

Practice Privacy Notice

Title	Privacy Notice
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Last updated by	Melissa Rawlings, Practice Manager

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Your Information, Your Rights

Being transparent and providing accessible information to patients about how we will use your personal information is a key element of the Data Protection Act 2018 and the EU General Data Protection Regulations (GDPR).

The following notice reminds you of your rights in respect of the above legislation and how your GP Practice will use your information for lawful purposes in order to deliver your care and the effective management of the local NHS system.

This notice reflects how we use information for:

- The management of patient records;
- Communication concerning your clinical, social and supported care;
- Ensuring the quality of your care and the best clinical outcomes are achieved through clinical audit and retrospective review;
- Participation in health and social care research; and
- The management and clinical planning of services to ensure that appropriate care is in place for our patients today and in the future.

Data Controller

As your registered GP practice, we are the data controller for any personal data that we hold about you.

Data Protection Officer

The Practice Data Protection Officer is Dr Andrew Greatrex.

Any queries about Data Protection issues should be addressed For the Attention of Data Protection Officer.

riverport.medicalpractice@nhs.net

Riverport Medical Practice
Constable Road
St Ives
Cambridgeshire
PE27 3ER

What information do we collect and use?

All personal data must be processed fairly and lawfully, whether it is received directly from you or from a third party in relation to your care.

When you register with Riverport Medical Practice we must collect basic 'personal data' about you. This includes your name, address, contact details such as email and mobile. We may also ask you for health information, ethnicity, sex, and religious beliefs. This type of information is called 'Special data'. We are required to do this to ensure your healthcare information is linked between other healthcare providers.

We will collect the following types of information from you or about you from a third party (provider organisation) engaged in the delivery of your care:

- 'Personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified from the data. This includes, but is not limited to name, date of birth, full postcode, address, next of kin and [NHS number/HCN number/ CHI number]; and
- 'Special category / sensitive data' such as medical history including details of appointments and contact with you, medication, emergency appointments and admissions, clinical notes, treatments, results of investigations, supportive care arrangements, social care status, race, ethnic origin, genetics and sexual orientation.

Your healthcare records contain information about your health and any treatment or care you have received previously (e.g. from an acute hospital, GP surgery, community care provider, mental health care provider, walk-in centre, social services). These records may be electronic, a paper record or a mixture of both. We use a combination of technologies and working practices to ensure that we keep your information secure and confidential.

Third party processors

When we use a third-party service provider to process data on our behalf, 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.

An example 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); data

hosting service providers; systems which facilitate appointment bookings or electronic prescription services; document management services etc.

Recipients, categories of recipients, third parties whom which process or share information or data include:

- Staff and employees within the Practice, including clinical and business support staff
- Other healthcare staff who work collaboratively with Riverport Medical Practice, but may be directly employed by other healthcare providers or within the NHS
- Local hospitals
- Out of hours care
- Treatment centres
- Diagnostic centres
- Health screening services
- Other organisations which are involved in the provision of direct healthcare to individual patients

Other organisations who manage data under formal agreements for specific purposes include:

- **St Ives Primary Care Network:** working in collaboration with local GP practices to provide Primary Care health services
- **Other local NHS Secondary Care providers:** hospitals and Trusts
- **Local private Secondary Care Providers:** includes private clinics and seeing private consultants, can include NHS services.
- **Public Health England:** reporting of data and information.
- **Cambridgeshire & Peterborough NHS Foundation Trust:** support for housebound, elderly, frail patients, patients who need support with psychological wellbeing or mental health services. Other support services: For more information: <http://www.cpft.nhs.uk/>
- **Medicines Optimisation Team, Cambridgeshire & Peterborough Integrated Care System:** review and support with prescribing at Practice level
- **Oasis Group noteSpace:** Offsite storage facility for paper medical records <https://www.oasisgroup.com/service/notespace/>
- **East Anglia Diabetic Screen Programme (DESP)** who keep information about patients diagnosed with diabetes to maintain an accurate register and deliver a safe and effective diabetic eye screen service. For more information: <http://www.health-intelligence.com>
- **HealthyYou** service who support patients wishing to receive help to stop smoking <https://healthyyou.org.uk/services/stop-smoking/>
- **NHS111:** out of hours care, signposting, and healthcare services

