

# SHAP MEDICAL PRACTICE

## Eden Primary Care Network (PCN) Privacy Notice

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2	18.03.2026	Wendy Hancock	Wendy Hancock and Margaret McCabe	Added about external providers and updated the employing practices

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## 1. Introduction

Shap Medical Practice is part of Eden Primary Care Network (PCN). A Primary Care Network is a group of GP practices working together with community, mental health, social care and voluntary services to provide coordinated healthcare services to the local population.

This privacy notice explains how we use and share your personal information, your rights under data protection law, and how we keep your information safe.

We are committed to protecting your privacy and handling your information in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

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## 2. Who We Are

### Member Practices of Eden PCN

- Shap Medical Practice
- Kirkoswald Practice
- The Lakes Medical Practice
- Birbeck Medical Practice
- Appleby Medical Practice
- Glenridding Health Centre
- Upper Eden Medical Practice
- Temple Sowerby Medical Practice
- Alston Medical Practice
- Court Thorn Surgery

Each GP practice within the PCN remains an independent Data Controller for the personal data it holds about its registered patients.

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## 3. Data Controller

Shap Medical Practice is the Data Controller for the personal information it holds about you.

Staff delivering services across the PCN are employed by individual member GP practices. Your registered GP practice remains responsible for your clinical record and acts as the Data Controller for your information.

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## 4. Data Protection Officer (DPO)

Our Data Protection Officer provides advice and monitors compliance with data protection law.

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## 5. Information We Hold About You

We may collect and hold the following types of information:

- Personal details (name, address, date of birth, NHS number)
- Contact details
- GP registration details
- Medical history and clinical information
- Medications and allergies
- Test results and referrals
- Appointment information
- Care plans and assessments
- Information about carers or family where relevant to care
- Observations and professional opinions recorded by healthcare staff

Health information is classified as special category data and is handled with additional safeguards under UK GDPR.

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## 6. How We Use Your Information

We use your information to:

- Provide direct healthcare and treatment
  - Coordinate services across the Primary Care Network
  - Support multidisciplinary team working
  - Arrange referrals and ongoing care
  - Improve quality and safety of services
  - Plan and commission local health services using anonymised or pseudonymised data
  - Meet legal and regulatory obligations
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## 7. Services Delivered Across the PCN

Services within Eden PCN are delivered by healthcare professionals who are employed by individual member GP practices. Depending on their role, staff may work across multiple practices within the PCN or within specific practices only.

Roles supporting PCN services may include:

- Clinical Director
- PCN Manager
- Social Prescribers
- Pharmacists and Pharmacy Technicians
- First Contact Physiotherapists
- Dietitians
- Care Coordinators
- GP Assistants (Safeguarding)

These professionals may access relevant parts of your medical record where necessary to provide your care, in line with data protection law and information governance requirements.

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## 8. Who We Share Information With

We share information only where necessary and relevant for your care or where required by law. This may include:

- Other GP practices within Eden PCN
- NHS Trusts and hospitals
- Community health services
- Mental health services
- Social care services
- NHS England and Integrated Care Boards (ICBs)
- Approved NHS service providers and data processors

All organisations are required to keep your information secure and confidential.

In some circumstances, external organisations or service providers may be contracted to support the delivery, administration or improvement of healthcare services on behalf of the practice or PCN. Where this occurs, these providers may be granted appropriate access to patient information strictly for agreed purposes. All such organisations are subject to formal data processing or information sharing agreements and must comply with UK GDPR, the Data Protection Act 2018 and NHS information governance standards.

We follow the principle of sharing the minimum necessary information.

Your information is never shared for marketing purposes.

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## 9. Lawful Basis for Processing

We process your information under the following legal bases:

<b>Purpose</b>	<b>UK GDPR Article 6</b>	<b>UK GDPR Article 9</b>
Direct care	6(1)(e) – Public task	9(2)(h) – Health or social care provision
Service planning	6(1)(e) – Public task	9(2)(i) – Public health
Risk stratification	6(1)(e) – Public task	9(2)(h) – Health management

Under the Common Law Duty of Confidence, information may be shared for direct care with implied consent where there is a reasonable expectation of sharing between healthcare professionals involved in your care.

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## 10. Risk Stratification

Risk stratification tools are used within the NHS to identify patients who may benefit from additional support or preventative care.

Data from multiple NHS sources may be analysed using anonymised or pseudonymised data. Results are returned to your GP practice to support clinical decision-making and improve patient outcomes.

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## 11. Planning and Commissioning

We may use anonymised or pseudonymised information to:

- Understand population health needs
- Identify gaps in services
- Improve healthcare delivery

Individuals cannot be identified from this data.

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## 12. National Data Opt-Out

You can choose whether your confidential patient information is used for purposes beyond your individual care.

For more information or to register your choice, visit:

[www.nhs.uk/your-nhs-data-matters](http://www.nhs.uk/your-nhs-data-matters)

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## 13. How Long We Keep Your Information

We retain records in accordance with the NHS Records Management Code of Practice. GP medical records are normally retained for a minimum of 10 years after death or after a patient permanently leaves the UK.

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## 14. How We Protect Your Information

We maintain appropriate technical and organisational security measures including:

- Secure NHS clinical systems
- Role-based access controls
- Staff confidentiality training
- Data sharing agreements
- Cybersecurity protections

All staff are bound by confidentiality obligations.

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## 15. Your Rights Under Data Protection Law

You have the right to:

- Access your information (Subject Access Request)
- Request correction of inaccurate data
- Request restriction of processing in certain circumstances
- Object to processing where applicable
- Request data portability where relevant
- Lodge a complaint about how your data is used

Some rights may be limited where information is required for healthcare provision or legal obligations.

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## 16. Complaints or Concerns

If you have concerns about how your information is used, please contact your GP practice in the first instance.

You also have the right to complain to the Information Commissioner's Office (ICO):

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

Telephone: 0303 123 1113

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## 17. Changes to This Privacy Notice

We may update this privacy notice periodically to reflect legal, operational or service changes. The latest version will always be available via your GP practice website or on request.