



Patient Privacy Policy

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Working towards accreditation with
SEQOHS
Safe Effective Quality Occupational Health Service



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Patient Privacy Notice

1. Statement and Purpose of Notice

This privacy notice lets you know what happens to any personal data that you give to us, or any that we may collect about you for the purpose of providing you a service of Occupational Medicine.

This privacy notice applies to personal information processed by or on behalf of Polbridge Health Ltd.

This notice explains

- **Who we are, how we use your information and information about our Data Protection Officer.**
- **What kinds of personal information about you do we process.**
- **What the legal grounds for our processing of your personal information (including when we share it with others).**
- **What should you do if your personal information changes.**
- **For how long your personal information is retained by us.**
- **What are your rights under data protection laws.**

The General Data Protection Regulation (GDPR) and the Data Protection Act 2018 became law on 25th May 2018. The GDPR is a single EU-wide regulation on the protection of confidential and sensitive information, the DPA 2018 deals with elements of UK law that differ from the European Regulation. These came into force in the UK on the 25th May 2018, repealing the previous Data Protection Act (1998).

For the purpose of applicable data protection legislation (including but not limited to the General Data Protection Regulation (Regulation (EU) 2016/679) (the “GDPR”), and the Data Protection Act 2018 Polbridge Health Ltd. are responsible for your personal data.

This Notice describes how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations to you. Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights

2. How we use your information and the law

Polbridge Health Ltd. will be what’s known as the ‘Controller’ of the personal data you provide to us.





We collect basic personal data about you which includes special types of information and location-based information. This includes name, address, medical conditions, contact details such as email and mobile number etc.

We will collect sensitive confidential data known as “special category personal data” in the form of health information, religious belief (if required in a healthcare setting), ethnicity, and sex during the services we provide to you and or linked to your healthcare through other health providers or third parties.

3. Why do we need your information?

The health care professionals who provide you with care maintain records about your health and any treatment or care you have received previously (e.g. Occupational Medicine.). These records help to provide you with the best possible healthcare.

Health records may 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. Records which Polbridge Health Ltd. hold about you may include the following information;

- Details about you, such as your address, carer, legal representative, emergency contact details
- Any contact Polbridge Health Ltd. has had with you, such as appointments, clinic visits, emergency appointments, etc.
- Notes and reports about your health
- 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
- Contact details (including email address, mobile telephone number and home telephone number)

To ensure you receive the best possible care, your records are used to facilitate the care you receive, including contacting you. Information held about you may be used to help protect the health of the public and to help us manage Polbridge Health Ltd. and the services we provide. Information may be used within Polbridge Health Ltd. for clinical audit to monitor the quality of the service provided.

4. How do we lawfully use your data?

We need to know your personal, sensitive and confidential data in order to provide you with healthcare services covered by Occupational Medicine, under the General Data Protection Regulation we will be lawfully using your information in accordance with: –



Article 6, (e) 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;”

Article 9, (h) 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

This Privacy Notice applies to the personal data of our patients and the data you have given us about your carers/family members.

5. Patient Communication

Polbridge Health Ltd. will use your name, contact details and email address to inform you of our services, or provide information about your health to help manage your healthcare or information about the management of the service.

6. Third party processors

In order to deliver the best possible service, Polbridge Health Ltd. will share data (where required) with other healthcare bodies such as other GP practices and hospitals. In addition, Polbridge Health Ltd. will use carefully selected third-party service providers. When we use a third-party service provider to process data on our behalf then we will always have an appropriate agreement in place to ensure that they keep the data secure, that they do not use or share information other than in accordance with our instructions and that they are operating appropriately. Examples of functions that may be carried out by third parties includes:

- Companies that provide IT services & support, including our core clinical systems;
- systems which manage patient facing services (such as our website);
- data hosting service providers;
- systems which facilitate appointment bookings services;
- document management services etc.
- Payment providers (if for example you were paying for a service such as travel vaccinations).

Further details regarding specific third-party processors can be supplied on request.





7. How do we maintain the confidentiality of your records?

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

- Data Protection Act 2018
- The General Data Protection Regulations 2016
- Human Rights Act 1998
- Common Law Duty of Confidentiality
- Health and Social Care Act 2012

Every member of staff who works for Polbridge Health Ltd. has a legal obligation to keep information about you confidential.

We will only ever use or pass on information about you if others involved in your care have a genuine need for it. We will not disclose your information to any third-party without your permission unless there are exceptional circumstances (i.e. life or death situations), where the law requires information to be passed on and/or in accordance with the information sharing principle following Dame Fiona Caldicott's information sharing review (Information to share or not to share) where "The duty to share information can be as important as the duty to protect patient confidentiality." This means that health and social care professionals should have the confidence to share information in the best interests of their patients within the framework set out by the Caldicott principles.

Our policy is to respect the privacy of our patients, their families and our staff and to maintain compliance with the General Data Protection Regulations (GDPR) and all UK specific Data Protection Requirements. Our policy is to ensure all personal data related to our patients will be protected.

All employees and sub-contractors engaged by Polbridge Health Ltd. are asked to sign a confidentiality agreement¹. Polbridge Health Ltd. will, if required, sign a separate confidentiality agreement if the client deems it necessary. If a sub-contractor acts as a data processor for Polbridge Health Ltd. an appropriate contract will be established for the processing of your information.

