

Privacy Notice – Surgery Connect (X-On)

As part of the Modern General Practice programme of work, GP Practices are required to adopt a cloud-based telephony system, that has;

- Clinical System Integration,
- Remote Access,
- Call Reporting,
- Call Recording and
- Video Consultation capabilities.

The aim of the Surgery Connect platform is to improve communications between healthcare staff and patients resulting in improved outcomes and productivity. The platform facilitates Audio and Video communications between the practice and our patients.

Using the Surgery Connect platform will require the processing of special category data by Accurx, their sub-processors and by default the GP Practice as a Controller. This will include Audio (and Video where applicable).

All Audio calls, both incoming and outgoing will be recorded. Video will not be recorded without patient consent. There is optional recording of video sessions, or audio part only. Patient can both opt out of, and suspend Video recording.

Surgery Connect is approved by NHS England to be used by GP practices and the other systems involved in patient care. NHS England has a lengthy assurance process to make sure they meet the highest standards of safety and security.

Surgery Connects privacy notice can be found on their website here:

[Privacy Notice | Surgery Connect Help Centre \(x-onweb.com\)](#)

Surgery Connects privacy policy can be found on their website here:

[Privacy Policy | Surgery Connect Help Centre \(x-onweb.com\)](#)

1) Controller contact details	Sidcup Medical Centre Main Surgery - 2 Church Avenue Sidcup Kent DA14 6BU Branch Surgery - 231 Burnt Oak Lane Sidcup Kent DA15 9BQ Branch Surgery - 63 Thanet Road Bexley Kent DA5 1AP Branch Surgery - 19 Crook Log Bexleyheath Kent DA6 8DZ Branch Surgery - 69 Station Road Sidcup Kent DA15 7DS
2) Data Protection Officer contact details	John Eni-Uwubame GP Data Protection Officer gpdpo@selondonics.nhs.uk
3) Purpose of the processing	The aim of the Surgery Connect platform is to improve communications between healthcare staff and patients resulting in improved outcomes and productivity. The platform facilitates Audio and/or Video communications between the practice and our patients.
4) Lawful basis for processing	Under UK GDPR and DPA 2018 – 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’

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	9(2)(h) ‘...medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems...
5) Recipient or categories of recipients of the shared data	Data may be shared with X-on, and their sub-processors such as cloud services used for X-on’s own storage, communications, security, engineering, and similar purposes.
6) Rights to object	You have the right under Article 21 of the UK GDPR to object to your personal information being processed. Please contact the Practice if you wish to object to the processing of your data. You should be aware that this is a right to raise an objection which is not the same as having an absolute right to have your wishes granted in every circumstance.
7) Right to access and correct	You have the right to access copies of the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law.
8) Retention period	<p>The data will be retained for active use during the processing and thereafter according to NHS Policies and the law.</p> <p>Data will be retained on Surgery Connect for 36 months before deletion.</p> <p>Audio and/or Video Recordings attached to a patient’s medical records will be subject to Records Management code of Practice for Health and Social Care and associated retention schedules.</p>
9) Right to Complain.	<p>You have the right to complain to us about the way your data is handled or processed. To so, please contact the Practice using the following details:</p> <p>Louise Wright Sidcup Medical Centre 231 Burnt Oak Lane, Sidcup, Kent DA15 9BQ sidcupmedical@nhs.net</p> <p>If you remain unsatisfied with our response, you have the right to complain to the Information Commissioner’s Office, you can use this link https://ico.org.uk/make-a-complaint/data-protection-complaints/</p>

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	or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)
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	There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)/
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