**THE**

**VILLAGE**

**SURGERY**

**Supplementary Privacy Notice due to Covid-19**

This notice describes how we may use your information to protect you and others during the COVID-19 outbreak. It supplements our main Privacy Notice which is can also be found on our website, or from the surgery.

**Coronavirus (COVID-19) pandemic and your information**

The ICO recognises the unprecedented challenges the NHS and other health professionals are facing during the COVID-19 pandemic.The ICO also recognise that 'Public bodies may require additional collection and sharing of personal data to protect against serious threats to public health.'

The Government have also taken action in respect of this and on 20th March 2020 the Secretary of State for Health and Social Care issued a notice under Regulation 3(4) of the Health Service (Control of Patient Information) Regulations 2002 requiring organisations such as GP Practices to use your information to help GP Practices and other healthcare organisations to respond to and deal with the COVID-19 pandemic.

Please note that this notice has now been revised and extended by a further notice from 29th July 2020 until 31st March 2021. In order to look after your healthcare needs during this difficult time, we may urgently need to share your personal information, including medical records, with clinical and non clinical staff who belong to organisations that are permitted to use your information and need to use it to help deal with the COVID-19 pandemic. This could (amongst other measures) consist of either treating you or a member of your family and enable us and other healthcare organisations to monitor the disease, assess risk and manage the spread of the disease. Additionally, the use of your information is now required to support NHS Test and Trace.Please be assured that we will only share information and health data that is **necessary**to meet yours and public healthcare needs.

The Secretary of State for Health and Social Care has also stated that these measures are temporary and will expire on 31st March 2021 unless a further extension is required. Any further extension will be will be provided in writing and we will communicate the same to you.Please also note that the data protection and electronic communication laws do not stop us from sending public health messages to you, either by phone, text or email as these messages are not direct marketing.It may also be necessary, where the latest technology allows us to do so, to use your information and health data to facilitate digital consultations and diagnoses and we will always do this with your security in mind.

If you are concerned about how your information is being used, please contact our GDPR team at the surgery (Dr Anna Whiteford, DR Sheetal Purohit and Ms Anita Mixides).

**Covid Hot hub and Covid vaccination centre**

The Covid Hot hub has been set up for assessment of patients in our area with suspected Coronavirus. To be able to run this service, we work with local practices and offer appointments from a central “Hub”. In order to be able to provide you with high-quality routine care, the hosting “Hub” practitioner will need access to your medical record. If you use this service, you will be asked for your explicit consent to allow access to your records in this situation. Please note to ensure that those practices comply with the law and to protect the use of your information, we have very robust data sharing agreements and other clear arrangements in place to ensure your data is always protected and used for those purposes only.

The Covid Hot hub is currently in Hemel Hempstead and overseen by Dacorum Healthcare.

The Covid Vaccination centre will run out of Harpenden Public Halls, and is being set up and run by Harpenden Health PCN which consists of the three Harpenden GP surgeries. This service will use secure IT systems (Pinnacle and Accubook) to ensure your vaccinations are safely booked and recorded. Volunteers, bound by confidentiality agreements, will be helping to run the vaccination centres.

**Why your information can help us manage COVID-19**

The health and social care system is facing significant pressures due to COVID-19.  Health and care information is essential to deliver care to individuals, to support health and social care services and protect public health. Information will also be vital in researching, monitoring, tracking and managing the outbreak. In the current emergency it has become even more important to share health and care information across relevant organisations.

Existing law that allows patient information to be used and shared appropriately and lawfully in a public health emergency is being used during this outbreak.  Using this law, the Secretary of State has required NHS Digital; NHS England and Improvement; Arm’s Length Bodies (such as Public Health England); local authorities; health organisations and GPs to share confidential patient information to respond to the COVID-19 outbreak. Any information used or shared during COVID-19 will be limited to the period of the outbreak unless there is another legal basis to use the data.

NHS England and Improvement and NHSX have developed a single, secure store to gather data from across the health and care system to inform the COVID-19 response. This includes data already collected by NHS England, NHS Improvement, Public Health England and NHS Digital. New data will include 999 call data, data about hospital occupancy and A&E capacity data as well as [data provided by patients themselves](https://www.nhs.uk/coronavirus-status-checker) eg on government Covid website pages.  All the data held in the platform is subject to strict controls that meet the requirements of data protection legislation.

In such circumstances where you tell us you’re experiencing COVID-19 symptoms we may need to collect specific health data about you. Where we need to do so, we will not collect more information than we require and we will ensure that any information collected is treated with the appropriate safeguards.

**Sharing your information**

We will also be required to share certain personal/ confidential patient information with health and care organisations and other bodies engaged in disease surveillance for the purposes of protecting public health, providing healthcare services to the public and monitoring and managing the outbreak. Further information about data is being used and shared by the NHS and social care in a variety of ways to support the COVID-19 response is here: <https://www.nhsx.nhs.uk/covid-19-response/data-and-information-governance/how-data-supporting-covid-19-response/>

In order to look after your health and care needs we may share patient information including health and care records with clinical and non-clinical staff in other health and care providers, for example neighbouring GP practices, hospitals and NHS 111.  We may also use the details we have to send public health messages to you, either by phone, text or email.

Specific Covid contigency plans and services have been mobilised across our locality and PCN to ensure the best and safest provision of healthcare during the Covid 19 pandemic; these systems are likely to require sharing of your data to enable provision of healthcare.

**Opt outs**

During this period of emergency, (<https://www.nhs.uk/your-nhs-data-matters/>) will not generally apply to the data used to support the COVID-19 outbreak, due to the public interest in sharing information. This includes National Data Opt-outs.  However in relation to the Summary Care Record, existing choices will be respected. Where data is used and shared under these laws your right to have personal data erased will also not apply.  It may also take us longer to respond to Subject Access requests, Freedom of Information requests and new opt-out requests whilst we focus our efforts on responding to the outbreak.

**Telephone and video consultations**

During this period we may offer you a consultation via telephone or video conferencing. By accepting the invitation and entering the consultation you are consenting to this. Your personal/ confidential patient information will be safeguarded in the same way it would with any other consultation and any risks explained to you before the consultation begins.

**Amendments**

We may amend this Privacy Notice at any time so please review it frequently.  The date at the bottom of this page will be amended each time this notice is updated.