



*"Bringing Practices Together
To Improve Primary Care"*

360 CARE

SUBJECT ACCESS REQUESTS

Date Published: 7th February 2020.

This information explains our Subject Access Policy and your right to access information we hold about you.

This policy only covers 360 Care Ltd.

Who We Are

360 Care Ltd is a federation of the GP practices listed below who work together and share the responsibility for developing and delivering high quality patient focused services.

- Roxton Practice
- Healing Partnership
- Dr A Sinha
- Raj Medical Centre
- Core Care Family Practice
- Dr AP Kumar
- Dr RK Mathews

360 Care Ltd provides a community Non-Obstetric Ultrasound service and a community Mental Health Counselling service. To use our services you must have been referred to us by your GP.

How we use Information

360 Care only hold information regarding service users who have been referred to us by their General Practitioner. This information is held in a secure clinical system and is only used to manage patients who have been referred by their General Practitioner, for the purposes for which they have been referred.

Subject Access Request

Under the 2018 Data Protection Act (incorporating the provisions of the EU GDPR regulations of 2019) you have the right to request your personal information held by 360 Care Ltd. This is known as a Subject Access Request. You can make this request verbally or in writing, or via e-mail or Social Media. You would not normally be charged a fee for making this request.

What You Can Ask For

You are entitled to request:

1. Confirmation that 360 Care Ltd are processing your personal data
2. A copy of your personal data
3. The purpose(s) of the processing
4. Recipients of personal data
5. The retention period of the data
6. Existence of your right to rectify, erase or restrict or to object to the processing
7. The right to lodge a complaint with the Information Commissioner's Office (ICO) or other regulatory body
8. Information about the source of the data (where it was not obtained directly from you)
9. The existence of automated decision making (e.g. profiling)

360 Care Ltd have one calendar month from the date of your request to respond to you. The response time can be extended by a further two months if the request is complex or a number of requests have been received by you at the same time. If an extension is necessary you will be notified within one month of the date of your request and you will be given an explanation why the extension is necessary.

You are only entitled to request your own personal data, not to data relating to other people, unless you are acting on behalf of someone (e.g. a solicitor acting on behalf of a client). 360 Care Ltd need to be satisfied that you are entitled to act on behalf of the individual, but it is your responsibility to provide evidence of this entitlement. This might be a written authority to make the request or it might be a more general power of attorney, for example.

If you make a request for your data electronically, 360 Care Ltd will normally provide this information in a commonly used electronic format, unless you request the data in a different format. If you request a large amount of information, 360 Care Ltd can ask you for more information to clarify your request.

360 Care Ltd will provide information to you in a concise, transparent, intelligible and easily accessible form, using clear and plain language.

When We Cannot Provide Information

360 Care Ltd cannot provide information if it would mean disclosing information about another person who can be identified from that information, unless the other person has consented to the disclosure or it is reasonable to comply with the request without the person's consent.

360 Care Ltd can refuse to comply with a subject access request if it is *manifestly unfounded or excessive*. If it is considered that the request is manifestly unfounded or excessive 360 Care Ltd can request a reasonable fee (i.e. based on the administrative costs of complying with the request) to deal with the request, or refuse to deal with the request, although in both circumstances 360 Care Ltd will have to justify this decision to you and you should be informed without undue delay and within one month of the receipt of the request. You will be informed of:

1. the reasons 360 Care Ltd are not taking action
2. your right to make a complaint to the ICO or another supervisory authority
3. your ability to seek to enforce this right through a judicial remedy.

Further information

Further information on Subject Access can be found via the ICO website:

<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-of-access/>

For independent advice about data protection, privacy and data-sharing issues, you can contact:

The Information Commissioner
Wycliffe House
Water Lane
Wilmslow,
Cheshire
SK9 5AF

Phone: 0303 123 1113

Website: www.ico.org.uk

Contacts

If you have any questions about these terms and conditions, please email us at: -

360care.nous@nhs.net

Or you can write to us at: -

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