

King Street Surgery

Version	Date	Changes
1	21/08/2025	Newly devised Privacy notice

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1. Practice privacy notice

Introduction

At **King Street Surgery**, we have a legal duty to explain how we use any personal information we collect about you at the organisation. This is in both electronic and paper format.

Why do we have to provide this privacy notice?

We are required to provide you with this privacy notice by law. It provides information about how we use the personal and healthcare information we collect, store and hold about you. If you have any questions about this privacy notice or are unclear about how we process or use your personal information or have any other issue regarding your personal and healthcare information, then please contact our Data Protection Officer - Judith Jordan, Arden & GEM Head of Integrated Governance.

- Email: agem.dpo@nhs.net
- Telephone: 0121 611 0730

The main things the law says we must tell you about what we do with your personal data are:

- We must let you know why we collect personal and healthcare information about you
- We must let you know how we use any personal and/or healthcare information we hold about you
- We need to inform you in respect of what we do with it
- We need to tell you about who we share it with or pass it on to and why
- We need to let you know how long we can keep it for

The General Data Protection Regulation (GDPR) became law on 24 May 2016. This was a single EU-wide regulation on the protection of confidential and sensitive information. It entered into force in the UK on the 25 May 2018, repealing the Data Protection Act (1998). Following Brexit, the GDPR became incorporated into the [Data Protection Act 2018 \(DPA18\)](#) at Part 2, Chapter 2 titled The UK GDPR.

For the purpose of applicable data protection legislation (including but not limited to the Data Protection Act 2018 (DPA2018) and Part 2 the UK GDPR).

Using your information

We will use your information so that we can check and review the quality of care we provide. This helps us improve our services to you.

- We will share relevant information from your medical record with other health or social care staff or organisations when they provide you with care. For example, your GP will share information when they refer you to a specialist in a hospital or your GP will send details about your prescription to your chosen pharmacy.
- More information on how we share your information with organisations who are directly involved in your care can be found in page 4.
- Healthcare staff working in A&E and out of hours care will also have access to your information. For example, it is important that staff who are treating you in an emergency know if you have any allergic reactions. This will involve the use of your Summary Care Record For more information see NHS E [Summary Care Record](#) or alternatively speak to this organisation.

You have the right to object to information being shared for your own care. Please speak to this organisation if you wish to object. You also have the right to have any mistakes or errors corrected.

Registering for NHS care

- All patients who receive NHS care are registered on a national database (NHS Spine). The Spine is held and maintained by NHS England, a national organisation which has legal responsibilities to collect NHS data.
- More information can be found at [NHS England - Spine](#)

Identifying patients who might be at risk of certain diseases

- Your medical records will be searched by a computer programme 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 organisation.
- More information speak to the organisation.

Safeguarding

- Sometimes we need to share information so that other people, including healthcare staff, children or others with safeguarding needs, are protected from risk of harm. These circumstances are rare, and we do not need your consent or agreement to do this.
- Please see our local policies for more information: [Safeguarding Bedfordshire - Safeguarding Bedfordshire home page](#) or request for leaflets at reception

Medical research

- This organisation shares information from medical records to support medical research when the law allows us to do so, for example to learn more about why people get ill and what treatments might work best. We will also use your medical records to carry out research within the organisation.
- The use of information from GP medical records is very useful in developing new treatments and medicines; medical researchers use information from these records to help to answer important questions about illnesses and disease so that improvements can be made to the care and treatment patients receive.
- We share information with the following medical research organisations with your explicit consent or when the law allows: OpenSAFELY
- You have the right to object to your identifiable information being used or shared for medical research purposes. Please speak to the organisation if you wish to object.

How your data is used for research and planning (OpenSAFELY)

To help improve NHS services and patient care, we allow some of your health information to be used for research and planning. This is done through a secure system called OpenSAFELY, which is run by NHS England. Only pseudonymised data (which means your name and other details that directly identify you are removed or replaced with codes) is used. Your full personal information never leaves our GP system, and the data is only used in highly secure environments by approved NHS researchers. This use of data is allowed by law because it supports important public health work and research that benefits everyone.

