

# Saltdean and Rottingdean Medical Practice

## Patient Privacy Notice

*Last updated: April 2026*

### Introduction

This privacy notice explains how Saltdean and Rottingdean Medical Practice collects, uses, stores and shares your personal information. It also sets out your rights under UK data protection law and the steps we take to keep your information safe.

The practice is the **Data Controller** for the personal information we hold about you. That means we are responsible for deciding how your information is used and for keeping it secure.

A full list of the systems and organisations that handle data on our behalf, along with the legal basis for each flow of information, is set out in **Appendix A** to this notice. Appendix A is available from reception and on our website.

### Data Controller and Key Contacts

**Data Controller:** Saltdean and Rottingdean Medical Practice, Grand Ocean, Longridge Avenue, Saltdean, Brighton, BN2 8BU.

**Caldicott Guardian:** Dr Jason Bolton, GP Partner. The Caldicott Guardian is responsible for safeguarding the confidentiality of patient information across the practice.

**Clinical Safety Officer:** Dr James Murdoch, GP Partner. The Clinical Safety Officer oversees the safe introduction and ongoing use of clinical IT systems at the practice.

**Data Protection Officer:** Laura Taw, Senior Information Governance Consultant and DPO, NHS South, Central and West Commissioning Support Unit.

### Our ICO Registration

The practice is registered as a Data Controller with the Information Commissioner's Office (ICO). You can view our registration on the ICO's public register at [ico.org.uk/about-the-ico/what-we-do/register-of-fee-payers](https://ico.org.uk/about-the-ico/what-we-do/register-of-fee-payers).

### The Legal Framework We Work Within

We process personal information in line with UK data protection law and other relevant legislation. The main pieces of law that govern how we handle your information are:

- the UK General Data Protection Regulation (UK GDPR)
- the Data Protection Act 2018
- the Data (Use and Access) Act 2025, which makes a number of amendments to the UK GDPR and the Data Protection Act 2018
- the Human Rights Act 1998
- the Health and Social Care Act 2012, as amended by the Health and Social Care (Safety and Quality) Act 2015
- the common law duty of confidentiality
- the Privacy and Electronic Communications Regulations 2003 (PECR)
- the Freedom of Information Act 2000

Together these set out our duties as a public authority providing NHS services and your rights as a patient.

## What Personal Information We Hold

To provide you with safe and effective healthcare, we need to collect and keep information about you and your health. This may include:

- your name, date of birth, address, contact details and NHS number
- your medical history, diagnoses, medications, allergies and test results
- records of consultations, treatments and referrals
- information from other healthcare providers involved in your care, such as hospitals, community services and out-of-hours providers
- family and social history relevant to your care
- correspondence relating to your care

Your medical records are held electronically on our clinical system, SystemOne, which is provided by TPP.

## Why We Process Your Information and Our Legal Basis

We use your information to provide you with direct healthcare and to run the practice effectively. Under the UK GDPR and the Data Protection Act 2018, we rely on the following legal bases:

**Article 6(1)(e)** – processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority.

**Article 9(2)(h)** – processing is necessary for the purposes of preventive or occupational medicine, medical diagnosis, the provision of health or social care or treatment, or the management of health or social care systems and services.

In addition to data protection law, we also owe you a **common law duty of confidentiality**. There are four routes by which we can lawfully use or share confidential patient information:

- **Consent.** For your direct care we rely on your implied consent. For other purposes we will seek your explicit consent unless one of the routes below applies.
- **A statutory or other legal requirement.** There are situations where the law obliges us to share information, for example notifiable diseases, court orders, or safeguarding duties.
- **Section 251 of the NHS Act 2006 / Confidentiality Advisory Group (CAG) support.** For some research, audit and planning purposes the Secretary of State, advised by the CAG, can authorise the use of confidential patient information without consent where seeking consent is not practical.
- **An overriding public interest.** In specific cases we may share information without consent where the public interest in sharing it clearly outweighs the public interest in keeping it confidential, for example to prevent or detect serious crime. This is always a case-by-case decision, made carefully and with senior clinical input.

## How We Use Your Information

We use your personal information for the following purposes:

- providing you with direct clinical care, including diagnosis, treatment and ongoing management of your health conditions
- referring you to other NHS or healthcare services
- managing your prescriptions and medications
- checking and reviewing the quality of the care we provide (clinical audit)
- responding to any concerns or complaints you raise
- supporting public health activities, including immunisation programmes and disease surveillance

- meeting our legal and regulatory obligations, including safeguarding, notifiable diseases, and court orders
- contributing to NHS planning and commissioning of services
- supporting approved research, where appropriate safeguards are in place

## Who We Share Your Information With

We share information with other organisations where this is necessary for your direct care or where we are required to do so by law. This includes, for example, NHS hospitals and community services, NHS 111 and out-of-hours providers, ambulance services, pathology and pharmacy services, NHS England and NHS Sussex Integrated Care Board, the UK Health Security Agency, and local authorities where there are safeguarding concerns.