In certain circumstances you may have the right to withdraw your consent to the processing of data. Please contact the Data Protection Officer in writing if you wish to withdraw your consent. In some circumstances we may need to store your data after your consent has been withdrawn to comply with a legislative requirement.

Some of this information will be held centrally and used for statistical purposes. Where we do this, we take strict measures to ensure that individual patients cannot be identified. Sometimes your information may be requested to be used for research purposes – Polbridge Health Ltd. will

¹ FORM010 Confidentiality Agreement



always gain your consent before releasing the information for this purpose in an identifiable format. In some circumstances you can Opt-out of Polbridge Health Ltd. sharing any of your information for research purposes.

8. With your consent we would also like to use your information

There are times that we may want to use your information to contact you or offer you services, not directly about your healthcare, in these instances we will always gain your consent to contact you. We would however like to use your name, contact details and email address to inform you of other services that may benefit you, we will only do this with your consent. There may be occasions where authorised research facilities would like you to take part on innovations, research, improving services or identifying trends, you will be asked to opt in to such programmes.

At any stage where we would like to use your data for anything other than the specified purposes and where there is no lawful requirement for us to share or process your data, we will ensure that you have the ability to consent and opt out prior to any data processing taking place. This information is not shared with third parties or used for any marketing and you can unsubscribe at any time via phone, email or by informing the practice DPO as below.

9. Where do we store your information electronically?

All the personal data we process is processed by our staff in the UK however for the purposes of IT hosting and maintenance this information may be located on servers within the European Union.

No third-parties have access to your personal data unless the law allows them to do so and appropriate safeguards have been put in place such as a Data Processor as above. We have a Data Protection regime in place to oversee the effective and secure processing of your personal and or special category (sensitive, confidential) data.

10. Sharing your information without consent

We will normally ask you for your consent, but there are times when we may be required by law to share your information without your consent, for example:

- where there is a serious risk of harm or abuse to you or other people;
- where a serious crime, such as assault, is being investigated or where it could be prevented;
- where we encounter infectious diseases that may endanger the safety of others, such as meningitis or measles (but not HIV/AIDS);



- where a formal court order has been issued;
- where there is a legal requirement, for example if you had committed a Road Traffic Offence.

11. How long will we store your information?

We are required under UK law to keep your information and data for the full retention periods as specified by the Records management policy².

12. How can you access, amend, move the personal data that you have given to us?

Even if we already hold your personal data, you still have various rights in relation to it. To get in touch about these, please contact us. We will seek to deal with your request without undue delay, and in any event in accordance with the requirements of any applicable laws. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

- **Right to object:**

If we are using your data because we deem it necessary for our legitimate interests to do so, and you do not agree, you have the right to object. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases). Generally, we will only disagree with you if certain limited conditions apply.

- **Right to withdraw consent:**

Where we have obtained your consent to process your personal data for certain activities (for example for a research project), or consent to market to you, you may withdraw your consent at any time.

- **Right to erasure:**

In certain situations (for example, where we have processed your data unlawfully), you have the right to request us to “erase” your personal data. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases) and will only disagree with you if certain limited conditions apply.

If we do agree to your request, we will delete your data but will generally assume that you would prefer us to keep a note of your name on our register of individuals who would prefer not to be contacted. That way, we will minimise the chances of

² POL0010 Records Management Policy



you being contacted in the future where your data are collected in unconnected circumstances. If you would prefer us not to do this, you are free to say so.

- **Right of data portability:**

If you wish, you have the right to transfer your data from us to another data controller. We will help with this with a data transfer to your GP and transfer of your hard copy notes.

13. Access to your personal information

Data Subject Access Requests (DSAR):

You have a right under the Data Protection legislation to request access to view or to obtain copies of what information Polbridge Health Ltd. holds about you and to have it amended should it be inaccurate. To request this, you need to do the following:

- Your request should be made to Polbridge Health Ltd. – for information from the hospital or GP you should write direct to them
- There is no charge to have a copy of the information held about you
- We are required to respond to you within one month
- You will need to give adequate information (for example full name, address, date of birth, NHS number and details of your request) so that your identity can be verified, and your records located information we hold about you at any time.

14. What should you do if your personal information changes?

Please contact us as soon as any of your details change, this is especially important for changes of address or contact details (such as your mobile phone number), Polbridge Health Ltd. will from time to time ask you to confirm that the information we currently hold is accurate and up-to-date.

15. Objections/Complaints

Should you have any concerns about how your information is managed, please contact the Information Compliance Manager. If you are still unhappy following a review by Polbridge Health Ltd., you have a right to lodge a complaint with a supervisory authority:





You have a right to complain to the UK supervisory Authority as below.

Information Commissioner:
Wycliffe house
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 01625 545745
<https://ico.org.uk/>

If you are happy for your data to be extracted and used for the purposes described in this privacy notice, then you do not need to do anything. If you have any concerns about how your data is shared, then please contact the Information Compliance Manager.

If you would like to know more about your rights in respect of the personal data we hold about you, please contact the Information Compliance Manager as below:

Information Compliance Manager
Polbridge Health Ltd.
20 Milestone Road
Knebworth
England
SG3 6DA

01582 395511
info@polbridge.org.uk

16. Changes

It is important to point out that we may amend this Privacy Notice from time to time. If you are dissatisfied with any aspect of our Privacy Notice, please contact the Information Compliance Manager.

