

Patient Engagement Portal (PEP) Privacy Notice

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: Mark.Pepper@nnuh.nhs.uk Vimmi Lutchmeah-Beeharry, Data Protection Officer Email: info.gov@nnuh.nhs.uk

1. Background

This Privacy Notice is being provided in order to make transparent why and how Norfolk & Norwich University Hospitals NHS Foundation Trust (“the Trust”) intends to undertake data handling activities in relation to a **Patient Engagement Portal (PEP)** and which is an expansion of the Trust’s previous Personalised Outpatient Programme (POP).

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

2. Purpose of the intended PEP activity

The Trust has contracted DrDoctor to support delivery of the PEP.

DrDoctor is a Digital Service Provider who will act as a Data Processor to the Trust in handling your data. DrDoctor also works with two third parties, Datagraphic and Wayfinder (for NHS App compatibility) to be able to undertake all functionalities required for the PEP.

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 PEP 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, and the ability (provided by Datagraphic) for a “hard copy” letter to be sent if the patient does not have access to the portal or who is deemed an exclusion under specific criteria.
- 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 PEP activity apply to?

The scope of the intended PEP data handling activities will apply to all Trust Outpatients activities.

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

The Trust has to provide a legal basis for the processing of your information and 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 PEP under the Data Protection Act 2018, 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 using DrDoctor services?

As a patient, you can object to using DrDoctor services. However, the decision about this is at the discretion of the Trust because of the legal basis above it is using (see Para 5 above). 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 PEP activity will involve your personal and special category data as would be used during your clinical care. Further details are available in the DrDoctor Privacy Policy at: <https://my.drdoctor.co.uk/privacy>

8. Keeping data up to date

The Trust 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 PEP processing activities as being part of clinical care. Therefore, records would be kept as per the NHS Records Management Code of Practice 2021 (Appendix II: Retention Schedule).

10. How we keep your information confidential and secure.

Everyone working for the Trust and contracted by the Trust 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 Government Communications Headquarters (GCHQ)/National Cyber Security Centre (NCSC) 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 available on the Trust’s 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 Trust’s internet site.