

## GOSFORD HILL MEDICAL CENTRE

### Privacy Notice

#### Your information, what you need to know

This privacy notice explains why we collect information about you, how that information may be used, how we keep it safe and confidential and what your rights are in relation to this.

#### Why we collect information about you

Health care professionals who provide you with care are required by law to maintain records about your health and any treatment or care you have received within any NHS organisation. These records help to provide you with the best possible healthcare and help us to protect your safety.

We collect and hold data for the purpose of providing healthcare services to our patients and running our organisation which includes monitoring the quality of care that we provide. In carrying out this role we may collect information about you which helps us respond to your queries or secure specialist services. We may keep your information in written form and/or in digital form. The records may include basic details about you, such as your name and address. They may also contain more sensitive information about your health and also information such as outcomes of needs assessments.

#### Our Commitment to Data Privacy and Confidentiality Issues

As a GP practice, all of our GPs, staff and associated practitioners are committed to protecting your privacy and will only process data in accordance with the Data Protection Legislation. This includes the General Data Protection Regulation (EU) 2016/679 (GDPR) now known as the UK GDPR, the Data Protection Act (DPA) 2018, the Law Enforcement Directive (Directive (EU) 2016/680) (LED) and any applicable national Laws implementing them as amended from time to time. The legislation requires us to process personal data only if there is a legitimate basis for doing so and that any processing must be fair and lawful.

In addition, consideration will also be given to all applicable Law concerning privacy, confidentiality, the processing and sharing of personal data including the Human Rights Act 1998, the Health and Social Care Act 2012 as amended by the Health and Social Care (Safety and Quality) Act 2015, the common law duty of confidentiality and the Privacy and Electronic Communications (EC Directive) Regulations.

#### Data we collect about you

Records which this GP Practice will hold or share about you will include the following:

- **Personal Data** – means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

- Special Categories of Personal Data – this term describes personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation.
- Confidential Patient Information – this term describes information or data relating to their health and other matters disclosed to another (e.g. patient to clinician) in circumstances where it is reasonable to expect that the information will be held in confidence. Including both information ‘given in confidence’ and ‘that which is owed a duty of confidence’. As described in the Confidentiality: NHS code of Practice: Department of Health guidance on confidentiality 2003.
- Pseudonymised – The process of distinguishing individuals in a dataset by using a unique identifier which does not reveal their ‘real world’ identity.
- Anonymised – Data in a form that does not identify individuals and where identification through its combination with other data is not likely to take place
- Aggregated – Statistical data about several individuals that has been combined to show general trends or values without identifying individuals within the data.

## How we keep your information confidential and safe

Everyone working for our organisation is subject to the Common Law Duty of Confidence. Information provided in confidence will only be used for the purposes advised with consent given by the patient, unless there are other circumstances covered by the law. The NHS Digital [Code of Practice on Confidential Information](#) applies to all NHS staff and they are required to protect your information, inform you of how your information will be used, and allow you to decide if and how your information can be shared. All our staff are expected to make sure information is kept confidential and receive regular training on how to do this.

The health records we use may be electronic, on paper or a mixture of both, and we use a combination of working practices and technology to ensure that your information is kept confidential and secure. Your records are backed up securely in line with NHS standard procedures. We ensure that the information we hold is kept in secure locations, is protected by appropriate security and access is restricted to authorised personnel.

We also make sure external data processors that support us are legally and contractually bound to operate and prove security arrangements are in place where data that could or does identify a person are processed.

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

- Data Protection Act 2018
- General Data Protection Regulation
- Human Rights Act
- Common Law Duty of Confidentiality
- NHS Codes of Confidentiality and Information Security
- Health and Social Care Act 2015

- And all applicable legislation

We maintain our duty of confidentiality to you at all times. We will only ever use or pass on information about you if we reasonably believe that others involved in your care have a genuine need for it. We will not disclose your information to any third party without your permission unless there are exceptional circumstances (such as a risk of serious harm to yourself or others) or where the law requires information to be passed on.

