

North Kent Adult Community Services – Local Privacy Notice 2022-23

Patient privacy notice

We want you to be confident that your information is kept safe and secure and understand how and why we use it to support your care. This privacy policy explains:

- Who we are
- Why we collect information about you
- How your information will be used
- How we keep it safe and confidential

1. Definitions

UK GDPR – UK General Data Protection Regulation

Personal data: any information relating to an identifiable individual such as your name, NHS number, contact details. It can also be location data or online identifier.

Special categories of personal data are defined as: racial or ethnic origin, politics, religious or philosophical beliefs, trade union membership, genetics, biometrics (where used for identification) information concerning your health, sex life or sexual orientation.

2. Who are we?

North Kent Adult Community Services are provided by HCRG Care Group on behalf of NHS Dartford, Gravesham and Swanley and Swale ICB. We are the data controller for any personal information we hold about you.

For more information please visit: <http://northkentacs.nhs.uk/>

HCRG Care Group is a limited company registered in England and Wales, number 07557877. Registered office: HCRG Care Group, Progressive House, The Heath Business Park, Runcorn, Cheshire, WA7 4QX.

3. The information we collect and use

We will collect basic **'personal data'** about you such as your name, d.o.b, address and contact details. We may also ask you for more sensitive data, called **'special category data'** such as your ethnicity and information about your health and outcomes of needs assessments. This information is held in written form and/or in digital form.

Health care professionals who provide you with care are required by law to maintain records about your health and any treatment or care you have received within any NHS organisation (eg information from Hospitals, GP surgeries etc). These records help to provide you with the best possible healthcare and help us to protect your safety.

In carrying out this role we will collect information about you which helps us respond to your queries or secure specialist services. We may collect the information from you or other trusted parties involved in your care.

This may include:

- Details about you, such as your address, NHS number, next of kin and/or carer information
- Any contact the surgery has had with you, such as appointments, clinic visits, emergency appointments, etc.
- Notes and reports about your health and safeguarding
- Details about your treatment and care
- Results of investigations, such as laboratory tests, x-rays, etc.
- Relevant information from other health professionals, relatives or those who care for you

4. How we use your information

Your records are used to:

- Provide information to make health decisions made by care professional with and for you
- Make sure your care is safe and effective
- Support working with others providing your care

We may also use, or share, your information for the following purposes:

- Looking after the health of the general public
- Making sure that our services can meet patient needs in the future
- Preparing statistics on NHS performance and activity
- Investigating concerns, complaints, or legal claims
- Helping colleagues review the care they provide to make sure it is of the highest standards
- Training and educating staff
- For research purposes

5. Services we provide

Services provided at home:

- Adult Continence Equipment Delivery Service.
- Community Matrons - intensive and personalised care and support to patients with more than one complex and chronic long-term condition.
- Community Nursing - specialised nursing care needs to housebound patients.
- Falls Service - work in the community for those aged 65 years or over, who have had a fall or are at risk of falls.
- Long Term Conditions Management - support to help patients manage their condition and work with other professionals to provide clinical treatment and care.
- Therapy Services including Occupational Therapy and Physiotherapy - we help people who have a disability as a result of an accident, illness or ageing to live safely and independently in their own home and support their carers in caring for them.
- Rapid Response - Nursing and Therapy Rapid Response Service within 2 hours.

Clinics and Treatments:

- Blood Clinic (Phlebotomy) - walk-in phlebotomy service for taking blood for blood tests.
- Cancer Nursing - specifically designed to support patients and carers with needs relating to a cancer diagnosis and cancer treatments.
- Continence Service - specialist team of nurses who are available to all patients with a bladder or bowel issue.
- Diabetes Service - to promote self management and independence by increasing patient knowledge regarding diabetes and its potential long-term complications.
- Cardiology (Heart) Services - our cardiology team provide a range of services within the community for our patients.
- Inpatient Wards - Kestrel, Livingstone and Harty wards at Sheppey and Sittingbourne Hospitals.
- Neurological Rehabilitation - care to patients who have a new neurological event or an acute change to an existing condition.
- Podiatry - interventions for those considered at greatest risk of developing foot health complications as a result of existing conditions and podiatry needs.
- Respiratory Service - specialist respiratory service aimed at improving the quality of life and care given to patients with chronic respiratory disease.
- Speech & Language Therapy - we provide assessment, information and therapy for adults with acquired communication and swallowing disorders.

