**Cardiff North Cluster**

**Discharge & Wellbeing Integrated Care Hub and Multidisciplinary Team Meetings (MDT) Privacy Notice**

This Privacy Notice will explain how the Cardiff North Cluster uses your personal data for the purposes of the Multi-Disciplinary Team (MDT) Meetings.

***What is MDT?***

MDT is a collaboration between health, social care and the third sector and forms part of the Accelerated Cluster Transformation Project (Project One). MDT is designed to bring efficiency to a whole systems approach with effective multi-organisation working to improve patient care and referrals to other healthcare providers. The Cardiff North Cluster MDT comprises of representatives from primary care (GPs), Cardiff and Vale University Health Board, Cardiff Council for example social workers, and third sector organisations that can support you with your healthcare needs. The purpose of the MDT is to discuss and recommend the best form of treatment and care based on each individual patient’s circumstances. As our patient we can refer you into the MDT meeting for further assessment in relation to your care.

***What information do we collect about you?***

For the purposes of providing your direct care and treatment, we collect the following personal information:

* Your name
* Address
* NHS No.
* Date of Birth
* Gender
* Racial / ethnic origin
* Relevant medical information pertaining to your physical and/or mental health
* Reason(s) for referral
* Criminal offences
* Employment, school, social services, housing records

***Partners we may share your information with***

To support delivery of the Cluster MDT, we will share your information, subject to agreement on how it will be used with the following organisation(s). This information will be kept to a minimum (as described above) and may include a brief summary of the support that your GP feels will be helpful when making a referral to MDT:

* Community Resource Team (CRT Health), Cardiff and Vale University Health Board
* Independent Living Services, Cardiff Council
* (Adult) Social Services, Cardiff Council
* ACE (Third Sector)
* Mental Health for Older Persons, Cardiff and Vale University Health Board
* Care & Repair (Third Sector)
* Age Connect (Third Sector)
* Tier Zero – MIND (Third Sector)
* CCAWS (Third Sector)
* Soil & Clay (Third Sector)

***How is your personal information collected?***

The information we hold is collected through various routes; these may include:

* Direct interactions with you as our patient and direct input by the clinician involved in your direct care and treatment.
* Indirectly from other health care providers, such as Cardiff and Vale University Health Board.
* When you attend other organisations providing health or social care services for example out of hours GP appointments or visits to A&E and some interactions with Social Care, they will let us know so that your GP record is kept up to date.

***How do we use your information?***

The information we collect about you, for the purposes of MDT and the Integrated Care Hub, is used for your direct care and treatment, but may also be used for:

* The management of healthcare services
* To contact you about patient surveys
* Anonymised reporting for the purposes of service evaluation and performance

***Access and security of your personal information***

The sharing of your information will be managed in such a way to assure that it remains confidential, and any organisation that either shares or receives your information has a duty of confidentiality and to ensure that the personal data of patients is shared and stored securely.

Your information is securely stored on the practice’s IT systems. All users accessing our systems will use a secure username and password to access the system, and all activity performed is fully audited. If any of your information needs to be communicated by email, this is done so using secure NHS Wales email addresses where all information is protected via secure web communication channels.

Referrals to third sector organisations listed above are made via our secure social prescribing system, Elemental, and our secure emailing system.

***Retaining and storing your information***

We are required by UK law to keep your information and data for a defined period, often referred to as a retention period. The Practice will keep your information in line with the [Records Management Code of Practice for Health and Social Care 2022](https://gov.wales/sites/default/files/publications/2022-03/records-management-code-of-practice-for-health-and-social-care-2022.pdf) and the Practice’s records management policy which can be found *at www.penylansurgery.co.uk.*

***Legal basis for processing your information***

The legal basis used to process your personal information, for the purposes of MDT, relates to your direct care and treatment. We rely on the following condition to lawfully process your information:

***Article 6(1)(e)****: processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.*

For the purposes of MDT, we also process special category information, for example data concerning your health. We rely on the following condition to lawfully process your information:

***Article 9(2)(h):*** *processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and service.*

***Article 9(2)(i):*** *processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices.*

***Your rights in relation to MDT and the Integrated Care Hub***

The UK GDPR includes a number of rights for individuals. We must generally respond to requests in relation to your rights within one month, although there are some exceptions to this. The availability of some of these rights depends on the legal basis that applies in relation to the processing of your personal data. For this Service, the following rights are listed and how they apply are described below.

***Right to be Informed***

Your right to be informed is met by the provision of this privacy notice, and similar information when we communicate with you directly – at the point of contact.

***Right of Access***

You have the right to obtain a copy of personal data that we hold about you and other information specified in the UK General Data Protection Regulation (UK GDPR), although there are exceptions to what we are obliged to disclose. A situation in which we may not provide all the information is where in the opinion of an appropriate health professional disclosure would be likely to cause serious harm to your, or somebody else’s physical or mental health.

***Right to Rectification***

You have the right to ask us to rectify any inaccurate data that we hold about you.

***Right to Erasure (‘right to be forgotten’)***

You have the right to request that we erase personal data about you that we hold. This is not an absolute right, and depending on the legal basis that applies, we may have overriding legitimate grounds to continue to process the data.

***Right to Restriction of Processing***

You have the right to request that we restrict processing of personal data about you that we hold. You can ask us to do this for example where you contest the accuracy of the data.

***Right to Object***

You have the right to object to processing of personal data about you on grounds relating to your particular situation. The right is not absolute, and we may continue to use the data if we can demonstrate compelling legitimate grounds, unless your object relates to marketing.

***How to Contact us***

Please contact the Practice if you have any questions about our privacy notice or information, we hold about you.

Practice Manager

Penylan Surgery

72-74 Penylan Road

Penylan

Cardiff

CF23 5SY

Email: admin.penylan@wales.nhs.uk

Tel: 029 20498181

***Contact Details of our Data Protection Officer***

The Practice is required to appoint a data protection officer (DPO). This is an essential role in facilitating practice accountability and compliance with UK Data Protection Law.

**Our Data Protection Officer is:**

Digital Health and Care Wales,
Information Governance, Data Protection Officer Support Service
4th Floor, Tŷ Glan-yr-Afon
21 Cowbridge Road East
Cardiff
CF11 9AD
Email: DHCWGMPDPO@wales.nhs.uk

***Right to complain to the Information Commissioner***

You have the right to complain to the Information Commissioner if you are not happy with any aspect of practices processing of personal data or believe that we are not meeting our responsibilities as a data controller. The contact details for the Information Commissioner are:

Information Commissioner’s Office
Wycliffe House
Water Lane,
Wilmslow SK9 5AF

Website: [www.ico.org.uk](https://ico.org.uk/)

Tel: 0303 123 1113