



The Sexual Health Hub - Patient Privacy Notice

We value your trust and are committed to protecting the privacy of your personal information.

This privacy notice explains:

- Who we are.
- Why we collect information about you.
- How your information will be used.
- How we keep it safe and confidential.
- Your rights.

Please take the time to review this notice carefully to understand how your information is managed.

If you would like this information in an alternative format – such as large print, easy read, or an alternative language, please let us know using the contact details below.

1. Key Definitions:

UK Data Protection Laws:

- UK General Data Protection Regulation (UK GDPR).
- Data Protection Act 2018 (DPA 18).

Personal data: Any information relating to an identifiable individual. This might include your name, NHS number, contact details. It can also be location data or an online identifier.

Special categories of personal data are defined as: Racial or ethnic origin, politics, religious or philosophical beliefs, trade union membership, genetics, and biometrics (where used for identification) information concerning your health, sex life or sexual orientation.

Data Controller: An entity or individual that determines how and why personal data is processed.

Data Processor: A entity or individual that processes personal data on the behalf of the data controller.

2. Who are we?

Leicestershire and Rutland Integrated Sexual Health services are provided by HCRG Care Ltd. We are the data controller for any personal information we hold about you.

HCRG Care Ltd is a limited company registered in England and Wales, registered number 5466033. Registered office: The Heath Business and Technical Park, Runcorn, Cheshire, WA7 4QX. Part of the HCRG Care Group of companies.

Please see our website for further information about the services we provide.

HCRG Care Group is partnering with SH:24, Community Interest Company (SH:24 CIC, company number: 08737119); SH:24 are commissioned to provide postal STI testing kits, emergency hormonal contraception and supplementary services.



Details on how SH:24 deliver this service and handle, process and store patient data can be found at sh24.org.uk/privacy-policy

3. Who can you contact regarding your personal information we hold?

General Manager

Kerrie Beasley

West Orchard Shopping Centre

Smithford Way

Coventry

CV1 1QX

Tel: 0300 247 0069

Data Protection Officer

Deborah Tonkin

The Heath Business Park

Runcorn

Cheshire

WA7 4QX

via email: Ask.IG@hcrqcaregroup.com

If you are not happy about the way your information is handled, you have the right to lodge a complaint with a supervisory authority. In the UK, this is the Information Commissioners Office (ICO).

The Information Commissioner's Office

Wycliffe House

Cheshire

SK9 5AF

Helpline: 0303 123 1113 (local rate)

Email: casework@ico.org.uk

Website: www.ico.org.uk

4. What Information do we collect about you?

We will collect 'personal data' about you such as your name, date of birth, address and contact details. We may also ask you for more sensitive data, called 'special category data', such as your ethnicity and information about your health.

Health care professionals are required by law to maintain records about your health. Your health record may include:

- Your contact details.
- Information about the treatment or care you have received.
- Supporting information such as test results, letters, or reports.
- Relevant information from other health professionals, relatives or those who care for you.

These records help to provide you with the best possible healthcare.

5. What Is our legal basis for processing your Information?

In order for HCRG Care Group to legally process your information a 'lawful basis' needs to be identified. Our legal basis for processing your personal information falls under one of the following legal bases:

- It is necessary for the performance of a task carried out in the public interest or in the exercise of official authority.
- It is necessary for a legal obligation or such as responding to a request from a coroner.
- We have your explicit consent (where none of the above bases apply).

Our legal basis for processing special category data falls under one of the following legal bases:

- The provision of health or social care.
- Social protection law for safeguarding purposes.
- Where it is necessary to protect your vital interests - when you are physically or legally incapable of providing consent.
- It is necessary for reason of public interest in area of public health.
- For archiving purposes in the public interest.
- We have your explicit consent (where none of the above bases apply).

6. How do we use your Information?

The information we hold about you is used to:

- Provide information to make health decisions made by care professional with and for you.
- To register you on our clinical system and book an appointment.
- You will also have the option to add your appointment directly in to your mobile calendar at the end of the online booking process.
- To post home sampling kits with your consent.
- Make sure your care is safe and effective.
- To issue treatments or supply contraception.

Without your permission we will not:

- Inform your GP or healthcare professional about the fact that you had the test or your results*.
- Refer you to other specialist services.
- Share your information.

* The only time we may need to discuss your results with a GP or healthcare professional is if we are unable to contact you by your chosen method of communication and your test is positive. This is to help protect your health.

We may also use, or share, your information for the following purposes:

- Looking after the health of the general public.
- Making sure that our services can meet patient needs in the future.
- Preparing statistics on NHS performance and activity.

- Investigating concerns, complaints or legal claims.
- Helping colleagues review the care they provide to make sure it is of the highest standards.
- Training and educating staff.
- For research purposes (we will always ask your consent for this).

The Friends and Family Test (FFT):

NHS organisations including HCRG Care Group are required to use the Friends & Family Test (FFT) to capture feedback and submit response data to NHS England each month.

Patients can access the data which will then help them make informed choices about their future care. We collect feedback from a number of different channels, including SMS text messaging, online – via our HCRG Care Group website and paper questionnaires/feedback forms.