This is done under the legal basis of public interest tasks (UK GDPR Article 6(1)(e)) and for health research (Article 9(2)(j)). You can read more about OpenSAFELY at www.opensafely.org and if you'd prefer not to have your data used in this way, you can opt out at www.nhs.uk/your-nhs-data-matters.

Please note: For some projects run under NHS legal powers (like OpenSAFELY), your data may still be used in a protected, pseudonymised form, even if you choose to opt out. This is because the law allows certain types of data use where it's in the public interest.

Checking the quality of care – national clinical audits

- This organisation contributes to national clinical audits so that healthcare can be checked and reviewed. Information from medical records can help doctors and other healthcare workers to measure and check the quality of care that is provided to you.
- The results of the checks or audits can show where organisations are doing well and where they need to improve. These results are also used to recommend improvements to patient care.
- Data is sent to NHS England, a national body with legal responsibilities to collect data.
- The data will include information about you, such as your NHS Number and date of birth, and information about your health which is recorded in coded form – for example the code for diabetes or high blood pressure.
- We will only share your information for national clinical audits or checking purposes when the law allows.
- For more information about national clinical audits see the Healthcare Quality Improvements Partnership [website](#).
- You have the right to object to your identifiable information being shared for national clinical audits. Please contact the organisation if you wish to object.

We are required by law to provide you with the following information about how we handle your information:

Data Controller	King Street Surgery, 273 Bedford Road, Kempston, Bedford, MK42 8QD
Data Protection Officer	<p>The Data Protection Officer for the for the GPs for the Bedfordshire Luton and Milton Keynes GP Practices signed to Arden and GEMCSU is:</p> <p>Judith Jordan, Arden & GEM Head of Integrated Governance, but we have a team who carry out the function, the contact details are:</p> <ul style="list-style-type: none"> • Email: agem.dpo@nhs.net • Telephone: 0121 611 0730
Purpose of the processing	<p>To give direct health or social care to individual patients. An example is, when a patient agrees to a referral for direct care, such as to a hospital, relevant information about the patient will be shared with the other healthcare staff to enable them to give appropriate advice, investigations, treatments and/or care.</p> <p>To check and review the quality of care. (This is called audit and clinical governance).</p> <p>Medical research and to check the quality of care which is given to patients (this is called national clinical audit).</p>

Data we get from other organisations	We receive information about your health from other organisations who are involved in providing you with health and social care. For example, if you go to hospital for treatment or an operation the hospital will send us a letter to let us know what happens. This means your GP medical record is kept up-to date when you receive care from other parts of the health service.
Lawful basis for processing	<p>These purposes are supported under the following sections of the GDPR:</p> <p>Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and</p> <p>Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services...’</p> <p>The following sections of the GDPR mean that we can use medical records for research and to check the quality of care (national clinical audits):</p> <p>Article 6(1)(e) – ‘processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller’.</p> <p>For medical research: there are two possible Article 9 conditions.</p> <p>Article 9(2)(a) – ‘the data subject has given explicit consent...’</p> <p>OR</p> <ul style="list-style-type: none"> • Medicines and medical device monitoring Article 9(2)(j) – ‘processing is necessary for... scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member States law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and interests of the data subject’. <p>Healthcare staff will also respect and comply with their obligations under the common law duty of confidence.</p>
Recipient or categories of recipients of the processed data	<p>The data will be shared with:</p> <ul style="list-style-type: none"> • healthcare professionals and staff in this surgery; • local hospitals & A&E; • out of hours services; • diagnostic and treatment centres; or other organisations involved in the provision of direct care to individual patients. • GP hubs/primary care networks (Caritas PCN s)/integrated care systems (ICSs), partnerships between healthcare providers and local authorities • local 'shared care' record systems • ambulance trusts, so paramedics can view GP patient records in an emergency. • healthcare professionals such as community services • acute and emergency care service providers • NHS 111 • pharmacies • optometrists

