



Privacy Policy

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities if you have a complaint.

When we use your personal data, we are regulated under the General Data Protection Regulation (GDPR) which applies across the European Union (including in the UK) and we are responsible as 'controller' of that personal data for the purposes of the GDPR. Our use of your personal data is subject to your instructions, the GDPR, other relevant UK and EU legislation and our professional duty of confidentiality.

Key terms

It would be helpful to start by explaining some key terms used in this policy:

We, us, our	Bromley GP Alliance Ltd, Bromley Community Education Provider Network and Bromley Primary Care Academy
Our data protection lead	Clare Ross Clare.ross@nhs.net Tel 01689 866044
Personal data	Any information relating to an identified or identifiable individual
Special category personal data	Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership Genetic and biometric data Data concerning health, sex life or sexual orientation

Personal data we collect about you

The table below sets out the personal data we will or may collect in the course of advising and/or acting for you. It also covers data that we will or may collect as part of our business relationship with you, for example in relation to introductions or recommendations.

Personal data we will collect	Personal data we may collect depending on our relationship with you e.g. as a shareholder, locum GP or member of practice staff
<p>Your name, address and telephone number</p> <p>Electronic contact details, e.g. your email address and mobile phone number</p>	<p>Information to enable us to check and verify your identity, e.g. your date of birth or passport details</p> <p>Information about your use of our IT, communication and other systems, and other monitoring information</p> <p>Your National Insurance and tax details</p> <p>Your bank and/or building society details</p> <p>Details of your professional online presence, e.g. LinkedIn profile</p> <p>Details of your next of kin</p> <p>Your employment status and details including salary and benefits and your employment records including, where relevant, records relating to sickness and attendance, performance, disciplinary, conduct and grievances (including relevant special category personal data)</p> <p>Immunisation records/medical questionnaire</p> <p>Professional registrations</p> <p>Indemnity Insurance status</p> <p>Education and training</p> <p>DBS check details</p> <p>Details of your pension arrangements,</p> <p>Your racial or ethnic origin, gender and sexual orientation, religious or similar beliefs</p> <p>Your trade union membership</p>

This personal data is required to enable us to provide our service and support to you. If you do not provide personal data we ask for, it may delay or prevent us from providing services to you.

How your personal data is collected

We collect most of this information from you. However, we may also collect information:

- directly from a third party, e.g.: former employers
- from a third party with your consent e.g. medical records
- your employer and/or trade union, professional body or pension administrators;
- via our website—we use cookies on our website
- via our information technology (IT) systems, e.g.: clinical systems, rota systems and compliance systems
- door entry systems and reception logs;
- automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, email and instant messaging systems.

How and why we use your personal data

Under data protection law, we can only use your personal data if we have a proper reason for doing so, e.g.:

- to comply with our legal and regulatory obligations;
- for the performance of our contract with you or to take steps at your request before entering into a contract;
- for our legitimate interests or those of a third party; or
- where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal data for and our reasons for doing so:

What we use your personal data for	Our reasons
To provide services to you and your patients	For the performance of our contracts for the provision of services, and to comply with legal and regulatory obligations
Conducting checks verify identity Screening for professional registration compliance and indemnity compliance Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business, e.g. under health and safety regulation	To comply with our legal and regulatory obligations
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to, eg policies covering security and internet use	For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can

What we use your personal data for	Our reasons
	deliver the right service for you and your patients
Ensuring the confidentiality of commercially sensitive information	For our legitimate interests or those of a third party, i.e. to protect our intellectual property and other commercially valuable information To comply with our legal and regulatory obligations
Statistical analysis to help us manage our organisation, e.g. in relation to our financial performance, client base, work type or other efficiency measures	For our legitimate interests or those of a third party, i.e. to be as efficient and safe as we can so we can deliver the right service for you and your patients
Preventing unauthorised access and modifications to systems	For our legitimate interests or those of a third party, i.e. to prevent and detect criminal activity that could be damaging for us and for you To comply with our legal and regulatory obligations
Updating and enhancing staff records	To comply with our legal and regulatory obligations
Statutory returns	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	To comply with our legal and regulatory obligations For our legitimate interests or those of a third party, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the right service to you and your patients
Marketing our services to: <ul style="list-style-type: none"> • shareholders • third parties who have previously expressed an interest in our services; • third parties with whom we have had no previous dealings. • Practice staff • GPs 	For our legitimate interests or those of a third party, i.e. to inform you of organisational developments, service updates, new services, education and training updates and courses available that might be of interest to you and/or information about our services including events
External audits and quality checks, e.g. CQC, CCG	For our legitimate interests or a those of a third party, i.e. to maintain our contracts so we can demonstrate we operate a safe effective service To comply with our legal and regulatory

What we use your personal data for	Our reasons
	obligations

The above table does not apply to special category personal data, which we will only process with your explicit consent.

Marketing communications

We may use your personal data to send you updates (by email, text message, telephone or post) about developments that might be of interest to you and/or information about our services and events.

We have a legitimate interest in processing your personal data for marketing purposes (see above '**How and why we use your personal data**'). This means we do not usually need your consent to send you marketing communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal data with the utmost respect and never share it with other organisations outside of Bromley GP Alliance Ltd for marketing purposes.

You have the right to opt out of receiving marketing communications at any time by emailing d.kinchin@nhs.net

We may ask you to confirm or update your marketing preferences if we provide additional services in the future, or if there are changes in the law, regulation or the structure of our business.

Who we share your personal data with

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

Where your personal data is held

Information will be held at our offices.

How long your personal data will be kept

We will keep your personal data in accordance with our data retention Policy.

We will not retain your data for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of data. For further details on this please contact our data protection lead.

When it is no longer necessary to retain your personal data, we will delete or anonymise it.

Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal data
Rectification	The right to require us to correct any mistakes in your personal data
To be forgotten	The right to require us to delete your personal data—in certain situations
Restriction of processing	The right to require us to restrict processing of your personal data—in certain circumstances, eg if you contest the accuracy of the data
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object: <ul style="list-style-type: none">• at any time to your personal data being processed for direct marketing (including profiling);• in certain other situations to our continued processing of your personal data, eg processing carried out for the purpose of our legitimate interests.
Not to be subject to automated individual decision-making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the General Data Protection Regulation.

If you would like to exercise any of those rights, please:

- email, call or write to us—see below: '**How to contact us**'; and
- let us have enough information to identify you
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know what right you want to exercise and the information to which your request relates.

Keeping your personal data secure

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

How to complain

We hope that we can resolve any query or concern you may raise about our use of your information.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.

Changes to this privacy policy

This privacy policy was published on 20th May 2018

We may change this privacy policy from time to time, when we do we will inform you via email.

How to contact us

Please contact us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you.

Our contact details are shown below:

Bromley GP Alliance Ltd
Kelsey Park Farmhouse
Beckenham Beacon
379 Croydon Road
Beckenham
BR3 3QL
Tel: 01689 866044
D.kinchin@nhs.net