Invoice Validation:

Invoice validation enables us to identify which ICB is responsible for paying for your treatment.

Section 251 of the NHS Act 2006 provides a statutory legal basis to process data for invoice validation purposes and uses your NHS number to validate payment. We can also use your NHS number to check whether your care has been funded through specialist commissioning, which NHS England will pay for. The process makes sure that the organisations providing your care are paid correctly.

For further information please see: [NHS Digital - how we use your information for invoice validation](#)

CCTV:

We have installed CCTV systems in our premises for the purposes of public and staff safety and crime and prevention and detection. In all locations, signs are displayed notifying you that CCTV is in operation and providing details of who to contact for further information.

Images captured by CCTV will be deleted 30 days after the CCTV footage was taken. However, on occasions there may need to be a need to keep images for longer, for example where a crime is being investigated.

You have the right to see CCTV images of yourself and be provided with a copy of the images. We will only disclose images to authorised bodies such as the police, who intend to use it for the purposes stated above. Please see Section 8 for details of how to request a copy of your information.

Call Recordings:

We may record telephone calls you make to our service for training and monitoring purposes. If this is the case, you will be informed via an automated message. The recording would include any personal information you provide to us during your call, such as your name and date of birth, as well as any information relating to your care.

Any recordings made are automatically deleted after one year. Please see Section 8 for details of how to request a copy of your information.

7. Who do we share your Information with?

We may share your information for the purpose of providing you with care, or another lawful reason, with our partners and other recipients. We work in partnership with our commissioners and other health and care providers. These may include:

- NHS Trusts/Foundations
- GP's
- Integrated Care Boards (NHS)
- NHS England (NHSE) and NHS Digital (NHSD)
- Local Authorities
- Police and Judicial Services
- HCRG Care Group Support teams
- TDL (The Doctors Laboratory)
- British Pregnancy Advisory Service (BPAS)
- SH:24 for online STI testing and emergency hormonal contraception
- Pharmacies
- TPP – System 1
- Midlands Partnership NHS Foundation Trust
- Chat Health – SMS messaging application
- Accurx – Video consultation platform
- Trusted providers that host our IT, archiving, email and texting services and surveys.
- Translation and interpretation services.
- HCRG Care Group corporate teams who provide our 'back office' support – such as IT.
- Trade Sexual Health
- BHA for equality

8. Where is your data stored and how long we keep it for?

Your information is stored in secure locations and only accessible on a need-to-know basis. These include:

- Electronic Health Records (EHR's) on our clinical systems.
- Secure Clinical Areas.
- Internal encrypted servers.
- Approved storage companies.

We will keep your healthcare records in accordance with the [NHS Records Management Code of Practice for Health and Social Care](#).

Please note that due to a legal hold on the destruction of records by NHS England, we are currently not destroying records that have reached their retention period. This is to support ongoing statutory public inquiries including:

- UK Covid 19 Inquiry
- Infected Blood Public Inquiry
- Historic Child Sexual Abuse Inquiry

9. How can I access a copy of my Information?

UK data protection laws provide you with the following rights:

The right to be informed	As a data controller, we are obliged to provide understandable and transparent information about the way we process your data (this is provided by our privacy policy)
The right of access	You are entitled to request a copy of the personal data we hold about you.
The right to rectification	You are entitled to request changes to information if it is inaccurate or incomplete.
The right to erasure	Where no overriding legal basis or legitimate reason continues to exist for processing personal data, you may request that we delete the personal data.
The right to restrict processing	Under certain circumstances, you may ask us to stop processing your personal data. We will still hold the data but will not process it any further.
The right to data portability	Subject to certain conditions, you may request a copy of your personal data to be transferred to another organisation.
The right to object to processing	<p>You have the right to object to our processing of your data where:</p> <ul style="list-style-type: none"> ▪ Processing is based on legitimate interest. ▪ Processing involves automated decision-making and profiling. ▪ Processing would be for a purpose beyond your care and treatment, e.g., direct marketing and scientific or historic research. <p>You can opt-out to the sharing of this information under the National Data Opt-Out. Further information can be found on the following website: https://digital.nhs.uk/national-data-opt-out</p>

Please note that the above rights may not apply in all circumstances, but we will respond within a month of any requests. If you have any questions or concerns about the information we hold on you, please contact our Data Protection Officer.

How to request a copy of your information:

Please email the Access to Records Team accesstorecordsteam@hcrpgcaregroup.com or write to us at The Heath Business Park, Runcorn, Cheshire, WA7 4QX.

Keep us updated of any changes:



Please let us know if you change your address or contact details etc. so that we can keep your information accurate and up to date.

10. Contract end provisions

In the event of the contract with the service and HCRG Care Group coming to an end, all relevant documentation and records will be transferred to the new provider (s).

The transfer of records will be conducted in accordance with the current UK Data Protection Law.

11. Changes to our privacy notice

We will update this privacy notice from time to time to reflect any changes to our ways of working.

Date privacy notice last updated: March 2025.