



Western Rural Health Care
Castleberg | Ederney | Newtownstewart

Annex A – Practice Privacy Notice

Western Rural Healthcare 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 maintain 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. Our information in the NIECR will not be passed on for research, monitoring or any other purpose; it is there solely to help the doctors, nurses and care workers in Northern Ireland to look after you when you need their care.¹

Any health and social care organisation that you have contact with keeps a record about you. The Northern Ireland Electronic Care Record (NIECR) is being introduced to bring together key information from your health and social care records from throughout Northern Ireland in a single, secure computer system. This means that, wherever you go in Northern Ireland for health or social care services, the doctors and nurses looking after you will have some information about you.

¹ [NIECR Information for better care](#)



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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 UKGDPR.

Maintaining confidentiality and accessing your records

We are committed to maintaining confidentiality and protecting the information we hold about you. We adhere to the UK General Data Protection Regulation (UKGDPR), the DoH Code of Practice on protecting the confidentiality of service user information, 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 Western Rural Healthcare; 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.

iGPR

We use a processor, iGPR Technologies Limited ("iGPR"), to assist us with responding to report requests relating to your patient data, such as subject access requests that you submit to us (or that someone acting on your behalf submits to us) and report requests that insurers submit to us under the Access to Medical records Act 1988 in relation to a life insurance policy that you hold or that you are applying for. iGPR manages the reporting process for us by reviewing and responding to requests in accordance with our instructions and all applicable laws,



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including UK data protection laws. The instruction we issue to iGPR include general instructions on responding to requests and specific instructions on issues that will require further consultation with the GP responsible for your care.

Invoice validation

Your information may be shared if you have received treatment to determine which local commissioning group 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

Following changes to the use of the NIECR and the relevant legislation which regulates the operation of the NIECR, the ability to opt out of data sharing is no longer available within NIECR.

Retention periods

In accordance with the Health & Personal Social Services (General Medical Services Contracts) Regulations (NI) 2004, your GP medical records will be returned to the HSCB when you die or when you are no longer a patient of a GP at Western Rural Healthcare. The HSCB will retain records for 10 years after you die or if you emigrate.



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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:

1. Contact the practice's data controller via email at ReceptionNTS.Z00616@gp.hscni.net. GP practices are data controllers for the data they hold about their patients²
2. Write to the data controller at Data Controller, Western Rural Healthcare, 5 Millbrook Street, Newtownstewart, BT78 4BW
3. Ask to speak to the practice manager Susan Young (Castleberg Surgery), Michelle McNulty (Newtownstewart Surgery), Fiona Colreavy (Ederney Surgery).

The Data Protection Officer (DPO) for Western Rural Healthcare is Dr Philip Haire.

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 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 June 2023.

² [BMA GPs as data controllers under the GDPR](#)