

## Privacy Notice – Direct Care

### Plain English explanation

This privacy notice explains why health and care providers collect information about you and how that information may be used.

Multi-agency teams hold regular huddle meetings at Croydon GP practices to proactively plan the care of people with complex health and care needs. Working alongside huddles and other care providers is the Complex Care Support Team, a specialist multi-disciplinary community health team, who provide co-ordinated specialist care and support.

To enable these discussions, your data may be shared by professionals who work for the following organisations:

- Age UK Croydon
- Alzheimer’s Society
- Croydon Clinical Commissioning Group Medicine Optimisation Team
- Croydon Council Adult Social Care
- Croydon GP practice you are registered with
- Croydon Health Services NHS Trust
- London Ambulance Service
- St Christopher’s Hospice
- South London and Maudsley NHS Foundation Trust
- Turning Point

The professionals who have access to your information will only have access to that which they need to fulfil their roles.

You have the right to object to our sharing your data in these circumstances but we have an overriding responsibility to comply with our legal obligations. Please see below.

We are required by law to provide you with the information in the following 9 subsections. We have also set out a list of definitions below.

1) Controller contact details

- Age UK Croydon, 2nd Floor, 46 George Street, Croydon CR0 1PB
- Alzheimer’s Society, 43-44 Crutched Friars, London EC3N 2AE
- Croydon Clinical Commissioning Group, Medicine Optimisation Team, 2nd Floor, Bernard Weatherill House, 8 Mint Walk, Croydon CR0 1EA
- Croydon Council Adult Social Care, 2nd Floor, Bernard Weatherill House, 8 Mint Walk, Croydon CR0 1EA

	<ul style="list-style-type: none"> <li>• Croydon GP practice you are registered with – see appendix 1</li> <li>• Croydon Health Services NHS Trust, Croydon University Hospital, 530 London Road, Croydon CR7 7YE</li> <li>• London Ambulance Service NHS Trust, South West London, HQ, New Malden Ambulance Station, Wellington Crescent, New Malden KT3 3NN</li> <li>• St Christopher’s Hospice, 51-59 Lawrie Park Road, Sydenham, London SE26 6DZ</li> <li>• South London and Maudsley NHS Foundation Trust - Trust HQ, 1st Floor, Maudsley Hospital, Denmark Hill, London SE5 8AZ</li> <li>• Turning Point, Croydon Recovery Network, 190 Church Road, Croydon CR0 1SE</li> </ul>
<p><b>2) Data Protection Officer</b> contact details</p>	<ul style="list-style-type: none"> <li>• Age UK Croydon – Chris Dulake, Age UK Sutton   020 8915 2495 (direct line) or 020 8915 2233 (main number)   <a href="mailto:chris.dulake@ageuksutton.org.uk">chris.dulake@ageuksutton.org.uk</a></li> <li>• Alzheimer's Society - Claire Ward   020 7423 5146   <a href="mailto:claire.ward@alzheimers.org.uk">claire.ward@alzheimers.org.uk</a></li> <li>• Croydon CCG – Claire Edgeworth   03000 428 438   <a href="mailto:nelcsu.dpo@nhs.net">nelcsu.dpo@nhs.net</a></li> <li>• Croydon Council - Sandra Herbert   020 8726 6000 ext 62928   <a href="mailto:dpo@croydon.gov.uk">dpo@croydon.gov.uk</a></li> <li>• Croydon GP practice you are registered with – see appendix 1</li> <li>• Croydon Health Services NHS Trust – post being recruited to   020 8401 3543   <a href="mailto:ch-tr.GDPR@nhs.net">ch-tr.GDPR@nhs.net</a></li> <li>• London Ambulance Service NHS Trust – Philippa Harding   020 7921 5100   <a href="mailto:dpo@lond-amb.nhs.uk">dpo@lond-amb.nhs.uk</a></li> <li>• St Christopher’s Hospice - Reg van Selm   020 8768 4517 / M: 07718 092159   <a href="mailto:R.vanSelm@stchristophers.org.uk">R.vanSelm@stchristophers.org.uk</a></li> <li>• South London and Maudsley NHS Foundation Trust - Murat Soncul   020 3228 6000   <a href="mailto:Murat.Soncul@slam.nhs.uk">Murat.Soncul@slam.nhs.uk</a></li> <li>• Turning Point – Kevin Gardner   0161 238 5230 / M: 07896 690 335   <a href="mailto:kevin.gardner@turning-point.co.uk">kevin.gardner@turning-point.co.uk</a></li> </ul>
<p><b>3) Purpose</b> of the processing</p>	<p>Information will be shared in order to facilitate “Direct Care” that is delivered to the individual – that is, where a health or care organisation has direct contact with a patient or service user in order to provide them with immediate care or treatment.</p> <p>Direct Care is care delivered to the individual alone. After a patient agrees to a referral for direct care elsewhere, such as a referral to a specialist in a hospital, necessary and relevant information about the patient, their circumstances and their problem will need to be shared with the other health and care workers, such as</p>

