

# PRIVACY NOTICE

## How The Bovey Tracey & Chudleigh Practice uses your information to provide you with healthcare

**This practice keeps medical records confidential and complies with the General Data Protection Regulation.**

**We hold your medical record so that we can provide you with safe care and treatment.**

**We will also use your information so that this practice can check and review the quality of the care we provide. This helps us to improve our services to you.**

- We will share relevant information from your medical record with other health or social care staff or organisations when they provide you with care. For example, your GP will share information when they refer you to a specialist in a hospital. Or your GP will send details about your prescription to your chosen pharmacy.
- This Practice is a member of the Southern Primary Care Collaborative (SPCCB) of GP Practices and works collaboratively with other member practices for the purpose of delivering the best possible healthcare to patients in South Devon & Torbay. To enable us to optimize the available resources to meet your needs you may be referred to other member health partners for treatment who will be given access to your health record to facilitate this treatment. You have a right to opt out if you do not wish your data to be shared under this agreement. For more information on how we share your information with other GP practices and any other organisations who are directly involved in your care can be found here: <https://www.towerhousesurgery.co.uk/pages/Data-Protection>
- Healthcare staff working in A&E and out of hours care will also have access to your information. For example, it is important that staff who are treating you in an emergency know if you have any allergic reactions. This will involve the use of your Summary Care Record for more information see: <https://digital.nhs.uk/summary-care-records> or alternatively speak to your practice.
- As well as using your information in caring for you, your information may be used to help improve the way we provide health and social care through research, service planning and population health management approaches. Using the information in this way is sometimes called 'secondary use'.

We are working with Optum to support the Devon Integrated Care System to improve short term and medium-term health outcomes for local populations through the application of Population Health Management. We will use the services of NHS Devon CCG to send an extract of data to Optum. A small number of analytics specialists from Optum alongside analytics staff at NHS Devon CCG, all of

whom are based in the UK will have access to your data (which will have been pseudonymised in accordance with the ICO Code of Practice). This means that no unauthorised person will be able to identify individuals and the data they receive will ensure anonymity. Only clinicians with direct responsibility for patient care will be able to re-identify patients. Individual patients who have chosen not to share their data will be excluded from source and their data will never be extracted from the GP system.”

- You have the right to object to your information being shared under the national data opt out model. The national data opt out model provides an easy way for you to opt out of sharing information that identifies you being used or shared for medical research purposes and quality checking or audit purposes.

To opt-out of your identifiable information being shared for medical research or to find out more about your opt out choices please ask a member of staff or go to NHS Digital's website – <https://digital.nhs.uk/services/national-data-opt-out-programme>

### **Improved Access Appointments**

As part of our Improved Access Initiative, **The Bovey Tracey and Chudleigh Practice** patients will be able to book evening and weekend appointments, both here and at other local GP Practices. This will benefit you as a patient as it ensures that there are more appointments available to you at times that are more convenient out of the practice's usual hours.

To ensure that the Clinician has full access to your medical records, when you book your appointment the Administrator will ask you to consent to sharing your medical records, which will ensure an effective and safe service.

This sharing occurs electronically through our clinical system and the sharing only occurs when you choose to book an appointment at another practice. You will be reminded of this when you book the appointment and your consent to share your medical record is taken.

Your data will be kept secure using the same clinical system used to access your medical record when you visit us for an appointment. The clinician you visit will be required to gain your consent prior to accessing your record. If you change your mind and do not wish to consent, the clinician will only be able to access your Summary Care Record. This will contain limited medical information and will restrict the care that you can be offered. We will be notified of your record being accessed and of any changes made to your medical record. We will review this to ensure any follow up is actioned.

The practices who could be involved in sharing your data are: The Bovey Tracey & Chudleigh Practice, Devon Square Surgery, Cricketfield Surgery, Albany, Kingsteignton Medical Practice, Kingskerswell and Ipplepen Health Centres and Buckland Surgery.

If you have any concerns about this, or object to the sharing of your medical record in this way, please speak to one of our reception team, who will be able to record your decision and change the settings for your record.

## Other important information about how your information is used to provide you with healthcare

### **Registering for NHS care**

- All patients who receive NHS care are registered on a national database.
- This database holds your name, address, date of birth and NHS Number but it does not hold information about the care you receive.
- The database is held by NHS Digital a national organisation which has legal responsibilities to collect NHS data.
- More information can be found at: [www.digital.nhs.uk](http://www.digital.nhs.uk) or NHS Digital 0300 303 5678

### **Identifying patients who might be at risk of certain diseases**

- Your medical records will be searched by a computer programme so that we can identify patients who might be at high risk from certain diseases such as heart disease or unplanned admissions to hospital.
- This means we can offer patients additional care or support as early as possible.
- This process will involve linking information from your GP record with information from other health or social care services you have used.
- Information which identifies you will only be seen by this practice.

