

BRADLEY STOKE SURGERY

Patient Privacy Notice

Who We Are

Bradley Stoke Surgery gathers and processes your personal information in accordance with this privacy notice and in compliance with the relevant data protection regulation and laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

Bradley Stoke Surgery's registered office is at Brook Way, Bradley Stoke, Bristol, BS32 9DS. We are registered on the Information Commissioner's Office Register; registration number Z5542018, and act as the data controller when processing your data. Our designated Data Protection Officer can be contacted at Bradley Stoke Surgery, Brook Way, Bradley Stoke, Bristol, BS32 9DS or by telephone 01454 616262.

Our Commitment to Data Privacy and Confidentiality Issues

As a GP practice, all 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.

Information That We Collect

Bradley Stoke Surgery processes your personal information to meet our legal, statutory and contractual obligations and to provide you with our services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

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.
(Name, Date of Birth, Home Address, Home Telephone Number, Mobile Telephone Number, Next of Kin, Medical history, Ethnicity, Disability, Religion)

Change of Detail

It is important that you tell the surgery if any of your contact details such as your name or address have changed, or if any of your other contacts details are incorrect including third party emergency contact details. It is important that we are made aware of any changes **immediately** in order that no information is shared in error.

Mobile Telephone Number

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

Email Address

Where you have provided us with your email address, with your consent 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.

- 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.
- Medical reports & Subject Access Requests:

We use a processor, iGPR Technologies Limited (iGPR), to assist us with responding to report request relating to your patient data, such as subject access requests that you submit to us (or that someone acting on your behalf submits to us) and report requests that insurers submit to us under the Access to Medical Records Act 1988 in relation to a life insurance policy that you hold or that you are applying for.

iGPR manages the reporting process for us by reviewing and responding to requests in accordance with our instructions and all applicable laws, including UK data protections laws.

The instructions we issue to iGPR include general instructions on responding to requests and specific instructions on issues that will require further consultation with the GP responsible for your care.

We collect information in the below ways: -

- Registration Form
- Change of address/name forms
- Previous GP records
- Online application forms

- Prescription requests
- Automated Arrivals System

How We Use Your Personal Data (Legal Basis for Processing)

Bradley Stoke Surgery takes your privacy very seriously and will never disclose, share or sell your data without your consent; unless required to do so by law. We only retain your data for as long as is necessary and for the purpose(s) specified in this notice.

The purposes and reasons for processing your personal data are detailed below: -

- We collect your personal data to provide a service to you.
- We collect special category data about you, to ensure that any disabilities, health conditions and religious requirements are known.

We use patients' details to help us to provide healthcare services to you as part of our duty of care and we have processes in place to send messages to patients and this includes text messages for appointment reminders, targeted campaigns, screening interventions and reviews as well as Friends and Family Tests. Patient should inform the surgery in writing if they do not wish to receive text messages.

Improvements in information technology are also making it possible for us to share data with other healthcare organisations for the purpose of providing you. Where your record is accessed without your permission it is necessary for them to have a legitimate basis in law.

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

This may only take place when there is a clear legal basis to use this information. All these uses help to provide better health and care for you, your family and future generations. Confidential patient information about your health and care is only used like this where allowed by law or with consent.

Pseudonymised or anonymised data is generally used for research and planning so that you cannot be identified.

Medical Examiner Officers – North Bristol NHS Trust (Processor):

Purpose: Medical records associated with deceased patients are outside scope of the UK GDPR. However, next of kin details are within the scope of the UK GDPR. We will share specified deceased patient records and next

of kin details with the Medical Examiners within North Bristol NHS Trust (Legal basis Article 6(1)c and Article 9(2)h).

Your Rights

You have the right to access any personal information that Bradley Stoke Surgery holds about you and to request information about: -

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing (*where applicable*) in accordance with the data protection laws but this is not an absolute right and it only applies in certain circumstances; as well as to object to any direct marketing from us. Where applicable, you have the right to data portability of your information and the right to be informed about any automated decision-making we may use.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

Sharing and Disclosing Your Personal Information

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement.

Safeguarding Measures

Bradley Stoke Surgery takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, **including:** -

Railex locked file system

Restricted access electronic information

Locked filing cabinet

Firewall

Anti-virus software

Transfers Outside the EU

Personal data in the European Union is protected by the General Data Protection Regulation (GDPR) but some other countries may not necessarily have the same high standard of protection for your personal data. Bradley Stoke Surgery does not transfer or store any personal data outside the EU.

Consequences of Not Providing Your Data

You are not obligated to provide your personal information to Bradley Stoke Surgery, however, as this information is required for us to provide you with our services, we will not be able to offer our services without it.

How Long We Keep Your Data

Bradley Stoke Surgery only ever retains personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations. We are required to keep your information whilst you are a patient at the surgery. We are required to transfer all of your medical records to the local Health Authority once we are notified that you have left the surgery.

Your rights to opt out of data sharing and processing

The NHS Constitution states 'You have a right to request that your personal and confidential information is not used beyond your own care and treatment and to have your objections considered'.

- **Type 1 Opt Out**

This is an objection that prevents an individual's personal confidential information from being shared outside of their general practice except when it is being used for the purposes of their individual direct care, or in particular circumstances required by law, such as a public health emergency like an outbreak of a pandemic disease. If patients wish to apply a Type 1 Opt Out to their record they should make their wishes known to the Surgery.

- **National Data Opt-out**

The national data opt-out was introduced on 25 May 2018, enabling patients to opt out from the use of their data for research or planning purposes, in line with the recommendations of the National Data Guardian in her [Review of Data Security, Consent and Opt-Outs](#).

The national data opt-out replaces the previous 'type 2' opt-out, which required NHS Digital not to use a patient's confidential patient information for purposes beyond their individual care. Any patient that had a type 2 opt-out recorded on or before 11 October 2018 has had it automatically converted to a national data opt-out. Those aged 13 or over were sent a letter giving them more information and a leaflet explaining the national data opt-out. For more information go to [National data opt out programme](#)

To find out more or to register your choice to opt out, please visit www.nhs.uk/your-nhs-data-matters.

- On this web page you will:
 - See what is meant by confidential patient information
 - Find examples of when confidential patient information is used for individual care and examples of when it is used for purposes beyond individual care
 - Find out more about the benefits of sharing data
 - Understand more about who uses the data
 - Find out how your data is protected
 - Be able to access the system to view, set or change your opt-out setting
 - Find the contact telephone number if you want to know any more or to set/change your opt-out by phone
 - See the situations where the opt-out will not apply
- **Open SAFELY service**

NHS England has been directed by the Government to establish and operate the OpenSAFELY service. This service provides a Trusted Research Environment that supports COVID-19 research and analysis.

Each GP practice remains the controller of its own patient data but is required to let researchers run queries on pseudonymised patient data. This means identifiers are removed and replaced with a pseudonym, through OpenSAFELY.

Only researchers approved by NHS England are allowed to run these queries and they will not be able to access information that directly or indirectly identifies individuals.

Lodging A Complaint

Bradley Stoke Surgery only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority.

Bradley Stoke Surgery

Mirinda Rowell
Brook Way
Bradley Stoke
Bristol
BS32 9DS
Telephone: 01454 616262

Supervisory Authority

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

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