	<p>specialist, therapists, technicians, social care etc. The information that is shared is to enable the other health and care workers to provide the most appropriate advice, investigations, treatments, therapies and or care.</p> <p>GP surgeries and CCG's participate in the National Fraud Initiative (NFI) run by the Government Cabinet Office which conducts data matching exercises to assist in the prevention and detection of fraud. Where applications are made for Personal Health Budget funding, your data will be shared for this purpose. More information on the NFI can be found on the Cabinet Office Privacy Notice here  <a href="https://www.gov.uk/government/publications/fair-processing-national-fraud-initiative/fair-processing-level-3-full-text">https://www.gov.uk/government/publications/fair-processing-national-fraud-initiative/fair-processing-level-3-full-text</a></p>
<p>4) <b>Lawful basis</b> for processing</p>	<p>The processing of personal data in the delivery of direct care and for providers' administrative purposes in this surgery and in support of direct care elsewhere is supported under the following Article 6 and 9 conditions of the Data Protection Act 2018/GDPR:</p> <p><i>Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’.</i></p> <p><i>Article 9(2)(h) ‘necessary for the purposes of preventative 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 and services...’</i></p> <p>We will also recognise your rights established under UK case law collectively known as the “Common Law Duty of Confidentiality”*</p> <p>Where processing occurs for the National Fraud Initiative the conditions for processing are Article 6(1)e (above) and</p> <p><i>Article 9(2)g ‘processing is necessary for reasons of substantial public interest, on the basis of Union or Member State Law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.’</i></p>

<p><b>5) Recipient or categories of recipients of the processed data</b></p>	<p>The data will be shared with health and care professionals and support staff in your GP practice and at hospitals, diagnostic and treatment centres who contribute to your personal care.</p>
<p><b>6) Rights to object</b></p>	<p>You have the right to object to some or all the information being processed under Article 21. Please contact the Controller. You should be aware that this is a right to raise an objection, which is not the same as having an absolute right to have your wishes granted in every circumstance.</p>
<p><b>7) Right to access and correct</b></p>	<p>You have the right to see the data that is being shared about you. This is known as ‘the right of subject access’. You can make a request for this information from a provider.</p> <p>If your health or care provider holds information about you, and you make a subject access request they will:</p> <ul style="list-style-type: none"> <li>• Give you a description of it</li> <li>• Tell you why it is being held</li> <li>• Tell you who it could be shared with</li> <li>• Let you have a copy of the information in an intelligible form.</li> </ul> <p>If you would like to make a ‘subject access request’, you will need to contact your health or care provider’s Data Protection Officer in writing.</p> <p>You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a Court of Law.</p>
<p><b>8) Retention period</b></p>	<p>The data will be retained in line with the law and national guidance. <a href="https://digital.nhs.uk/article/1202/Records-Management-Code-of-Practice-for-Health-and-Social-Care-2016">https://digital.nhs.uk/article/1202/Records-Management-Code-of-Practice-for-Health-and-Social-Care-2016</a>.</p>
<p><b>9) Right to Complain.</b></p>	<p>You have the right to complain regarding the use and sharing of your data, if you think the information has been shared inappropriately. Each provider will have their own complaints process and you will need to contact them directly.</p> <p>You have the right to complain to the Information Commissioner’s Office, you can use this link <a href="https://ico.org.uk/global/contact-us/">https://ico.org.uk/global/contact-us/</a></p> <p>or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)</p>

	There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)
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\* “Common Law Duty of Confidentiality”, common law is not written out in one document like an Act of Parliament. It is a form of law based on previous court cases decided by judges; hence, it is also referred to as 'judge-made' or case law. The law is applied by reference to those previous cases, so common law is also said to be based on precedent.