### **Safeguarding**

- Sometimes we need to share information so that other people, including healthcare staff, children or others with safeguarding needs, are protected from risk of harm.
- These circumstances are rare.
- We do not need your consent or agreement to do this.

We are required by law to provide you with the following information about how we handle your information.

<b>Data Controller</b> contact details	GP Partners of The Bovey Tracey & Chudleigh Practice Riverside Surgery, Bovey Tracey, TQ13 9QP – 01626 832666 & Tower House Surgery, Chudleigh, TQ13 OHL – 01626 852379
<b>Data Protection Officer</b> contact details	<b>Rebekah Lovewell, DELT Shared Services Ltd</b> ( <a href="mailto:bex.lovewell@nhs.net">bex.lovewell@nhs.net</a> ) - 01752 580321 / 07870 997267 DELT Shared Services Ltd., Building 2 – DELT, Derriford Business Park, Plymouth, PL6 5QZ
<b>Purpose</b> of the processing	<ul style="list-style-type: none"><li>• To give direct health or social care to individual patients.</li><li>• For example, when a patient agrees to a referral for direct care, such as to a hospital, relevant information about the patient</li></ul>

	<p>will be shared with the other healthcare staff to enable them to give appropriate advice, investigations, treatments and/or care.</p> <ul style="list-style-type: none"> <li>To check and review the quality of care. (This is called audit and clinical governance).</li> </ul>
<b>Lawful basis</b> for processing	<p>These purposes are supported under the following sections of the GDPR:</p> <p><i>Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and</i></p> <p><i>Article 9(2)(h) ‘necessary for the purposes of preventative 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 and services...’</i></p> <p>Healthcare staff will also respect and comply with their obligations under the common law duty of confidence.</p>
<b>Recipient or categories of recipients</b> of the processed data	<p>The data will be shared with:</p> <ul style="list-style-type: none"> <li>healthcare professionals and staff in this surgery;</li> <li>local hospitals;</li> <li>out of hours services;</li> <li>diagnostic and treatment centres;</li> <li>or other organisations involved in the provision of direct care to individual patients.</li> <li>Clinical IT Systems such as SystmOne and INRStar</li> <li>Intermediate Care, Community Nursing and Health Visiting Services</li> <li>NHS Digital</li> </ul>
<b>Rights to object</b>	<ul style="list-style-type: none"> <li>You have the right to object to information being shared between those who are providing you with direct care.</li> <li>This may affect the care you receive – please speak to the practice.</li> <li>You are not able to object to your name, address and other demographic information being sent to NHS Digital.</li> <li>This is necessary if you wish to be registered to receive NHS care.</li> <li>You are not able to object when information is legitimately shared for safeguarding reasons.</li> <li>In appropriate circumstances it is a legal and professional requirement to share information for safeguarding reasons. This is to protect people from harm.</li> <li>The information will be shared with the local safeguarding service.</li> </ul>
<b>Right to access and</b>	<ul style="list-style-type: none"> <li>You have the right to access your medical record and have any</li> </ul>

<b>correct</b>	<p>errors or mistakes corrected. Please speak to a member of staff or look at our 'subject access request' policy on the practice website.</p> <ul style="list-style-type: none"> <li>• We are not aware of any circumstances in which you will have the right to delete correct information from your medical record; although you are free to obtain your own legal advice if you believe there is no lawful purpose for which we hold the information and contact us if you hold a different view.</li> </ul>
<b>Retention period</b>	<p>GP medical records will be kept in line with the law and national guidance. Information on how long records are kept can be found at: <a href="https://digital.nhs.uk/article/1202/Records-Management-Code-of-Practice-for-Health-and-Social-Care-2016">https://digital.nhs.uk/article/1202/Records-Management-Code-of-Practice-for-Health-and-Social-Care-2016</a> or speak to the practice.</p>
<b>Right to complain</b>	<p>You have the right to complain to the Information Commissioner's Office. If you wish to complain follow this link <a href="https://ico.org.uk/global/contact-us/">https://ico.org.uk/global/contact-us/</a> or call the helpline <b>0303 123 1113</b></p>
<b>Data we get from other organisations</b>	<p>We receive information about your health from other organisations who are involved in providing you with health and social care. For example, if you go to hospital for treatment or an operation the hospital will send us a letter to let us know what happens. This means your GP medical record is kept up-to date when you receive care from other parts of the health service.</p>