

Privacy Notice

Fordingbridge Surgery

Summary Care Record –

For the duration of the COVID 19 pandemic extended access has been deemed necessary on a national basis. Full details can be found here <https://digital.nhs.uk/services/summary-care-records><https://digital.nhs.uk/services/summary-care-records-scr/scr-coronavirus-covid-19-supplementary-privacy-notice>

How we look after your personal information during the Covid-19 pandemic when staff work from home

In accordance with government guidance and in order to protect the health and safety of our staff during this difficult period we will be requiring both clinical and administration staff to work from home.

This means that staff may have access to any necessary personal and/or medical information in order to look after your healthcare needs.

We would like to assure you that our staff will be subject to all relevant security procedures and policies of the Practice to ensure that any information is kept safe, secure and confidential at all times.

If you are concerned about how your information is being used, please contact our DPO using the contact details provided in this Privacy Notice.

We understand how important it is to keep your personal information safe and secure and we take this very seriously. We have taken steps to make sure your personal information is looked after in the best possible way. We review our procedures regularly.

Please read this privacy notice ('Privacy Notice') carefully, as it contains important information about how we use the personal and healthcare information we collect on your behalf.

Version number	Implemented By	Revision Date	Approved By	Approval Date	Reason
1.0	M Smith	25/05/2018	M Raymond	25/05/2018	New document v1 document
2.0	M Smith	30/05/2018	M Raymond	30/05/2018	Additional details added to section 8 for ESP Network Limited and Clinical Interface Services
3.0	M Smith	15/10/2018	M Raymond	15/10/2018	Additional details added to sect 8 Dept of Work and Pensions/child health and sect 10 for changes in type 1 & 2 opt outs
4.0	M Smith	08/02/2019	M Raymond	08/02/2019	Added in sect 7, West Hampshire Referral Support Service
5.0	M Smith	28/06/2019	M Raymond	28/06/2019	Amended details about extended access, new provider sect 8. H

6.0	M Smith	12/07/2019	M Raymond	12/07/2019	Change of Data Protection Officer
7.0	T Wallis	12/03/2020	M Raymond	12/03/2020	Added in sect 8, MJog, AccuRX, REACT, Ardens, Social Prescribers, Coronavirus (Covid-19)
8.0	P Moulard	27/04/2020	T Wallis	27/04/2020	Updated information regarding Coronavirus (Covid-19) pandemic
9.0	P Moulard	18/05/2020	M Raymond	18/06/2020	Full review
10	K Doris	13/07/2021	K Doris	20/07/2021	Full review
11	P Moulard	10/02/2022	M Raymond	10/02/2022	Updated DPO information
12	S Thomson	04/04/2023	M Raymond	04/04/2023	Full Review
13	S Thomson	31/05/23	M Raymond	31/05/23	Full Review
14	S Thomson	04/09/2023	M Raymond	04/09/2023	Adding in DPIA
15	S Thomson	23/10/2023	M Raymond	23/10/2023	Adding in IGPR

1. WHY WE ARE PROVIDING THIS PRIVACY NOTICE

We are required to provide you with this Privacy Notice by Law. It explains how we use the personal and healthcare information we collect, store and hold about you. If you are unclear about how we process or use your personal and healthcare information, or you have any questions about this Privacy Notice or any other issue regarding your personal and healthcare information, then please do contact our **Data Protection Officer** (details below).

The Law says:

- A. We must let you know why we collect personal and healthcare information about you;
- B. We must let you know how we use any personal and/or healthcare information we hold on you;
- C. We need to inform you in respect of what we do with it;
- D. We need to tell you about who we share it with or pass it on to and why; and
- E. We need to let you know how long we can keep it for.

