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| **AUTHOR/LEAD** | Alison Shelton |
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| VERSION | DESCRIPTION OF CHANGE | REASON FOR CHANGE | AUTHOR | DATE |
| V.5.2 | New Policy | Re-Written Policy | AS | 10/05/2022 |
| V5.3 | DCCR added |  | SS | 02/08/2022 |
| V 5.4 | ODD/PHM added |  | SS | 15/09/2022 |
| V5.5 | Covid 19 addition |  | SS | 24/11/2022 |
| V 5.6 | SystmOne | Updated | SS | 3/7/2023 |
| V5.7 | Additional services added | Update | SS | 29/02/2024 |
| V 6.0 | Changes in Personnel | Update | SS | 07/01/2025 |

**Practice Privacy Notice for Friary House Surgery**

This privacy notice describes the data, the practice holds about you, why we hold it, where and how we store it, how long for and how we protect it. It also tells you about your rights under the Data Protection Legislation and how the law protects you.

**Who we are and what do we do?**

Friary House Surgery Tel; 01752 663138, web site [https://www.friaryhousesurgery.nhs.uk](https://www.friaryhousesurgery.nhs.uk/)

E Harley Street is the Data Controller for the data we hold about you. We hold your data to provide you with health and social care.

The Partners are Dr Jalil Ahmed

Dr Jonathan Allinson.

**What is personal data and what data do we use?**

Your personal data is any information that can be connected to you personally. If you can be identified from the data, it is personal data. The types of personal data we use and hold about you are:

* Details about you: your name, address, contact number, email address, date of birth, gender and NHS number. We may also hold information about your emergency contact, next of kin and carer.
* Details about your medical care: medical diagnosis, record of treatment received, referrals, history of prescribed medication, results of investigations such as X-rays etc.
* Information provided by you: this includes correspondence relating to feedback, concerns and complaints about the service you have received.
* Relevant information from other healthcare professionals, relatives or those who care for you.
* CCTV images captured at distinct points in and around the surgery building. (see separate CCTV privacy notice)

We may also hold the following information about you:

* Religion or other beliefs of a similar nature,
* Family, lifestyle and/or social circumstances,
* Employment details,
* Financial details.

When we collect your mobile number, we use it to text you to remind you of appointments or bring your attention to health-based questionnaires directly involved in your care. If you no longer wish to receive communication this way, please let a member of staff know who will be able to update your preferences.

When we collect your email address, we use it to send you links for retrieving documentation or use it to respond to any Data Protection Right requests you may have. If you no longer wish to receive communication this way, please let a member of staff know who will be able to update your preferences.

**Why do we process your data and what legal basis do we have to process your data?**

In order to process your personal data or share your personal data outside of the practice, we need a legal basis to do so. If we process or share special category data, such as health data, we will need an additional legal basis to do so.

We rely upon Article 6(1)(e) (public interest task) and Article 9(2)(h) (health and social care) for most of our processing and sharing, in particular to:

* Provide you with health and social care,
* Share data from, or allow access to, your GP record, for healthcare professionals involved in providing you with health and social care,
* Receive data from or access your data on other NHS organisation clinician systems,
* Work effectively with other organisations and healthcare professionals who are involved in your care,
* Ensure that your treatment and advice, and the treatment of others is safe and effective,
* Participate in National Screening Programmes,
* Use a computer program to identify patients who might be at risk from certain diseases or unplanned admissions to Hospitals,
* Help NHS Digital and the practice to conduct clinical audits to ensure you are being provided with safe, high-quality care,
* Support medical research when the law allows us to do so,
* Supply data to help plan and manage services and prevent infectious diseases from spreading.

We rely upon Article 6(1)(d) (vital interest) and Article 9(2)(c) (vital interests) to share information about you with another healthcare professional in a medical emergency.

We rely upon Article 6(1)(e) (public interest task) and Article 9(2)(g) (substantial public interest) to support safeguarding for patients who, for instance, may be particularly vulnerable to protect them from harm or other forms of abuse.

We rely upon Article 6(1)(c) (legal obligation) and Article 9(2)(h) to share your information for mandatory disclosures of information (such as NHS Digital, CQC and Public Health England).

We rely upon Article 6(1)(c) (legal obligation) and Article 9(2)(f) (legal claims) to help us investigate legal claims and if a court of law orders us to do so.

