

GP websites: A report on COVID-19 data sharing privacy notice

As a result of the COVID-19 pandemic, COVID-19 specific data sharing for GP practices across South East London is being established.

As a result of the COVID-19 pandemic, Our Healthier South East London Integrated Care System (OHSEL ICS) are establishing COVID-19 specific data sharing for GP practices across South East London which would allow the processing of Confidential Patient Information (CPI), to ensure that healthcare professionals work together more effectively, make better use of the information they hold, and better support the COVID-19 situation and response.

To ensure service users are aware of how their personal data is being shared, the OHSEL privacy notice link should be displayed on GP practice websites. This is the link you should see on your GP's website: <https://www.ourhealthiersel.nhs.uk/privacy-notice.htm>

In November 2020, we carried out an audit to check how many of the 33 GP practices in Greenwich had this privacy notice displayed on their website. We wanted to find out if:

- The OHSEL privacy notice is displayed on the website
- If there was any other privacy notice/data sharing policy on the website
- How easy it is to find the above

Our audit found that very few practices in Greenwich have provided a link to the OHSEL privacy notice.

As stated by the [Information Commissioner's Office](#) service users have the right to be informed about the collection and use of their personal data. In accordance with the General Data Protection Regulation (GDPR), transparency is a key requirement. Privacy notices facilitate organisations to comply with other aspects of the GDPR and build trust with service users.

On the 25th November 2020, we shared the findings of our audit with the South East London Clinical Commissioning Group (Greenwich). We are yet to receive a response.

Below you can see a table of all the 33 GP practices in Greenwich and which privacy notice we could find at their sites as of Thursday 10 December 2020.

PCN	GP	Do they have the OHSEL privacy notice? Y/N	If N, do they have a privacy notice at all?	Is it easy to find on site?	Notes
BLACKHEATH AND CHARLTON	MANOR BROOK PMS	No	Yes	Yes	Privacy statement at the bottom of page
BLACKHEATH AND CHARLTON	BLACKHEATH STANDARD PMS	No	Yes	Yes	Privacy statement at the bottom of page
BLACKHEATH AND CHARLTON	VANBRUGH GROUP PRACTICE	No	Yes	Yes	Tab for other information and under is GDPR, Confidentiality and your data,

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					and information sharing
BLACKHEATH AND CHARLTON	FAIRFIELD PMS	No	Yes	Yes	Tab for patient information and under is GDPR, patients rights and responsibilities. Information sharing under news tab.
ELTHAM	COLDHARBOUR HILL	No	Yes	Yes	Privacy statement at the bottom of page
ELTHAM	ELTHAM PALACE PMS	No	Yes	Yes	Privacy statement at the bottom of page
ELTHAM	SHERARD ROAD MEDICAL CENTRE	No	Yes	Yes	Bottom of page
ELTHAM	NEW ELTHAM MEDICAL	No	Yes	Yes	Privacy statement at the bottom of page
ELTHAM	PRIMECARE PMS (ELMSTEAD)	N/A	N/A	n/a	Bottom of page. Primecare PMS don't have their own website, could only find information on NHS website overview.
ELTHAM	ELTHAM MEDICAL PRACTICE	No	Yes	Yes	Bottom of page
GREENWICH WEST	PRIMECARE PMS (SOUTH STREET)	No	No	n/a	Accessible Information Standard Policy
GREENWICH WEST	BURNEY STREET PMS	No	Yes	Yes	Bottom of page
GREENWICH WEST	PLUMBRIDGE MEDICAL CENTRE	No	Yes	Yes	Bottom of page

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GREENWICH WEST	WOODLANDS SURGERY	No	Yes	Yes	Bottom of page
GREENWICH WEST	GREENWICH PENINSULA	No	Yes	Yes	Tab for Our Policies
HERITAGE	TRIVENI PMS	Yes		Yes	Under View Practice News
HERITAGE	ABBEY WOOD SURGERY	No	Yes	Yes	Under Patient Information
HERITAGE	BASILDON ROAD SURGERY	No	Yes	Yes	Bottom of page
HERITAGE	WAVERLEY PMS	Yes		Yes	
HERITAGE	BANNOCKBURN SURGERY	No	Yes	Yes	Under General Information
RIVERVIEW	THAMESMEAD MED ASSOCIATES (GALLIONS REACH)	No	Yes	Yes	Bottom of page
RIVERVIEW	ROYAL ARSENAL MEDICAL CENTRE	No	Yes	Yes	Bottom of page
RIVERVIEW	ST MARKS PMS	No	Yes	Yes	Bottom of page
RIVERVIEW	CONWAY PMS	No	Yes	Yes	Bottom of page
RIVERVIEW	THE TRINITY MEDICAL CENTRE	No	Yes	Yes	Bottom of page
RIVERVIEW	AT MEDICS	No	Yes	Yes	Bottom of page
RIVEVIEW	VALENTINE HEALTH PARTNERSHIP (Ferryview)	No	Yes	Yes	Bottom of page
UNITY	PLUMSTEAD HEALTH CENTRE PMS	No	Yes	Yes	Bottom of page
UNITY	ALL SAINTS MEDICAL CENTRE PMS	No	Yes	Yes	Bottom of page