2. THE DATA PROTECTION OFFICER

The Data Protection Officer (DPO) for Fordingbridge Surgery is Caroline Sims. You can contact the DPO as follows:- fordingbridgesurgery@nhs.net

- You have any questions about how your information is being held
- If you require access to your information or if you wish to make a change to your information
- If you wish to make a complaint about anything to do with the personal and healthcare information we hold about you
- If you wish to make a **Subject Access Request**
- Or any other query relating to this Policy and your rights as a patient

3. ABOUT US

We, at The Fordingbridge Surgery (**'the Surgery'**) situated at Barton's Road, Fordingbridge, Hampshire, SP6 1RS, are the **Data Controller** of your information. This means we are responsible for collecting, storing and handling your personal and healthcare information when you register with us as a patient.

There may be times where we also process your information. That means we use it for a particular purpose and, therefore, on those occasions we may also be **Data Processors**. The purposes for which we use your information are set out in this Privacy Notice.

4. INFORMATION WE COLLECT FROM YOU

The information we collect from you will include:

- A. Your contact details (such as your name and email address, including place of work and work contact details);
- B. Details and contact numbers of your next of kin;
- C. Your age range, gender, ethnicity, language, disability status, information we need to allow us to provide information in a more accessible format for you;
- D. Details in relation to your medical history;
- E. The reason for your visit to the Surgery;
- F. Medical notes and details of diagnosis and consultations with our GPs and other health professionals within the Surgery involved in your direct healthcare;
- G. Friends and Family Test – Patient feedback on services.

5. INFORMATION ABOUT YOU FROM OTHERS

We also collect personal information about you when it is sent to us from the following:

- A. A hospital, a consultant or any other medical or healthcare professional, or any other person involved with your general healthcare.
- B. Insurance Company – in respect of requests for medical information, with your prior approval
- C. Police service – in respect of a Firearms application you are making
- D. Social Services
- E. Solicitors – correspondence from them about you
- F. Benefit Agency
- G. Driving Vehicle Licensing Authority (DVLA)
- H. Indeed any organisation who you give permission to ask for your medical information

6. YOUR SUMMARY CARE RECORD (SCR)

Your summary care record is an electronic record of your healthcare history (and other relevant personal information) held on a national healthcare records database provided and facilitated by NHS England.

This record may be shared with other healthcare professionals and additions to this record may also be made by relevant healthcare professionals and organisations involved in your direct healthcare.

You may have the right to demand that this record is not shared with anyone who is not involved in the provision of your direct healthcare. If you wish to enquire further as to your rights in respect of not sharing information on this record then please contact the surgery.

To find out more about the wider use of confidential personal information and to register your choice to opt out if you do not want your data to be used in this way, please visit www.nhs.uk/my-data-choice.

Note if you do choose to opt out, you can still consent to your data being used for specific purposes. However, if you are happy with this use of information you do not need to do anything. You may however change your choice at any time. Please note that by opting out of having your information shared with the Summary a Record could result in a delay of care that may be required in an emergency.

7. WHO WE MAY PROVIDE YOUR PERSONAL INFORMATION TO, AND WHY

Whenever you use a health or care service, such as attending Accident & Emergency or using Community Care Services, important information about you is collected to help ensure you get the best possible care and treatment. This information may be passed to other approved organisations where there is a legal basis, to help with planning services, improving care, research into developing new treatments and preventing illness. All of this helps in providing better care to you and your family and future generations. However, as explained in this privacy notice, confidential information about your health and care is only used in this way where allowed by law and would never be used for any other purpose without your clear and explicit consent.

We may pass your personal information on to the following people or organisations, because these organisations may require your information to assist them in the provision of your direct healthcare needs. It, therefore, may be important for them to be able to access your information in order to ensure they may properly deliver their services to you:

- A. Hospital professionals (such as doctors, consultants, nurses, etc);
- B. Other GPs/Doctors;
- C. West Hampshire Referral Support Service;
- D. Pharmacists;
- E. Nurses and other healthcare professionals (eg District Nurses and Midwives)
- F. Dentists;
- G. Any other person that is involved in providing services related to your general healthcare, including mental health professionals (eg Care Navigators, Pharmacists, Social Prescribers)