We rely upon Article 6(1)(a) (consent) and Article 9(2)(a) (explicit consent), in order to:

* Help the practice investigate any feedback, including patient surveys, complaints or concerns you may have about contact with the practice,
* Help manage how we provide you with services from the practice, for example, when you nominate individuals to contact the practice on your behalf,
* Share your information with third parties, for example, insurance companies and medical research organisations.

We also use anonymised data to plan and improve health care services. Specifically, we use it to:

* Review the care being provided to make sure it is of the highest standard,
* Check the quality and efficiency of the services we provide,
* Prepare performance reports on the services we provide.

Healthcare staff will respect and comply with their obligations under the common law duty of confidence.

**How do we collect your data?**

The practice collects data that you provide when you:

* Receive treatment or care from the practice,
* Contact the practice by telephone all telephone calls received and made by the practice are recorded,
* Complete a form electronically or in paper,
* Contact the practice via a Social Network for example if you communicate with the practice through Facebook,
* Visit the practice’s website (If cookies are enabled).

We receive information about you from other providers to ensure that we provide you with effective and comprehensive treatment. These providers may include:

* The GP Practices within the Sound Primary Care Network
* Other GP Practices
* NHS Trusts/Foundation Trusts
* NHS Commissioning Support Units (CSUs)
* Community Services (District Nurses, Rehabilitation Services and out of hours services)
* Ambulance or emergency services
* Independent contractors such as Pharmacies, Dentists and Opticians
* Devon Integrated Care Board (ICB)
* NHS Digital
* NHS England
* Local authorities (PCC)
* Health and Social Care Information Centre (HSCIC)
* Police and Judicial Services
* Educational Services
* NHS 111
* Public Health England and Screening
* Non-NHS health care providers
* Research providers e.g., CPRD GP Network, University of Exeter, RD&E NHS Foundation trust. Southampton University CRNSW.

We also use Klinik which is an online tool that allows you to get advice and treatment, request sick notes, repeat prescriptions and results or self-help.

You can also use Klinik via the NHSApp. Further information regarding the role of NHS England and the practice can be found: <https://www.nhs.uk/using-the-nhs/nhs-services/the-nhs-app/privacy/online-consultations/>

**Who do we share your data with?**

In order to deliver and coordinate your health and social care, we may sometimes share information with other organisations. We will only ever share information about you if other agencies involved in your care have a genuine need for it. Anyone who receives information from the practice is under a legal duty to keep it confidential and secure.

Please be aware that there may be certain circumstances, such as assisting the police with the investigation of a serious crime, where it may be necessary for the practice to share your personal information with external agencies without your knowledge or consent.

We may share information with the following organisations:

* The GP Practices Budshead, Oakside, Southway and Elm within the Sound Primary Care Network
* Other GP Practices
* NHS Trusts/Foundation Trusts
* Devon Integrated Care Board (ICB)
* NHS Commissioning Support Units
* Community Services (District Nurses, Rehabilitation Services and out of hours services)
* Ambulance or emergency services
* Independent contractors such as Pharmacies, Dentists and Opticians
* Local authorities
* Multi-Agency Safeguarding Hub (MASH)
* Health and Social Care Information Centre (HSCIC)
* Police and Judicial Services
* Educational Services
* Fire and Rescue Services
* NHS 111
* Healthtech1
* MapmyMole
* Marie Curie
* The Care Quality Commission, ICO and other regulated auditors
* Public Health England and Screening
* NHS England
* NHS Digital
* Non-NHS health care providers
* Research providers e.g. CPRD GP Network, University of Exeter, RD&E NHS Foundation trust. Southampton University CRNSW.

In addition to sharing data with the above services, the practice will also use carefully selected third party service providers that process data on behalf of the practice. When we use a third-party service provider, 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 responsibly to ensure the protection of your data. Examples of functions that may be carried out by third parties includes:

* Organisations 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); data hosting service providers; systems which facilitate video consultation, appointment bookings or electronic prescription services; document management services etc.
* Organisations who are delivering services on behalf of the practice (for example conducting Medicines Management Reviews to ensure that you receive the most appropriate, up to date and cost-effective treatments or supporting practices in offering choices of providers and appointments to patients who are being referred via the NHS E-Referral system).
* 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).
* DCCR - Health and social care services in Devon and Cornwall have developed a system to share patient data efficiently and quickly and, ultimately, improve the care you receive. This shared system is called the Devon and Cornwall Care Record. It’s important that anyone treating you has access to your shared record so they have all the information they need to care for you. This applies to your routine appointments and also in urgent situations such as going to A&E, calling 111 or going to an out-of-hours appointment. It’s also quicker for staff to access a shared record than to try to contact other staff by phone or email. Only authorised health and care staff can access the Devon and Cornwall Care Record and the information they see is carefully checked so that it relates to their job. Also, systems do not share all your data – just data that services have agreed is necessary to include.

