

# KILCREGGAN MEDICAL PRACTICE

DR ANTHONY DOYLE  
MB BCH MRCGP DRCOG DCH

DR DÓNAL MURRAY  
MB CHB MRCGP

SHORE ROAD, KILCREGGAN, ARGYLL & BUTE, G84 0JL  
TEL: 01436 842156 FAX: 01436 842259

Kilcreggan Medical Practice has a legal duty to explain how we use any personal information we collect about you, as a registered patient at the practice. Staff at this practice maintains records about your health and the treatment you receive in electronic and paper format.

## **What information do we collect about you?**

We will collect information such as personal details, including name, address, next of kin, records of appointments, visits, telephone calls, your health records, treatment and medications, test results, X-rays, etc. and any other relevant information to enable us to deliver effective medical care.

## **How we will use your information**

Your data is collected for the purpose of providing direct patient care; however, we can disclose this information if it is required by law, if you give consent or if it is justified in the public interest. The practice may be requested to support research; however, we will always gain your consent before sharing your information with medical research databases when the law allows.

Sometimes the NHS also uses relevant information about your health to help improve NHS services and public health in Scotland – for example, to find out how many people have a particular illness or disease. If so, information that identifies you is removed if possible. If the NHS uses information that does identify you (for example, to include it in a disease register), they must explain how and why your information will be used.

Processing your information in this way and obtaining your consent ensures that we comply with Articles 6(1)(c), 6(1)(e) and 9(2)(h) of the GDPR.

## **Maintaining confidentiality and accessing your records**

We are committed to maintaining confidentiality and protecting the information we hold about you. We adhere to the General Data Protection Regulation (GDPR), the NHS Scotland Code of Practice, as well as guidance issued by the Information Commissioner's Office (ICO). You have a right to access the information we hold about you, and if you would like to access this information, you will need to complete a Subject Access Request (SAR). Please ask at reception for a SAR form and you will be given further information. Furthermore, should you identify any inaccuracies, you have a right to have the inaccurate data corrected.

## **Risk stratification**

Risk stratification is a mechanism used to identify and subsequently manage those patients deemed as being at high risk of requiring urgent or emergency care. Usually this includes patients with long-term conditions, e.g. cancer. Your information is collected by a number of sources, including Kilcreggan Medical Practice; this information is processed electronically and given a risk score which is relayed to your GP who can then decide on any necessary actions to ensure that you receive the most appropriate care.

## **Invoice validation**

Your information may be shared if you have received treatment to determine which health board is responsible for paying for your treatment. This information may include your name, address and treatment date. All of this information is held securely and confidentially; it will not be used for any other purpose or shared with any third parties.

## **Opt-outs**

You have a right to object to your information being shared. Should you wish to opt out of data collection, please contact a member of staff who will be able to explain how you can opt out and prevent the sharing of your information; this is done by writing to NSS, preventing your information from being shared outside this practice.

## **Retention periods**

In accordance with the Records Management NHS Codes of Practice (Scotland), your healthcare records will be retained for the duration of your life and for 3 years after your death.

## **What to do if you have any questions**

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

- Contact the practice's data controller via email at [ac-uhb.doyle@nhs.net](mailto:ac-uhb.doyle@nhs.net). GP practices are data controllers for the data they hold about their patients.
- Write to the data controller at Kilcreggan Medical Practice, Kilcreggan, Argyll G84 0JL
- Ask to speak to the practice manager Linda Gray.

The Data Protection Officer (DPO) for Kilcreggan Medical Practice is to be confirmed by NHS Highland Health Board.

## **Complaints**

In the unlikely event that 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](http://ico.org.uk) and select 'Raising a concern'.

## **Changes to our privacy policy**

We regularly review our privacy policy and any updates will be published on our website, in our newsletter and on posters to reflect the changes. This policy is to be reviewed in May 2019.