8. OTHER PEOPLE WHO WE PROVIDE YOUR INFORMATION TO

- 1. Commissioners;
- 2. Clinical Commissioning Groups;
- 3. Local authorities;
- 4. Community health services;
- 5. For the purposes of complying with the law e.g. Police, Solicitors, Insurance Companies ;
- 6. Anyone you have given your consent to, to view or receive your record, or part of your record.
Please note, if you give another person or organisation consent to access your record we will need to contact you to verify your consent before we release that record. It is important that you are clear and understand how much and what aspects of, your record you give consent to be disclosed.
- 7. **Child Health Information** – We wish to make sure that your child has the opportunity to have immunisations and health checks when they are due. We share information about childhood immunisations, the 6-8 week new baby check and breast-feeding status with health visitors and school nurses, and with NHS South Central and West Commissioning Support Unit, who provide the Child Health Information Service in Hampshire on behalf of NHS England.
- 8. **Extended Access** – we provide extended access services to our patients which means you can access medical services outside of our normal working hours. This service is called 'Appointments+'. In order to provide you with this service, we have formal arrangements in place with HIOW ICB . 'Partnering Health Limited' (PHL) is commissioned to provide this service at Ringwood Medical Centre and Lymington Hospital on our behalf for you as a patient to access appointments outside of our opening hours. This means clinicians at these clinics will require access to your medical records to be able to treat and care for you. Please note, to ensure that 'PHL' comply with the law and to protect the use of your information, we have very robust data sharing agreements and other clear arrangements in place to ensure your data is always protected and used for those purposes only.
- 9. **Data Extraction by the Clinical Commissioning Group** – the clinical commissioning group at times extracts medical information about you, but the information we pass to them via our computer systems **cannot identify you to them**. This information only refers to you by way of a code that only your practice can identify (it is pseudo-anonymised). This therefore protects

you from anyone who may have access to this information at the Clinical Commissioning Group from **ever** identifying you as a result of seeing the medical information and we will **never** give them the information that would enable them to do this.

There are good reasons why the Clinical Commissioning Group may require this pseudonymised information, for example; to better plan the provision of services across a wider locality than practice level.

10. **Individual Funding Requests – The CSU** – We may need to share your information with the IFR team for the funding of treatment that is not normally covered in the standard contract. The clinical professional who first identifies that you may need the treatment will explain to you the information that is needed to be collected and processed in order to assess your needs and commission your care; they will gain your explicit consent to do this. We ask NHS South, Central and West Commissioning Support Unit (CSU) to do this on our behalf.
11. **Other GP Practices** – We will enable other GP practices to have access to your medical record to allow you to receive accurate medical care within that service. This service is for your direct care and is fully consented; permission to share your medical record will be gained prior to an appointment being made in the service and again once you are in the consultation. Your registered surgery will continue to be responsible for your full medical record.
12. **Community Nursing – Complex Care Team, Diabetes Team, Home Visiting Team Leg Ulcer Service, Heart Failure Service, Multi-disciplinary Team, District Nurses and Midwives** – We will enable the Community Nursing Team to have access to your medical record to allow you to receive care from the community nurses for the services listed. These services are for your direct care and is fully consented; permission to share your medical record will be gained prior to an appointment being made in this service. Your registered surgery will continue to be responsible for your full medical record.

Pharmacists from the ICB/PCN – To provide monitoring and advice in line with the national directive for prescribing. Anonymous data is collected by the **ICB**/PCN. The practices within the PCN will be utilising the services of Virtual Pharmacy, to review and support patients medication needs. This will provide support for the clinical team within the practice by allowing a qualified pharmacist to review the prescribing for the patient, reducing practice waiting times and freeing up clinician time, it will help to reduce the overuse and wastage of medication through optimisation of poly pharmacy and increase the quality and safety of prescribing within the practices.

