

Health Plus Data Protection and Patient Privacy Notice

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Introduction

This Notice explains what information we collect about you, how we store this information, how long we retain it and with whom and for which legal purpose we may share it.

Health Plus also publishes a number of specific notices which are available at the bottom of this page.

1. Who we are?

Health Plus employs more than 25 staff and operates from one location.

Our Practice is registered with the Office of the Information Commissioner to process personal and special categories of information under the Data Protection (Jersey) Law 2018 and our registration number is 16459.

For further information on us please refer to the 'about Health Plus' page on our website - www.healthplus.je

2. Why we collect personal information about you?

Our clinical and administration team caring for you will need to collect and maintain information about your health, treatment and care, so that you can be given the best possible healthcare from us. This personal information may be held in a variety of formats, including paper records, electronically on computer systems, in pictures, video or audio files.

3. What is our legal basis for processing your personal information?

Any personal information we hold about you is processed for the purposes of 'Employment and Social Fields' (Sch 2, para 8) 'Medical Purposes' (Sch 2, para 15) and 'Public Health' (Sch 2, para 16) of the Data Protection (Jersey) Law 2018.

For further information on this legislation please visit: <https://jerseyoic.org/>

4. What personal information do we need to collect about you and how do we obtain it?

Personal information about you is collected in a number of ways. This can be from registration forms, referral details from our clinical or administration team, other third party healthcare providers or hospitals, directly from you or your authorised representative, or through the online forms and services available on our website (see section 9).

We will likely hold the following basic personal information about you: your name, address (including correspondence), telephone numbers, date of birth, emergency contact and next of kin contacts, etc. We might also hold your email address, marital status, occupation, residency status, place of birth and preferred name or previous name(s).

In addition to the above, we may hold sensitive personal information about you which may include:

- Notes and reports about your health, treatment and care, including:
 - your medical conditions
 - results of investigations, such as x-rays and laboratory tests
 - future care you may need
 - personal information from people who care for and know you, such as relatives and health or social care professionals
 - other personal information such as smoking status, alcohol intake and any disabilities
- Your religion and ethnic origin
- Your identified gender or sexual orientation
- Whether or not you are subject to any protection orders regarding your health, wellbeing and human rights (Safeguarding status).

It is important for us to have a complete picture of you as this will assist staff to deliver appropriate treatment and care plans in accordance with your needs.

5. What do we do with your personal information?

Your records are used to directly, manage and deliver healthcare to you to ensure that:

- The staff involved in your care have accurate and up to date information to assess and advise on the most appropriate care for you.
- Staff have the information they need to be able to assess and improve the quality and type of care you receive.
- Appropriate information is available if you see another healthcare professional, or are referred to a specialist or another part of the Jersey Health Service, social care or other health provider in Jersey, UK or elsewhere.

6. What we may do with your personal information?

The personal information we collect about you may also be used to:

- Remind you about your appointments and send you relevant correspondence.
- Review the care we provide to ensure it is of the highest standard and quality, e.g. through audit or service improvement;
- Support the funding of your care, e.g. with commissioning organisations;
- Prepare statistics on Primary Care performance to meet the needs of the population or for the Health Department and or other regulatory bodies;
- Help to train and educate healthcare professionals;
- Report and investigate complaints, claims and untoward incidents;
- Report events to the appropriate authorities when we are required to do so by law;
- Contact you with regards to patient satisfaction surveys relating to services you have used within our organisation so as to further improve our services to patients
- Where you have signed up to receive it, send you our email newsletter (see Section 9 for how this works and the third-party service we use).

Where possible, we will always look to anonymise/pseudonymise your personal information so as to protect patient confidentiality, unless there is a legal basis that permits us to use it and we will only use/share the minimum information necessary and with appropriate security protections.

7. Who do we share your personal information with and why?

We may need to share relevant personal information with other healthcare organisations. For example, we may share your information for healthcare purposes with health authorities such as Jersey Health Department, Customer Local Services (formerly Social Security Department), NHS UK, Out of Hours Service, other general practitioners (GPs), ambulance services, private consultants, primary or secondary care service providers, etc. We will also share information with other parts of the Jersey Health Department and those contracted to provide services to the Health Department in order to support your healthcare needs.

We may need to share information from your health records with other non-Health Department organisations from which you elect to or are also receiving care from, such as Social Services, private consultants, secondary care providers or private care homes. However, we will not disclose any health information to third parties without your explicit consent unless there are circumstances, such as when the health or safety of others is at risk or where current legislation permits or requires it.

There are occasions where the Practice may be required by law to share information provided to us with other bodies responsible for auditing or administering public funds, in order to prevent and detect fraud. There may also be situations where we are under a duty to share your information, due to a legal requirement. This includes, but is not limited to, disclosure under a court order, sharing with the Jersey Primary Care Governance Team for inspection purposes, the police for the prevention or detection of crime or where there is an overriding public interest to prevent abuse or serious harm to others and other public bodies (e.g. Social Security for the misuse of public funds in order to prevent and detect fraud).

For any request to transfer your data internationally outside Jersey or the UK/EU, we will make sure that an adequate level of protection is satisfied before the transfer.

The Practice is required to protect your personal information, inform you of how your personal information will be used, and allow you to decide if and how your personal information can be shared. Personal information you provide to the Practice in confidence will only be used for the purposes explained to you and to which you have consented. Unless, there are exceptional circumstances, such as when the health or safety of others is at risk, where the law requires it or there is an overriding public interest to do so. Where there is cause to do this, the Practice will always do its best to notify you of this sharing. Where we engage processors to act on our behalf we will always ensure robust contractual agreements are in place to protect all personal data (see also section 9 for the online services we use).