	<ul style="list-style-type: none"> • dentistry • mental health trusts • hospices • adult and children's social care • care and nursing homes. <p>For medical research the data will be shared with OpenSAFELY at www.opensafely.org. For national clinical audits which check the quality of care the data will be shared with NHS England.</p>
Rights to object and the national data opt-out	<p>You have the right to object to information being shared between those who are providing you with direct care. This may affect the care you receive – please speak to the practice. You are not able to object to your name, address and other demographic information being sent to NHS England. This is necessary if you wish to be registered to receive NHS care.</p> <p>You are not able to object when information is legitimately shared for safeguarding reasons. In appropriate circumstances it is a legal and professional requirement to share information for safeguarding reasons. This is to protect people from harm. The information will be shared with the local safeguarding service. Safeguarding Bedfordshire - Safeguarding Bedfordshire home page</p> <p>The national data opt-out model provides an easy way for you to opt-out of information that identifies you being used or shared for medical research purposes and quality checking or audit purposes. Please contact the practice if you wish to opt-out. Further information is available from NHS England.</p>
Right to access and correct	<p>You have the right to access your medical record and have any errors or mistakes corrected. Please speak to a member of staff or look at our Access to Medical Records Policy.</p> <p>We are not aware of any circumstances in which you will have the right to delete correct information from your medical record; although you are free to obtain your own legal advice if you believe there is no lawful purpose for which we hold the information and contact us if you hold a different view.</p>
Retention period	<p>Records will be kept in line with the law and national guidance. Information on how long records are kept can be found in the Records Management Code of Practice.</p>
Right to complain	<p>In the unlikely event that you are unhappy with any element of our data-processing methods, do please contact the Practice Manager in the first instance. If you feel that we have not addressed your concern appropriately, you have the right to lodge a complaint with the Information Commissioner's Office (ICO).</p> <p>Further details, visit https://ico.org.uk/for-the-public/ and select "Make a complaint" or telephone: 0303 123 1113.</p>
Risk Stratification	<p>Changes to data controller responsibilities for risk stratification</p> <p>The Confidentiality Advisory Group (CAG) approval CAG 7-04(a)/2013 for risk stratification which was previously managed by NHS England to provide support for the processing of confidential data for integrated care boards (ICBs) is no longer in place. As ICBs undertake this processing as independent data controllers, it was agreed that they should apply to CAG directly to obtain their own approval, providing the necessary assurance on their processing activities to CAG as required. If you</p>

	need any information regarding risk stratification activities which may include your data, please contact your local ICB or check their website.
Software's use	<p>1. use SystmOne as their core clinical system. This means that this system is the core system that all patient records are held. SystmOne integrates to a number of different third-party suppliers to provide the range of services needed to perform effective patient care. SystmOne is part of the TTP Group.</p> <p>SystmOne Connect Privacy Policy – TPP</p> <p>2. Under the UK General Data Protection Regulation (UK GDPR) guidelines, it is important that we take your data privacy seriously and remain open and transparent about how we utilise it.</p> <p>This privacy notice explains why we need patients' personal information, what we plan to do with it, how long we will keep it, and whether we will share it with anyone else when using our medical scribe software. All the software's used will Meeting NHSE requirements for AI scribe technology.</p> <p>How Does It Work?</p> <p>Software is an ambient voice technology (AVT) powered by artificial intelligence (AI). It uses speech recognition technology to accurately transcribe your consultation with your doctor, creating a written summary of your visit. This software is designed to assist with administrative tasks and is not used in any way to aid in diagnosing medical issue</p>
Mobile telephone number	If you provide us with your mobile phone number we may use this to send you reminders about your appointments or other health screening information. Please let us know if you do not wish to receive reminders on your mobile

Child Health Information

We wish to make sure that your child has the opportunity to have immunisations and health checks when they are due. We share information about childhood immunisations, the 6-8 week new baby check and breast-feeding status relevant Health departments Trust health visitors and school nurses.

Who is NHS England?

NHS England is the national information and technology partner for the health and care system. It provides information and data to the health service so that it can plan effectively and monitor progress, create and maintain the technological infrastructure that keeps the health service running and links systems together to provide seamless care and develops information standards that improve the way different parts of the system communicate

NHS England is the national custodian for health and care data in England and has responsibility for standardising, collecting, analysing, publishing and sharing data and information from across the health and social care system, including general practice

What does it do with the data it collects?

