

Data Protection Privacy Notice for Patients

1. Introduction.

This Privacy Notice lets you know what happens to any personal data that you give to us, or any that we may collect from or about you.

This Privacy Notice applies to personal information processed by or on behalf of the general practice “GP”), Abington Park Surgery, Christchurch Medical Centre, Ardington Road, Northampton, NN1 5LT its website www.abingtonparksurgery.com and any access via mobile applications. If you are happy for your personal data to be extracted and used for the purposes described in this Privacy Notice, then you do not need to do anything. If you have any concerns about how your data is shared, then please contact the GP practice manager or the Data Protection Officer.

This Notice explains:

- who we are, how we use your information and our Data Protection Officer
- what kinds of personal information about you we process
- the legal grounds for our processing of your personal information (including when we share it with others)
- what you should do if your personal information changes
- how long your information is retained by us
- your rights under data protection laws

For the purpose of applicable data protection legislation (including the UK GDPR) and the Data Protection Act 2018 the practice is responsible for your personal data.

The General Data Protection Regulation (the “EU GDPR”) and the Data Protection Act 2018 (the “DPA18”) became law on 25th May 2018. The GDPR is a single EU-wide regulation on the protection of confidential and sensitive information and the DPA18 implements the regulations into comprehensive UK legislation. Following the decision for the UK to leave the European Union and following the end of the transition period, from January 1st, 2021 the UK has implemented the UK GDPR and been subject to an adequacy agreement which will allow data to continue to be shared with European Union Countries without further safeguarding being necessary. This is to allow the European Commission suitable time to grant the UK with adequacy status, meaning they have met the required standards in ensuring data transfers to and from the UK are safe. All references to GDPR in this policy will now be referred to as UK GDPR.

This Notice describes how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations to you. Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights.

2. How we use your information and the law.

We collect basic personal data about you which does not include any special types of information or location-based information. This does however include name, address, contact details such as email and mobile number etc. We will also collect sensitive confidential data known as “special category personal data”, in the form of health information, religious belief (if required in a healthcare setting) ethnicity, and sex during the services we provide to you and or linked to your healthcare through other health providers or third parties.

3. Why we need your information.

The health care professionals who provide you with care maintain records about your health and any treatment or care you have received previously. NHS health records may be electronic, on paper or a mixture of both, and we use a combination of working practices and technology to ensure that your information is kept confidential and secure.

Records about you may include the following information;

- details about you, such as your address, carer, legal representative, emergency contact details.
- any contact the surgery has had with you, such as appointments, clinic visits, emergency appointments etc.
- notes and reports about your health
- details about your treatment and care
- results of investigations such as laboratory tests, x-rays etc
- relevant information from other health professionals, relatives or those who care for you
- contact details (including email address, mobile telephone number and home telephone number)

To ensure you receive the best possible care, your records are used to facilitate the care you receive, including contacting you. Information held about you may be used to help protect the health of the public and to help us manage the NHS. Information may be used within the GP surgery for clinical audit to monitor the quality of the service provided.

4. How we lawfully use your data.

We need to know your personal, sensitive and confidential personal data in order to provide you with Healthcare services as a GP surgery. Under the UK GDPR we will be lawfully using your information in accordance with: -

- Article 6,(1) (e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
- Article 6,(1) (a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes.

- Article 6, (1) (c) processing is necessary for compliance with a legal obligation to which the controller is subject.
- Article 9, (2) (h) processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems.
- Article 9, (2) (h) processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.

This privacy notice applies to the personal data of our patients and the personal data you have given us about your carers/family members.

5. Risk Stratification.

Risk stratification data tools are increasingly being used in the NHS to help determine a person's risk of suffering a condition, preventing an unplanned or (re)admission and identifying a need for preventative intervention. Information about you is collected from a number of sources including NHS Trusts and from this GP surgery. A risk score is then arrived at through an analysis of your de-identified information is only provided back to your GP surgery as data controller in an identifiable form. Risk stratification enables your GP surgery to focus on preventing ill health and not just the treatment of sickness. If necessary, your GP surgery may be able to offer you additional services.

Our data processor for Risk Stratification is: Northamptonshire CCG.

