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020 8979 3253

# Glenlyn Medical Centre

## Privacy Notice

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### Plain English Summary

At Glenlyn Medical Centre we keep records about your health so we can provide you with safe and effective care.

Your information is used by the practice and other NHS organisations involved in your treatment. In some cases, information may also be used in a secure and anonymised or pseudonymised form to help the NHS improve services, plan care, and support medical research.

We take the protection of your personal data seriously. Your information is stored securely, only shared when necessary, and handled in accordance with UK data protection law.

You have rights over how your information is used, including the right to access your records and request corrections where needed.

More detailed information about how we use and protect your data is provided in the full Privacy Notice below.

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## Introduction

Glenlyn Medical Centre is committed to protecting the confidentiality and security of personal information.

This Privacy Notice explains how we collect, use, store and share personal information in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and NHS information governance requirements.

We ensure that personal data is handled lawfully, fairly and transparently and that patient confidentiality is maintained at all times.

This Privacy Notice should be read alongside other information governance policies and workforce privacy information issued by Glenlyn Medical Centre.

## Scope of This Privacy Notice

This Privacy Notice primarily explains how Glenlyn Medical Centre processes patient information in order to provide healthcare services.

However, the principles described in this notice also apply to other individuals whose personal data may be processed by the practice as part of its operations. This includes:

- employees and members of the workforce
- volunteers
- contractors and temporary staff
- trainees and students
- individuals working with the practice in a professional capacity

Personal information relating to these groups may be processed for purposes including employment administration, governance, regulatory compliance, safeguarding, training, and service delivery.

Where appropriate, additional workforce or employment-specific privacy information may be provided separately.

All personal data handled by Glenlyn Medical Centre is processed in accordance with UK GDPR, the Data Protection Act 2018, and NHS information governance requirements.

## Purpose

This Privacy Notice explains how Glenlyn Medical Centre processes personal information in order to provide safe and effective healthcare services.

It outlines:

- what information we collect
- why we collect it
- how it is used
- who it may be shared with
- how it is protected
- the rights individuals have over their data

This ensures transparency and demonstrates our commitment to protecting patient confidentiality and complying with UK data protection law.

## Data Controller Details

|                         |                                                           |
|-------------------------|-----------------------------------------------------------|
| Name                    | Glenlyn Medical Centre                                    |
| Address                 | 115 Molesey Park Road, East Molesey, Surrey, KT8 0JX      |
| Telephone               | 020 8979 3253                                             |
| Data Protection Officer | Provided by Surrey Heartlands Integrated Care Board (ICB) |

Glenlyn Medical Centre acts as the Data Controller for the personal data it holds and processes for the purposes of providing NHS healthcare services.

## What Information We Collect

We collect and maintain records relating to your health and care. These may include:

- personal details such as name, address, date of birth and NHS number
- contact information such as telephone numbers and email addresses
- medical history and diagnoses
- medications and allergies
- results of tests, investigations and imaging
- information provided by other healthcare professionals involved in your care
- appointment and consultation records

These records are usually held within secure electronic health record systems used by the NHS.

## **Why We Collect This Information**

Your information is used to:

- provide you with appropriate healthcare
- coordinate care with other NHS providers
- refer you to hospitals or specialist services
- support clinical audit, service evaluation and quality improvement
- support public health monitoring
- fulfil legal and regulatory obligations placed on NHS organisations

We only use the minimum amount of information necessary to deliver safe and effective care.

## **Lawful Basis for Processing**

Under UK GDPR the lawful basis for processing personal information is:

**Article 6(1)(e)** – Processing necessary for the performance of a task carried out in the public interest.

For health information (special category data):

**Article 9(2)(h)** – Processing necessary for the provision of health or social care or treatment.

## **Sharing Your Information**

To provide effective healthcare, information may be shared with:

- NHS hospitals and community healthcare services
- other GP practices and out-of-hours providers
- social care services and local authorities
- NHS England and Surrey Heartlands Integrated Care Board
- approved digital service providers supporting NHS services

Only the minimum necessary information required for the intended purpose will be shared.

#### *NHS OpenSAFELY Data Analytics Service*

NHS England operates the OpenSAFELY Data Analytics Service, a secure platform used for research, clinical audit, service evaluation and public health monitoring.

GP practices remain the data controllers of their patient data, but authorised users may run queries on pseudonymised data within the secure environment.

Patients who do not wish for their data to be used in this way may request a Type 1 Opt-Out from the practice.

#### *AI-Supported Telephony Services*

Glenlyn Medical Centre uses an AI-supported telephone system provided by InTouchNowAI to support patient access to services.

The system helps manage incoming calls by identifying the reason for contact and directing patients to the appropriate service.

Limited information may be processed to support call handling.

InTouchNowAI acts as a data processor on behalf of the practice and complies with UK GDPR, the Data Protection Act 2018, NHS information governance standards and the NHS Data Security and Protection Toolkit.