### How we use your information

Improvements in information technology are also making it possible for us to share data with other healthcare organisations for the purpose of providing you, your family and your community with better care. For example it is possible for healthcare professionals in other services to access your record with your permission when the practice is closed. This is explained further in the Local Information Sharing section below.

Whenever you use a health or care service, such as attending Accident & Emergency or using Community Care services, important information about you is collected in a patient record for that service. Collecting this information helps to ensure you get the best possible care and treatment.

The information collected about you when you use these services can also be used and provided to other organisations for purposes beyond your individual care, for instance to help with:

- improving the quality and standards of care provided by the service
- research into the development of new treatments and care pathways
- preventing illness and diseases
- monitoring safety
- planning services
- risk stratification
- Population Health Management

Under the powers of the Health and Social Care Act 2015, NHS Digital can request personal confidential data from GP Practices without seeking patient consent for a number of specific purposes, which are set out in law. These purposes are explained below.

You may choose to withdraw your consent to personal data being shared for these purposes. When we are about to participate in a new data-sharing project we will display prominent notices in the Practice and on our website at least four weeks before the scheme is due to start. Instructions will be provided to explain what you have to do to 'opt-out' of the new scheme. Please be aware that it may not be possible to opt out of one scheme and not others, so you may have to opt out of all the schemes if you do not wish your data to be shared.

You can object to your personal information being shared with other healthcare providers but should be aware that this may, in some instances, affect your care as important information about your health might not be available to healthcare staff in other organisations. If this limits the treatment that you can receive then the practice staff will explain this to you at the time you object.

To ensure you receive the best possible care, your records are used to facilitate the care you receive. Information held about you may be used to help protect the health of the public and to help us manage the NHS.

### Third party processors

In order to deliver the best possible service, the practice will share data (where required) with other NHS bodies such as other GP practices and hospitals. In addition the practice will use carefully selected third party service providers. When we use a third party service provider to process data on our behalf then we will always have an appropriate agreement in place to ensure that they keep the data secure, that they do not use or share information other than in accordance with our instructions and that they are operating appropriately. Examples of functions that may be carried out by third parties includes:

- Companies that provide IT services & support, including our core clinical systems; systems which manage patient facing services (such as our website and service accessible through the same including e-Consult); data hosting service providers; systems which facilitate appointment bookings or electronic prescription services; document management services etc.
- Delivery services (for example if we were to arrange for delivery of any medicines to you).
- Payment providers (if for example you were paying for a prescription or a service such as travel vaccinations).

Further details regarding specific third party processors can be supplied on request.

### **OpenSAFELY COVID-19 and Data Analytics Services**

<https://digital.nhs.uk/about-nhs-digital/corporate-information-and-documents/directions-and-data-provision-notice/data-provision-notice-dpns/opensafely-data-analytics-service>

OpenSAFELY COVID-19 and Data Analytics Services	<p><b>Purpose:</b></p> <p>"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.</p> <p>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 removed and replaced with a pseudonym.</p> <p>Only approved users are allowed to run these queries, and</p>
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	<p>they will not be able to access information that directly or indirectly identifies individuals.</p> <p><b>Legal Basis –</b>  UK GDPR – Article 6 basis:  UK GDPR Article 6(1)(c) - processing is necessary for compliance with a legal obligation to which the controller is subject (the Directions).  UK GDPR Article 9 basis:  UK GDPR Article 9(2)(g) - processing is necessary for reasons of substantial public interest, on the basis of domestic law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject, by virtue of compliance with a direction supplemented by:  Data Protection Act 2018 basis  Data Protection Act 2018 (DPA 2018) Schedule 1, Part 2, paragraph 6: Statutory etc and government purposes.</p> <p>Patients who do not wish their data to be used as part of this process can register a <a href="#">type 1 opt out</a> with their GP. Here you can find <a href="#">additional information about OpenSAFELY</a>."</p> <p><b>Processor:</b></p> <p>NHS England</p> <p>EMIS</p>
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**Online consultation providers currently available through your NHS account**