Individual Risk Management at a GP surgery level however is deemed to be part of your individual healthcare and is covered by our legal powers above.

6. Medicines Management.

The GP surgery may conduct Medicines Management Reviews of medications prescribed to its patients.

This service performs a review of prescribed medications to ensure patients receive the most appropriate, up to date and cost-effective treatments.

The reviews may be carried out by the Clinical Commissioning Group's Medicines Management Team under a Data Processing contract with the Practice.

7. Patient Communication.

The GP surgery will use like to use your name, contact details and email address to inform you of NHS services, or provide inform about your health/information to manage your healthcare or information about the management of the NHS service. There may be occasions where authorised research facilities would like you to take part in research in regards to your particular health issues to improve your health. Your contact details may be used to invite you to receive further information about such research opportunities, but you must give your explicit consent to receive messages for research purposes.

8.Safeguarding.

The GP surgery is dedicated to ensuring that the principles and duties of safeguarding adults and children are holistically, consistently and conscientiously applied with the wellbeing of all, at the heart of what we do.

Categories of personal data

The data collected by GP surgery staff in the event of a safeguarding situation will be as much personal information as is necessary or possible to obtain in order to handle the situation. In addition to some basic demographic and contact details, we will also process details of what the safeguarding concern is. This is likely to be special category information (such as health information).

Sources of the data.

The GP surgery will either receive or collect information when someone contacts the organisation with safeguarding concerns, or if we believe there may be safeguarding concerns, and make enquiries to relevant providers.

Recipients of personal data.

The information is used by the GP surgery when handling a safeguarding incident or concern. We may share information accordingly to ensure duty of care and investigation as required with other partners such as local authorities, the police or healthcare professionals (i.e. their GP or mental health team).

9.GP Surgery Data for Planning and Research.

The NHS needs data about the patients it treats in order to plan and deliver its services and to ensure that care and treatment provided is safe and effective. The General Practice Data for Planning and Research data collection will help the NHS to improve health and care services for everyone by collecting patient data that can be used to do this. For example, patient data can help the NHS to:

- monitor the long-term safety and effectiveness of care.
- plan how to deliver better health and care services.
- prevent the spread of infectious diseases.
- identify new treatments and medicines through health research.

GP surgeries already share patient data for these purposes, but this new data collection will be more efficient and effective. We have agreed to share the patient data we look after in our practice with NHS Digital who will securely store, analyse, publish, and share this patient data to improve health and care services for everyone. This includes:

- informing and developing health and social care policy
- planning and commissioning health and care services
- taking steps to protect public health (including managing and monitoring the coronavirus pandemic)
- in exceptional circumstances, providing you with individual care.
- enabling healthcare and scientific research

This means that we can get on with looking after our patients and NHS Digital can provide controlled access to patient data to the NHS and other organisations who need to use it to improve health and care for everyone.

Contributing to research projects will benefit us all as better and safer treatments are introduced more quickly and effectively without compromising your privacy and confidentiality.

NHS Digital has engaged with the [British Medical Association \(BMA\)](#), [Royal College of GPs \(RCGP\)](#) and the [National Data Guardian \(NDG\)](#) to ensure relevant safeguards are in place for patients and GP surgery.

Clinical Practice Research Datalink (CPRD) collects anonymised patient data from a network of GP surgery across the UK. Primary care data is linked to a range of other health related data to provide a fully representative UK population health dataset. You can opt out of your information being used for research purposes at any time and full details on CRPD can be found here:

<https://cprd.com/transparency-information>

10. Data about you that we share with NHS Digital.

Data will be shared from 1 September 2021. Data may be shared from the GP medical records about:

- any living patient registered at a GP practice in England when the collection started - this includes children and adults.
- any patient who died after this data sharing started and was previously registered at a GP practice in England when the data collection started.

We will not share your name or where you live. Any other data that could directly identify you, for example your NHS number, General Practice Local Patient Number, Full postcode, and date of birth, is replaced with unique codes which are produced by de-identification software before the data is shared with NHS Digital.

