WHARFEDALE, AIREDALE & CRAVEN
ALLIANCE

Privacy Notice

At WACA we are committed to ensuring the best standards of practice in all our activities. This extends beyond assuring the quality and safety of our clinical services, to ensuring high standards of quality and safety in the way we handle and manage personal data. We understand how important it is to keep your personal information safe and secure and we take this very seriously.

We have taken steps to make sure your personal information is looked after in the best possible way, and we review this regularly. We take a transparent approach to how we process personal data by being, open, honest and transparent.

In particular, our approach to data privacy and security is designed to protect the interests of:

- Our Patients
- Our Staff and other organisations that we work with
- Individuals who interact with our website

Individuals from any of the above categories can be assured that the protection of privacy and confidentiality are given the highest priority, with all personal information being collected, held and used in strict compliance with the Data Protection Act 2018 and the General Data Protection Regulations (GDPR) 2018.

Types of data and the legal grounds on which data can be processed

As a Healthcare organisation we have a legal duty to collect and process information relating to the creation of medical records (patients) and personnel records (staff) as well as receiving enquiries (website) and conducting surveys. As such, we will ensure all personal data is collected, held and transferred (where required) in a lawful manner and in line with GDPR ‘good practice guidelines’.

Who controls the data we hold?

WACA Ltd will be the Data Controller for the information we gather from you. We use NHS approved systems to process patient data, the companies that operate these systems are data processors. In all cases we have confirmed that they are compliant with relevant legislation in relation to the management of your data. No data will be transferred outside of the UK.

How long will the data we keep be held for?

The length of time we keep your personal data depends on what it is and whether we have an ongoing duty to retain it (for example, to provide you with ongoing care or to comply with legal and regulatory requirements). We'll retain your personal data for as long as we have a relationship with you and for a period of time afterwards where we have an ongoing duty to retain it, in accordance with our data retention policies and practices. Following that period, we'll make sure it's deleted or anonymised.

How do we use your information?

First and foremost, we use your personal data to support and manage your care. We also use your personal data for other purposes, which may include the following:

***To communicate with you*.** This may include:

- Provide you with information about your care, such as appointments times and information about the care you will receive.
- To understand how you are responding to your care.
- To obtain feedback from you on the standard and quality of the care we have provided usually in the form of questionnaires.

Who do we share your information with?

We share information about you with other health professionals to support your care, and in more limited ways for indirect care purposes:

- NHS Trusts and hospitals that are involved in your care.
- NHS Digital and other NHS bodies.
- Community Care Teams
- Care homes
- Other General Practitioners (GPs) or Primary Care Networks (which are groups of GP Practices).
- Ambulance Services.
- Social Care Services.
- Education Services.
- Local Authorities.
- Voluntary and private sector providers working with or for the NHS. Such as Dentists, Pharmacies. Opticians & care homes

The rights of the individuals whose data we process (Data Subjects)

GDPR regulations allow individual 'data subjects' particular rights, the key ones being:

- **Right to be informed** – of how we fairly process your data.
- **Right to access** – the data that is held on you.
- **Right to rectification** – of any data felt to be inaccurate or incomplete.
- **Right to erasure** – of your data (otherwise known as 'right to be forgotten')
- **Right to restrict processing** – to 'block' or prevent further processing of existing data.
- **Right to data portability** – transferring data to another provider/data controller.
- **Right to object** – to processing (including profiling), direct marketing, and certain types of research.
- **Right to question automated decision making** (e.g. for the purpose of profiling)

We will accommodate your wishes in line with your rights under UK GDPR as long as it is not contravened by any other relevant associated regulations.

Information collected through our website

We do not collect any personal information from visitors to our website other than information that is

knowingly or voluntarily given. Anonymous information is collected, such as the number of visitors to the website in a given period but is purely statistical and cannot be used to identify an individual user.

Cookies are not used to collect any other information from visitors to the website. Visitors interested in requesting more information must provide contact details and the reason for their request. Visitors will not be contacted by us, unless such information is given, and contact is specifically requested.

How you can access your health records

The UK GDPR gives you a right to access the information we hold about you on our records. Requests must be made in writing to your registered practice and should be provided to you within one month (this can be extended depending on the complexity of the request) from receipt of your application..

Third party disclosure

We will never pass any personal information to any third party outside of our organisation (unless they are commissioned for data processing activities where we remain the 'data controller') without your consent.

Security and Integrity of Data

Security is a priority for us when it comes to your personal data. We're committed to protecting your personal data and have appropriate technical and organisational measures in place to make sure that happens.

We take all reasonable measures to ensure that the information we hold is accurate. In particular we use reliable collection methods and destroy or convert to an anonymous form any out of date data. Individuals may request details of all personal information held by us so as to contest inaccurate or incomplete data, verify the information and have it corrected as appropriate.

What to do if you have any questions or complaints?

Should you have any questions about our privacy notice or the information we hold about you, you can:

- Contact the organisation's data controller via email at hello@wacalliance.co.uk.
- Write to the data controller at WACA Ltd, Ling House Medical Centre, Scott Street, Keighley, BD21 2JH.
- Contact the Data Protection Officer (DPO) for WACA, Daljeet Sharry-Khan at Daljeet.Sharry-Khan@nhs.net

If you are unhappy with any element of our data-processing methods, you have the right to lodge a complaint with the ICO. For further details, visit ico.org.uk and select 'Raising a concern'.