Bromley GP Alliance
Kelsey Park Farmhouse, 379 Croydon Road,
Beckenham, BR3 3QL

IG09

Privacy Notice – NHS Digital

Next review date: November 2026

Version Control

Document	IG09 – Privacy Notice – NHS Digital
Version:	3
Ratified by:	Board
Date ratified:	June 2020
Name of originator/author:	CEO
Policy Owner:	Data Protection Officer
Date issued:	June 2020
Review date:	November 2026
Scope	Directors, Managers, Clinicians, Staff

Version	Date	Reason for Change	Reviewed by
1	June 2020	New GDPR rules	CEO
2	December 2022	Review by DPO	Umar Sabat
3	November 2024	Review by DPO	Umar Sabat

NHS Digital is the secure haven* for NHS patient data, a single secure repository where data collected from all branches of the NHS is processed. NHS Digital provides reports on the performance of the NHS, statistical information, audits and patient outcomes (https://digital.nhs.uk/data-and-information). Examples include; A/E and outpatient waiting times, the numbers of staff in the NHS, percentage target achievements, payments to GPs etc. and more specific targeted data collections and reports such as the Female Genital Mutilation, general practice appointments data and English National Diabetes Audits. Organisations are required by the Health and Social Care Act to provide NHS Digital with information when instructed. This is a legal obligation which overrides any patient wishes. These instructions are called "Directions". More information on the directions placed on organisations can be found at https://digital.nhs.uk/article/8059/NHS-England-Directions- and www.nhsdatasharing.info

1**) Data Controller** contact details	Bromley GP Alliance Ltd Beckenham Beacon 379-397 Croydon Rd Beckenham BR3 3QL
2) Data Protection Officer contact details	Umar Sabat IG-Health umar.sabat@ig-health.co.uk
3) **Purpose** of the processing	To provide the Secretary of State and others with information and reports on the status, activity and performance of the NHS. The provide specific reporting functions on identified.
4) **Lawful basis** for processing	The legal basis will be *Article 6(1)(c) "processing is necessary for compliance with a legal obligation to which the controller is subject."* And *Article 9(2)(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 and services on the basis of Union or Member State law or pursuant to contract with a health professional and subject to the conditions and safeguards referred to in paragraph 3;"*
5) **Recipient or categories of recipients** of the shared data	The data will be shared with NHS Digital according to directions which can be found at https://digital.nhs.uk/article/8059/NHS-England-Directions-

6) **Rights to object**	You have the right to object to some or all of the information being shared with NHS Digital. Contact the Data Controller or the practice.
7) **Right to access and correct**	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.
8**) Retention period**	The data will be retained for active use during the processing and thereafter according to NHS Policies and the law.
9) **Right to Complain**.	You have the right to complain to the Information Commissioner's Office, you can use this link https://ico.org.uk/global/contact-us/ or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate) There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)/

* The BMA has serious concerns regarding the status of NHS Digital as a "safe haven" and is not confident it has acted as a secure repository for patient data. See (**https://www.bma.org.uk/-/media/files/pdfs/collective%20voice/influence/uk%20governments/bma-submission-to-hoc-health-cttee-on-the-mou_final.pdf?la=en**)