For more information about the Devon and Cornwall Care Record, please go to <https://www.devonandcornwallcarerecord.nhs.uk/>

**TPP SystmOne**

### [Why do we need to share your personal data?

We recognise that you will benefit from other health and social care providers that care for you (either currently or in the future) having access to your electronic health (and where applicable social care) record. This is because they can then make fully informed decisions about the care you require. The reasons for access to the detailed record, mentioned above, apply across the health and social care profession. A shared record ensures that care providers always have the most accurate, up to date information.]

***What do we mean by ‘Direct Care’?***

The term ‘Direct Care’ means a clinical health activity concerned with the prevention and investigation and treatment of illness. It includes supporting your ability to function and improve your participation in life and society. It also includes the assurance of safe and high-quality care and treatment undertaken by one or more registered and regulated health or social care professionals and their team with whom you have a legitimate relationship for your care purposes.

It does **not** include access to information for purposes such as insurance, advertising or marketing.

## How we share your personal data (our practice default)

As your GP practice we have set the following practice settings for all our registered patients whose detailed electronic health (and where applicable social care) record is in our possession and within the clinical computer system, SystmOne. However, we recognise that each of our patients have differing health and social care needs and you may wish to control yourself how your personal data is shared. This can be done via ‘Your Choices’ stated below.

### [Explicit consent to make your record available to all organisations (without verification/security code process) - original eDSM) for direct care purposes.

We will obtain your explicit consent (permission) to share your detailed electronic health (and where applicable social care) record to anyone that cares for you. By providing your permission, we make your record available to all NHS commissioned services and local authorities providing health and social care services, using the clinical record computer system, SystmOne. This allows for anyone at these organisations who have the appropriate controls to retrieve your electronic record once you are registered for care. However, these individuals should only legitimately access your record to provide you with care services. They must also record your permission to view your record.

The types of organisation who could be involved in your direct care and therefore need access to your electronic record are:

* GP practices
* Community services (for example, physiotherapy, diabetic clinics, district nursing, rehabilitation centres)
* Referral triage centres (services determining which organisations should care for you)
* Child Health
* Urgent Care (for example, A&E, Minor Injury Units (MIU) and Out of Hours services)
* Community Hospitals
* Palliative Care
* Care Homes
* Offender Health (care providers within organisations such as Prisons and Custody Suites)
* NHS Hospitals
* NHS Mental Health Services
* Social Care – registered and regulated professionals within social care organisations coordinating care (not social care providers)
* Community Pharmacy

To find out more about these types of organisations please go to the following webpage: <http://www.tpp-uk.com/products/systmone/modules> or talk to a member of your GP practice.

If at any point in the future you are not happy to share your electronic record in this way, please let us know as soon as possible so that we can record your dissent (refusal of permission) and stop your record from being accessed outside of the GP practice. You can choose to refuse your permission for any organisation having access to your GP record..

Where we have not received your explicit consent or dissent then your record will not be shared.

### [Implied consent to make your record available to all organisations (without verification/security process - original eDSM for direct care purposes)

We assume that you are happy to share your detailed electronic health (and where applicable social care) record to anyone that cares for you. We therefore make your record available to all NHS commissioned services and local authorities providing health and social care services, using the clinical record computer system, SystmOne. This allows for anyone at these organisations who have the appropriate controls to retrieve your electronic record once you are registered for care. However, these individuals should only legitimately access your record to provide you with care services. They must also record your permission to view your record.

The types of organisation, which could be involved in your direct care and therefore need access to your electronic record are:

* GP practices
* Community services (for example, physiotherapy, diabetic clinics, district nursing, rehabilitation centres)
* Referral triage centres (services determining which organisation should care for you)
* Child Health
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* Community Pharmacy

To find out more about these types of organisation please go to the following webpage: <http://www.tpp-uk.com/products/systmone/modules> or talk to a member of your GP Practice.

