

# Shrewsbury Primary Care Network

## Privacy Notice

*Last updated: June 2026*

### Quick summary

We collect and use information about you so we can provide safe, effective NHS care and run our services. We only use the information we need, keep it secure, and only share it when there is a lawful reason. This may be for your direct care, to meet legal duties, to protect public health, to manage services, or for research and planning where the law allows. You have rights over your information, including the right to ask for a copy, ask us to correct inaccurate information, and raise concerns. This notice explains what we do with your information and how to contact us.

### 1. Who we are and who is responsible for your information

Shrewsbury Primary Care Network (PCN) is a group of 11 GP practices working together to deliver NHS services across Shrewsbury and the surrounding area. A Primary Care Network is not the same as a single GP practice. Member practices keep their own legal responsibilities for the records they hold in their GP systems.

For most information held in your GP record, your registered GP practice is the Data Controller. This means your practice decides how and why that information is used.

When Shrewsbury PCN delivers services directly, such as clinics, care coordination, pharmacy, paramedic, social prescribing, mental health, enhanced access or other network services, Shrewsbury PCN acts as a Data Controller for the information used to provide and manage those services.

In some cases, Shrewsbury PCN and one or more member practices may act as joint controllers where services are designed or delivered together. Where this applies, we have agreements in place that set out our responsibilities, including how we protect your information and how we respond to your rights.

### 2. Why we collect and use your information

Health and care professionals are required by law to keep records of the care and treatment they provide. These records help us to:

- provide safe and effective care and treatment
- arrange appointments, tests, prescriptions and referrals
- coordinate care with other health, social care and community services
- contact you about your care, including appointment reminders and essential service messages
- manage, monitor, improve and audit the quality and safety of our services
- investigate incidents, complaints and compliments

- meet legal and regulatory duties, including safeguarding and public health reporting
- support approved research, service planning and population health work where the law allows

### **3. How to contact us and our Data Protection Officer**

**Shrewsbury PCN contact for this notice:** [stw.shrewsburyhealthhub@nhs.net](mailto:stw.shrewsburyhealthhub@nhs.net)

Shrewsbury Health Hub reception at Severn Fields Medical Practice, Sundorne Road, SY1 4RQ

You can also contact your registered GP practice, especially if your query relates to your GP record held by that practice.

**Data Protection Officer (DPO):** Midlands and Lancashire Commissioning Support Unit (MLCSU), email: [mlcsu.ig@nhs.net](mailto:mlcsu.ig@nhs.net)

### **4. The information we collect**

The personal information we collect will depend on the service you use. It may include:

- your name, date of birth, address, telephone number, email address and NHS number
- details about your appointments, contacts with services, referrals and care received
- details about your health, diagnoses, medicines, allergies, treatment, care plans and outcomes
- results from tests, scans and investigations
- information about family members, carers, next of kin or emergency contacts where relevant
- information about your sex life or sexual orientation where this is relevant to your care
- genetic or biometric information where clinically required
- call recordings, CCTV footage or digital message content where these are used for service delivery, safety or quality purposes

### **5. Where your information comes from**

We obtain information about you:

- directly from you, your parent, guardian, carer or representative
- from your registered GP practice and other member practices where relevant to a PCN service
- from hospitals, community services, mental health services, social care providers, care homes and other professionals involved in your care
- from laboratories, imaging providers and other diagnostic services
- from systems that support NHS appointments, prescribing, communications and referrals

### **6. How we use your information**

We use your information to:

- assess your needs and provide direct care and treatment

- support staff working across the PCN, such as pharmacists, paramedics, care coordinators, social prescribers and mental health practitioners, where they need access to provide your care
- coordinate care across practices and partner services involved in your treatment or support
- deliver PCN clinics and services, including enhanced access and care home support where relevant
- audit clinical records and care processes as part of the management of healthcare services and quality improvement
- carry out safeguarding activity and protect children and adults at risk
- meet legal reporting duties, including public health notifications
- review incidents, complaints and compliments
- plan and improve services, using anonymised or pseudonymised data wherever possible
- support research where you have given consent or where another legal approval applies

## 7. Our legal basis for using your information

Under UK GDPR, the main legal basis we use for providing health and care services is Article 6(1)(e) – public task, and Article 9(2)(h) – health or social care. This covers direct care, care coordination and the management of health and care services.

