

West Cambs GP Federation - Privacy Notice

We ask that you read this privacy policy carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

This privacy policy is divided into the following sections:

- Who we are
- Our website
- Our collection and use of your personal information
- Transfer of your information out of the EEA
- Cookies and similar technologies
- Marketing
- Your rights
- Keeping your personal information secure
- How to complain
- Changes to this website privacy policy
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Who we are

This service is operated by West Cambs Federation CIC (Company number 10231960) trading as West Cambs GP Federation or WCF. We provide extended GP surgery opening hours in four GP surgeries on behalf of [Cambridgeshire & Peterborough CCG](#). ('the CCG').

In relation to the medical consultations that take place at the GP surgeries WCF provide this service under contract from the CCG. For this purpose of data processing CCG is the 'data controller' and WCF is the 'data processor'. For further details about the CCG please refer to their [privacy/fair processing notice](#).

In relation to the personal data we collect directly from individuals that contact WCF either through the web contact form or by phone we are the 'data controller'. When we collect, use and are responsible for certain personal information about you we do so we are regulated under the [General Data Protection Regulation](#) which applies across the European Union (including in the United Kingdom) and we are responsible for that personal information for the purposes of those laws.

Our website

This privacy policy relates to your use of our website, <https://www.westcambsfed.nhs.uk/>.

Our website may contain links to other websites owned and operated by certain trusted third parties to provide you with other relevant information, education and training resources. These other third-party websites may also gather information about you in accordance with their own separate privacy policies. For privacy information relating to these other third-party websites, please consult their privacy policies as appropriate.

Our collection and use of your personal information

We collect personal information about you when you access our website, register with us or contact us via our website.

We collect this personal information from you either directly, such as when you register with us or contact us via our website or by phone, or indirectly, such as your browsing activity while on our website (see 'Cookies' below).

The personal information we collect about you depends on the particular activities carried out through our website. Such information includes:

- your name (first and last)
- email address
- phone number
- details of any message or feedback you give us by phone, email, post or via social media
- information about the services we provide to you

We use this personal information to:

- create and manage your relationship with us
- verify your identity
- provide services to you
- customise our website and its content to your particular preferences
- notify you of any changes to our website or to our services that may affect you
- improve our services

This website is not intended for use by children under the age of 13 and we do not knowingly collect or use personal information relating to children.

Our legal basis for processing your personal information

When we use your personal information we are required to have a legal basis for doing so. There are various different legal bases upon which we may rely, depending on what personal information we process and why.

The legal bases we may rely on include:

- **consent:** where you have given us clear consent for us to process your personal information for a specific purpose
- **legal obligation:** where our use of your personal information is necessary for us to comply with the law (not including contractual obligations)
- **vital interests:** where our use of your personal information is necessary to protect you or someone else's life
- **public task:** where our use of your personal information is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law
- **contract:** where our use of your personal information is necessary for a contract (e.g. out of hours service agreement with a GP surgery) we have with you, or because you have asked us to take specific steps before entering into a contract

- **legitimate interests:** where our use of your personal information is necessary for our legitimate interests or the legitimate interests of a third party (unless there is a good reason to protect your personal information which overrides our legitimate interests)

Further information—the personal information we collect, when and how we use it

For further details on when we collect personal information, what we collect as well as how we use it, please read the following sections. The first section relates to patients:

Patients of GP Surgeries

When information is collected	What information we ask for	How and why we use your information
When you contact us either via the web form or by phone	Contact details: your name (first & last name), email address, phone number, message.	<p>We ask for this information in order to respond to you query and communicate with you about the services we provide.</p> <p>We rely on legitimate interest as the lawful basis for collecting and using your personal information. Our legitimate interests are to respond to your enquiry and provide you with information on our service which we are contracted to provide by the CCG.</p> <p>We will keep this information for 2 years after your query has been addressed.</p>
When booking appointments to use the WCF Extended GP Opening Hours service	Surgery appointment details: your name and appointment days / times	<p>We ask for this information in order to make an appointment with your GP when accessing the services. The data will be stored on the GP surgery appointment booking system, SystemOne.</p> <p>The appointment data is shared with the CCG to measure how often the services are used for the purposes of determining their effectiveness.</p> <p>The data is retained by us for 2 years and then deleted.</p>
When you use the WCF Extended GP Opening Hours service for health consultation	Medical records from the NHS information systems	Our clinical staff access your medical data from the NHS patient records system, EMIS. The clinical staff will review and update your medical records according to the consultation received.