- **Cambridgeshire & Peterborough Integrated Care System (ICS)** – this has replaced the Clinical Commissioning Group <https://www.cpics.org.uk/>
- **Cambridgeshire Community Service NHS Trust** – CCS supporting delivery of vaccine programme for covid19 and influenza. Community based care to our patients and providing First Contact Physiotherapy services <https://www.cambscommunityservices.nhs.uk/home>
- **Cambridgeshire County Council:** Local authority <https://www.cambridgeshire.gov.uk/>
- **National Diabetes Prevention Programme:** Supporting patients to make diet and lifestyle changes to prevent the onset of Diabetes <http://www.healthieryou.org.uk/>
- **Primary Care Support England (PCSE):** Supporting with patient registrations, new patients, patient transfers and deductions, and with NHS numbers <https://pcse.england.nhs.uk/>
- **TPP(SystemOne Clinical System):** This is the clinical system used at the Practice to retain medical records and appointment books as well as prescription information and patient details <https://tpp-uk.com/products/>
- **Care Quality Commission:** Regulator for General Practice and other healthcare service <https://www.cqc.org.uk/>
- **Information Commissioners Office:** Support and advice on information governance, data protection, and GDPR <https://ico.org.uk/>
- **NHS England and the Open Exeter System:** Operated by PCSE, see above. Patient information and recall of screening service such as Cervical Screening <https://pcse.england.nhs.uk/services/open-exeter>
- **National Bowel Screening Programme:** <https://www.nhs.uk/conditions/bowel-cancer-screening/>
- **AccuRx:** Adjoining our clinical system, used for patient communication including SMS, video calls, images, emails <https://www accurx.com/patient>
- **Interface Clinical Services** - providing disease prevalence data and clinical and prescribing support in specific disease areas under a contractual arrangement.
- **Prescribing Care Direct** - Clinical Pharmacists and Pharmacy Technician support under a contractual arrangement <https://www.prescribingcaredirect.co.uk/>
- **Ardens Health Informatics Ltd** – providing clinical templates for use with SystemOne <https://www.ardens.org.uk/>
- **NHS Pathways, Eclipse** – providing prescribing data and reporting to assist the practice in managing patient conditions.

- **Wavenet** – providing call recording and call reporting software.
- **Iatro** – Website service provider and collecting patient feedback submissions and Patient Group applications.
- **Redmoor Health** – Management of social media
- **Joy Digital Platform** – managing data and referrals
- **Healthy.IO** – Home ACR test data is captured and processed by the app and shared with the practice team <https://healthy.io/eu/>
- **MoreLife (UK) Ltd** – MoreLife (UK) Ltd are commissioned by the Public Health team to deliver the weight management service for patients registered with the practice <https://www.more-life.co.uk/>
- **Oviva (UK) Ltd** - The NHS Type 2 Diabetes Path to Remission <https://oviva.com/uk/en/>
- **iPlato** – iPlato integrates with our clinical system to support national recall programmes for screening such as cervical screening <https://www.iplato.com/>
- **GPN** – offer cervical smear, adult eating disorder and SMI healthcheck appointments to patients registered with the practice.
- **InHealth Intelligence Ltd** – provide targeted lung health checks.
- **UK National Eye Health & Hearing Study** – The study will determine the prevalence and causes of vision impairment, blindness and hearing loss in the UK population aged 50 years and older (by gender, age, socio-economic group and geographical area). <https://www.uknehs.org.uk/>

Why do we collect this information?

The NHS Act 2006 and the Health and Social Care Act 2012 invests statutory functions on GP Practices to promote and provide the health service in England, improve quality of services, reduce inequalities, conduct research, review performance of services and deliver education and training.