Links to privacy policies, and help and support, for online consultation providers

Name	Online consultation services offered	Privacy policy
<b>Accurx Limited</b>	Answer questions online and get a response from your GP surgery; ask your GP surgery a question	<a href="#">Accurx's privacy policy</a>

**eConsult Health** Answer questions online and get a response from [eConsult's GP online](#)  
**Limited trading as** your GP surgery; you may be able to get advice for [consultation service](#)  
**eConsult or WebGP** your child if it's available at your surgery [privacy notice](#)

**Engage Health** Answer questions online and get a response from [Engage Health Systems'](#)  
**Systems Limited** your GP surgery; view your online consultations and [privacy policy](#)  
any responses from your GP surgery

### **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 NHS Oxford Health Foundation Trust health visitors and school nurses, and with NHS South Central and West Commissioning Support Unit, who provide the Child Health Information Service in Oxfordshire on behalf of NHS England.

### **Clinical audit**

Information may be used by the CCG for clinical audit to monitor the quality of the service provided to patients with long terms conditions. Some of this information may be held centrally and used for statistical purposes (e.g. the National Diabetes Audit). When this happens, strict measures are taken to ensure that individual patients cannot be identified from the data.

### **Clinical Research**

Sometimes your information may be requested to be used for research purposes – we will always ask your permission before releasing your information for this purpose.

### **Department for Work and Pensions**

Our practice is legally required to provide anonymised data on 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.

### **Improving Diabetes Care**

Information that does not identify individual patients is used to enable focussed discussions to take place at practice-led local diabetes review meetings between health care professionals. This enables the professionals to improve the management and support of these patients.

### **Individual Funding Request**

An 'Individual Funding Request' is a request made on your behalf, with your consent, by a clinician, for funding of specialised healthcare which falls outside the range of services and treatments that CCG has agreed to commission for the local population. An Individual Funding Request is taken under consideration when a case can be set out by a patient's clinician that there are exceptional clinical circumstances which make the patient's case different from other patients with the same condition who are at the same stage of their disease, or when the request is for a treatment that is regarded as new or experimental and where there are no other similar patients who would benefit from this treatment. A detailed response, including the criteria considered in arriving at the decision, will be provided to the patient's clinician.

### **Invoice Validation**

Shared info/non-clinical/master copies [/GHMC Privacy Notice 2018](#) adopted date: October 2018  
Reviewed June 2021 – review date: June – reviewed August 2022 – reviewed Sept 23 update to NDSA – reviewed Oct 23 – reviewed Nov 23  
reviewed -Jan 25 Reviewed Aug 25 – reviewed April 26 – review date: April 28

Invoice validation is an important process. It involves using your NHS number to check which CCG is responsible for paying for your treatment. Section 251 of the NHS Act 2006 provides a statutory legal basis to process data for invoice validation purposes. We can also use your NHS number to check whether your care has been funded through specialist commissioning, which NHS England will pay for. The process makes sure that the organisations providing your care are paid correctly.

### **Local Information Sharing**

Your GP electronic patient record is held securely and confidentially on an electronic system managed by your registered GP practice. If you require attention from a local health or care professional outside of your usual practice services, such as in an Evening and Weekend GP Access Clinic, GP Federation Service, Emergency Department, Minor Injury Unit or Out Of Hours service, the professionals treating you are better able to give you safe and effective care if some of the information from your GP record is available to them.

Where available, this information can be shared electronically with other local healthcare providers via a secure system designed for this purpose. Depending on the service you are using and your health needs, this may involve the healthcare professional accessing a secure system that enables them to view parts of your GP electronic patient record (e.g. Oxfordshire Care Summary or your Summary Care Record) or a secure system that enables them to view your full GP electronic patient record (e.g. EMIS remote consulting system).