This process is called pseudonymisation and means that no one will be able to directly identify you in the data. NHS Digital will be able to use the same software to convert the unique codes back to data that could directly identify you in certain circumstances, and where there is a valid legal reason. Only NHS Digital has the ability to do this. An example would be where you consent to your identifiable data being shared with a research project or clinical trial in which you are participating, as they need to know the data is about you.

For more information about when NHS Digital may be able to re-identify the data, and how NHS Digital will use your data see the [NHS Digital General Practice Data for Planning and Research Transparency Notice](#).

11. How we maintain the confidentiality of your records.

We are committed to protecting your privacy and will only use information collected lawfully in accordance with:

- Data Protection Act 2018

- The General Data Protection Regulations 2016
- Human Rights Act 1998
- Common Law Duty of Confidentiality
- Health and Social Care Act 2012
- NHS Codes of Confidentiality, Information Security and Records Management
- Information: To Share or Not to Share Review

Every member of staff who works for an NHS organisation has a legal obligation to keep information about you confidential.

We will only ever use or pass on information about you if others involved in your care have a genuine need for it. We will not disclose your information to any third party without your permission unless there are exceptional circumstances (i.e. life or death situations) where the law requires information to be passed on and / or in accordance with the information sharing principle following Dame Fiona Caldicott’s information sharing review (Information to share or not to share) where “The duty to share information can be as important as the duty to protect patient confidentiality.” This means that health and social care professionals should have the confidence to share information in the best interests of their patients within the framework set out by the Caldicott principles.

Our GP surgery policy is to respect the privacy of our patients, their families and our staff and to maintain compliance with the UK GDPR and all UK specific data protection requirements. Our policy is to ensure all personal data related to our patients will be protected.

All employees and sub-contractors engaged by our practice are asked to sign a confidentiality agreement. If a sub-contractor acts as a data processor for GP surgery an appropriate contract will be established for the processing of your information.

In certain circumstances you may have the right to withdraw your consent to the processing of personal data. Please contact the GP surgery practice manager in writing if you wish to withdraw your consent. In some circumstances we may need to store your personal data after your consent has been withdrawn to comply with a legislative requirement.

Some of this information will be held centrally and used for statistical purposes. Where we do this, we take strict measures to ensure that individual patients cannot be identified. Sometimes your information may be requested to be used for research purposes – the surgery will always gain your consent before releasing the information for this purpose in an identifiable format. In some circumstances you can opt-out of the GP surgery sharing any of your information for research purposes.

12. With your consent we would also like to use your information

There are times that we may want to use your information to contact you or offer you services, not directly about your healthcare, in these instances we will always gain your consent to contact you. We would however like to use your name, contact details, and email address to inform you of other

services that may benefit you. We will only do this with your consent. There may be occasions where authorised research facilities would like you to take part on innovations, research, improving services or identifying trends.

At any stage where we would like to use your data for anything other than the specified purposes and where there is no lawful requirement for us to share or process your data, we will ensure that you have the ability to consent and opt out prior to any data processing taking place.

This information is not shared with third parties or used for any marketing and you can unsubscribe at any time via phone, email or by informing the Practice.

13. Opting Out.

If you don't want your identifiable patient data to be shared for purposes other than for your own care, you can opt-out by registering a [Type 1 Opt-out](#) or a [National Data Opt-out](#), or both. These opt-outs are different, and they are explained in more detail below. Your individual care will not be affected if you opt out using either option.

If you have registered a National Data Opt-out, NHS Digital will not share any confidential patient information about you with other organisations, unless there is an exemption to this, such as where there is a legal requirement or where it is in the public interest to do so, such as helping to manage contagious diseases like coronavirus. You can find out more about [exemptions on the NHS website](#).

From 1 October 2021, the National Data Opt-out will also apply to any confidential patient information shared by the GP practice with other organisations for purposes except your individual care. It will not apply to this data being shared by GP practices with NHS Digital, as it is a legal requirement for us to share this data with NHS Digital and the National Data Opt-out does not apply where there is a legal requirement to share data.

You can find out more about and register a National Data Opt-out or change your choice on nhs.uk/your-nhs-data-matters or by calling 0300 3035678.