If you are not happy to share your electronic record in this way, please let us know as soon as possible so that we can record your dissent (refusal of permission) and stop your record from being accessed outside of the GP practice. You can choose to refuse your permission for any organisation having access to your GP record.

Where we have not implied your consent or dissent then your record will not be shared.

### [Organisations we make your record available to

We work collaboratively with a variety of health [and social care] organisations [across the NHS][across local authorities][within the locality] and therefore [with your explicit consent] [with your assumed consent] we make your electronic patient record available to a select list of organisations using the clinical record computer system, SystmOne. This means that once you are registered at those organisations their staff, who have been given the role of viewing clinical records, will be able to view your record, once they have discussed this with you and recorded your consent.

These organisations are stated [below] [on our website] and/or [you can ask for a printed list].

All other health and social care organisations require you to verify their access (see verification section below) [or are prevented from accessing your record (see below sections)].

[The list of organisations]

### [Organisations we make your record available to

It is not always possible to predict the specific health and social care services that you may require in the future. For example, you may require a specialist service or need to be treated whilst away on holiday in another part of the country. Therefore, where we have [obtained][assumed] your consent we make your electronic health (and where applicable social care) record available to organisations subject to you providing them with a verification (security) code if/when you present there for care; it’s similar to the verification (security) process you may be familiar with using for internet banking. Without this code the organisation will not be able to access your record.

[Verification applies to all health and social care organisations using the clinical record computer system, SystmOne][Verification only applies to those health and social care organisations, using the clinical record computer system SystmOne, who are not mentioned above, as those who we have chosen to automatically share with (see above), or those mentioned below who we have chosen not to share with (see below)]. All [other] NHS commissioned services and local authorities providing health and social care services, using SystmOne, must ask you to provide verification via a PIN number sent to your phone and/or email address. Without this PIN number provided to the organisations, they will be unable to access your electronic record. unless you put that organisation on your personal sharing list – see **[**Your choice- or ask the GP practice to add them to their sharing list.

You will only be required to provide the PIN number to that particular organisation once (e.g. each referral, A&E attendance, contact with an out of hour’s service). As soon as the verification (security) code is provided, the individuals at the organisation will continue to have access to your record to treat you for that particular matter/condition/referral, until you change your mind and ask that organisation to record refusal of your permission. Only staff with the appropriate job functions, granted to them by the organisation and only those providing you with care services, should legitimately access your record, once they have obtained your consent.]

### [Organisations we do not make your record available to and are prevented from obtaining a security code from you

We prevent your detailed SystmOne electronic health (and where applicable social care) record from being available to a list of health and social care organisations, no matter whether your consent has been obtained. [These organisations are stated below] [You can ask for a printed list of these organisations]. We do not expect that these health and social care services will ever need to access your detailed electronic record, [nor do we consider that we have sufficient information about their data access and security policies to make your record available].

If you wish to ensure that one or all of these organisations can access your record then the options available to you are explained below in ‘Your Choice’.

[The list of organisations]

## Your choice

You may not agree with the health and social care organisations we have chosen to have access to your detailed electronic health (and where applicable social care) record (the practice default). You can therefore control this yourself. Your choice will override our settings. You have the following options:

* **No organisations require you to provide a security code** - You can give your permission to allow all NHS commissioned services and local authorities providing health and social care services, using the clinical record computer system, SystmOne, to access your record. This allows for any individual at these organisations (who have the appropriate access controls) to retrieve your electronic record, only after you are registered with them for care. These individuals should only legitimately access your record to provide you with care services and they should always request and gain your consent before doing so.
* **Dissent/Refusal of your permission** - You can refuse your permission for your record to become available to all NHS commissioned services and local authorities providing health and social care services, using the clinical record computer system, SystmOne,, which prevents us sharing your clinical record to any other organisation involved in your care. Please carefully consider the benefits of sharing your record, mentioned [why] and [sharing your record] before choosing this option.
* **All organisations require you to provide a security code** - You can require that all health and social care organisations must ask you for a PIN number on your first visit to that service. This allows you to verify/confirm that each individual organisation should have access to your record, as they are legitimately involved in your care. You will require access to either a mobile phone or email account, as a PIN will be sent to you. [Alternatively, you will need access to SystmOnline to accept or reject a share request sent to your account by the organisation wishing to view your record. Please contact your GP or GP receptionist to request to be enabled for SystmOnline]
* **Custom** **lists** - You can put together your own personal lists for access, adding organisations to each of the 3 lists i.e. does not require a security code (allowed list), requires a security code (verification list) and cannot access (prohibited list). The functionality for each list will act as described above, but it is you who can determine the level of access, which applies to them. This should be done in conjunction with your GP to ensure you understand the full implications of your decisions.
* **Marking items as private** – If you have had a consultation about a particularly sensitive matter, you can ask for this section of your record to be marked as private. That way, even if you consent for another service to see your record, that consultation will not be shown outside the organisation that recorded it. However, if the consent override function is used, then consultations marked as private can be accessed by the other service/organisation performing the override.