In all cases, your information is only accessed and used by authorised staff who are involved in providing or supporting your direct care. Your permission will be asked before the information is accessed, other than in exceptional circumstances (e.g. emergencies) if the healthcare professional is unable to ask you and this is deemed to be in your best interests (which will then be logged).

### **GP Connect users – National Data Sharing Agreement (NDSA)**

A National Data Sharing Arrangement (NDSA) has been launched for GP Connect users.

The [GP Connect NDSA](#) sets out the data sharing requirements and obligations for the use of GP Connect for end user organisations.

The GP Connect National Data Sharing Arrangement (NDSA) sets out the data sharing requirements and obligations for the use of GP Connect. This ratifies the safe sharing of clinical information through GP Connect to support direct patient care.

The NDSA is endorsed by key stakeholders, including the Information Commissioners Office (ICO), National Data Guardian (NDG), the Royal College of General Practitioners (RCGP), and the British Medical Association (BMA).

### **New GP Connect users**

From 18 September 2023 any new GP Connect users are asked to review and sign the NDSA as part of their onboarding process. They should do this through the [NDSA sign up portal](#).

### **Existing GP Connect users**

Existing GP Connect users who were live with GP Connect, before 18 September 2023 are asked to review the NDSA through the [NDSA sign up portal](#) and ensure they satisfy the actions outlined below but they don't need to sign it. This is because the NDSA has been developed to allow existing users to indicate their acceptance and to accede the new terms by continuing to use the GP Connect products.

### **National Fraud Initiative - Cabinet Office**

The use of data by the Cabinet Office for data matching is carried out with statutory authority under Part 6 of the Local Audit and Accountability Act 2014. It does not require the consent of the individuals

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concerned under the Data Protection Act 1998. Data matching by the Cabinet Office is subject to a Code of Practice. For further information see:

<https://www.gov.uk/government/publications/code-of-data-matching-practice-for-national-fraud-initiative>

### **National Registries**

National Registries (such as the Learning Disabilities Register) have statutory permission under Section 251 of the NHS Act 2006, to collect and hold service user identifiable information without the need to seek informed consent from each individual service user.

### **Risk Stratification**

'Risk stratification for case finding' is a process for identifying and managing patients who have or may be at-risk of health conditions (such as diabetes) or who are most likely to need healthcare services (such as people with frailty). Risk stratification tools used in the NHS help determine a person's risk of suffering a particular condition and enable us to focus on preventing ill health before it develops.

Information about you is collected from a number of sources including NHS Trusts, GP Federations and your GP Practice. A risk score is then arrived at through an analysis of your de-identified information. This can help us identify and offer you additional services to improve your health.

Risk-stratification data may also be used to improve local services and commission new services, where there is an identified need. In this area, risk stratification may be commissioned by the Oxfordshire NHS Clinical Commissioning Group (OCCG). Section 251 of the NHS Act 2006 provides a statutory legal basis to process data for risk stratification purposes. Further information about risk stratification is available from: <https://www.england.nhs.uk/ourwork/tsd/ig/risk-stratification/>

If you do not wish information about you to be included in any risk stratification programmes, please let us know. We can add a code to your records that will stop your information from being used for this purpose. Please be aware that this may limit the ability of healthcare professionals to identify if you have or are at risk of developing certain serious health conditions.

### **Safeguarding**

To ensure that adult and children's safeguarding matters are managed appropriately, access to identifiable information will be shared in some limited circumstances where it's legally required for the safety of the individuals concerned.

### **Local Information Sharing**

Your GP electronic patient record is held securely and confidentially on an electronic system managed by your registered GP practice. If you require attention from a local health or care professional outside of your usual practice services, such as in an Evening and Weekend GP Access Clinic, GP Federation Service, Emergency Department, Minor Injury Unit or Out Of Hours service, the professionals treating you are better able to give you safe and effective care if some of the information from your GP record is available to them.

