TWIN OAKS MEDICAL CENTRE NHS

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.

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 who we share it with or pass it on to and why.
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 Twin Oaks Medical Centre is Caroline Sims. You can contact the DPO by emailing hiowicb-hsi.twinoaksmedicalcentre@nhs.net should 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 have any other query relating to this Policy and your rights as a patient

3. ABOUT US

We, at Twin Oaks Medical Centre ('**the Surgery**') situated at Ringwood Road, Bransgore, Dorset, BH23 8AD, 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 then 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. 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 on the National Care Records Service (formerly the Summary Care 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 to provide 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 to ensure they may properly deliver their services to you:

A. Hospital professionals (such as doctors, consultants, nurses, etc).
B. Other GPs/Doctors.
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 Pharmacists, Social Prescribers.)

8. OTHER PEOPLE WHO WE PROVIDE YOUR INFORMATION TO

1. **Commissioners**
2. **Integrated Care Board (ICB)**
3. **Local authorities**
4. **Community Health Services**
5. **For the Purposes of Complying with the Law**
   For the Purposes of Complying with the Law e.g. Police, Courts, Solicitors, Insurance Companies.
6. **Anyone you have given your consent to**
   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. **Data Extraction by the Integrated Care Board –** the ICB 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 ICB 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 ICB may require this pseudonymised information, for example; to better plan the provision of services across a wider locality than practice level.
9. **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 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.
10. **Other GP Practices 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 as part of the NHS contract 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.
11. **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.
12. **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 interest issues e.g. to protect the safety and welfare and safeguarding of patients 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 ICB as well as other Public bodies and Government agencies such 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, ICB, 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 (IGARD) Digital NHS UK. 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. **Access to Records by Primary Care Network (PCN) Staff** Twin Oaks Medical Centre is part of a Primary Care Network (PCN). Primary Care Networks bring together groups of local GP practices to work collaboratively with other healthcare professionals in order to provide additional services and improve the care offered to patients within the local community. As part of this arrangement, certain healthcare professionals who are employed through the PCN may work with the practice to support patient care. These staff may include roles such as clinical pharmacists, pharmacy technicians, care coordinators, social prescribers, health and wellbeing coaches, cancer care coordinators, frailty practitioners and other specialist staff. In order to provide appropriate support and coordinate care, these PCN staff may need access to relevant parts of your GP medical record. Access is provided only where it is necessary to support your direct care. This may include activities such as reviewing medications, supporting patients living with frailty or long-term conditions, coordinating cancer care, assisting with health promotion and prevention programmes, or helping patients access appropriate services and support within the community. PCN staff accessing patient records are bound by the same strict confidentiality and information governance requirements as practice staff. Access to records is controlled through secure NHS systems, role-based permissions and audit trails that monitor when records are accessed and by whom. PCN staff will only access the information that is necessary to carry out their role in supporting your care. The purpose of allowing PCN staff access to patient records is to improve the coordination of care, provide additional support for patients with complex or long-term health needs, optimise medication use, and promote preventative healthcare and wellbeing. All processing of patient information in this context is undertaken in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and NHS confidentiality requirements. The lawful basis for this processing is that it is necessary for the provision and management of health and social care services and for the delivery of direct patient care.
24. **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 waste 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

NHS Talking Therapies
Health Visitors
Palliative Nurses Clinical
Waste

Additional Systems, Services and Data Sharing Arrangements

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. Additional Systems, Services and Data Sharing Arrangements
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 NCRS, but is only available to organisations in Hampshire. For more information visit https://careandhealthinformationexchange.org.uk/
E. **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.
F. **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.
G. **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.

   We can also 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.

H. **Photographs Requested via AccuRX** - 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.

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

J. **CCTV** is in operation around the external walls of the surgery building and in the waiting room and reception area of the practice. This is monitored by a screen in the administration office 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.

K. **Recorded information –** all telephone calls are recorded for training and monitoring purposes. The calls are available to listen back to for 3 years, after which they are deleted.

