

## Personalised Outpatient Programme (POP) Privacy Notice – April 2022

Name of Data Controller	Norfolk & Norwich University Hospital, Colney Lane, Colney, Norwich NR4 7UY
Name of controller contacts/DPO	Mark Pepper, Divisional Operational Manager Email: <a href="mailto:Mark.Pepper@nnuh.nhs.uk">Mark.Pepper@nnuh.nhs.uk</a>  Vimmi Lutchmeah-Beeharry, Data Protection Officer Email: <a href="mailto:info.gov@nnuh.nhs.uk">info.gov@nnuh.nhs.uk</a>

### 1. Background

This Privacy Notice is being provided in order to make transparent why and how Norfolk & Norwich University Hospitals NHS Foundation Trust (“NNUH”) intends to undertake data handling activities in relation to a **Personalised Outpatient Programme (POP)**.

This notice supplements the NNUH Privacy Notice which is available on the internet at <https://www.nnuh.nhs.uk/publication/privacy-notice-v4/>

### 2. Purpose of the intended POP activity

NNUH has contracted DrDoctor to support delivery of the POP.

DrDoctor is a Digital Service Provider who will act as a Data Processor to NNUH in handling your data.

DrDoctor is a patient engagement platform which allows patients to communicate and interact with their Healthcare Provider and manage their appointments. It also enables the Trust to make data driven decisions, activate patients through self-booking and provide remote care.

### 3. Why is the intended POP activity taking place?

The DrDoctor digital platform supports the following benefits:

- SMS and email appointment reminders and confirmations.
- The ability to opt-in to view digital letters and their attachments within a patient portal.
- Patient portal which allows patients to view their appointments and add appointment information to their own calendars, obtain clinic level information and important treatment documentation.
- Allows patients to re-schedule or cancel appointments via two-way SMS system communication.

### 4. To whom will the scope of the POP activity apply to?

The scope of the intended POP data handling activities will apply to all NNUH Outpatients activities:

### 5. The law that allows us to process your health information

NNUH has to provide a legal basis for the processing of your information.

NNUH has a public duty to provide care for its patients. Under relevant UK Legislation:

- We shall use your information in line with the legislation from the NHS Act 2006 and process your information for POP under the Data Protection legislation and the UK GDPR (General Data Protection Regulation) legislation, *Article 6(1)(e)* ‘...**necessary for the performance of a task carried out in the public interest or in the exercise of official**



***authority...’ and Article 9(2)(h) ‘necessary for the purposes of preventative .... medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services...’; and***

- In relation to the Common Law Duty of Confidentiality - ***Implied consent*** for your Clinical Care

## **6.How do you object to use DrDoctor services?**

As a patient, you can object to using DrDoctor services. However, the decision about this is at the discretion of NNUH because of the legal basis above it is using. If you would like to stop any information being shared with DrDoctor then you will need to contact us on **01603 286563** to communicate your decision.

## **7.What types of information will be processed?**

The nature of the personal data to be handled through the POP activity shall involve your personal and special category data as would be used during your clinical care. Further details are available in the Privacy Policy on the <https://my.drdoctor.co.uk/privacy>

## **8.Keeping data up to date**

NNUH needs to ensure any information it uses is accurate. You can help us by promptly informing us of any changes to the information we hold about you.

## **9.How long will information be kept for?**

The Trust considers the information associated with the intended POP processing activities as being part of clinical care. Therefore, records would be kept as per the NHS Records Management Code of Practice 2021.

## **10.How we keep your information confidential and secure.**

Everyone working for the NNUH and contracted by NNUH as a service provider has a legal duty to keep information about you confidential and secure.

All the data we collect about you as an individual is protected with multiple levels of security including industry leading encryption and access controls. DrDoctor data centres are accredited to the standards set out by the NHS and GCHQ/CESG for protecting the healthcare information of UK citizens.

When you use the Site and Patient Platform your access is controlled using 2-factor authentication unless you have been given the option to disable this when using a username and password.

## **11.Your information, your rights**

Data Protection legislation gives individuals rights in respect of the personal information which we hold about you. These are as available on NNUH Privacy Notice link provided in section 1.

## **12.Questions / Complaints**

If you have any queries or you would like to make a complaint regarding the use of your personal data, please contact the Trust contacts provided on the first page.

## **13.Updates**

We may amend this privacy notice from time to time, so please review it frequently through the NNUH internet site.