Where available, this information can be shared electronically with other local healthcare providers via a secure system designed for this purpose. Depending on the service you are using and your health needs, this may involve the healthcare professional accessing a secure system that enables them to view parts of your GP electronic patient record (e.g. Oxfordshire Care Summary or your Summary Care Record) or a secure system that enables them to view your full GP electronic patient record (e.g. EMIS remote consulting system).

In all cases, your information is only accessed and used by authorised staff who are involved in providing or supporting your direct care. Your permission will be asked before the information is accessed, other than in exceptional circumstances (e.g. emergencies) if the healthcare professional is unable to ask you and this is deemed to be in your best interests (which will then be logged).

### **Summary Care Record (SCR)**

The NHS in England uses a national electronic record called the Summary Care Record (SCR) to support patient care. It contains key information from your GP record. Your SCR provides authorised healthcare staff with faster, secure access to essential information about you in an emergency or when you need unplanned care, where such information would otherwise be unavailable.

Summary Care Records are there to improve the safety and quality of your care. SCR core information comprises your allergies, adverse reactions and medications. An SCR with additional information can also include reason for medication, vaccinations, significant diagnoses / problems, significant procedures, anticipatory care information and end of life care information. Additional information can only be added to your SCR with your agreement.

Please be aware that if you choose to opt-out of SCR, NHS healthcare staff caring for you outside of this surgery may not be aware of your current medications, allergies you suffer from and any bad reactions to medicines you have had, in order to treat you safely in an emergency. Your records will stay as they are now with information being shared by letter, email, fax or phone. If you wish to opt-out of having an SCR please return a completed opt-out form to the practice.

### **Supporting Medicines Management**

Oxfordshire BOB and some Oxfordshire GP Federations operate pharmacist and prescribing advice services to support local GP practices with prescribing queries, which may require identifiable information to be shared. These pharmacists work with your usual GP to provide advice on medicines and prescribing queries, and review prescribing of medicines to ensure that it is appropriate for your needs, safe and cost-effective. Where specialist prescribing support is required, the CCG medicines management team may order medications on behalf of your GP Practice to support your care.

### **Supporting Locally Commissioned Services**

CCGs support GP practices by auditing anonymised data to monitor locally commissioned services, measure prevalence and support data quality. The data does not include identifiable information and is used to support patient care and ensure providers are correctly paid for the services they provide.

### **Suspected Cancer**

Data may be analysed in cases of suspected cancer by Nuffield Department of Primary Care Health Sciences, Oxford University to facilitate the prevention, early diagnosis and management of illness. Measures are taken to ensure the data for analysis does not identify individual patients.

## **Public health**

### **Transfer of Public Health functions to NHS England**

On 1 October 2021, as part of the government's strategy to transform the public health system in England, responsibility for a number of public health functions transferred from Public Health England (PHE) to NHS England. NHS England is now therefore the controller for personal data processed to support these functions under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Other than the change in Controller there was no changes to

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patients' personal data to discharge these functions, how it is processed or the services received by patients as a result.

More information on NHS England's public health functions and commissioning activities can be [found on our website](#).

From January 2023 the responsibility for the management of the National Disease Registries, a collection of data on all cancers, rare diseases and congenital anomalies diagnosed each year in England from NHS Digital to NHS England the privacy information can be found on the [NHS Digital website: National Disease Registration Service: NHS Digital Transparency Notice](#).

### Purposes for processing

We process personal information of staff transferring into NHS England for the purposes of staff employment. Please see [Our Workforce](#) section of our privacy notice to find out how we use personal data about our employees.

We use personal information to fulfil the Secretary of State for Health and Social Care's duty to protect and improve public health and reduce health inequalities. We may process personal information in order to provide:

- Regional and National Healthcare Public Health services
- Regional and Local Screening functions and Immunisation Commissioning Support and Expert Advice
- Screening Quality Assurance Services.

### How we collect your personal information

We collect personal information in 3 main ways:

- Directly from you
- From the providers of health and care services
- From other organisations supporting the health and care system in England.