The general position is that if information is given in circumstances where it is expected that a duty of confidence applies, that information cannot normally be disclosed without the information provider's consent.

In practice, this means that all patient information, whether held on paper, computer, visually or audio recorded, or held in the memory of the professional, must not normally be disclosed without the consent of the patient. It is irrelevant how old the patient is or what the state of their mental health is; the duty still applies.

Three circumstances making disclosure of confidential information lawful are:

- Where the individual to whom the information relates has consented;
- Where disclosure is in the public interest; and
- Where there is a legal duty to do so, for example a court order.

## Appendix 1: List of Croydon GP Practice

If you would like to talk to your GP Practice's Data Protection Officer, please contact them via the details below:

<b>Practice Name</b>	<b>Address</b>	<b>Telephone Number</b>
<b>Addington Medical Practice (Parkway Health Centre)</b>	Parkway Health Centre New Addington Croydon CR0 0JA	01689 849993
<b>Addington Medical Practice (Gravel Hill Surgery)</b>	7 Gravel Hill South Croydon Croydon CR0 5BG	020 8655 4013
<b>Ashburton Park Medical Practice</b>	416 Lower Addiscombe Road Addiscombe Croydon CR0 7AG	020 3714 6868
<b>Auckland Surgery</b>	84a Auckland Road Upper Norwood London SE19 2DF	020 8653 5146
<b>Bramley Avenue Surgery</b>	1B Bramley Avenue Coulsdon CR5 2DR	020 8660 0193
<b>Brigstock and South Norwood Partnership</b>	141 Brigstock Road Thornton Heath CR7 7JN	020 8684 0033
<b>Brigstock Family Practice</b>	83 Brigstock Road Thornton Heath CR7 7JH	020 8689 7800
<b>Broom Road Medical Practice</b>	23 Broom Road Shirley Croydon CR0 8NG	020 8777 5511
<b>Broughton Corner Medical Centre</b>	87 Thornton Road Thornton Heath CR7 6BH	020 8683 1277
<b>Castle Hill Surgery</b>	1a Castle Hill Avenue New Addington CR0 0TH	01689 843636
<b>Country Park Practice (Greenwood Group)</b>	Woodside Health Centre 3 Enmore Road South Norwood London SE25 5NT	020 3764 0664

<b>Denmark Road Surgery</b>	Woodside Health Centre 3 Enmore Road South Norwood London SE25 5NT	020 8654 8760
<b>Dr B Baskaran &amp; Partners</b>	Parkway Health Centre 1 Parkway New Addington Croydon CR0 0JA	01689 808300
<b>East Croydon Medical Centre</b>	59 Addiscombe Road Croydon CR0 6SD	020 3657 4170
<b>Edridge Road Community Health Centre</b>	Impact House 2 Edridge Road Croydon CR0 1FE	020 3040 0800
<b>Eversley Medical Centre</b>	501 London Road Thornton Heath CR7 6AR	020 8684 1172
<b>Fairview Medical Centre</b>	69 Fairview Road Norbury London SW16 5PX	020 8765 8525
<b>Friends Road Medical Practice</b>	49 - 51 Friends Road Croydon CR0 1ED	020 8688 0532
<b>Greenside Group Practice (Greenside Road)</b>	88 Greenside Rd Croydon CR0 3PN	020 8240 0072
<b>Greenside Group Practice (Lennard Road)</b>	26 Lennard Road Croydon CR0 2UL	020 8680 2270
<b>Haling Park Medical Practice</b>	96 Brighton Road South Croydon CR2 6AD	020 8688 0875
<b>Hartland Way Surgery</b>	1 Hartland Way Shirley Croydon CR0 8RG	020 8777 7215
<b>Keston Medical Practice</b>	Purley War Memorial Hospital 856 Brighton Road Purley CR8 2YL	020 8660 8292
<b>Leander Family Practice</b>	949 London Road Thornton Heath	020 3457 8727