L. **eConsult Health Ltd -** is a communication platform providing patients with the opportunity to use the on-line application to contact the surgery giving details of symptoms and requesting assistance. All the medical information data given on the on-line form goes straight to the GP practice and any patient identifiable information is deleted by eConsult Health Ltd as soon as the practice receives the eConsultation, which is usually a matter of seconds.

M. **X-On Cloud Telephony and X-On Intellect** all telephone calls are recorded for training and monitoring purposes. The calls are retained in the cloud provided by X-on for a period of three years. Twin Oaks Medical Centre uses a cloud-based telephone system provided by X-On Health, together with an associated digital tool called X-On Intellect, to support the management of patient communications and clinical documentation. These systems are designed for use within NHS healthcare settings and help the practice manage incoming calls and assist clinicians with documenting consultations. The X-On telephone system allows the practice to manage incoming and outgoing calls more effectively. When patients contact the surgery by telephone, information such as the caller's telephone number, call time, call duration and call routing may be recorded within the system. In some circumstances, calls may be recorded for purposes such as staff training, service improvement, and patient safety. Where call recording is used, patients are informed through practice communications or automated telephone messages. X-On Intellect is a digital tool that may be used during clinical consultations to assist clinicians with documentation. When used in a consultation, the system listens to the conversation between the clinician and the patient and generates a structured summary of the consultation. This summary may be used by the clinician to assist in producing consultation notes or correspondence relating to the appointment. The clinician reviews and edits any generated content before it is saved in the patient's clinical record. The use of these systems helps improve efficiency within the practice, supports accurate documentation of consultations, and enables clinicians to focus more attention on patient interaction during appointments. Information processed through these systems may include personal information such as telephone numbers and call metadata, as well as clinical information discussed during consultations where the Intellect tool is used. Any clinically relevant information generated from these interactions is reviewed by the clinician and may be incorporated into the patient's medical record within the practice clinical system. Access to information processed through the X-On systems is restricted to authorised members of the practice team who require the information in order to carry out their duties. Appropriate technical and organisational safeguards are in place to ensure that personal data is handled securely.

These safeguards include controlled access permissions, encrypted data transmission, and system monitoring to protect patient confidentiality.

N. **Apex** Twin Oaks Medical Centre uses Apex, an intelligent analytics platform designed to support NHS primary care by turning complex clinical and operational data into clear and actionable insights. Apex brings together information from the practice's core clinical system SystmOne, and presents this information through intuitive dashboards that help teams understand patterns in activity, capacity and demand. The purpose of using Apex is to support informed decision-making across the practice and wider NHS system. By presenting data in a clear and accessible format, the platform helps practices, Primary Care Networks and wider commissioning organisations to review service demand, understand access patterns, monitor clinical and operational pressures, and plan services more effectively in response to the needs of patients. Apex may process information drawn from the practice clinical system in order to generate dashboards, reports and service insights. This may include demographic information, appointment and activity data, coded clinical information, and other operational data held within the patient record. In most circumstances, this information is used to support service planning, performance monitoring, quality improvement and population-level analysis. Where patient-level data is available within the platform, access is restricted to authorised users who require it for legitimate healthcare, management, planning or quality purposes. The use of Apex supports the practice in understanding workload, improving access to care, planning resources, identifying trends in patient need, and contributing to service improvement across primary care. It assists the practice and the wider NHS in responding to changing patterns of demand and in making decisions that support the safe, effective and efficient delivery of healthcare services. Access to Apex is limited to authorised members of the practice team and, where appropriate, other authorised NHS users working at Primary Care Network, Integrated Care System or commissioning level, in line with agreed data sharing arrangements and information governance controls. Appropriate safeguards are in place to protect confidentiality, including secure authentication, role-based access controls, and audit processes to monitor system use. The processing of information through Apex is undertaken in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and relevant NHS information governance requirements. The lawful basis for processing is that it is necessary for the performance of a task carried out in the public interest and for the provision, management, planning and improvement of health and social care services. The use of Apex has been mandated for practices by the Clinical Commissioning Group as part of its approach to service oversight, planning and improvement. Any information processed through the platform remains subject to NHS confidentiality requirements and is handled in line with the practice's wider privacy and information governance arrangements.