13. **MASH – Multi Agency Safeguarding Board – Safeguarding Children Safeguarding Adults** – We share information with health and social care authorities for safeguarding issues. Because of public interests issues e.g. to protect the safety and welfare of Safeguarding we will rely on a statutory basis rather than consent to share information for this use.
14. **Risk Stratification** – Risk stratification is a process for identifying and managing patients who are at high risk of emergency hospital admission. Risk stratification tools use various combination of historic information about patients, for example, age, gender, diagnoses and patterns of hospital attendance and admission and primary care data collected from GP practice record systems. GPs will be able to identify which of their patients are at risk in order to offer a preventative service to them. Risk stratification has been approved by the Secretary of State, through the confidentiality Advisory Group of Health Research Authority. NHS England encourages GPs to use risk stratification tools as part of their local strategies for supporting patients with long-term conditions and to help and prevent avoidable hospital admission and to promote quality improvement in GP practices. NHS South, Central and West Commissioning Support Unit (CSU) assist us with providing Risk Stratification tools. The GP practice instructs its GP IT system supplier to provide primary care data identifiable by your NHS number. If you do not wish information about you to be included in our risk stratification programme, please contact the GP practice. They can add a code to your records that will stop your information from being used for this purpose. Further

information about risk stratification is available from
<https://www.england.nhs.uk/ourwork/tsd/ig/risk-stratification/>

15. **Quality monitoring, concerns and serious incidents** - We need to ensure that the health services you receive are safe, effective and of excellent quality. Sometimes concerns are raised about the care provided or an incident has happened that we need to investigate. You may not have made a complaint to us directly but the health care professional looking after you may decide that we need to know in order to help make improvements. The health care professional raising the concern or reporting the incident should make every attempt to talk to you about this and gain your consent to share information about you with us. Sometimes they can do this without telling us who you are. We have a statutory duty under the Health and Social Care Act 2012, Part 1, Section 26, in securing continuous improvement in the quality of services provided. We share your information with health care professionals that may include details of the care you have received and any concerns about that care. In order to look into these concerns we may need to talk to other organisations such as West Hampshire CCG as well as other Public bodies and Government agencies such as NHS Improvement, the Care Quality Commission, NHS England as well as the providers of your care.
16. **Commissioning, planning, contract monitoring and evaluation** – We share aggregated, anonymous, patient data about services we have provided. We set out our reporting requirements as part of our contract with NHS service providers and do not ask them to give us identifiable data about you. If patient level data was required for clarity and extensive evaluation of a service, consent will be gained for the surgery to share this information. Various organisations, CCG, third party organisations commissioned by the NHS to perform actuarial services, NHS England. eConsult – Anonymised aggregated numbers of contacts are shared for the online consultation tool.
17. **National Registries** – National Registries (such as Learning Disabilities Register) have statutory permission under section 251 of the NHS Act 2006, to collect and hold service users identifiable information without the need to seek informed consent from each individual service user.
18. **Care Quality Commission** – CQC has powers under the Health and Social Care Act 2008 to access and use information where they consider it is necessary to carry out their functions as a regulator. CQC relies on its legal powers to access information rather than consent, therefore may use its power to access records even in cases where objections have been raised. CQC Privacy Notice is available on the CQC Website www.cqc.co.uk
19. **Surveys and asking your feedback** – Sometimes we may offer you the opportunity to take part in a survey that the practice is running. We will not generally ask you to give us any personal confidential information as part of any survey. You are under no obligation to take part and where you do, we consider your participation as consent to hold and use the responses you give us.
20. **Research** – To support research orientated proposals and activities in our commissioning system. Your consent will be obtained by the organisation holding your records before identifiable information about you is disclosed for any research. If this is not possible then the organisation wishing to use your information will need to seek formal approval from The Independent Group Advising on the Release of Data (GARD) [Digital NHS UK - IGARD](http://Digital.NHS.UK-IGARD) We may write to you offering you the opportunity to take part in research, for which your consent will be sought.
21. **Screening** – To support disease monitoring and health prevention for specific patients. Your consent is sought either implicitly or explicitly. You are invited to be screened either by the practice or the screening provider directly. You can choose to consent or dissent at any point in the screening.
22. **Hampshire County Council** – To support disease monitoring and health prevention for specific patients. Your consent is sought either implicitly or explicitly. You are invited to be screened either by the practice or the screening provider directly. You can choose to consent or dissent at any point in the screening.