6. Who we share your information with

We may also share your information for the provision of your care or for another legal obligation with the following organisations and partners:



- NHS Trusts/Foundations
- GP's
- Other Community Services providers or services that support us in providing community services
- Urgent care organisations, minor injury units or out of hours services
- Care Homes
- Mental Health Trusts
- Dentists, opticians, pharmacists
- Private Sector providers such as Boots
- Voluntary Sector Providers
- Ambulance Trusts
- Integrated Care Board
- NHS England (NHSE) and NHS Digital (NHSD)
- Local Authorities and Social Care Providers
- Education Services
- Police and Judicial Services
- HCRG Care Group Support teams
- Regulatory Bodies
- Safeguarding Boards

We may share information about you for the following purposes:

- To support your health and care arrangements including referrals, to other providers, obtaining tests such as blood tests
- Recommendations for special arrangements at home such as equipment you may need to support you to maintain your independence at home
- To manage incidents that you have been involved in
- To deal with complaints and investigations
- Requests for information from official authorities or your representatives
- Your records if the service is transferring to us under contract or if you are moving out of area
- The prevention and detection of crime
- Funding requests or payments
- Integrated care initiatives
- Legal advice or proceedings
- To participate in national audits

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WE CHANGE LIVES BY TRANSFORMING HEALTH AND CARE.



- Responding to legal requests and court orders
- Public health notifications

Our partners and other recipients:

- We work in partnership with commissioners, other health and care providers such as primary care services, local authorities, NHS trusts, pathology providers etc.
- Prison service relating to prison healthcare
- Local Safeguarding Boards
- Regulators
- We may use trusted providers to host our IT, archiving, email and texting services and surveys
- We may use corporate teams within the HCRG Care Group who provide 'back office' support on behalf of services within our group such as communications and marketing, information governance, clinical governance and IMT.

7. How long do we keep information

We will keep your healthcare record in accordance with the national guidance: Records Management Code of Practice for Health and Social Care 2021, after which records, and confidential information are securely destroyed in line with this code of practice.

8. How we keep your information safe

Everyone working for our organisation is subject to the Common Law Duty of Confidence. Information provided in confidence will only be used for the purposes advised with consent given by the patient, unless there are other circumstances covered by the law.

The NHS Digital Code of Practice on Confidential Information applies to all NHS staff and they are required to protect your information, inform you of how your information will be used, and allow you to decide if and how your information can be shared. All our staff are expected to make sure information is kept confidential and receive regular training on how to do this.

The health records we use will be electronic, on paper or a mixture of both, and we use a combination of working practices and technology to ensure that your information is kept confidential and secure. Your records are backed up securely in line with NHS standard procedures. We ensure that the information we hold is kept in secure locations, is protected by appropriate security and access is restricted to authorised personnel.

We also make sure external data processors that support us are legally and contractually bound to operate and prove security arrangements are in place where data that could or does identify a person are processed.

We are committed to protecting your privacy and will only use information collected lawfully in accordance with:

- Data Protection Act 2018



- General Data Protection Regulation 2016
- Human Rights Act
- Common Law Duty of Confidentiality
- NHS Codes of Confidentiality and Information Security
- Health and Social Care Act 2015
- And all applicable legislation

We maintain our duty of confidentiality to you at all times. We will only ever use or pass on information about you if we reasonably believe that others involved in your care have a genuine need for it.

We will not disclose your information to any third party without an appropriate legal basis and there are exceptional circumstances (such as a risk of serious harm to yourself or others) or where the law requires information to be passed on.