To do this we will need to process your information in accordance with current data protection legislation to:

- Protect your vital interests;
- Pursue our legitimate interests as a provider of medical care, particularly where the individual is a child or a vulnerable adult;
- Perform tasks in the public's interest;
- Deliver preventative medicine, medical diagnosis, medical research; and
- Manage the health and social care system and services.

We also may use or share your information for the following purposes:

- Looking after the health of the public
- Making sure that our services can meet patient needs in the future
- Preparing statistics on NHS performance and activity (where steps will be taken to ensure you cannot be identified)
- Investigating concerns, complaints, or legal claims
- Helping staff to review the care they provide to make sure it is of the highest standards
- Training and educating clinical staff
- Research approved by the Local Research Ethics Committee. You will always be asked to provide consent to take part in research
- The Practice may conduct reviews of medications prescribed to its patients. This is a review of prescribed medications to ensure patients receive the most appropriate, up to date and cost-effective treatments.

The health care professionals who provide you with care must maintain records about your health and any treatment or care you have received previously. This maybe at another GP Surgery or at a hospital. These records help to provide you with the best possible healthcare.

NHS health records may be electronic, on paper or a mixture of both. We use several ways of working and with computerised systems this helps to ensure that your information is kept confidential and secure.

How is the information collected?

Your information will be collected either electronically using secure NHS Mail or a secure electronic transferred over an NHS encrypted network connection. In addition, physical information will be sent to your practice. This information will be retained within your GP's electronic patient record or within your physical medical records.

Who will we share your information with?

In order to deliver and coordinate your health and social care, we may share information with the following organisations:

- Local GP Practices in order to deliver extended primary care services through PCN (see above)
- Local NHS Trusts and hospitals; for example North West Anglia Foundation Trust (Hinchingsbrooke Hospital or Peterborough City Hospital), Cambridge University Hospitals (Addenbrookes Hospital), Royal Papworth Hospital; other local NHS hospitals and Trusts
- NHS111 and Out of Hours Service

- Local Social Services and Community Care services including county council
- Voluntary Support Organisations commissioned to provide services by Cambridgeshire and Peterborough ICS
- Community services such as district nurses, rehabilitation services, telehealth and out of hospital services.
- Child health services that undertake routine treatment or health screening
- Urgent care organisations, minor injury units or out of hours services
- Community hospitals
- Palliative care hospitals and hospices
- Care Homes
- Mental Health Trusts
- Social Care organisations
- NHS Commissioning Support Units
- Independent Contractors such as dentists, opticians, pharmacists
- Private Sector Providers
- Voluntary Sector Providers
- Ambulance Trusts
- Cambridgeshire and Peterborough Integrated Care System
- NHS England (NHSE) and NHS Digital (NHSD)
- Local Authorities
- Education Services
- Fire and Rescue Services
- Police & Judicial Services
- Other 'data processors' of which you will be informed

Your information will only be shared if it is appropriate for the provision of your care or required to satisfy our statutory function and legal obligations.

Whilst we might share your information with the above organisations, we may also receive information from them to ensure that your medical records are kept up to date and so that your GP can provide the appropriate care.

In addition we received data from NHS Digital (as directed by the Department of Health) such as the uptake of flu vaccinations and disease prevalence in order to assist us to improve "out of hospital care.

We may also receive information on prescribing from the NHS Business Authority in respect to prescription authority and dispensing.

How do we maintain the confidentiality of your records?

We are committed to protecting your privacy and will only use information that has been collected lawfully. Every member of staff who works for an NHS organisation has a legal obligation to keep information about you confidential. We maintain our duty of confidentiality by conducting annual training and awareness, ensuring access to personal data is limited to the appropriate staff and information is only shared with organisations and individuals that have a legitimate and legal basis for access.

Information is not held for longer than is necessary. We will hold your information in accordance with the Records Management Code of Practice for Health and Social Care 2016.