Type 1 Opt-Outs - If you do not want your identifiable patient data to be shared outside of the GP practice for purposes except your own care, you can register an opt-out with the GP practice. This is known as a Type 1 Opt-out. Type 1 Opt-outs were introduced in 2013 for data sharing from GP practices, but may be discontinued in the future as a new opt-out has since been introduced to cover the broader health and care system, called the National Data Opt-out. If this happens, patients who have registered a Type 1 Opt-out will be informed. There is more information about [National Data Opt-outs](#) below.

NHS Digital will not collect any patient data for patients who have already registered a Type 1 Opt-in line with current policy. If this changes patients who have registered a Type 1 Opt-out will be informed.

If you do not want your patient data shared with NHS Digital for the purposes above, you can register a Type 1 Opt-out with your GP practice. You can register a Type 1 Opt-out at any time. You can also change your mind at any time and withdraw a Type 1 Opt-out.

If you have already registered a Type 1 Opt-out with us your data will not be shared with NHS Digital. If you wish to register a Type 1 Opt-out with us before data sharing starts with NHS Digital, this should be done by [returning this form](#) to us practice by 23 June 2021 to allow time for processing it. If you have previously registered a Type 1 Opt-out and you would like to withdraw this, you can also use the form to do this. You can send the form by post or email to us at the GP Practice or call 0300 3035678 for a form to be sent out to you.

If you register a Type 1 Opt-out after your patient data has already been shared with NHS Digital, no more of your data will be shared with NHS Digital. NHS Digital will however still hold the patient data which was shared with them before you registered the Type 1 Opt-out.

If you do not want NHS Digital to share your identifiable patient data with anyone else for purposes beyond your own care, then you can also register a [National Data Opt-out](#).

14. Text messages.

Prior to the introduction of the UK GDPR the GP surgery sought explicit patient consent for the use of their telephone numbers for text messaging. Since then, ICO has confirmed that explicit consent for our use of text messaging is unnecessary as we only use the method in support of the GP surgery's patient healthcare service. Furthermore, the NHS have advised that because of the pandemic we must use text messaging as an essential tool in promoting actions and providing information, and to ensure good coverage we may not need to adhere to text consent policies. Therefore, in common with the majority of NHS organisations our new policy is to use telephone numbers supplied by patients for text messages regarding their health and health promotion, without explicit consent. Where patients have previously dissented or consented to text messages, we will abide by these choices, but where a patient was invited to give consent or dissent, but did not respond, we will now send text messages, though patients have the option to opt out of text messages any time.

15. Where we store your information electronically.

All the personal data we process is processed by our staff in the UK however for the purposes of IT hosting and maintenance this information may be located on servers within the European Union.

No third parties have access to your personal data unless the law allows them to do so and appropriate safeguards have been put in place. We have a Data Protection regime in place to oversee the effective and secure processing of your personal and or special category data.

TPP SystemOne

The GP surgery uses a clinical system provided by a Data Processor called TPP SystemOne.

The system is a secure centralised system which supports modules for every healthcare setting from primary care to hospitals, social care, and mental health. SystemOne provides clinicians and health professionals with a single shared Electronic Health Record (EHR) available in real time at the point of care.

The data will remain in the UK at all times and allows patient data to be shared securely across services—promoting efficiency and standardisation. Most importantly it enables services to improve the patient experience and deliver safer patient care.

accuRx

The GP surgery uses a patient triage and communication system provided by a Data Processor called *accuRx*. This platform has been approved and provided to us by the Clinical Commissioning Group. When you complete a form by text message or reply to our SMS messages, your data is processed by the triage and communication system.

The system is a secure platform which is only available through a toolbar connected to TPP SystemOne.

16. Our partner organisations.

We may also have to share your information, subject to strict agreements on how it will be used, with the following organisations;

- NHS Trusts / Foundation Trusts
- GPs
- NHS Commissioning Support Units or 111
- Independent Contractors such as dentists, opticians, pharmacists
- Private Sector Providers
- Voluntary Sector Providers
- Ambulance Trusts
- Clinical Commissioning Groups
- Social Care Services
- NHS England (NHSE) and NHS Digital (NHSD)
- Multi Agency Safeguarding Hub (MASH)
- Local Authorities
- Education Services
- Fire and Rescue Services
- Police & Judicial Services
- Voluntary Sector Providers
- Private Sector Providers
- Other 'data processors' which you will be informed of

You will be informed who your data will be shared with and in some cases asked for consent for this to happen when this is required.