### The information we collect

The types of personal information we may collect about you include:

- Demographic information – for example, we may collect your name, date of birth, sex, ethnic group, NHS number, address and postcode, occupation, and contact details such as your phone number
- Health information – for example, we may collect information about your physical health, mental wellbeing, symptoms and medical diagnoses, and health risk factors such as your height and weight, whether you smoke and what your occupation is
- Treatment information – for example, we may collect information about your hospital admissions, clinic attendances, screening appointments, laboratory test results, prescriptions and vaccination history.

### Who we share your information with

We may share your personal information with other organisations to provide you with individual care or for other purposes not directly related to your health and care.

- Your doctor and hospital to help them provide you and other patients with better care by auditing and evaluating the safety and effectiveness of the service they provide
- Data processors: We may share your personal information with organisations we have contracted to help us fulfil our remit

- With other organisations, where such sharing is necessary, proportionate and allowed by law, which may include universities and other researchers.

### Legal basis for processing

We process both personal data and special categories of personal data, including data about your health and ethnic group. Our legal basis to collect your personal information may vary according to the purpose we use it for. In most cases unless stated below Section 7A of the National Health Service Act 2006 satisfies the UK General Data Protection Regulation and the Data Protection Act 2018 that apply below:

- GDPR Article 6(1)(e) 'processing is necessary for the performance of a task carried out in the exercise of official authority vested in the controller.'
- GDPR Article 6(1)(a) 'consent' where processing for surveys and public consultations for changes.

Where we need to use special categories of personal data, the lawful bases will be:

- GDPR Article 9(2)(i) 'processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health'
- GDPR Article 9(2)(h) 'processing is necessary for the provision of health or social care or treatment or the management of health or social care systems and services'
- GDPR Article 9(2)(a) 'explicit consent'
- Data Protection Act Schedule 1 Part 1 (3) 'public health'.

## Data Retention

We manage patient records in line with the [Records Management NHS Code of Practice for Health and Social Care](#) which sets the required standards of practice in the management of records for those who work within or under contract to NHS organisations in England, based on current legal requirements and professional best practice. If you transfer to another GP and we are asked to transfer your records we will do this to ensure your care is continued. Currently the NHS is required to keep GP records for 10 years after a patient has died. Exceptions to these rules are detailed in the code of practice.

## Who are our partner organisations?

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

- NHS Trusts
- Specialist Trusts
- GP Federations
- Independent Contractors such as dentists, opticians, pharmacists
- Private Sector Providers
- Voluntary Sector Providers
- Ambulance Trusts
- Clinical Commissioning Groups
- Social Care Services
- Local Authorities
- Education Services
- Fire and Rescue Services
- Police
- Other 'data processors'

We will never share your information outside of health partner organisations without your explicit consent unless there are exceptional circumstances such as when the health or safety of others is at risk, where the law requires it or to carry out a statutory function.

Within the health partner organisations (NHS and Specialist Trusts) and in relation to the above mentioned themes – Risk Stratification, Invoice Validation, Supporting Medicines Management, Summary Care Record – we will assume you are happy to for your information to be shared unless you choose to opt-out (see below).

This means you will need to express an explicit wish to not have your information shared with the other organisations; otherwise it will be automatically shared. We are required by law to report certain information to the appropriate authorities. This is only provided after formal permission has been given by a qualified health professional. There are occasions when we must pass on information, such as notification of new births, where we encounter infectious diseases which may endanger the safety of others, such as meningitis or measles (but not HIV/AIDS), and where a formal court order has been issued. Our guiding principle is that we are holding your records in strictest confidence. We are compliant with the national data opt out policy.

## Your right to withdraw consent for us to share your personal information (Opt-Out)

If you are happy for your data to be extracted and used for the purposes described in this privacy notice then you do not need to do anything. If you do not want your information to be used for any purpose beyond providing your care you can choose to opt-out. We will respect your decision if you do not wish your information to be used for any purpose other than your care but in some circumstances we may still be legally required to disclose your data.

