

# Fair Processing Notice

## How we use your personal information

This fair processing notice explains why the GP practice collects information about you and how that information may be used.

The health care professionals who provide you with care maintain records about your health and any treatment or care you have received previously (e.g. NHS Trust, GP Surgery, Walk-in clinic, etc.). These records help to provide you with the best possible healthcare.

NHS health records 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. Records which this GP Practice holds about you may include the following information:-

- Details about you, such as your address, contact number, legal representative, emergency contact details, kin of kin details, power of Attorney etc.
- Any contact the surgery has had with you, such as appointments, clinic visits, emergency appointments, etc.
- Notes and reports about your health including assessment reports
- Details about your treatment and care including referrals etc.
- Results of investigations such as laboratory tests, x-rays etc
- Relevant information from other health professionals, relatives or those who care for you

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. Information may be used within the GP practice for clinical audit to monitor the quality of the service provided.

Some of this information will be held centrally and used for statistical purposes. Where we do this, we take strict measures to ensure that individual patients cannot be identified. Sometimes your information may be requested to be used for research purposes – the surgery will always gain your consent before releasing the information for this purpose.

**Please note that you have the right to opt out at any time.**

## Risk Stratification

Risk stratification data tools are increasingly being used in the NHS to help determine a person's risk of suffering a particular condition, preventing an unplanned or (re)admission and identifying a need for preventive intervention. Information about you is collected from a number of sources including NHS Trusts and from your GP Practice. A risk score is then arrived at through an analysis of your unidentifiable information and is only provided back to your GP as data controller in an identifiable form. Risk stratification enables your GP to focus on preventing ill health and not just the treatment of sickness. If necessary your GP may be able to offer you additional services.

## Invoice Validation

If you have received treatment within the NHS, North West London Commissioning Support Unit may require access to your personal information in order to determine which Clinical Commissioning Group should pay for the treatment or procedure you have received. Information such as your name, address and date of treatment may be passed on to enable the billing process. These details are held in a secure system and kept confidential. This

information will only be used to validate invoices, and will not be shared for any further commissioning purposes.

## **Other Data Sharing /Access Projects**

### How we keep information confidential

We process and manage information in accordance with our legal duties under the Data Protection Act 1998. This includes the requirement to keep information secure and not hold it for longer than necessary.

To support our legal duties, the Practice and Ealing CCG has a robust suite of Information Governance policies in place, including policies on information security, confidentiality and data protection. The Practice and Ealing CCG follows the retention and destruction guidelines issued in the Records Management Code of Practice.

<https://www.gov.uk/government/publications/records-management-code-of-practice-for-health-and-social-care>

Under the Data Protection Act, we must ensure we have a legal justification for holding and using personal information. Under the Common Law Duty of Confidentiality, we have a duty to respect any duty of confidence attached to information we hold.

As an NHS organisation, we work in accordance with the confidentiality principles and guidelines laid out in the Caldicott reviews and the 'Confidentiality: NHS Code of Conduct'.

We have strict information governance terms and conditions within our contractual agreements and policies and procedures which outline the expectations we have on staff to safeguard personal information. We ensure that all staff who access personal information receive appropriate on-going information governance training.

### 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 / Foundation Trusts
- GP's
- NHS Commissioning Support Units
- Independent Contractors such as dentists, opticians, pharmacists
- 111 and urgent care centres
- Private Sector Providers
- Voluntary Sector Providers
- Ambulance Trusts
- Clinical Commissioning Groups
- Social Care Services
- Health and Social Care Information Centre (HSCIC)
- Local Authorities
- Education Services
- Fire and Rescue Services
- Police & Judicial Services
- Voluntary Sector Providers
- Private Sector Providers
- The National Diabetes Audit
- Other 'data processors' which you will be informed of

You will be informed who your data will be shared with and in some cases asked for explicit consent for this happen when this is required.

We may also use external companies to process personal information, such as for archiving purposes. These companies are bound by contractual agreements to ensure information is kept confidential and secure.

### Access to personal information

You have a right under the Data Protection Act 1998 to request access to view or to obtain copies of what information the surgery holds about you and to have it amended should it be inaccurate. In order to request this, you need to do the following:

- Your request must be made in writing to the GP - for information from the hospital you should write direct to them
- We aim to comply with requests for access to personal data as quickly as possible. We will ensure that we deal with requests within a reasonable time period from the date of receipt unless there is a reason for delay that is justifiable under the Data Protection Act.
- There may be a charge to have a printed copy of the information held about you
- You will need to give adequate information (for example full name, address, date of birth, NHS number and reasons for your request) so that your identity can be verified and your records located

### Objections / Complaints

Should you have any concerns about how your information is managed at the GP, please contact your GP Practice Manager. If you are still unhappy following a review by the GP practice, you can then raise a complaint to the Information Commissioners Office (ICO) via their website [www.ico.org.uk](http://www.ico.org.uk)

If you are happy for your data to be extracted and used for the purposes described in this fair processing notice then you do not need to do anything.

If you do not want your personal data being extracted and leaving the GP practice for any of the purposes described, you need to let us know as soon as possible.

We will then enter encrypted read codes into your records that will prevent data being shared by the practice and / or being shared with the central information system at the Health and Social Care Information Centre

### Change of Details

It is important that you tell your GP practice if any of your details such as your name or address have changed or if any of your details such as date of birth is incorrect in order for this to be amended. You are responsible for informing us of any changes so our records are accurate and up to date.

### 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.

This information is publicly available on the Information Commissioners Office website [www.ico.org.uk](http://www.ico.org.uk)

The GP practice is registered with the Information Commissioners Office (ICO).

Who is the Data Controller?

The Data Controller, responsible for keeping your information secure and confidential is your GP Practice.