17. Computer System.

This GP surgery operates a Clinical Computer System on which NHS Staff record information securely. This information can then be shared with other clinicians so that everyone caring for you is fully informed about your medical history, including allergies and medication. To provide around the clock safe care, unless you have asked us not to, we will make information available to partner

organisations above. Wherever possible, their staff will ask your consent before your information is viewed.

18. Third parties we use.

The GP surgery may contract with third parties for the purpose of provisioning services.

- General Practice Alliance
- Interface Clinical Pharmacy
- Prescribing Care Direct
- Northamptonshire Healthcare Foundation Trust

19. Shared Care Records.

To support your care and improve the sharing of relevant information to our partner organisations when they are involved in looking after you, we will share information to other systems. You can opt-out of this sharing of your records with our partners at any time if this sharing is based on your consent.

We may also use external companies to process personal information, such as for archiving purposes. All employees and sub-contractors engaged by our practice are asked to sign a confidentiality agreement. If a sub-contractor acts as a Data Processor for Abington Park Surgery an appropriate contract will be established for the processing of your information.

20. Sharing your information without consent.

We will normally ask you for your consent, but there are times when we may be required by law to share your information without your consent, for example:

- where there is a serious risk of harm or abuse to you or other people;
- where a serious crime, such as assault, is being investigated or where it could be prevented;
- notification of new births;
- where we encounter infectious diseases that may endanger the safety of others, such as meningitis or measles (but not HIV/AIDS);
- where a formal court order has been issued;
- where there is a legal requirement, for example if you had committed a Road Traffic Offence.

21. How long we store your information.

We are required under UK law to keep your information and data for the full retention periods as specified by the NHS Records management code of practice for health and social care and national archives requirements.

More information on records retention can be found in the NHS Records Management Code of Practice 2020.

22. Destruction.

The Practice will only destroy data following a review of the information at the end of its retention period. Where data have been identified for disposal, we have the following responsibilities:

- to ensure that information held in manual form is destroyed using a cross-cut shredder or contracted to a reputable confidential waste company SRCL that complies with European Standard EN15713 and obtain certificates of destruction.
- to ensure that electronic storage media used to store, or process information are destroyed or overwritten to national standards.

23. Primary Care Networks

The objective of Primary Care Networks (the “PCNs”) is for group practices working together to create more collaborative workforces which ease the pressure of GPs, leaving them better able to focus on patient care. The aim is for all areas within England to be covered by a PCN.

Primary Care Networks form a key building block of the NHS long-term plan. Bringing general practices together to work at scale has been a policy priority for some years for a range of reasons, including improving the ability of practices to recruit and retain staff; to manage financial and estates pressures; to provide a wider range of services to patients and to integrate with the wider health and care system more easily.

All GP surgeries are expected to come together in geographical networks covering populations of approximately 30–50,000 patients and take advantage of additional funding attached to the GP contract.

This means the GP surgery may share your information with other practices within the PCN to provide you with your care and treatment.

24. Your rights over your personal data.

As an individual you have the following rights over your personal information:

- a) **Right to object to processing** - If we are using your data because we deem it necessary for our legitimate interests to do so, and you do not agree, you have the right to object. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases). Generally, we will only disagree with you if certain limited conditions apply.
- b) **Right to withdraw consent**- Where we have obtained your consent to process your personal data for certain activities (for example for a research project) you may withdraw your consent at any time.
- c) **Right to erasure (right to be forgotten)**: In certain situations (for example, where we have processed your data unlawfully), you have the right to request us to “erase” your personal data except where there are exceptions apply for example legal or public health reasons.