8. How we maintain your records?

Your personal information is held in both paper and electronic forms for specified periods of time as set out in the Information Governance Alliance Records Management Code of Practice for Health and Social Care. Whilst this is UK legislation for NHS Providers, it is used in Jersey as a 'Best Practice Solution' in the void of our own similar procedures.

We hold and process your information in accordance with the Data Protection (Jersey) Law 2018. In addition, everyone working for our Practice must comply with the Contractual Duty of Confidentiality and various national and professional standards and requirements.

We have a duty to:

- maintain full and accurate records of the care we provide to you;
- keep records about you confidential and secure;
- provide information in a format that is accessible to you.

Use of Email/SMS Text/Other Electronic Communications:

Some services in the Practice provide the option to communicate with patients via email, SMS text or other electronic communications. Please be aware that the Practice cannot guarantee the security of this information whilst in transit, and by requesting this service you accepting this risk.

9. Our website and online services

Our website (www.healthplus.je) offers a number of ways to interact with the Practice online. This section explains how your personal information is handled when you use these services.

Online prescription requests

Our website provides a form which allows you to request a prescription. When you complete and submit this form, the information you enter is sent from our website using a Google Workspace account (provided by Google) and is delivered to our secure GPNET practice inbox. The information is not stored on our website or on the servers that host it. In transmitting this submission, Google acts as a processor on our behalf under strict contractual and data protection safeguards. Once your request arrives in our inbox, it is handled and stored within our secure clinical record systems in the same way as any other information you provide to us. Please note that email is not a wholly secure method of communication and we cannot guarantee the security of your information while it is in transit; by using this form you accept this risk.

Online appointment booking (Hero Health)

Online appointment booking on our website is provided by Hero Health, a third-party supplier. When you book an appointment online, the personal information you enter is processed by Hero Health on our behalf as a processor, under strict contractual arrangements that require them to keep your information secure and to use it only for the purpose of providing this service. Hero Health's own privacy notice sets out in more detail how they handle information: [<https://www.herohealthsoftware.net/legal/privacy-policy>]

Patient Access

Our website provides a link to Patient Access, an online service provided by EMIS Health. Patient Access allows registered patients to use a range of online services, which may include viewing parts of their medical record, booking appointments and ordering repeat medication. Patient Access is a separate, third-party platform. When you follow the link from our website and log in, you leave our website, and your use of Patient Access is governed by EMIS Health's own privacy policy and terms of use. We are not responsible for the content, security or data-handling practices of the Patient Access service.

Email newsletters (EmailOctopus)

If you choose to sign up to our newsletter, we use EmailOctopus (operated by Three Hearts Digital Ltd) to manage our subscriber list and send these emails. EmailOctopus, together with the email infrastructure providers it relies on, processes your name and email address on our behalf as our processor, under a written data processing agreement that requires your information to be kept secure and used only to provide this service. When we send an email we also use tracking pixels to record limited engagement information — for example whether the email was opened or a link was clicked — to help us improve what we send; by subscribing you consent to this tracking. Your information may be processed or transferred outside Jersey, the UK or the EEA, subject to appropriate safeguards required under data protection law. Our lawful basis for sending you these emails is your consent, which you give when you subscribe, and you can withdraw it and unsubscribe at any time using the link at the foot of every email or by contacting us; under the Data Protection (Jersey) Law 2018 you have an unconditional right to object to this processing. We retain your details for as long as you remain subscribed.

10. What are your rights?

The Data Protection (Jersey) Law 2018 gives you certain rights, including the right to:

- Request access to the personal data we hold about you, e.g. in health records. The way in which you can access your own health records is further explained in our "patient access to medical records policy and request form". You can download a Subject Access Request form from our website.
- Request the correction of inaccurate or incomplete information recorded in our health records, subject to certain safeguards.
- Refuse/withdraw consent to the sharing of your information
- Request your personal information to be transferred to other providers on certain occasions.
- Object to the use of your personal information: In certain circumstances you may also have the right to 'object' to the processing (i.e. sharing) of your information where the sharing would be for a purpose beyond your care and treatment (e.g. as part of a local data sharing initiative).

If you have any queries or wish to raise a complaint on how we have handled your personal data, you can contact our Data Protection Contact who will investigate the matter and respond to you accordingly where appropriate.

11. Who is the Practice Information Governance Lead?

Please contact:

Dr Steven Perchard

Director

Health Plus Limited

Queens Road Health Centre

Queens Road

St Helier

Jersey JE2 4HY

Email: healthplus@healthplus.gpnet.je

12. Who is the Data Protection Contact?

Please contact:

Samantha

Practice Manager

Health Plus Limited

Queens Road Health Centre

Queens Road

St Helier

Jersey JE2 4HY

Email: healthplus@healthplus.gpnet.je

Telephone: 01534 733322

13. How to contact the Jersey Office of the Information Commissioner (JOIC)

The Jersey Office of the Information Commissioner (JOIC) is the body that regulates the processing of all personal data. <https://jerseyoic.org/>. If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law you can complain to the JOIC at:

Office of the Information Commissioner

2nd Floor,

5 Castle Street,

St Helier,

Jersey,

JE2 3BT