

Transparency Notice: GP Connect

Overview

Head First (Assessment, Rehabilitation and Case Management) Limited is committed to protecting your personal data while providing you with high-quality care. At Head First, we use **Nourish**, a secure digital care management platform, to access GP Connect. This enables our authorised staff to view key GP health record information where appropriate, to support **direct care** for individuals using our service.

GP Connect helps ensure that care staff involved in your support have timely access to relevant health information - such as current medications or allergies - where this is necessary to provide safe and effective care. This is particularly helpful when care is delivered away from your GP practice and where traditional communication routes (e.g. telephone, email) are less secure or efficient.

How we use GP Connect

We only access information through GP Connect to support direct care. Our staff do not use the service for administrative, research, or indirect care purposes. Access is role-based and controlled, and audit trails are kept for transparency and security.

Information accessed through GP Connect via Nourish:

- Is only viewed by staff directly involved in providing your care
- Is subject to strict role-based access controls and information governance
- Remains confidential and is not stored outside the GP systems

We do **not** create or hold a copy of your full GP record.

Legal Basis for Accessing Your Information

We access GP Connect as part of our duty to provide direct health or social care. The lawful bases under the UK GDPR are:

- Article 6(1)(e) Public task: processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority.
- Article 9(2)(h) Special category data: processing is necessary for the provision
 of health or social care or the management of health or social care systems and
 services.

We will also recognise your rights established under UK case law collectively known as the "Common Law Duty of Confidentiality".

Your Rights

If your GP record is accessed using GP Connect, you have the following rights under UK GDPR:

- **To be informed** This transparency notice and our main <u>privacy notice</u> explain how your data is used.
- **To access** You can request a copy of the information accessed.
- To object You can opt out of GP Connect by contacting your GP directly.
- **To rectification** If the information in your GP record is incorrect, contact your GP to correct it.
- **To restrict processing** You can ask that information not be processed while any concerns are being reviewed.

Please note that the **National Data Opt-out** does **not** apply to GP Connect, as it only covers data used for research or planning, not direct care.

Confidentiality and Security

All Head First staff accessing GP Connect via Nourish:

- Are trained in data protection and confidentiality
- Agree to professional codes of conduct and system-specific conditions of access
- Access information only where necessary for the delivery of direct care

Any information received or accessed about a service user for direct care purposes must remain confidential.

The GP Connect system and the Nourish platform have been assured by NHS England, and all access is auditable both within our organisation and by your GP.

Consumer and Provider Roles

- Providers are your GP practices who make the GP record available.
- **Consumers** are organisations like Head First who access the record through approved systems like Nourish, for direct care purposes only.

Opting Out

If you do **not** wish for your GP record to be accessed via GP Connect, you must inform your **GP practice**, who will record your preference.