23. **Other organisations who provide support services** - The Practice may use services of additional organisations (other than those listed), who will provide additional expertise to support the Practice. We have entered into contracts with other organisations to provide some services for us on our behalf.
- Shred-IT provide confidential was destruction services.
 - NHS England use City Sprint to transfer medical records.
 - Continence and Stoma Service – for direct care in providing continence / stoma products and monitoring
 - I-Talk Counselling service
 - Signposters
 - Dementia Friendly
 - Springboard
 - Health Visitors
 - Palliative Nurses
 - Clinical Waste
- A. Data Extraction by Hampshire Diabetic Eye Screening Service** – a monthly extract is taken of all diabetics who have not opted out of sharing data with the service. This information includes name, address, date of birth and medical details relating to diabetes allows the service to identify newly diagnosed diabetics and ensure their records are up to date with patients recently registered or deducted. The screening service use this data to manage the screening invites.
- B. Data Extraction by Public Health Hampshire county Council NHS Health Checks** – Data is extracted every two months for eligible patients to be invited for NHS Health Checks. This data includes name, address and month of birth. This is the minimum data required to invite eligible patients for a health check.
- C. Data Extraction to Department of Health** – a monthly extract is taken of vaccination details given so that the Department of Health can monitor uptake across the country.
- D. Care and Health Information Exchange (CHIE)** The CHIE is an electronic summary record for people living in Hampshire, Portsmouth and Southampton. GP Surgeries, hospitals, social care and community care teams collect information about you and store it electronically on separate computer systems. The Care and Health Information Exchange stores summary information from these organisations in one place so that – with your consent – professionals can view it to deliver better care to you. This record contains more information than the SCR, but is only available to organisations in Hampshire. For more information Visit <https://careandhealthinformationexchange.org.uk/>
- E. Care Navigators** – These are healthcare workers employed by ESP Network Limited who are commissioned by West Hampshire Clinical Commissioning Group to provide care navigators to work within practices. The Care Navigator works from the Practice and will have the benefit of being able to access important information, such as your medical records, which can help to provide them with key information to support your care.
- F. Clinical Interface Services** – This company offer pharmacist based services to practices. Their services are detailed in contracts within which the practice provides written consent for Pharmacists from Clinical Interface Services to deliver patient care services. Only information relevant to the direct care of patients within the service specification is accessed and only by those staff involved in the service delivery. Any patient that has asked for the viewing of their record to be restricted is excluded from any Interface service.
- G. Department for Work and Pensions** – Our Practice is legally required to provide anonymised data of patients who have been issued with a fit note under the Fit for Work Scheme. The purpose is to provide the Department for Work and Pensions with information from fit notes to improve the monitoring of public health and commissioning and quality of health services.
- H. AccuRX SMS texting service** - AccuRx is a communication platform whose main product is Chain SMS, a free, easy-to-use secure messaging service that allows practice staff to

instantly send ad-hoc personalised text messages to patients. It has been designed to support Clinicians, administration staff and practice managers etc. Typical use-cases for Chain SMS includes sending advice to patients, notifying a patient of normal results, and reminding them to book appointments. All communications are saved back to the relevant patient's medical record. Data may be shared with sub-processors such as cloud services used for accuRx's own storage, communications, security, engineering, and similar purposes. *If you do not wish to receive text messages please let reception know.* Patients should keep the surgery updated with their latest contact details.

Batch Messaging and Batch Floreys are integrating with the NHS App – giving you an additional, more cost effective route to communicate with patients 📱

When is this happening?

In early September, we'll be switching on automatic routing to the NHS App for all types of Batch Messaging including plain text SMS, templates and Floreys. This feature will not be switched on for Batch Self-Book messages, which will still send via SMS.