We will only ever use or pass on information about you if 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, or where the law requires information to be passed on, for example:

- We believe you are putting yourself at risk of serious harm
- We believe you are putting a third party (adult or child) at risk of serious harm
- We have been instructed to do so via court order made against the practice
- Your information is essential for the investigation of a serious crime
- You are subject to the Mental Health Act (1983)
- Public Health England needs to be notified of certain infectious diseases
- Regulators use their legal powers to request your information as part of an investigation

Our practice policy is to respect the privacy of our patients, their families, and our staff and to maintain compliance with the General Data Protection Regulations (GDPR) and all UK specific Data Protection Requirements. Our policy is to ensure all personal data related to our patients will be protected.

All employees and sub-contractors who work with our practice are asked to sign a confidentiality agreement. The practice will, if required, sign a separate confidentiality agreement if necessary.

Health Risk Screening / Risk Stratification

Health Risk Screening or Risk Stratification is a process that helps your GP to determine whether you are at risk of an unplanned admission or deterioration in health. By using selected information such as age, gender, NHS number, diagnosis, existing long term condition(s), medication history, patterns of hospital attendances, admissions and periods of access to community care your GP will be able to

judge if you are likely to need more support and care from time to time, or if the right services are in place to support the local population's needs.

To summarise Risk Stratification is used in the NHS to:

- Help decide if a patient is at a greater risk of suffering from a particular condition;
- Prevent an emergency admission;
- Identify if a patient needs medical help to prevent a health condition from getting worse; and/or
- Review and amend provision of current health and social care services.

Your GP will use computer-based algorithms or calculations to identify their registered patients who are at most risk, with support from the local Commissioning Support Unit and/or a third-party accredited Risk Stratification provider. The risk stratification contracts are arranged by Cambridgeshire and Peterborough ICS in accordance with the current Section 251 Agreement. Neither the CSU nor your local ICS will at any time have access to your personal or confidential data. They will only act on behalf of your GP to organise the risk stratification service with appropriate contractual technical and security measures in place.

Your GP will routinely conduct the risk stratification process outside of your GP appointment. This process is conducted electronically and may be with or without human intervention. The resulting report is then reviewed by a multidisciplinary team of staff within the Practice. This may result in contact being made with you if alterations to the provision of your care are identified.

A Section 251 Agreement is where the Secretary of State for Health and Social Care has granted permission for personal data to be used for the purposes of risk stratification, in acknowledgement that it would overburden the NHS to conduct manual reviews of all patient registers held by individual providers.

As mentioned above, you have the right to object to your information being used in this way. However, you should be aware that your objection may have a negative impact on the timely and proactive provision of your direct care. Please contact the Practice Manager to discuss how disclosure of your personal data can be limited.

Sharing of Electronic Patient Records within the NHS

Electronic patient records are kept in most places where you receive healthcare. Our local electronic systems (such as SystmOne) enables your record to be shared with organisations involved in your direct care, such as:

- GP practices
- Community services such as district nurses, rehabilitation services, telehealth and out of hospital services.
- Child health services that undertake routine treatment or health screening
- Urgent care organisations, minor injury units or out of hours services
- Community hospitals
- Palliative care hospitals or hospices

- Care Homes
- Mental Health Trusts
- Hospitals
- Social Care organisations
- Pharmacies

In addition, NHS England] have implemented the Summary Care which contains information including medication you are taking and any bad reactions to medication that you have had in the past.

In most cases, particularly for patients with complex conditions and care arrangements, the shared electronic health record plays a vital role in delivering the best care and a coordinated response, taking into account all aspects of a person's physical and mental health. Many patients are understandably not able to provide a full account of their care, or may not be in a position to do so. The shared record means patients do not have to repeat their medical history at every care setting.

Your record will be automatically setup to be shared with the organisations listed above, however you have the right to ask your GP to disable this function or restrict access to specific elements of your record. This will mean that the information recorded by your GP will not be visible at any other care setting.