	CR7 6JE	
<b>London Road Medical Practice</b>	515 London Road Thornton Heath CR7 6AR	020 8684 2161
<b>Mersham Medical Centre</b>	30 Norbury Road Thornton Heath CR7 8JN	020 8653 1869
<b>Mitchley Avenue Surgery</b>	116 Mitchley Avenue Sanderstead South Croydon CR2 9HH	020 8657 6565
<b>Morland Road Surgery</b>	1 Morland Road Croydon CR0 6HA	020 8688 0434
<b>New Addington Group Practice - AT Medics (Fieldway Medical Centre)</b>	15a Danebury Fieldway New Addington CR0 9EU	01689 841466
<b>New Addington Group Practice - AT Medics (Headley Drive Surgery)</b>	117a Headley Drive New Addington Croydon CR0 0QL	01689 808160
<b>New Addington Group Practice - AT Medics (Parkway Health Centre)</b>	1 Parkway New Addington Croydon CR0 0JA	01689 808810
<b>Norbury Health Centre</b>	2b Pollards Hill North Norbury London SW16 4NL	020 8679 6591
<b>North Croydon Medical Centre</b>	518 London Road Thornton Heath CR7 7HQ	020 8665 4757
<b>Northway Road Surgery</b>	139 Northway Road Croydon CR0 6JJ	020 8654 3714
<b>Old Coulsdon Medical Practice</b>	2a Court Avenue Old Coulsdon CR5 1HF	01737 558288
<b>Parchmore Medical Centre</b>	97 Parchmore Road Thornton Heath CR7 8LY	020 8251 4200
<b>Parkside Group Practice</b>	27 Wyche Grove South Croydon CR2 6EX	020 8680 2588
<b>Portland Medical Centre</b>	184 Portland Road	020 8662 1233



	South Norwood London SE25 4QB	
<b>Queenhill Medical Practice</b>	31 Queenhill Road Selsdon South Croydon CR2 8DU	020 8651 1141
<b>Selhurst Medical Centre</b>	27 Selhurst Road South Norwood London SE25 5QA	020 8684 2010
<b>Selsdon Park Medical Practice</b>	97 Addington Road Selsdon South Croydon CR2 8LG	020 8657 0067
<b>Shirley Medical Centre</b>	370 Wickham Rd Croydon CR0 8BH	020 8684 2010
<b>South Norwood Hill Medical Practice</b>	103 South Norwood Hill South Norwood London SE25 6BY	020 8771 0742
<b>St James Medical Practice</b>	189A St James's Road Croydon CR0 2BZ	020 8684 5353
<b>Stovell House Surgery</b>	188 Lower Addiscombe Road Addiscombe CR0 6AH	020 8654 1427
<b>The Addiscombe Road Surgery</b>	395a Addiscombe Road Croydon CR0 7LJ	020 8654 2200
<b>The Birdhurst Medical Practice</b>	1 Birdhurst Avenue South Croydon CR2 7DX	020 8686 2070
<b>The Farley Road Medical Practice</b>	53 Farley Road Selsdon South Croydon CR2 7NG	020 8651 1222
<b>The Farley Road Medical Practice (125 Holmbury Grove)</b>	125 Holmbury Grove Forestdale Croydon CR0 9AQ	020 8651 1222
<b>The Moorings Medical Practice</b>	2a Valley Road Kenley CR8 5DG	020 3417 7565
<b>The Whitehorse Practice</b>	87 Whitehorse Road Croydon CR0 2JJ	020 8684 1162

<b>Thornton Heath Medical Practice</b>	Thornton Heath Health Centre 61a Gillett Road Thornton Heath CR7 8RL	020 8664 1590
<b>Thornton Road Surgery – AT Medics</b>	299 Thornton Road Croydon CR0 3EW	020 8683 1255
<b>Upper Norwood Group Practice</b>	130 Church Road Upper Norwood London SE19 2NT	020 8771 6050
<b>Valley Park Surgery – AT Medics</b>	Healthy Living Centre Franklin Way Croydon CR0 4YD	020 8251 9470
<b>Violet Lane Medical Practice</b>	231 Violet Lane Croydon CR0 4HN	020 8688 0333
<b>Woodcote Medical</b>	Purley Surgery 32 Foxley Lane Purley CR8 3EE	020 8763 5620
<b>Woodcote Medical</b>	Coulsdon Surgery 140 Chipstead Valley Road Coulsdon CR5 3BB	020 8763 5620