What does this mean for your practice?

If a patient has the NHS App downloaded and notifications switched on, any Batch Message or Batch Florey you send will **automatically** be sent to the App with a push notification. This includes messages with attachments.

What should you know about this update?

- If the message is not read by the patient within three hours, Accurx will automatically revert to sending the message via SMS.
- Stagger and schedule will continue to work no matter the route.
- There is no change to how messages are written back to the patient record.
- You can check the patient's medical record to view all sent messages, including those sent via the NHS App.
- If messages revert to SMS after three hours, fragment costs will be charged to the party that currently covers these costs.

What do you need to do?

1. Communicate with your patients – NHS England have customisable [message templates](#). You can also share on social media and your practice website.
2. Read the [Do's and Don'ts of sending messages via the NHS App](#).
3. Take a look at our [information hub](#), created by Accurx to support you and your patients.
4. Check your practice's privacy policy to ensure it covers the NHS App as a communication channel. NHS England have suggested the following wording for a privacy policy:

"We use the NHS Account Messaging Service provided by NHS England to send you messages relating to your health and care. You need to be an NHS App user to receive these messages. Further information about the service can be found at the [privacy notice for the NHS App](#) managed by NHS England."

We recommend that you do not send time critical messages using Batch Messages . A time critical message would be any message where there could be a clinical risk if the user was either not informed or did not action the request within a specific timeframe. In these cases, please use a more direct route such as a phone call.

I.

Clinic co - We will be offering patients video consultations through AccuRX as another way for Patients to consult with their GP. This tool will be especially useful to implement remote consulting in the Coronavirus Surgery Plan. Patients will be offered video consultations when they phone to book appointments and will also be invited to transfer existing face to face and telephone appointments into video appointments. *The video link is via your mobile phone, through a secure encrypted link.* Patients are sent an SMS link to join the consultation. The SMS message will be stored on the patient's clinical record. A GP may request a photo to support a patient's consultation. The photo will be added to the patient's medical record and AccuRX stores the image as part of the process of transferring the information to the practice. The stored photos are on UK servers which are fully encrypted to NHS standards, and are inaccessible by any AccuRX staff. They are stored for the period of time recommended by the NHS Records Management Code of Practice. Video consultations are not recorded or stored by AccuRX or The Fordingbridge Surgery. GP's will record written notes as they do with all other consultation types.

J. **National Services for Health Improvement (NSHI)** - This Company offers nursing based services to practices. Their services are detailed in contracts within which the practice provides written consent for nurses from National Services for Health Improvement to access patient's details and deliver care. Only information relevant to the direct care of patients within the service specification is accessed and only by those staff involved in the service delivery. Any patient that has asked for the viewing of their record to be restricted is excluded from any NSHI service.

K. **Ardens Healthcare Informatics** – This Company provides Clinical Decision Support Tools in the form of templates which is compatible to the clinical system we operate – SystmOne. This company on occasion will test the support tool on patient's records.

L. **Consultant Connect** – Salisbury NHS Foundation Trust are providing a new communication service which allows GPs at Fordingbridge Surgery to quickly access advice and guidance from specialist hospital teams, whilst using the Consultant Connect App or dial-in number. This conversation will be recorded by the GP accurately in the patient's primary care record. A patient is within their right to opt-out of this service at the point of the GP identifying their desire to see advice and guidance. However, the risks associated with opting out will be fully explained to the patient at that point.

M. **MedLink Solutions** – This Company provides the surgery with the software to offer patients the option of online Clinical Reviews for certain medical conditions. The GP will offer the patient this service via SMS Text Message. Once completed, each review summary is sent by secure email to the surgery for adding to the patients' medical record.

N. **CCTV** is in operation around the external walls of the surgery building. This is monitored by a screen in one of our administration rooms and in the conference room for the safety and security of the surgery's staff, Partners, patients plus the building and contents. Recordings are stored on a secure computer drive, kept for 7 days then erased and will only be accessed when necessary.