There are several forms of opt-outs available at different levels:

**Type 1 opt-out.** If you do not want personal confidential information that identifies you to be shared outside your GP practice you can register a 'Type 1 opt-out' with your GP practice. This prevents your personal confidential information from being used except for your direct health care needs and in particular circumstances required by law, such as a public health emergency like an outbreak of a pandemic disease. If you do not want your information to be used for any purpose beyond providing your care you can choose to opt-out. If you wish to do so, please let us know so we can code your record appropriately to stop your records from being shared outside of your GP Practice.

### National data opt-out

The national data opt-out was introduced on 25 May 2018 and replaces the previous 'type 2' opt-out. NHS Digital collects information from a range of places where people receive care, such as hospitals and community services. The new programme provides a facility for individuals to opt-out from the use of their data for research or planning purposes. For anyone who had an existing type 2 opt-out, it will have been automatically converted to a national data opt-out from 25 May 2018 and you will receive a letter giving you more information and a leaflet explaining the new national data opt-out.

The national data opt-out choice can be viewed or changed at any time by using the online service at [www.nhs.uk/your-nhs-data-matters](http://www.nhs.uk/your-nhs-data-matters)

## Right of Access to your information (Subject Access Request)

Under Data Protection Legislation everybody has the right of access to, or request a copy of, information we hold that can identify them, this includes medical records. There are some safeguards regarding what patients will have access to and they may find information has been redacted or removed for the following reasons;

- It may be deemed to risk causing harm to the patient or others
- The information within the record may relate to third parties who are entitled to their confidentiality, or who have not given their permission for the information to be shared.

Patients do not need to give a reason to see their data. And requests can be made verbally or in writing. Although we may ask them to complete a form in order that we can ensure that they have the correct information required.

Where multiple copies of the same information is requested, the surgery may charge a reasonable fee for the additional copies.

Patients will need to provide proof of identity to receive this information. We will not share information relating to you with other individuals without your explicit instruction or without sight of a legal document.

Patients may also request to have online access to their data, they may do this via the [NHS APP](#), or via the practice's system. If you would like to access your GP record, online click, here [Gosford Hill Medical Centre \(gosfordhillmc.co.uk\)](http://Gosford Hill Medical Centre (gosfordhillmc.co.uk))

### COVID Passport access

Patients may access their Covid passport via the [link](#), the practice cannot provide this document as it is not held in the practice record. If you have any issues gaining access to your Covid Passport or letter you should call: 119

### Change of Details

It is important that you tell the person treating you if any of your details such as your name or address have changed or if any of your details are incorrect in order for this to be amended. Please inform us of any changes so our records for you are accurate and up to date.

### Mobile telephone number

If you provide us with your mobile phone number we may use this to send you reminders about your appointments or other health screening information. Please let us know if you do not wish to receive reminders on your mobile.

We 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.

### Email address

Where you have provided us with your email address we will use this to send you information relating to your health and the services we provide. If you do not wish to receive communications by email please let us know.

### Data Protection Officer

Should you have any data protection questions or concerns, please contact our Data Protection Officer at: [gosford.prescriptions@nhs.net](mailto:gosford.prescriptions@nhs.net)

### Notification

The Data Protection Act 1998 requires organisations to register a notification with the Information Commissioner to describe the purposes for which they process personal and sensitive information.

We are registered as a data controller and our registration can be viewed online in the public register at: [http://ico.org.uk/what\\_we\\_cover/register\\_of\\_data\\_controllers](http://ico.org.uk/what_we_cover/register_of_data_controllers)

Any changes to this notice will be published on our website and in a prominent area at the Practice.

### What is the right to know?

The Freedom of Information Act 2000 (FOIA) gives people a general right of access to information held by or on behalf of public authorities, promoting a culture of openness and accountability across the public sector. You can request any non-personal information that the GP Practice holds, that does not fall under an exemption. You may not ask for information that is covered by the Data Protection Legislation under FOIA. However, you can request this under a right of access request – see section above 'Access to your information'.

