



Practice
Plus
Group

Privacy notice

Practice Plus Group Hospitals

UK General Data Protection
Regulations (GDPR)



At Practice Plus Group Hospitals, we are proud to be England's **largest independent provider of NHS hospital services**, delivering healthcare services throughout the UK.

Patients who are treated by us can rest assured that we value your privacy and want you to understand the choices and control you have over your information with Practice Plus Group Hospitals.

This UK GDPR Privacy Notice explains those choices and give you that control.

Introduction

At Practice Plus Group Hospitals, we are committed to being transparent about how we use your data and keep it safe, and will continue to provide accessible information to individuals in line with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and the Data (Use and Access) Act 2025. The most common way to provide this information is in a privacy notice.

Purpose of processing personal information

The purpose of Practice Plus Group Hospitals processing your personal information/ data is so we may provide you with an effective service. As a healthcare provider, Practice Plus Group Hospitals delivers NHS services to you and must collect and use personal information about you.

We follow NHS good practice and will:

- Let you know what we are going to record about you.
- Give you a copy of letters we are writing about you; and
- Show you what we have recorded about you, if you ask.

The GDPR ensures that we comply with a series of data protection principles. These principles are there to protect you and they make sure that we:

- Process all personal information lawfully, fairly and in a transparent manner.
- Collect personal information for a specified, explicit and legitimate purpose.
- Guarantee that the personal information processed is adequate, relevant and limited to the purposes for which it was collected.
- Ensure the personal information is accurate and up to date.
- Retain your personal information for no longer than is necessary for the purpose(s) for which it was collected.
- Keep your personal information securely using appropriate technical or organisational measures.

To make sure you receive the best possible care, your records are used to assist the care you receive. Information held about you may also be used by the NHS in interests of protecting and promoting public health. Your Information may be used within Practice Plus Group Hospitals for clinical audit purposes to monitor the quality of the service provided.

The lawful basis for the process without consent

As a publically funded NHS provider working under the statutory health and social care organisations guidelines in the delivery of their functions, Practice Plus Group Hospitals use the following lawful basis for processing your data:

- Article 6 Lawful processing: 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 vested in the controller...’
- Article 9 condition for direct care or administrative purposes: 9(2)(h) ‘...medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems...’

This also includes local administrative purposes such as:

- Waiting list management
- Performance against national targets
- Activity monitoring
- Local clinical audit
- Production of datasets to submit for commissioning purposes and national collections.

We will not share information that identifies you for any reason, unless:

- You ask us to do so
- We ask and you give us specific permission
- We have to do this by law
- We have special permission because we believe that the reasons for sharing are so important that they override our obligation of confidentiality, for example, to prevent someone from being seriously harmed.

Categories of personal data we process

We process personal information relating to identified natural persons so we may deliver a thorough and efficient service for our patients.

NHS health records may be electronic, physical (paper) or a mixture of both. We use a combination of working practices and technology to guarantee that your information is kept confidential and secure. Records held by Practice Plus Group Hospitals may include the following information about you:

- Details such as your address, carer, legal representative, emergency contact details
- Any contact the Practice Plus Group Hospitals operational units have had with you, such as appointments, clinic visits, emergency appointments, telephone calls etc.
- Notes and reports about your health
- Details about your treatment and care
- Results of investigations such as laboratory tests, X-rays etc.
- Relevant information from other health professionals, relatives or those who care for you.

Information sharing

To make sure that we provide you with an efficient and effective service, we will sometimes need to share your information:

- Between teams within our organisation including our parent company based in India for administration and back-office support purposes
- With partner organisations within the NHS that support the delivery of the service you may receive
- Via the various NHS Shared Records Systems
- With organisations we have contracted to provide a direct care service to you
- Online access to your Personal health record services via our Patient Knows Best portal (PKB) should you choose to use it.

Data Sharing with our Parent Company

Following the acquisition of Practice Plus Group Hospitals by Narayana Hrudayalaya Limited India, we will share certain data belonging to our service users with our parent company located in India. This data sharing is necessary for global administrative support and management purposes, including IT support.

National Data Opt-Out

The National Data-Opt out gives patients greater control over what purposes their health data can be used. The NHS Constitution states “You have the right to request that your confidential information is not used beyond your own **direct care** and treatment and to have your objections considered”.

- **Direct care** is defined as a clinical, social or public health activity concerned with the prevention, investigation and treatment of illness and the alleviation or suffering of an individual.
- **Indirect care** is defined as work within the health and social care environment which does not involve the direct treatment or support of individuals e.g. research, commissioning and much of the work done in public health.

The opt-outs do not apply to data required to support pandemic responses.

To find out more or to register your choice to opt out, please visit www.nhs.uk/your-nhs-data-matters.

On this web page you will:

- See what is meant by confidential patient information
- Find examples of when confidential patient information is used for individual care and examples of when it is used for purposes beyond individual care
- Find out more about the benefits of sharing data
- Understand more about who uses the data
- Find out how your data is protected
- Be able to access the system to view, set or change your opt-out setting
- Find the contact telephone number if you want to know any more or to set/change your opt-out by phone
- See the situations where the opt-out will not apply

You can also find out more about how patient information is used at: www.hra.nhs.uk/information-about-patients/ (which covers health and care research); and www.understandingpatientdata.org.uk/what-you-need-know (which covers how and why patient information is used, the safeguards and how decisions are made).

You can change your mind about your choice at any time.

Who are our partner organisations?