O. **Recorded information** – all telephone calls are recorded for training and monitoring purposes. The calls are downloaded weekly and are stored on the internal server for 6 months, after which they are deleted.

P. **Restore PLC** To provide off site storage of Patients' paper notes (known as Lloyd George folders).The Lloyd George medical records offsite storage and document management

service has been commissioned by the ICB to meet the Lloyd George medical records storage and retrieval needs of participating practices. The ICB learned from and understood the needs and requirements of practices during the discovery phase of the project leading to the development of a specification for the service. The ICB has commissioned the service.

Q. Anima- Is a communication platform whose main product is an E Consultation. It has been designed for patients to contact the surgery to communicate with a triage team who are able to signpost them to the most appropriate care.

R, iGPR software - Insurance reports – a medical report will be produced using the iGPR software and checked prior to release by a GP/Administrator Admin staff will produce SAR records using iGPR to redact the third-party information Patient clinical records will only be released with consent from the patient to third parties unless on a best interests basis to be decided by their GP in collaboration with Caldicott guardian if advice needed.

9. ANONYMISED INFORMATION

Sometimes we may provide information about you in an anonymised form. If we do so, then none of the information we provide to any other party will identify you as an individual and cannot be traced back to you.

10. YOUR RIGHTS AS A PATIENT

The Law gives you certain rights to your personal and healthcare information that we hold, as set out below:

A. Access and Subject Access Requests

You have the right to see what information we hold about you and to request a copy of this information. If you would like a copy of the information we hold about you please email our Data Protection Officer in writing. We will provide this information free of charge however, we may in some **limited and exceptional** circumstances have to make an administrative charge for any extra copies if the information requested is excessive, complex or repetitive. We have one month to reply to you and give you the information that you require. We would ask, therefore, that any requests you make are in writing and it is made clear to us what and how much information you require.

B. Online Access

You may ask us if you wish to have online access to your medical record. However, there will be certain protocols that we have to follow in order to give you online access, including written consent and production of documents that prove your identity. Please note that when we give you online access, the responsibility is yours to make sure that you keep your information safe and secure if you do not wish any third party to gain access.

C. Correction

We want to make sure that your personal information is accurate and up to date. You may ask us to correct any information you think is inaccurate. It is very important that you make sure you tell us if your contact details including your mobile phone number has changed.

D. Removal

You have the right to ask for your information to be removed. However, if we require this information to assist us in providing you with appropriate medical services and diagnosis for your healthcare, then removal may not be possible.

E. Objection

We cannot share your information with anyone else for a purpose that is not directly related to your health, e.g. medical research, educational purposes, etc. We would ask you for your consent in order to do this however, you have the right to request that your personal and healthcare information is not shared by the Surgery in this way. Please note the Anonymised Information section in this Privacy Notice.

F. **Transfer**

You have the right to request that your personal and/or healthcare information is transferred, in an electronic form (or other form), to another organisation, but we will require your clear consent to be able to do this.

11. THIRD PARTIES MENTIONED ON YOUR MEDICAL RECORD

Sometimes we record information about third parties mentioned by you to us during any consultation. We are under an obligation to make sure we also protect that third party's rights as an individual and to ensure that references to them which may breach their rights to confidentiality, are removed before we send any information to any other party including you. Third parties can include: spouses, partners, and other family members.

12. HOW WE USE THE INFORMATION ABOUT YOU

We use your personal and healthcare information in the following ways:

- A. when we need to speak to, or contact other doctors, consultants, nurses or any other medical/healthcare professional or organisation during the course of your diagnosis or treatment or on going healthcare;
- B. When we are required by Law to hand over your information to any other organisation, such as the police, by court order, solicitors, or immigration enforcement.

We will never pass on your personal information to anyone else who does not need it, or has no right to it, unless you give us clear consent to do so.

13. LEGAL JUSTIFICATION FOR COLLECTING AND USING YOUR INFORMATION

The Law says we need a **legal basis** to handle your personal and healthcare information.