### Complaints

If you have concerns or are unhappy about any of our services, please contact the Practice Manager Ms Sally Mackie on 01865 374242.

For independent advice about data protection, privacy and data-sharing issues, you can contact:

The Information Commissioner  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Phone: 0303 123 1113 Website: <https://ico.org.uk/global/contact-us>

### The NHS Constitution

The NHS Constitution establishes the principles and values of the NHS in England. It sets out the rights patients, the public and staff are entitled to. These rights cover how patients access health services, the quality of care you'll receive, the treatments and programs available to you, confidentiality, information, and your right to complain if things go wrong.

[The NHS Constitution for England - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

### Further Information

Further information about the way in which the NHS uses personal information and your rights in that respect can be found here:

#### The NHS Care Record Guarantee

The NHS Care Record Guarantee for England sets out the rules that govern how patient information is used in the NHS, what control the patient can have over this, the rights individuals have to request copies of their data and how data is protected under the Data Protection Act 1998.

<http://systems.digital.nhs.uk/infogov/links/nhscrg.pdf>

## NHS Digital

NHS Digital collects health information from the records health and social care providers keep about the care and treatment they give, to promote health or support improvements in the delivery of care services in England.

<http://content.digital.nhs.uk/article/4963/What-we-collect>

## Reviews of and Changes to our Privacy Notice

Review and update of Privacy Notice Nov 23 - NHSE data provision notice – update National Obesity Audit

Review and update of Privacy Notice Oct 23 – changes to cervical smear system transfer of Public Health to NHS England

Review of Privacy Policy June 2023 – added to privacy policy DPIA blood transportation CitySprint.

Review of Privacy Policy October 2023 - added to privacy policy DPIA Joy Data Processing Agreement found shared folder/nonclinical KIWI Joy app.

Reviewed/updated August 2025. Additional information added for NHS England expansion OpenSAFELY secure COVID-19 research

## Reviews of and Changes to our Privacy Notice

We will keep our Privacy Notice under regular review. This notice was last reviewed in April 2026. The surgery has added information on management of the IG and DPO services provided to GP Practices by the ICB.

From the 1st April 2026 Thames Valley ICB planned to provide new generic email addresses:

1. A generic DPO email address which can be placed on GP Practices' privacy notices
2. A generic email address for IG support, advice and guidance

Due to technical issues with NHS Mail, there is a delay in creating these new email addresses.

Therefore, a temporary email address for GP practices to use to obtain DPO support, advice and guidance is: [frimleyicb.igenquiries@nhs.net](mailto:frimleyicb.igenquiries@nhs.net).

Where a GP Practice is required to name their DPO and is utilising the ICB service, we advise practices state: "Our Data Protection Officer function is provided by NHS Thames Valley ICB, please contact [frimleyicb.igenquiries@nhs.net](mailto:frimleyicb.igenquiries@nhs.net).

For GP IG services including DSPT support, until the transition, please continue to contact Lindsay Blamires: [Lindsay.blamires@nhs.net](mailto:Lindsay.blamires@nhs.net)

**Addendum:**

NHS England expansion OpenSAFELY secure COVID-19 research

<https://transform.england.nhs.uk/information-governance/frequently-asked-questions/#questions-about-opensafely>

Privacy Policy updated August 2025 – DPIA Open SAFELY data and Appliance prescription Manager



DPIA Blood  
Transportation Servi

Field Code Changed



Data Processing  
Agreement Joy App

Field Code Changed



National Obesity  
Data Provision Notic



OpenSAFELY\_Data\_  
Analytics\_ServiceDPI



DPIA Appliance  
Prescription Manage

- "This practice is supporting vital health and care planning and research by sharing your data with NHS Digital. For more information about this see the [GP Practice Privacy Notice for General Practice Data for Planning and Research](#)."

**Gosford Hill Medical Centre is compliant with the national data opt – out policy.**