

Privacy Policy

How we use your data

Who We Are and What We Do?

One Health Group is an independent healthcare provider treating patients across South Yorkshire, West Yorkshire, North Derbyshire and North Lincolnshire. We are approved by the NHS to provide elective (non-emergency) NHS services to NHS patients. We also treat private patients.

We care about your personal data and it's important that you know how we use it and how we keep it safe. This Privacy Policy covers how, when and why we use your information. It also explains the choices you can make about the way in which we use your information and identifies your rights.

This Privacy Policy is not exhaustive, and we are always happy to provide any additional information or explanations where needed. Please contact our Data Protection Officer using these contact details:

Data Protection Officer, One Health Group, 131 Psalter Lane, Sheffield S11 8UX.

This Privacy Policy applies to all information held by One Health Group relating to individuals, whether you are a patient, service user, member of staff, or contractor.

For further information on what information we may hold about you and the legal reasons for processing your information please refer to our 'How We Use Your Health Records' leaflet.

<https://www.onehealth.co.uk/assets/uploads/files/One-Health-How-We-Use-Your-Health-Records.pdf>

Reviews of and Changes to our Privacy Policy

We will review our Privacy Policy regularly; specifically, if we need to make any changes to how we process your information. This policy was last updated in June 2019.

Why We Process Data About You

We process personal information for various reasons:

- We collect and hold information about patients to enable us to give you the best quality care and treatment and to contact you about your healthcare or treatment. The information is held on both computers and as paper records.
- We collect and hold information about our staff, contractors and Board members to communicate and carry out administration, as necessary for your role.

- We hold information about our suppliers; including financial information, who provide us with goods and services.
- We automatically collect technical data from visitors to our website to ensure that content from our website is presented in the most effective manner for you and for your computer.

Our records may be held on paper or in electronic computer systems.

We do not always need to use person identifiable information. Sometimes we will use information that does not identify you i.e. statistics / anonymised reports.

Legal Obligations to Collect and Use Information

In the circumstances where we are required to use personal identifiable information, we will only do this if we have a legal and legitimate reason to do so. Please see below our legal reasons for processing your personal information:

- The information is necessary for providing you with direct healthcare
- We have received consent from you to use your information for a specific purpose other than healthcare e.g. research etc.
- There is an overriding public interest in using the information e.g. in order to safeguard an individual or to prevent a serious crime
- There is a legal requirement that will allow us to use or provide information e.g. a formal Court order, returns to HMRC (HM Revenue & Customs), information provided to regulatory bodies i.e. Care Quality Commission (CQC).
- We have set up a formal contract regarding the supply of goods or services or for employment purposes.

Primary and Secondary Care Data

The NHS provides a wide range of services which involve the collection and use of information. Even though we are an independent provider we are also an NHS Partner as we provide a healthcare service. Different care settings are considered as either 'primary care' or 'secondary care'. Primary care settings include GP Practices, pharmacists, dentists and some specialised services including military health services. Secondary care settings include local hospitals, rehabilitative care, urgent and emergency care and community and mental health services. One Health Group is a secondary care provider.

Our Commitment to Data Privacy and Confidentiality Issues

We are committed to protecting your privacy and will only process personal confidential data in accordance with UK data protection legislation, the Common Law Duty of Confidentiality and the Human Rights Act 1998. The various laws and rules about using and sharing confidential information, with which One Health Group will comply, are available as part of our local policy on Confidentiality which can be made available on request.

In line with UK data protection legislation, One Health Group is a Data Controller. We are legally responsible for ensuring that all personal confidential data that we process i.e. hold, obtain, record, use or share about you is done in compliance with legislation.

As a data controller we are required to register with the Information Commissioner's Office (ICO). Our ICO Data Protection Register number is Z9057663 and our entry can be found in the Data Protection Register on the Information Commissioner's Office website.

Everyone working for One Health Group has a legal duty to keep information about you confidential. The NHS Care Record Guarantee and NHS Constitution provide a commitment that all NHS organisations and those providing care on behalf of the NHS will use records about you in ways that respect your rights and promote your health and wellbeing.

All identifiable information that we hold about you will be held securely and confidentially. We use administrative and technical controls to do this. We use strict controls to ensure that only authorised staff are able to see information that identifies you.