We may have to share your personal information, subject to strict agreements on how it will be used, with the following organisations:

- NHS trusts / Foundation trusts
- GPs
- NHS Commissioning support units
- Local primary care networks
- Independent contractors such as dentists, opticians, pharmacists
- Private sector providers
- Voluntary sector providers
- Ambulance trusts
- Integrated Care Systems
- Social care services
- NHS Digital
- Local authorities
- Education services
- Fire and Rescue services
- Police and Judicial services
- Voluntary sector providers
- NHS approved private sector providers

We will only ever share your information for your direct care, and only when we are satisfied that our partners or suppliers have sufficient measures in place to protect your information in the same way that we do.

We may share data with other organisations within the health economy in the event of a pandemic / preparedness plan, in line with national guidance from NHS England and local clinical commissioning group policy.

Before sharing information we confirm that:

- Privacy Notices are completed with our partners, if appropriate.
- Technical security such as encryption and access controls are in place to keep information secure.
- Information Sharing Agreements are completed showing the rules to be adopted by the various organisations involved in the sharing exercise.
- Data Protection Impact Assessments are completed to assess any risks or potential negative effects to you.
- Common retention periods and deletion arrangements are set for the information we process and share.
- Your access rights are catered for to support you in any request for your data.

Your information will only be shared within the legal basis we have stated and we will never share your information for any other purposes other than for your direct care.

Transfers and safeguards of your personal data to other countries

International data transfers (our Indian parent company).

We are part of a global group with our parent company, Narayana Hrudayalaya Limited based in India. Our colleagues in India provide high quality administrative and IT support.

- Nature of Processing: Staff in India provide secure, remote administrative and technical support.
- Data Residency: All patient medical records remain physically stored in the UK. No data is permanently moved to or hosted in India.
- Safeguards: We have implemented the ICO's mandated approach to ensure your data is protected. This includes an International Data Transfer Agreement (IDTA) to ensure your data receives the same protection as it does in the UK. We have also conducted a Data Protection Test (Transfer Risk Assessment), we have verified security measures and will regularly assure that your data is protected.

Retention periods

We will only keep your information for as long as it is required to be retained under the statutory limits. The retention period is either dictated by law or by our discretion. Once your information is no longer needed as set out in this Privacy notice it will be securely and confidentially destroyed.

Your rights

You have guaranteed rights under the GDPR which we will uphold at all times. Your rights are:

- The right to be informed via Privacy notices such as this one.
- The right to free access to any personal information Practice Plus Group Hospitals holds about you. You are entitled to receive a copy of your personal data – free of charge – and within 1 calendar month of our receipt of your subject access request, provided you have submitted the correct proof of identity details.
- The right of rectification. If you believe your details are incorrect, we are required to correct inaccurate or incomplete data within one month.
- The right to erasure. Ordinarily under GDPR you have the right to have your personal data erased and to prevent processing, however, this right does not apply to GDPR Art 9 – special category data. The processing we conduct is necessary for the purposes of preventative or occupational medicine for medical diagnosis; and for the provision of health and social care systems. Your data is processed by and under the responsibility of healthcare professionals who are subject to a legal obligation of professional secrecy.
- The right to restrict processing. You have the right to suppress processing. We can retain just enough information about you to ensure that the restriction is respected in future.
- The right to data portability. We can provide you with your personal data in a structured, commonly used, machine readable form when you request your data.
- The right to object. You can object to your personal data being used for profiling, direct marketing or research purposes.
- You have rights in relation to automated decision making and profiling, to reduce the risk that a potentially damaging decision is taken without human intervention.

To request a copy of the personal information we hold about you, you must send your request in writing to DATA ACCESS REQUEST, addressed to the Practice Plus Group Hospitals site where you have received care or treatment.

To help us deal with your request as efficiently as possible, you will need to include:

- Your current name and address
- Proof of identity (a copy of your driving licence, passport or two different utility bills that display your name and address)
- As much detail as possible regarding your request so that we can identify any information we may hold about you, this may need to include your previous name and address, date of birth and what Practice Plus Group Hospitals services you received.

The right to lodge a complaint

Should you have any concerns about how your information is managed by Practice Plus Group, please contact the Practice Plus Group Hospitals Caldicott Guardian. Under the Data (Use and Access) Act 2025, we will acknowledge your complaint within 30 days.

Practice Plus Group, Unit H2, Harlequin Office Park, Fieldfair, Emersons Green, Bristol, BS16 7FN

If you are still unhappy following a review by our Caldicott Guardian, you can then complain to the Information Commissioners Office (ICO) via their website (www.ico.gov.uk).

Where personal data comes from

The healthcare professionals who provide you with care maintain records about your health and any treatment or care you have received previously (e.g. NHS trust, GP surgery, walk-in clinic, etc.). These records help us to provide you with the best possible healthcare.

We will not use any information about you that is available in publicly accessible sources. Any additional details we will require about you in order to carry out our duty of care, we will request directly from you.

Failure to provide personal data to Practice Plus Group

The provision of your personal data about your health and any treatment or care you have received previously is part of the UK statutory instrument:

- Health and Social Care Act 2012
- GDPR Art 9.2(h)

Failure to provide personal information and data about yourself may result in us failing to provide you the necessary healthcare services as mandated by NHS England.

If you do not wish personal data that we hold about you to be used or shared in the way that is described in this notice, please discuss the matter with us. You have the right to object, but this may affect our ability to provide you with care or advice.

The transfer of your data from NHS systems such as the Summary Care Record and NHS Choices is automated in how it is received; however, no care or treatment decisions made about you are automated in any way.

How to contact us

Practice Plus Group Hospitals Ltd is registered as a data controller with the Information Commissioner's Office registration number: **Z9601307**.

If you have any questions, comments or concerns about how we handle your personal data, then you may contact our Quality and Governance team by email to DPO@practiceplusgroup.com or write to us at:

Quality and Governance team
Practice Plus Group,
Unit H2,
Harlequin Office Park,
Fieldfair,
Emersons Green,
Bristol,
BS16 7FN

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