#### *Population Health Management*

Population Health Management enables the NHS to improve services by analysing health data across groups of patients.

Information may be used in pseudonymised form to:

- identify health trends
- improve service planning
- identify patients who may benefit from additional care

This work is undertaken by authorised NHS organisations such as Integrated Care Boards using secure NHS systems.

#### *NHS App and Digital Services*

Patients may use the NHS App and other NHS digital services to book appointments, request repeat prescriptions, view elements of their health record and communicate with the practice.

These services operate within secure NHS digital platforms.

### *SMS and Patient Messaging Services*

The practice may use approved digital communication services to send patients:

- appointment reminders
- healthcare notifications
- information relating to their care
- recall invitations for reviews or long-term condition monitoring

Messages may be sent via SMS, email, or secure digital platforms.

Some systems used by the practice support clinical recall, condition management, or workflow administration to ensure that patients receive appropriate follow-up care.

These services are provided by approved suppliers acting as data processors on behalf of the practice and operating under NHS information governance requirements.

### *Safeguarding*

Information may be shared where necessary to protect a child, vulnerable adult or other individual from harm.

This may involve sharing information with safeguarding teams, social care services, the police or other NHS organisations.

### *Disclosures in the Public Interest*

In rare circumstances information may be shared where necessary to protect public safety or prevent serious harm.

Such disclosures are carefully considered and made in accordance with data protection law and professional guidance.

### *Law Enforcement and Legal Requirements*

Information may be disclosed where there is a legal obligation to do so, including requests from courts, coroners, law enforcement agencies or regulatory bodies.

### *Use of Artificial Intelligence and Decision Support Systems*

The practice may use digital technologies incorporating artificial intelligence or automated decision-support tools to support healthcare services.

These systems may assist with managing patient access, documenting consultations, supporting administrative processes and improving clinical coding.

Such tools support staff but do not replace clinical judgement.

## **National Data Opt-Out**

The National Data Opt-Out allows patients to choose whether their confidential patient information is used for research and planning purposes.

This does not apply to information used for direct care or where there is a legal obligation to share information.

## **Your Rights**

Under UK GDPR you have the right to:

- access your personal information (Subject Access Request)
- request correction of inaccurate information
- request deletion of information in certain circumstances
- object to certain types of processing
- request restriction of processing
- lodge a complaint with the Information Commissioner's Office

Subject Access Requests are normally fulfilled within one month, although complex requests may take longer as permitted by law.

## **Retention and Storage**

Patient records are retained in accordance with the NHS Records Management Code of Practice for Health and Social Care, which sets national retention periods for healthcare records.

## **Data Security**

The practice implements appropriate technical and organisational security measures including:

- role-based access to systems
- secure NHSmail communication
- encrypted NHS digital infrastructure
- staff training in confidentiality and information governance

## **Changes to This Notice**

This Privacy Notice may be updated periodically.

The latest version will always be available on the practice website and at reception.

## **Contact Us**

Glenlyn Medical Centre  
115 Molesey Park Road  
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Telephone: 020 8979 3253

For data protection queries you may contact the Data Protection Officer via Surrey Heartlands Integrated Care Board.

Complaints may also be made to the Information Commissioner's Office.

# Annex A

## Organisations Supporting Our Services

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| Organisation                            | Service                                                |
|-----------------------------------------|--------------------------------------------------------|
| InTouchNowAI                            | AI-supported telephony system                          |
| NHS England                             | National NHS systems and data services                 |
| NHS Digital                             | NHS App and digital services                           |
| Surrey Heartlands Integrated Care Board | Commissioning and population health management         |
| Abtrace                                 | long-term condition management and recall optimisation |
| XON Communications                      | telephony infrastructure provider                      |
| InTouchNowAI                            | AI call handling layer                                 |
| NOVA HS                                 | workflow management services                           |

These organisations may act as data processors on behalf of the practice or as independent NHS organisations depending on the service provided.

### **Additional Information About Service Providers**

The organisations listed in this annex represent the main providers supporting the delivery of services at the time this Privacy Notice was published.

From time to time the practice may introduce new digital systems or replace service providers in order to improve patient care, operational efficiency, or information security. Where this occurs, appropriate data protection assessments, contractual safeguards, and NHS information governance requirements will be applied.

Any organisations processing personal data on behalf of the practice will do so under formal data processing agreements and will only process information for authorised healthcare purposes.

## Version Control

|                |                                 |
|----------------|---------------------------------|
| Document Title | Privacy Notice                  |
| Organisation   | Glenlyn Medical Centre          |
| Version        | 1.0                             |
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| Review Date    | March 2027                      |
| Document Owner | Managing Director               |
| Approved By    | Glenlyn Medical Centre Partners |

This document will be reviewed whenever there are significant changes to data protection legislation, NHS guidance, or digital systems used by the practice.