When deciding which option to choose it is important to consider that your detailed record allows for an overall picture of your health and wellbeing to be assessed. This in turn helps health and social care professionals diagnose and prescribe appropriate courses of treatment to you. This ensures that the most safe and efficient care is provided. It will prevent you from having to repeat your medical history and remember every detail, which may or may not be relevant, to every health and social care professional involved in your care. Lack of access to your information may lead to misdiagnosis, inappropriate prescribing of medication or tests and/or ineffective treatment.

You can make the above changes at any time by contacting your [GP][GP Receptionist] [or by logging onto your SystmOnline account].

Please see the SystmOnline eDSM functional guide for patients which can be accessed on Our website at https://www.friaryhousesurgery.nhs.uk/

**Covid 19 (Now Suspended)**

The health and social care system is taking action to manage and mitigate the spread and impact of the current outbreak of coronavirus (COVID-19).

Action to be taken requires the collection, analysis and sharing of information, including confidential patient information where necessary and lawful, amongst health organisations and other appropriate bodies. This is due to the urgent need to protect public health and respond to the COVID-19 outbreak. This notice describes how we may use your information to protect you and others during the COVID-19 outbreak.

To support the healthcare response to COVID-19, NHS Digital has been directed by the Secretary of State for Health and Social Care (the Secretary of State) and NHS England under the COVID-19 Directions to:

* establish information systems to collect and analyse data in connection with COVID-19; and
* develop and operate IT systems to deliver services in connection with COVID-19

**Targeted Lung Health Check Programme**

We are participating in the National Targeted Lung Health Checks pilot, with the Peninsula Cancer Alliance InHealth Intelligence. The aim of the pilot is to identify lung cancers at an earlier stage that is evidenced to result in better outcomes. It follows successful trials in Manchester, Liverpool, and Nottingham. During the Manchester trial, 65% of lung cancers were diagnosed at stage 1 and 13% at stage 4, compared to 18% at stage 1 and 48% at stage 4 before the trial. We will provide limited data of all coded smokers and ex-smokers between the ages of 55 yrs and 74 yrs who will be invited to participate in the scheme.

**One Devon Dataset**

As well as using your data to support the delivery of care to you, your data may be used to help improve the way health and social care is delivered to patients and service users throughout Devon using Population Health Management methods.

We will use a pseudonymised extract (i.e., ***Not***identifiable information) which will be sent securely to NHS Devon ICB (Integrated Care Board) and in partnership with the Local Authorities. Data will be used to support the Devon Integrated Care System to improve short-term and medium-term health outcomes for local populations. If you would benefit from some additional care or support, your information will be shared back to the practice, or another local provider involved in your care, so that they can offer you direct care.

Further information about Population Health Management can be found here:

<https://www.england.nhs.uk/integratedcare/what-is-integrated-care/phm/>

Further information about the One Devon Dataset can be found here:

[One Devon: NHS Devon Integrated Care Board responsible for the majority of NHS budget and services in Devon](https://onedevon.org.uk/)

We will rely on public interest task as the legal basis for processing your data for this purpose. You have a right to object to your information being used in this way.

For further information of who we share your personal data with and our third-party processors, please contact Steve Shelton Data and Facilities Manager 01752 663138.

**Healthtech1**

Click Link for[Privacy Policy for Patients (healthtech1.uk)](https://docs.healthtech1.uk/privacy-policy)

**MapmyMole**

This is a pilot allowing patients to use photographs and a Map my Mole App to submit photographs of their suspected Moles lesions etc. to a specialist team for analysis. This is designed as a triage process to speed up and simplify the investigation and treatment of these phenomenon. If the patient has a worrisome mole or lesion, they will contact the Surgery reception and be offered the option of either capturing the image at home or at the surgery or have an appointment with a clinician. After team have examined the images, they will be contacted by letter with the result of the investigation.