O. **Healthtech1** Healthtech-1's automated registration product 'Sanny' is designed to reduce the 'time till registration' for patients, increase the quality and quantity of data collected, and reduce the burden of registrations on the administration team.

P. **CUSAP** Community urology and stoma appliance prescribing service, patients will order catheters and related products from the systemwide service instead of GP.

Q. **SystmOne** Twin Oaks Medical Centre uses an electronic clinical record system called SystmOne, supplied by The Phoenix Partnership (TPP), to securely record and manage patient information. SystmOne is widely used across the NHS and enables healthcare professionals to maintain accurate, up-to-date records to support the safe and effective delivery of healthcare. Your electronic medical record held within SystmOne contains information necessary for the provision of your care. This may include personal details such as your name, address, date of birth, contact information and NHS number, as well as information relating to your health and care. Clinical information recorded in your record may include consultation notes made by clinicians, details of medical conditions, medications and allergies, test results, referrals, and letters or reports received from hospitals or other healthcare providers involved in your treatment. The information stored in SystmOne is used to support the delivery and coordination of your healthcare.

It enables authorised members of the practice team to record consultations, review relevant medical history when assessing new symptoms, prescribe medications safely, review investigation results, and process clinical correspondence received from other healthcare services. Having a comprehensive electronic record allows clinicians to make informed decisions and provide appropriate treatment. Access to patient records within SystmOne is restricted to authorised healthcare professionals and practice staff who require the information in order to carry out their duties in relation to patient care or the administration of healthcare services. Access is controlled through secure logins, role-based permissions, and system audit trails, which record when records are accessed and by whom. Where it is necessary for your care, relevant information from your record may be shared securely with other healthcare organisations involved in your treatment. This may include hospitals, community services, other GP practices, or urgent care services such as NHS 111. Any sharing of information takes place using secure NHS systems and only where there is a lawful basis to do so. SystmOne operates within secure NHS-approved hosting environments and incorporates a range of security measures designed to protect patient information. These include encrypted data transmission, controlled user access, system monitoring, and audit logging to ensure that patient information is handled safely and confidentially. Your information is processed in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. The lawful basis for processing this information is that it is necessary for the performance of a task carried out in the public interest and for the provision and management of health or social care services. Information recorded within your GP record is retained in accordance with the NHS Records Management Code of Practice, which generally requires that GP medical records are kept for the lifetime of the patient and for a period of up to ten years after death.

R. **OpenSAFELY** NHS England Has been directed by the government to establish and operate the OpenSAFELY COVID-19 Service and the OpenSAFELY Data Analytics Service. These services provide a secure environment that supports research, clinical audit, service evaluation and health surveillance for COVID-19 and other purposes.
Each GP practice remains the controller of its own GP patient data but is required to let approved users run queries on pseudonymised patient data. This means identifiers are rmeoved and replaced with a pseudonym.
Only approved users are allowed to run these queries, and they will not be able to access information that directly or indirectly identifies individuals.
Patients who do not wish for their data to be used as part of this process can register a type 1 opt out with their GP.

2. 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.

3. 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 need 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 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.

G. **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.

4. 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.

5. 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.

6. 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).

7. 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.

8. 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

9. UNDER 16s

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

10. 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 hiowicb-hsi.twinoaksmedicalcentre@nhs.net or contact reception.

11. 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/.

12. OUR WEBSITE

The only website this Privacy Notice applies to is the Surgery's website. Currently this is: www.twinoaksmedicalcentre.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.

13. COOKIES

The Surgery's website uses cookies. For more information on which cookies we use please see our website.

14. 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.

15. 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.

16. 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.

17. CHANGES TO OUR PRIVACY NOTICE

We regularly review and update our Privacy Notice. This Privacy Notice was last updated on 22/4/26