Patient data collected from general practice is needed to support a wide variety of research and analysis to help run and improve health and care services. While the data collected in other care settings such

as hospitals is valuable in understanding and improving specific services, it is the patient data in general practice that helps NHS England to understand whether the health and care system as a whole is working for patients.

Furthermore, it may be used for research purposes or to analyse healthcare inequalities.

Information NHS England collects	Information NHS England does not collect
<p>NHS Digital collected data from GP practices, hospitals, social care, and community services to improve planning, research, and delivery of care. Examples include:</p> <ul style="list-style-type: none"> • Demographic details (age, sex, ethnicity, postcode – but not names for most datasets) <ul style="list-style-type: none"> • NHS number (to link records securely, not usually shared openly) • Diagnoses (e.g., diabetes, heart disease) • Treatments & procedures (operations, prescriptions, referrals) • Test results (e.g., blood tests, scans) • Hospital Episode Statistics (HES) – records of admissions, outpatient visits, A&E attendances • Vaccination and screening data • Public health data (disease prevalence, outcomes, mortality rates) <p>Data is usually pseudonymised (stripped of direct identifiers like name/address) when used for research, planning, and statistics.</p>	<ul style="list-style-type: none"> • Private communications (e.g., conversations with your GP, text/email content) • Full medical notes or GP consultation notes (they do not routinely get the <i>free text</i> written in your records) • Mental health therapy session notes (only coded diagnoses/procedures, not detailed narratives) • Social media or personal browsing data • Financial details (like bank account numbers) • Employment records (except if linked to occupational health data in specific cases)

2. Social media and website information

Using your health data for planning and research

You can decide whether you wish to have your information extracted and there are two main options available to you.

Option 1:

Type 1 opt-out applies at organisational level and means that your medical record is not extracted from the organisation for any purpose other than for direct patient care. You can opt-out at any time. Opting out will mean that no further extractions will be taken from your medical record.

For a Type 1 Opt-out, you need to contact the organisation by phone, email or post to let us know that you wish to opt-out. Further information is available [here](#)

Option 2:

The National Data Opt-out (NDO-O) allows data to be extracted by NHS England for its lawful purposes but it cannot share this information with anyone else for research and planning purposes. You can opt-out at any time.

NDO-O – you need to inform NHS England. Unfortunately, this cannot be done by this organisation for you. You can opt in or out at any time and complete this by any of the following methods:

- **Online service** – You will need to know your NHS number or your postcode as registered at this organisation via [Make your choice about sharing data from your health records](#)
- **Telephone service** 0300 303 5678 which is open between 0900 – 1700 Monday to Friday
- **NHS App** – For use by patients aged 13 and over. The app can be downloaded from the App Store or Google Play
- **“Print and post”** [Manage your choice](#)
Photocopies of proof of the applicant’s name (e.g., passport, UK driving licence etc.) and address (e.g., utility bill, payslip etc.) need to be sent with the application.

It can take up to 14 days to process the form once it arrives at NHS, PO Box 884, Leeds. LS1 9TZ

Further information on NDO-O is available [here](#).

Patient SMS and telephone message

SMS (text) message content template

You can opt-out of your health information being shared with NHS England for planning and research before the commencement date.

Visit [Make your choice about sharing data from your health records](#) for more information.

Patient information for website template

The way in which patient data gathering is done by NHS England is changing. There is currently a lot of information online and in the news about your choices and opting out of these collections. You can opt-out of your GP record being shared with NHS England for planning and research and this should be done before the commencement date.

For more information, please visit our privacy notice at [About Our Surgery - King Street Surgery](#) to find out more.

Email response template

Thank you for your email regarding the sharing of patient data and being able to opt-out of these collections. The NHS England GP Data extraction is a legally required activity for this practice; however, you do have a right to opt-out of the sharing of your data for research and planning purposes.

NHS England provides a detailed guide for patients on how the information it extracts is used and how you can opt-out. This can be found at [General Practice Data for Planning and Research \(GDPR\)](#)