**Where do we store your data?**

We use several IT systems and tools to store and process your data, on behalf of the practice. Examples of tools we use include our Core Clinical System EMIS, NHSmail, Microsoft 365, AccuRx, Klinik and IGPR

For further information on this, please contact Steve Shelton Data and Facilities Manager 01752 663138.

**Summary Care Record (SCR)**

NHS England have implemented the SCR which contains information about you; including your name, address, data of birth, NHS number, medication you are taking and any bad reactions to medication that you have had in the past. This information is automatically extracted from your records and uploaded onto a central system.

Many patients who are seen outside of their GP Practice are understandably not able to provide a full account of their care or may not be able to do so. The SCR means patients do not have to repeat their medical history at every care setting and the healthcare professional they are seeing is able to access their SCR. The SCR can only be viewed within the NHS on NHS smartcard-controlled screens or by organisations, such as pharmacies, contracted to the NHS.

As well as this basic record, additional information can be added to include further information. However, any additional data will only be uploaded of you specifically request it and with your consent. You can find out more about the SCR here: <https://digital.nhs.uk/services/summary-care-records-scr>

**National Screening Programmes**

The NHS provides national screening programmes so that certain diseases can be detected at early stages. These screening programmes include bowel cancer, breast cancer, cervical cancer, aortic aneurysms and a diabetic eye screening service. More information on the national screening programmes can be found at: <https://www.gov.uk/topic/population-screening-programmes>

**Risk Stratification**

Your medical records will be searched by a computer program so that we can identify patients who might be at high risk from certain diseases such as heart disease or unplanned admissions to hospital. This means we can offer patients additional care or support as early as possible.

This process will involve linking information from your GP record with information from other health or social care services you have used. Information which identifies you will only be seen by this practice. More information can be found at <https://www.england.nhs.uk/ig/risk-stratification/> or speak to the practice.

**Research**

We are a research practice and work with Royal Devon University Health Care NHS Foundation Trust of Exeter, RD&E NHS Foundation trust. Southampton University and CRNSW.to deliver research studies and trials. Employees of the practices will access your information in order to determine whether you are suitable to be invited to participate in a study. We will only share your information with the research providers with your explicit consent.

#### Clinical Practice Research Datalink (CPRD)

#### This practice contributes to medical research and may send relevant data to CPRD. CPRD collects de-identified patient data from a network of GP practices across the UK. Primary care data is linked to a range of other health related data to provide a longitudinal, representative UK population health dataset. Further information regarding CPRD can be found here: <https://cprd.com/transparency-information>

#### How long do we hold your data?

We only hold your data for as long as necessary and are required to hold your data in line with the NHS Records Management Code of Practice for Health and Social Care 2016 Retention Schedule. Further information can be found online at:

<https://transform.england.nhs.uk/information-governance/guidance/records-management-code/>

Call Recordings are stored for 90 days on a rolling deletion basis as are the CCTV recordings stored for 30 days.

**What rights do you have?**

You have various rights under the UK GDPR and Data Protection Act 2018:

**Right of access:**

You have the right to request access to view or request copies of the personal data, we hold about you; this is known as a Subject Access Request (SAR). In order to request access, you should:

Contact the practice in person or by telephone 01752 663138 or via the website. [https://www.friaryhousesurgery.nhs.uk](https://www.friaryhousesurgery.nhs.uk/)

Please note that you are entitled to a copy of your data that we hold free of charge; however, we are entitled to charge in certain circumstances where the law permits us to do so. We are also entitled to refuse a request, where the law permits us to do so. If we require a fee or are unable to comply with your request, we will notify you within 1 calendar month of your request.

**Right to restrict or object the use of your information:**

There are certain circumstances in which you can object from your data being shared. Information regarding your rights to opt-out is detailed below:

**Consent:**

If the practice is relying on the consent as the basis for processing your data, you have the right to withdraw your consent at any time. Once you have withdrawn your consent, we will stop processing your data for this purpose.

However, this will only apply in circumstances on which we rely on your consent to use your personal data. Please be aware that if you do withdraw your consent, we may not be able to provide certain services to you. If this is the case, we will let you know.