A full list of who we share information with, what is shared, and the legal basis for each flow is set out in **Appendix A**.

## Your Right to Opt Out

**Type 1 Opt-out:** If you do not want your identifiable patient data shared outside the practice (other than for your direct care), you can register a Type 1 opt-out with us. This applies, for example, to data that would otherwise flow to NHS England for research, planning and analysis through services such as OpenSAFELY.

**National Data Opt-out:** You can also register a National Data Opt-out if you do not want NHS England to share your identifiable data for purposes beyond your individual care, such as research and planning. You can register at [nhs.uk/your-nhs-data-matters](https://nhs.uk/your-nhs-data-matters) or by calling 0300 303 5678.

These opt-outs do not apply to information that is shared for your direct care or where we have a legal obligation to share it.

## How Long We Keep Your Information

We retain your medical records in line with the NHS Records Management Code of Practice. GP medical records are generally retained for 10 years after death or after the patient has permanently left the country, unless otherwise required. Different retention periods may apply to specific types of record. We will not keep your data for longer than is necessary.

## Your Rights Under Data Protection Law

Under the UK GDPR and the Data Protection Act 2018, you have the following rights:

- the right to be informed about how your data is used (this notice)
- the right of access – you can request a copy of the information we hold about you (a Subject Access Request, see below)
- the right to rectification – you can ask us to correct any information you believe is inaccurate
- the right to erasure – in certain circumstances, you can ask for your data to be deleted (this is not an absolute right and rarely applies to clinical records)
- the right to restrict processing – you can ask us to limit how we use your data in certain circumstances
- the right to object – you can object to certain types of processing, including processing for research or planning purposes
- the right not to be subject to automated decision-making, including profiling

To exercise any of these rights, please contact the practice. We will respond within one calendar month.

## Subject Access Requests (Right of Access)

You have the right to ask for a copy of the personal information we hold about you, including your medical record. This is known as a Subject Access Request.

**How to make a request.** You can make a request **verbally or in writing**, and you do not need to give a reason. We may ask you to complete a form so that we can be sure we are giving you the right information.

**Proof of identity.** We will ask you for proof of identity before we release any information. This protects you and helps us make sure your records are not disclosed to anyone else. We will not share information about you with another person without your explicit consent or sight of an appropriate legal authority.

**Timescale.** We aim to respond within one calendar month of receiving your request and the necessary identification. Where requests are particularly complex or numerous we may extend this by up to a further two months, and we will let you know if so.

**What you will see.** You are entitled to a copy of your information based on a reasonable and proportionate search of your record. Some information may be redacted, that is, removed before the information is shared with you. The main reasons we redact are:

- where releasing the information could cause serious harm to your physical or mental health, or to the physical or mental health of another person
- where the information relates to or identifies a third party who has not consented to their information being shared, and it would not be reasonable to share it without their consent

**Fees.** A copy is provided free of charge. If you ask for additional copies of the same information, or if a request is manifestly unfounded or excessive, we may charge a reasonable fee to cover our administrative costs.

**Online access.** You can also access most of your record online through the NHS App. The NHS App has its own privacy notice, managed by NHS England.

## Freedom of Information

The Freedom of Information Act 2000 gives anyone a general right to ask for non-personal information held by public authorities. As a provider of NHS services, the practice is subject to the Act for information about how the practice is run.

You can make a Freedom of Information request in writing to the practice. We will respond within 20 working days. Some types of information are exempt from disclosure, for example information that is personal to an identifiable individual, commercially confidential, or held for the purposes of an investigation.

If the information you want is about yourself, this is dealt with as a Subject Access Request rather than a Freedom of Information request, see the section above.

## Complaints

If you have any concerns about how we are handling your information, please raise them with us first. You can contact the practice or the NHS SCW IG team at [scwcsu.sussexpigenquiries@nhs.net](mailto:scwcsu.sussexpigenquiries@nhs.net).

You also have the right to complain to the Information Commissioner's Office (ICO) if you believe your information has been handled inappropriately.

ICO contact details:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Phone: 0303 123 1113

Website: [ico.org.uk/make-a-complaint](http://ico.org.uk/make-a-complaint)

## **Changes to This Notice**

We keep this notice under regular review and will publish any updates on our website. This notice was last updated in April 2026.