All of our staff and Senior Management Team receive appropriate and on-going training to ensure they are aware of their personal responsibilities and have contractual obligations to uphold confidentiality, enforceable through disciplinary procedures. All staff are trained to ensure they understand how to recognise and report an incident.

We will only keep information for as long as we need it. This is in line with the schedules set out in the NHS Records Management Code of Practice for Health and Social Care 2016. One Health Group's Records Management Policy includes guidance around the secure destruction of information in line with the Code of Practice.

Your information will not be sent outside of the European Economic Area (EEA) where the laws do not protect your privacy to the same extent as the law in the UK. We will never sell any information about you.

Confidentiality Advice and Support

One Health Group has a Caldicott Guardian who is a senior person responsible for protecting the confidentiality of service users and service user information and enabling appropriate and lawful information-sharing. Further information about the role of the Caldicott Guardian is available on request.

Your Rights

Under UK data protection legislation, you have certain rights over how your information is processed. They are:

- **The right to be informed** – we must provide fair processing information, which we do through this and other privacy policies or notices.
- **The right of access** – this is the right for you to have access to and copies of information that we hold about you.
- **The right to rectification** – this is the right to have personal data rectified if it is inaccurate or incomplete.
- **The right to erasure** – this is also known as the ‘right to be forgotten’. Health records are kept in line with NHS national guidance and it is extremely rare that we destroy or delete records earlier than the recommended retention period. We also have a statutory obligation to hold other records for a certain period of time e.g. staff records, financial records, contractual information etc. Therefore, a request for erasure of all or part of any record will always need to be discussed with our Data Protection Officer.
- **The right to restrict processing** – this is the right to block or suppress the processing of your personal data. Please note it will not be possible to restrict processing whilst someone is receiving care and treatment from One Health Group.
- **The right to data portability** – this is the right to obtain and re-use any information you have provided to us as part of an automated process.
- **The right to object** – this is the right to object to One Health Group processing data because of a particular situation. Because of our obligation to keep health records it is extremely rare that we would stop processing your data if you wish to continue to be treated by One Health Group.
We also have a statutory obligation to process other records e.g. staff records, financial records, contractual information etc. Therefore, a request to stop processing will always need to be discussed with our Data Protection Officer.
- **Rights in relation to automated decision making and profiling** – UK data protection legislation provides safeguards for individuals against the risk that a potentially damaging decision is taken without human intervention. One Health Group does not undertake automated decision making or profiling.

If we do hold identifiable information about you and you have any queries about the information we hold, please contact the Data Protection Officer using the details below:

One Health Group, 131 Psalter Lane Sheffield S11 8UX. Tel: 0114 250 5510 email: enquiries@onehealth.co.uk www.onehealth.co.uk

You have the right to refuse or withdraw consent to information sharing at any time by using the contact details above. If there are any consequences to withdrawing consent these will be fully explained and discussed with you first.

Complaints

One Health Group aim to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring concerns to our attention and we welcome any suggestions for improving our procedures. Contact details for complaints regarding the processing of information should be directed to the Data Protection Officer, One Health Group, 131 Psalter Lane, Sheffield S11 8UX. Tel: 0114 250 5510. Email: enquiries@onehealth.co.uk. You can also raise a concern directly with the ICO here www.ico.gov.uk; although our aim is to resolve your complaint swiftly ourselves in the first instance.

Cookies

Most websites you visit will use cookies in order to improve your user experience by enabling that website to 'remember' you. Cookies do lots of different jobs, like letting you navigate between pages efficiently, storing your preferences and generally improving your experience of a website. Cookies make the interaction between you and the website faster and easier.

Cookies may be set by the website you are visiting, or they may be set by other websites who run content on the page you are viewing.

What is in a Cookie?

A cookie is a simple text file that is stored on your computer or mobile device by a website's server and only that server will be able to retrieve or read the contents of that cookie. Each cookie is unique to your web browser. It will contain some anonymous information such as a unique identifier and the site name and some digits and numbers. It allows a website to remember things like your preferences or login.

What to do if you don't want Cookies to be set

Some people find the idea of a website storing information on their computer or mobile device intrusive, particularly when this information is stored and used by a third party. Although this is generally quite harmless you may not, for example, want to see advertising that has been targeted to your interests. If you prefer, it is possible to block some or all cookies, or even to delete cookies

that have already been set; but you need to be aware that you might lose some functions of that website. If you have any concerns about cookies, please contact our Data Protection Officer.