You can also reinstate your consent at any time by giving your permission to override your previous dissent.

Prospective access to patient records online

In November 2023, patients with online access to their medical records we able to access their future full medical records, including free text, letters, and documents once they have been reviewed and filed by the GP. This does not affect proxy access.

There are limited legitimate reasons as to why access to prospective medical records may not be given or may be reduced and these are based on safeguarding. If the release of information is likely to cause serious harm to the physical or mental health of the patient or another individual, the GP is allowed to refuse or reduce access to prospective records; third party information may also not be disclosed if deemed necessary. On occasion, it may be necessary for a patient to be reviewed before access is granted, if access can be given without a risk of serious harm.

Your Right of Access to Your Records

The Data Protection Act and General Data Protection Regulations allows you to find out what information is held about you including information held within your medical records, either in electronic or physical format. This is known as the "right of subject access".

You also have the right to have it amended, should it be inaccurate. This is called “Right to rectification”. In certain situations, you have the right to request us to rectify your personal data. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases) and will only disagree with you if certain limited conditions apply.

To request access to your information, you need to do the following:

- Your request should be made to the GP Practice
- For information from the hospital, you should write directly to them
- We are required to respond to you within 30 days
- You will need to give adequate information (for example full name, address, date of birth, NHS number) and details of your request
- We will also ask you to provide additional information before we release information to you

If you would like to have access to all or part of your records, you can make a request in writing to the organisation that you believe holds your information. This can be your GP, or a provider that is or has delivered your treatment and care.

You should however be aware that some details within your health records may be exempt from disclosure, however this will be in the interests of your wellbeing or to protect the identity of a third party. If you would like access to your GP record, please submit your request to the Practice in writing or via email.

If your personal information changes

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 such as date of birth is incorrect for this to be amended.

You have a responsibility to inform us as soon as possible of any changes so our records are accurate and up to date for you.

How long will we store your information?

The NHS Records Management Code of Practice 2021 identifies specific retention periods which are listed in Appendix II: Retention Schedule.

Please see <https://www.nhs.uk/information-governance/guidance/records-management-code/records-management-code-of-practice-2021/> for a copy of the 2021 NHS retention period policy.

Consent and Objections

Do I need to give my consent?

The GDPR sets a high standard for consent. Consent means offering people genuine choice and control over how their data is used. When consent is used properly, it helps you build trust and enhance your reputation.

However, consent is only one potential lawful basis for processing information. Therefore, your GP practice may not need to seek your explicit consent for every instance of processing and sharing your information, on the condition that the processing is carried out in accordance with this notice.

Your GP Practice will contact you if they are required to share your information for any other purpose which is not mentioned within this notice. Your consent will be documented within your electronic patient record.

What will happen if I withhold my consent or raise an objection?

You have the right to write to withdraw your consent at any time for any particular instance of processing, provided consent is the legal basis for the processing. Please contact your GP Practice for further information and to raise your objection.

You have a choice about whether you want your confidential patient information to be used in this way. If you are happy with this use of information you do not need to do anything. If you do choose to opt out, your confidential patient information will still be used to support your individual care.

National Data opt out

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

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

Complaints

In the event that you feel your GP Practice has not complied with the current data protection legislation, either in responding to your request or in our general processing of your personal information, you should raise your concerns in the first instance in writing to the Practice Manager at:

riverport.medicalpractice@nhs.net

Riverport Medical Practice
Constable Road
St Ives
Cambridgeshire
PE27 3ER

01480 466611

If you remain dissatisfied with our response you can contact the Information Commissioner's Office ;

<https://ico.org.uk/global/contact-us/>

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

0303 123 1113

Changes

It is important to point out that we may amend this Privacy Notice from time to time. If you are dissatisfied with any aspect of our Privacy Notice, please contact the Practice Manager or Data Protection Officer.

References

Data Protection Act 2018 and the EU General Data Protection Regulations (GDPR)

Information Commissioners Office <https://ico.org.uk/>