9. How the NHS and care services use your information

North Kent Adult Community Services is one of many organisations working in the health and care system to improve care for patients and the public.

Whenever you use a health or care service, such as attending Accident & Emergency or using Community Care services, important information about you is collected in a patient record for that service.

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 used and 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

This may only take place when there is a clear legal basis to use this information. All these uses help to provide better health and care for you, your family and future generations. Confidential patient information about your health and care is only used like this where allowed by law.

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 isn't needed.

10. Access to your information, your rights, and corrections

Keeping us updated of any changes

Please let us know if you change your address or contact details etc. so that we can keep your information up to date. If you have a concern about some of the information held on your record, you can contact us about it or request a copy of your record.



How to request a copy of your record

You can request a copy of your records via our [Data Subject Access Requests \(DSAR\) portal](#). Our portal supports the management of requests with regards to records and/or alterations/concerns. Your request will be directed to our Privacy Team which will ensure that the correct service receives your request promptly.

To progress the request you will need proof of identity as follows:

- Driving licence or Passport or Work ID badge or Bus Pass or a witness to your signature by someone who is over 18 and is not a relative, (preferably by your doctor/solicitor on their headed business paper) as proof of identity
- Bank statement or Pay slip or Utility bill or a Letter on headed paper from a local authority or similar as proof of residence.

If you are a Representative acting on a data subject's behalf you will need proof of your identity as well as proof that the data subject is freely giving consent to the request, or you have the appropriate legal authority.

If you would like more information about your records, please ask at reception, speak to the person proving your care or Email: information.governance@hcrqcaregroup.com

Your rights

Data Protection laws provides you with the following rights:

The right to be informed	As a data controller, we are obliged to provide understandable and transparent information about the way we process your data (this is provided by our privacy policy).
The right of access	You are entitled to request a copy of the personal data we hold about you.
The right of rectification	You are entitled to request changes to information if it is inaccurate or incomplete.
The right to erasure	Where no overriding legal basis or legitimate reason continues to exist for processing personal data, you may request that we delete the personal data.
The right to restrict processing	Under certain circumstances, you may ask us to stop processing your personal data. We will still hold the data, but will not process it any further;
The right to data portability	Subject to certain conditions, you may request a copy of your personal data to be transferred to another organisation.
The right to object to processing	You have the right to object to our processing of your data where <ul style="list-style-type: none"> • Processing is based on legitimate interest; • Processing is for the purpose of direct marketing; • Processing is for the purposes of scientific or historic research; • Processing involves automated decision-making and profiling.

Please note that the above rights may not apply in all circumstances, but we will respond within a month of any requests. If you have any questions or concerns about the information, we hold on you, please contact our Data Protection Officer by one of the following options:

Via our secure [Data Subject Access Requests \(DSAR\) portal](#)

Email the central IG Team: information.governance@hrcgcaregroup.com

Tel: 01925 302 514

Post: Data Protection Officer

HCRG Care Group Ltd.

Progressive House

The Heath Business Park

Runcorn

If you are not happy about the way your information is handled, you have the right to lodge a complaint with a supervisory authority. In the UK, this is the Information Commissioners Office (ICO).

<https://ico.org.uk/global/contact-us/>

11. UK Mail (IMail)

UK Mail provide a postal service utilised by the Wiltshire Children's Community Services for sending letters and/or correspondence to service users/patients. The UK Mail privacy Policy sets out how your personal information is processed complying with the current UK Data Protection regulations

<https://www.ukmail.com/privacy-and-cookies>

12. Kent and Medway Care Record (KMCR)

Our North Kent Community Services are part of the Kent & Medway Care Record. KMCR is an Electronic Record linking system that provides a read-only summary of the relevant data (information) to a health or social care professional when required for the purpose of providing health and social care. The system brings together patient/client information across health and social care systems in a secure manner, giving a summary of your information from within a number of local records. [Please click here for further information](#)

Changes to our privacy notice

We will update this privacy notice from time to time to reflect any changes to our ways of working. Please contact our data protection officer if you would like more information.

Last updated: June 2022