the Data Protection Act 2018, the Privacy and Electronic Communications Regulations 2003, the UK General Data Protection Regulations (UKGDPR) and the Data (Use and Access) Act 2025. We will also comply with all applicable clinical confidentiality guidelines.

We are recorded on the ICO Data Protection Register under registration number ZA602264.

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;
- Salford Primary Care Together ZA133267;
- Wigan GP Alliance ZA551270.

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
New Century House Progress Way,
Denton,
Manchester,
Greater Manchester,
M24 2GP

Registered Company: 11726007

Greater Manchester Urgent Primary Care Alliance is a 'Community Interest Company' preserving the five organisations' 'social enterprise', and 'not for profit' status. As an Alliance and individually these organisations provide primary care, urgent care and dental helpline services across Greater Manchester and other areas.

3. What information we collect.
We collect personal information about you to enable us to provide the services or fulfil a role with us. This may include:

- Name and address, marital status, family history and details of any lasting power of attorney
- Email address and telephone numbers.
- The country you live in, your gender, date of birth, national insurance number, NHS 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 about associated people, for example, children, partners, carers and relatives.
- Information from your parent or guardian if you are under 16.
- Details of any educational establishment attended.
- Recordings of telephone calls or video calls we receive or make.
- Your photograph and photographs for treatment and care.
- Video and sound recordings on our premises and in our vehicles
- 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.
- Your payment information (e.g. credit card details) provided when you make a payment to us.
- Information from customer surveys or promotions that you take part in.

We will also collect Special category data. This may include:

- 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 provide information by filling in a form on registration or information provided at any other time at any other time.
- When you correspond with us by email, phone or other ways.
- During the course of the provision of services to you.
- When you contact us by email, telephone, social media or in any other way.
- When you visit our website.
- When you fill in a form or survey for us.
- Information from emergency services, local authority and other public organisations.
- From video and sound recordings on our premises and in our vehicles.
- Information from third parties including business partners, service providers, technical sub-contractors, payment and delivery services, 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 or GP Connect.

- When you participate in one of our discussion forums or other social media on our site or sites managed by us.
- When you take part in a social event.
- When you take part in a competition, promotion or survey.

5. Personal Information Provided by other Sources
We may collect personal data about you from other sources, which can include:

- Your next of kin or other family member.
- 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, e.g. GP Connect, GMCR
  Find out more about GP Connect.
- Local Authority or the Police.

6. How we use the information and why we need it.
We use personal and special category (sensitive) information provided to deliver direct health, or social care services to individual patients and/ or to meet our contractual commitments.

Under UK data protection legislation, we are required to have a legitimate purpose for processing this information.

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.

The main legal bases we rely on are:

Public Interest 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. This also includes processing personal information for medical research, trials and to train and educate health care professionals.

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 16. Any email or text to you will have a link to let you do so.

- **Contract –** if we have a contract with you, we will process your personal information to fulfil that contract.

- **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.

- **Automatic decision making and Profiling –** we may make use of automatic decision making and profiling and screening methods to provide a better service to patients. Automatic decision making assists us to deliver more effective services. 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. The use of automatic decision making or profiling will not result in a denial of services.

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: -

- Sharing information when requested by another organisation because they need it for their public task or official function.

- Sharing information when required for national security, to protect public security or for defence.
- When necessary to respond to or deal with an emergency situation.
- To prevent, detect or investigate crimes, including the apprehension and prosecution of offenders.
- Safeguarding, when it is necessary to protect the physical, mental or emotional well-being of an individual at risk.
- 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:

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 16, 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. This also includes processing personal information to enable organisations to carry out research and medical trials and processing personal information to train and educate health care professionals

- Your GP – where clinically necessary 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. 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.
- Other 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.
- GP Connect is a NHS England service that allows authorised health and social care professionals to securely share and access patient GP records in real time for direct patient care. You can opt out of sharing your health information with GP Connect but this could affect the ability of health and care professionals to treat you.
- 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.
- Social Care Services, Education Services, Local Authorities and Voluntary and Private Sector providers working with the NHS.
- 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, external reception and appointment services, 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.
- To our associated GP Practices and Primary Care Networks.
- 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. National Data Opt-Out

Whenever you use a health or care service, important information about you is collected in a patient record. 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 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

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

Sometimes, for research and planning your confidential patient information will be 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 your information you do not need to do anything. If you do not wish your information to be used, you can opt out. 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. On this web page you will:

- See what is meant by confidential patient information
- Find examples of when confidential patient information is used for individual care and examples of when it is used for purposes beyond individual care
- Find out more about the benefits of sharing data
- Understand more about who uses the data
- Find out how your data is protected
- Be able to access the system to view, set or change your opt-out setting
- Find the contact telephone number if you want to know any more or to set/change your opt-out by phone
- See the situations where the opt-out will not apply

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

Our organisation [is / is not currently] compliant with the national data opt-out policy.

10. 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. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

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.

11. 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.

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 16). 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.

12. Complaints

You can make a data protection complaint about the way in which we have handled your personal information. You can do this by contacting us at the address in paragraph 16. On receipt of your complaint we will:

- Acknowledge your complaint within 30 days.
- If necessary, ask you for information to confirm your identity or for more information about the complaint.
- Make appropriate enquiries or investigation about the complaint you have raised.
- Inform you of our enquiries and response to your complaint.

13. 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.

14. 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.

15. CCTV
For more information on CCTV at each of our partners sites, please refer to each organisations CCTV policy.

16. 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
New Century House Progress Way,
Denton,
Manchester,
Greater Manchester,
M24 2GP

gm.dentalenquiries@nhs.net
0333 332 3800

This policy was last updated on 18.08.26.