**Summary Care Record:**

The SCR improves care; however, if you do not want one, you have the right to object to sharing your data or to restrict access to specific elements of your records. This will mean that the information recorded by the practice will not be visible at any other care setting.

If you wish to discuss your options regarding the SCR, please speak to a member of staff at the practice. You can also reinstate your consent at any time by giving your permission to override your previous dissent.

**Devon and Cornwall Care Record:**

The Devon and Cornwall Care Record brings together patient data from a number of health and social care providers and presents it as a single record.  
  
This new system enables frontline staff to see details held by GP practices, hospitals, care homes and other organisations across Devon, Cornwall and the Isles of Scilly, giving them a more complete view of a patient’s history.

For more information on the DCCR and how to opt out if you wish visit; <https://www.devonandcornwallcarerecord.nhs.uk>

**National Screening Programmes:**

If you do not wish to receive an invitation to the screening programmes, you can opt out at <https://www.gov.uk/government/publications/opting-out-of-the-nhs-population-screening-programmes> or speak to the practice.

**National Data Opt-out:**

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

To opt-out of your identifiable data being shared for medical research or to find out more about your opt-out choices please ask a member of staff or go to NHS Digital’s website:

**[https://digital.nhs.uk/services/national-data-opt-out-programme](https://digital.nhs.uk/services/national-data-opt-out-programme" \t "_blank)**

Our organisation ‘is compliant with the national data opt-out policy.

**Cancer Registry:**

The National Cancer Registration and Analysis Service is run by Public Health England and is responsible for cancer registration in England, to support cancer epidemiology, public health, service monitoring and research.

Further information regarding the registry and your right to opt-out can be found at: <https://www.gov.uk/guidance/national-cancer-registration-and-analysis-service-ncras>

**Right to rectification:**

You have the right to have any errors or mistakes corrected within your medical records. This applies to matters of fact, not opinion. If the information is of clinical nature, this will need to be reviewed and investigated by the practice. If you wish to have your records amended, please contact Steve Shelton Data and Facilities Manager 01752 663138.

If your personal information changes, such as your contact address or number, you should notify the practice immediately so that we can update the information on our system. We will also ask you from time to time to confirm the information we hold for you, is correct.

**Right to erasure:**

The practice is not aware of any circumstances in which you will have the right to delete correct data from your medical record, which the practice is legally bound to retain. Although you are free to obtain your own legal advice if you believe there is no lawful purpose for which we hold the data and contact the practice if you hold a different view.

**Right to complain:**

Please let us know if you wish to discuss how we have used your personal data, raise a concern, make a complaint or compliment. You can contact us at 01752 663138 or via the website at <https://www.friaryhousesurgery.nhs.uk>

You also have the right to complain to the Information Commissioner’s Office. If you wish to complain follow this link: [**https://ico.org.uk/global/contact-us/**](https://ico.org.uk/global/contact-us/) or call the helpline on **0303 123 1113.**

**Data outside EEA**

We do not send your personal data outside of the EEA. However, if this is required, the practice would only do so, with your explicit consent.

**Data Protection Officer**

The Data Protection Officer Post for the practice is vacant but expected to be filled shortly all enquiries to Operations Manager Sharon Moss contactable at Friary House Surgery 01752 633138.

**Cookies**

The practice’s website uses cookies. A cookie is a small file, typically of letters and numbers, downloaded on to a device (like your computer or smart phone) when you access certain websites. Cookies allow a website to recognise a user’s device. Some cookies help websites to remember choices you make (e.g. which language you prefer if you use the Google Translate feature). Analytical cookies are to help us measure the number of visitors to our website. The two types the practices uses are ‘Session’ and ‘Persistent’ cookies.

Some cookies are temporary and disappear when you close your web browser, others may remain on your computer for a set period. We do not knowingly collect or intend to collect any personal information about you using cookies. We do not share your personal information with anyone.

**What can I do to manage cookies on my devices?**

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit <http://www.allaboutcookies.org/> If you are concerned about cookies and would like to discuss this, please contact Steve Shelton Data and Facilities Manager 01752 663138.

**Changes to privacy notice**

The practice reviews this privacy notice regularly and may amend the notice from time to time. If you wish to discuss any elements of this privacy notice, please contact Ops Manager Sharon Moss 01752 663138.