CONTRACT: We have a contract with NHS England to deliver healthcare services to you. This contract provides that we are under a legal obligation to ensure that we deliver medical and healthcare services to the public.

CONSENT: Sometimes we also rely on the fact that you give us consent to use your personal and healthcare information so that we can take care of your healthcare needs. Please note that you have the right to withdraw consent at any time if you no longer wish to receive services from us.

NECESSARY CARE: Providing you with the appropriate healthcare, where necessary. The Law refers to this as 'protecting your vital interests' where you may be in a position not to be able to consent.

LAW: Sometimes the Law obliges us to provide your information to an organisation (see above).

14. SPECIAL CATEGORIES

The Law states that personal information about your health falls into a special category of information because it is very sensitive. Reasons that may entitle us to use and process your information may be as follows:

- **PUBLIC INTEREST:** Where we may need to handle your personal information when it is considered to be in the public interest. For example, when there is an outbreak of a specific disease and we need to contact you for treatment, or we need to pass your information to relevant organisations to ensure you receive advice and/or treatment;
- **CONSENT:** When you have given us consent;

- **VITAL INTEREST:** If you are incapable of giving consent, and we have to use your information to protect your vital interests (e.g. if you have had an accident and you need emergency treatment);
- **DEFENDING A CLAIM:** If we need your information to defend a legal claim against us by you, or by another party;

PROVIDING YOU WITH MEDICAL CARE: Where we need your information to provide you with medical and healthcare services

15. HOW LONG WE KEEP YOUR PERSONAL INFORMATION

We carefully consider any personal information that we store about you, and we will not keep your information for longer than is necessary for the purposes as set out in the NHS Records Management Code of Practice 2021

16. UNDER 16s

There is a separate privacy notice for patients under the age of 16.

IF ENGLISH IS NOT YOUR FIRST LANGUAGE

If English is not your first language you can request a translation of this Privacy Notice. Please contact our Surgery By email fordingbridgesurgery@nhs.net or contact reception.

17. COMPLAINTS

If you have a concern about the way we handle your personal data or you have a complaint about what we are doing, or how we have used or handled your personal and/or healthcare information, then please contact our Practice Manager

However, you have a right to raise any concern or complaint with the UK information regulator, at the Information Commissioner's Office: <https://ico.org.uk/>.

18. OUR WEBSITE

The only website this Privacy Notice applies to is the Surgery's website.

Currently this is: www.fordingbridgegps.co.uk

If you use a link to any other website from the Surgery's website then you will need to read their respective privacy notice. We take no responsibility (legal or otherwise) for the content of other websites.

19. COOKIES

The Surgery's website uses cookies. For more information on which cookies we use and how we use them, please see our Cookies Policy. This is in the 'Practice Policies' section on our home page.

20. SECURITY

We take the security of your information very seriously and we do everything we can to ensure that your information is always protected and secure. We regularly update our processes and systems and we also ensure that our staff are properly trained. We also carry out assessments and audits of the information that we hold about you and make sure that if we provide any other services, we carry out proper assessments and security reviews.

21. TEXT MESSAGING AND CONTACTING YOU

Because we are obliged to protect any confidential information we hold about you and we take this very seriously, it is imperative that you let us know immediately if you change any of your contact details.

We may contact you using SMS texting to your mobile phone in the event that we need to notify you about appointments and other services that we provide to you involving your direct care, therefore you must ensure that we have your up to date details. This is to ensure we are sure we are actually contacting you and not another person.

We also send Friends and Family feedback SMS text messages following an appointment.

If you do not wish to be contacted by text or email please notify the surgery.

22. WHERE TO FIND OUR PRIVACY NOTICE

You will find a copy of this Privacy Notice on our website, or a copy may be provided on request.

23. CHANGES TO OUR PRIVACY NOTICE

We regularly review and update our Privacy Notice. This Privacy Notice was last updated on
31.5.2023 23/10/2023