- d) **Right of data portability:** If you wish, you have the right to transfer your data from us to another for example transferring from one GP surgery records to another GP surgery transmitted in an automated machine readable format.
- e) **Right to rectification:** Upon being notified of any personal data changes which are incorrect we will try do within 30 days of receipt the request. You should tell us of any changes as soon as any of your details change; this is especially important for changes of address or contact details (such as your mobile phone number). The GP surgery will from time to time ask you to confirm that the information we currently hold is accurate and up-to-date.
- f) **Right restriction of processing:** In order to restrict any processing for a period for example until the inaccuracies following rectification are corrected and lifting of restrictions is notified to you.
- g) **Right to object:** To object any processing of personal data for performance of task in public interest or legitimate interest We may be able to process your personal data by demonstrating reasonably if there may be compelling legitimate grounds which are overridden by interests or rights such as processing is necessary to provide treatment for a child.
- h) **Rights in relation to automated decision making and profiling:** Where there is for example automate online decision following an evaluation without human intervention which affects you that decision. The safeguard is to introduce human intervention which is made available to review automated decisions.
- i) **Right of access:** you can request access to and/or copies of the personal data we hold about you, free of charge (subject to exemptions) within one calendar month. Such requests can be made verbally or in writing, but we do request that you provide us with adequate information to process your request, such as providing full name, address, date of birth, NHS number and details of your request and, where necessary, any documents to verify your identity. On processing a request there may be occasions when information may be withheld if we as a practice believe that releasing the information to you could cause serious harm or distress. Information may also be withheld if another person (i.e. third party) is identified in the record, and they do not want their information disclosed to you. However, if the other person mentioned in your records was acting in their professional capacity in caring for you, in normal circumstances they could not prevent you from having access to that information.

25. Data Subject Access Requests (DSAR)

You have a right under the Data Protection legislation to request access to view or to obtain copies of your information the GP surgery holds about you, except in certain circumstances (e.g. confidential information). To request this, you need to do the following:

- Your request should be made to the GP surgery – for information from the hospital you should write direct to them
- There is no charge to have a copy of the information held about you, unless it's excessive or repetitive, in which case we reserve the right to charge a reasonable fee
- As the data controller we are required to respond to you within one month or any extension following receipt of the request

- We will respond by the same method the request as the original request unless otherwise requested.
- You will need to give adequate information (for example full name, address, date of birth, NHS number and details of your request) so that your identity can be verified, and your records located information we hold about you at any time. We reserve the right at our discretion to redact commercial, confidential or sensitive information.

26. Invoice validation

If you have received treatment within the NHS, the local Commissioning Support Unit (CSU) may require access to your personal information to determine which Clinical Commissioning Group (CCG) is responsible for payment for the treatment or procedures you have received. Information such as your name, address, date of treatment and associated treatment code may be passed onto the CSU to enable them to process the invoice. These details are held in a secure environment and kept confidential. This information is only used to validate invoices. .

27. How to Complain

If you have any queries or concerns about how your information is processed at this GP, please initially contact the GP practice manager via email aps.patients@nhs.net or the Data Protection Officer. We are registered with the ICO and our registered number is ZA509592.

Our Caldicott Guardian is:	Our Data Protection Officer is:
<p>Dr Catherine Massey</p>	<p>The Midlands and Lancashire Commissioning Support Unit You can contact via email: MLCSU.dpo@nhs.net or address the envelope to The Data Protection Officer at The Midlands and Lancashire Commissioning Support Unit 120 Grove Road, Stoke on Trent ST4 4LX.</p>

If you are still unhappy following a review by the GP, you complain to the UK’s Information Commissioner’s Office (ICO) if you are unhappy with how your personal data are used.

Information Commissioner’s Office
 Wycliffe house
 Water Lane
 Wilmslow
 Cheshire
 SK9 5AF

Tel: 01625 545745

ICO website: <https://www.ico.org.uk>

28. Changes

It is important to point out that we may amend this Privacy Notice from time to time. If you are dissatisfied with any aspect of our privacy notice, please contact the GP Data Protection Officer.

Confidentiality Statement

This policy contains information confidential and proprietary to Abington Park Surgery. This document contains information that is confidential or otherwise protected from disclosure and shall not be disclosed without prior approval.

Document version control

The document owner is Mrs Lisa McKenzie.

Date	Current Version	Comment	Next review date	Author	Status
15/12/2021	1	Policy created		Jo Pennell	Approved
05/04/2023	1.1	Policy updated with new suppliers		Jo Pennell	Approved
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15/12/2021	1	Policy created	Jo Pennell	Mrs Lisa McKenzie	Approved
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