In some situations, we may also rely on Article 6(1)(c) – legal obligation, for example where we must share information for safeguarding or public health purposes. Where the law requires this, we may also rely on an additional condition under Article 9, such as Article 9(2)(i) for public health or Article 9(2)(j) for research, subject to safeguards.

We also follow the Common Law Duty of Confidentiality. For direct care, this usually means information is shared on the basis of implied consent between professionals involved in your care. For other uses, we will rely on a different lawful basis, specific consent, anonymisation, or another legal approval where this is required.

<b>Purpose</b>	<b>Personal data lawful basis</b>	<b>Special category condition</b>
Direct care and treatment	Article 6(1)(e)	Article 9(2)(h)
Care coordination and referrals	Article 6(1)(e)	Article 9(2)(h)
Service management, clinical audit and quality improvement	Article 6(1)(e)	Article 9(2)(h)
Safeguarding and statutory reporting	Article 6(1)(c) and/or 6(1)(e)	Article 9(2)(h) and/or 9(2)(i)
Research with consent	Article 6(1)(a)	Article 9(2)(a)
Research or planning under	Article 6(1)(e)	Article 9(2)(j) where

another legal approval		applicable
------------------------	--	------------

## 8. Clinical audit and service review

We may review records as part of clinical audit, service evaluation, staff supervision, incident review and quality improvement. This is part of the management of healthcare services. We only allow access on a need-to-know basis, and anyone involved must be subject to confidentiality obligations.

## 9. Who we share your information with

We only share the minimum information necessary, and only where there is a lawful reason. Depending on the service you use, we may share information with:

- GP practices within Shrewsbury PCN, where this is needed to provide or coordinate your care
- hospitals, community trusts, mental health services, ambulance services and NHS 111 for direct care
- local authorities, social care teams, safeguarding services and care homes where relevant to your care or safety
- diagnostic services, pharmacies and specialist services involved in your treatment
- NHS England, the local Integrated Care Board and other public bodies where the law requires or permits this
- system suppliers and support providers acting under contract as our data processors

When we use suppliers to host or support systems, they must act under a written contract, follow our instructions, and meet UK GDPR and NHS data security requirements.

Where information is used for planning, service improvement or population health work, we will use anonymised or pseudonymised data wherever possible. If identifiable data is needed, we will only use or share it where there is a lawful basis and appropriate safeguards.

## 10. National systems and services that may use or receive your information

### Summary Care Record (SCR)

Most patients registered with a GP in England have a Summary Care Record unless they have chosen not to have one. This includes basic information such as your current medicines, allergies and previous reactions to medicines. Additional information may also be available where this is enabled. Authorised health and care staff can access this for direct care.

More information: [Summary Care Record supplementary transparency notice](#)

You can speak to your GP practice if you want to discuss your Summary Care Record choices.

### **GP Connect**

We use GP Connect to support direct care. GP Connect allows authorised health and care professionals using approved systems and role-based access controls to view relevant GP record information when they need it to provide your care. It must not be used for research or other non-direct-care purposes.

More information: [GP Connect privacy notice](#)

If you want to object to your GP record being shared using GP Connect, please contact your GP practice.

### **National screening, audits and NHS reporting**

Some NHS services, such as national screening programmes and national clinical audits, require information from health and care organisations so that people can be invited for screening, national standards can be monitored, and services can be improved. We will only share what is required and where the law allows or requires it.

## **11. Public health and legal reporting duties**

The law sometimes requires us to share information to protect public health. For example, registered medical practitioners must report certain notifiable diseases to the UK Health Security Agency (UKHSA). We may also share information where necessary to prevent or control the spread of infection or where another statutory duty applies.

More information: [Notifiable diseases and how to report them \(UKHSA\)](#)

## **12. Risk stratification and population health management**

Risk stratification, sometimes called population health management or health risk screening, helps NHS organisations understand which groups of patients may need more support. This can help us plan services and identify patients who may benefit from proactive care.

Where possible, this uses anonymised or pseudonymised data. In some cases, data may be shared with the local Integrated Care Board or approved NHS partners for these purposes. If you have concerns about this, please contact us or your GP practice. Any objection will be considered, although we may still need to use information where the law permits or where this is necessary for your direct care.