When information is collected	What information we ask for	How and why we use your information
		<p>No data is retained by WCF. Only the appointed doctor or healthcare professional will access your data and no data is shared with third parties. The data is retained on the NHS medical records system.</p> <p>We rely on you giving your consent as the lawful basis for collecting and using your personal information.</p>

Healthcare Clinicians, Administrators and Third-Party Suppliers

When information is collected	What information we ask for	How and why we use your information
When you contact us either via the web form or by phone	Contact details: your name (first & last name), email address, phone number, message.	<p>We ask for this information in order to respond to you query.</p> <p>We rely on legitimate interest as the lawful basis for collecting and using your personal information. Our legitimate interests are to respond to your query about services we are contracted to provide by the CCG.</p> <p>We will keep this information for 2 years after your query has been addressed.</p>

Who we share your personal information with

We do not routinely share your personal data with third parties. On an aggregated basis (i.e. your personal details are removed and made anonymous) we share data with AtScale, who are commissioned by CCG to test the cost effectiveness of WCF services.

We use Microsoft O365 for communicating with individuals by email. This data sharing enables WCF to maintain contact with you and inform you of appointments made on your behalf and other details relevant to the services we provide. For further details refer to their [GDPR privacy commitment statement](#).

We will share personal information with law enforcement or other authorities if required by applicable law. We will not share your personal information with any other third party.

Transfer of your information out of the EEA

We do not transfer your personal information outside the European Economic Area (EEA).

Cookies and similar technologies

A cookie is a small text file which is placed onto your device (e.g. computer, smartphone or other electronic device) when you use our website. We use cookies on our website. These help us recognise you and your device and store some information about your preferences or past actions. We only use necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.

For further information on cookies generally visit www.aboutcookies.org or www.allaboutcookies.org.

Marketing

We may send you information about changes to the out of hours services or introducing new GP staff to you or other information which may be of interest to you. Where we have your consent or it is in our legitimate interests to do so, we may do this by post, email, telephone, or text message (SMS).

We will only ask whether you would like us to send you marketing messages when you tick the relevant boxes when you complete our online web form. Click [here](#) to see what this form looks like.

If you have previously agreed to being contacted in this way, you can unsubscribe at any time by:

- contacting us at Unit 6, Incubator 1, Enterprise Campus, Alconbury Weald, Cambridgeshire, PE28 4WX Tel: 0300 102 1560, or
- using the 'unsubscribe' link in emails

It may take up to five working days for this to take place. For more information on your rights in relation to marketing, see 'Your rights' below.

Your rights

Under the [General Data Protection Regulation](#) you have a number of important rights, free of charge. In summary, those include rights to:

- fair processing of information and transparency over how we use your use personal information
- access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address
- require us to correct any mistakes in your information which we hold
- require the erasure of personal information concerning you in certain situations
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- object at any time to processing of personal information concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to our continued processing of your personal information
- otherwise restrict our processing of your personal information in certain circumstances

For further information on each of those rights, including the circumstances in which they apply, 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 or our Data Protection Officer and
- let us have enough information to identify you (e.g. name and email address)
- 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 the information to which your request relates

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know 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.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

How to complain

We hope that we can resolve any query or concern you 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 website privacy policy

This website privacy policy was last updated on 1st October 2020.

We may change this website privacy policy from time to time, when we do, we will inform you by email if you are registered with us to receive email communications.

How to contact us

Please contact us or our Data Protection Officer, if you have any questions about this privacy notice or the information we hold about you.

If you wish to contact WCF, please email your enquiry to CAPCCG.westcambsfed@nhs.net or write to West Cambs GP Federation, Unit 6, Incubator 1, Enterprise Campus, Alconbury Weald, Cambridgeshire, PE28 4WX, or call 0300 102 1560 or call. If you prefer to contact our Data Protection Officer, please send an email to dpo@evalian.co.uk.

Do you need extra help?

If you would like this website privacy policy in another format (for example: audio, large print, braille) please contact us (see 'How to contact us' above).