## **13. Research and planning – your choices**

Information may sometimes be used for research and planning to improve health and care services. Wherever possible, this will use anonymised or pseudonymised data.

We will only share identifiable information for research if:

- you have given explicit consent
- another legal approval allows this, with appropriate safeguards in place
- or the information is lawfully anonymised so that you are not identified

You can choose whether your confidential patient information is used for research and planning through the National Data Opt-Out. This does not affect your care and treatment. The National Data Opt-Out does not apply to direct care uses, such as appointments, referrals, Summary Care Record or GP Connect.

More information: [National Data Opt-Out](#)

If you want to discuss a Type 1 Opt-out relating to GP practice data sharing for research and planning, please speak to your GP practice.

## **14. Systems we use to communicate or process your information**

We use a range of approved systems to deliver services safely and efficiently. These may include:

AccuRx (SMS messaging)

- used to send appointment reminders, self-book links and health questionnaires
- uses your contact details and relevant message content
- you can opt out of SMS at any time by informing your practice

MJOG (SMS messaging)

- used to send appointment reminders and health questionnaires
- uses your contact details and relevant message content
- you can opt out of SMS at any time by informing your practice

BT Cloud Work (telephony and call recording)

- call recordings may be used to support the learning and development of our staff and to improve the service we provide to our patients.
- they may also be used when reviewing incidents, compliments or complaints.
- recordings are kept securely and only accessed by authorised staff
- Call recordings will be managed in the same way as all other personal information processed by us and in line with current data protection legislation.

CCTV footage

- Close Circuit Television (CCTV) may be in operation in the public areas of some of the locations from which we run clinics for the safety and security of our patients and staff.
- CCTV footage is managed in line with current legislation.

Anima (electronic document and workflow processing)

- clinical documents may be received, triaged and processed electronically

- access is role-based and audited

These suppliers act as data processors where they process information on our behalf. They must follow written contracts, role-based access controls, confidentiality requirements and NHS data security standards.

## **15. International transfers**

We do not routinely transfer personal data outside the United Kingdom. If this ever becomes necessary, we will make sure appropriate safeguards are in place as required by data protection law.

## **16. Automated decision-making and profiling**

We do not make decisions about your care solely by automated means where those decisions have legal or similarly significant effects on you.

## **17. How we keep your information secure**

We take steps to keep your information safe. These include:

- secure NHS and approved supplier systems
- role-based access controls so staff only see information they need
- audit trails and monitoring of access to records
- staff training in confidentiality, data protection and cyber security
- contracts and security checks for suppliers who process data on our behalf

## **18. How long we keep your information**

We keep records in line with the NHS Records Management Code of Practice for Health and Social Care. Different records have different minimum retention periods.

By way of example, GP patient records are usually retained for 10 years after death. Some records may need to be kept for longer where there is a legal, clinical or operational reason. We will securely dispose of records when they are no longer required.

## **19. Your rights**

You have rights under data protection law. These include the right to:

- be informed about how your information is used
- ask for a copy of the information we hold about you
- ask us to correct inaccurate or incomplete information
- ask us to restrict how your information is used in some circumstances
- object to processing in some circumstances
- ask about data portability in limited situations
- withdraw consent where we rely on consent
- complain if you are unhappy with how your information has been used

The right to erasure does not usually apply to health records that must be kept to provide care or meet legal obligations.

Where a child or young person is able to understand and make their own decisions about their information, we will respect their rights and confidentiality in line with the law.

## **20. How to raise a concern or complain**

If you have concerns about how your information has been used, please contact Shrewsbury PCN using the contact details above, or contact your GP practice if your concern relates to a record they hold. You can also contact our DPO.

If you are still unhappy, you have the right to complain to the Information Commissioner's Office (ICO).

**ICO website:** [www.ico.org.uk](http://www.ico.org.uk) | Telephone: 0303 123 1113

## **21. Changes to this notice**

We keep this notice under review and may update it from time to time. The latest version will be published on our website. If we make significant changes, we will take reasonable steps to bring them to your attention.

### **Useful links**

- [Summary Care Record supplementary transparency notice](#)
- [GP Connect privacy notice](#)
- [National Data Opt-Out](#)
- [Notifiable diseases and how to report them \(UKHSA\)](#)
- [NHS Records Management Code of Practice](#)