



Sherwood Medical Partnership

Clipstone

[www.sherwoodmedical.co.uk](http://www.sherwoodmedical.co.uk)

### Policy/Protocol Control Sheet

|  |   |
|--|---|
| Practice Name                          | Sherwood Medical Partnership  |
| Policy Title                           | <b>Data Protection Privacy Notice for Members of Sherwood Medical Partnership Patient Participation Group (PPG)</b> |
| Author/Nominated Lead                  | Paul Couldrey – Data protection officer<br>Amy Marriott   |
| Purpose/ Aim of the Policy/Protocol    | To advise members of the PPG how we use their information   |
| Target audience                        | Members of the PPG  |
| Location of Policy/Protocol            | GPT and Website   |
| How often will the policy be reviewed? | In line with DSPToolkit   |
| Policy Approval Date                   | September 2023  |
| Policy Approved By                     | Management  |
| Policy Review Date                     | June 2025   |

## **Introduction:**

This privacy notice lets you know what happens to any personal data that you give to us, or any that we may collect from or about you.

This privacy notice applies to personal information processed by or on behalf of the practice.

This Notice explains.

- Who we are, how we use your information and our Data Protection Officer
- What kinds of personal information about you do we process?
- What are the legal grounds for our processing of your personal information (including when we share it with others)?
- What should you do if your personal information changes?
- For how long your personal information is retained by us?
- What are your rights under data protection laws?

The UK General Data Protection Regulation (UK GDPR) became law on 24th May 2016. This is a regulation on the protection of confidential and sensitive information. It entered into force in the UK on the 25th May 2018, repealing the Data Protection Act (1998), being supplemented by the Data Protection Act 2018.

For the purpose of applicable data protection legislation (including but not limited to the UK General Data Protection Regulation (Regulation (UK) 2016/679) (the "UKGDPR"), and the Data Protection Act 2018 the practice responsible for your personal data is [Practice Name].

This Notice describes how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations to you. Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights.

This Privacy Policy applies to the personal data collected from members of the PPG.

## **What is the Patient Participation Group (PPG)?**

Sherwood Medical Partnership has established a PPG to help us to gather views and experiences from people who use our services. The PPG aims to allow our service users to be actively engaged and involved in decision-making to help shape our services and culture, with the aim of supporting high-quality sustainable services.

## How we use your information and the law.

Sherwood Medical Partnership will be what's known as the 'Controller' of the personal data you provide to us. Participation in the PPG is entirely voluntary. If you are interested in joining our PPG, please complete the online form at <https://www.sherwoodmedical.co.uk/practice-information/patient-participation-group/> or speak to a member of staff.

If you have expressed an interest in attending our PPG, we will collect some or all of the following information about you:

- Name.
- Contact number.
- Email address.
- Preferred contact method.
- Age.
- Ethnicity; and
- Area in which you live.

Your information will be used to:

- Keep a register of current members.
- Contact you with details of PPG meetings;
- Progress any comments or suggestions; and
- Collect views and experiences from people from a range of equality groups.

You may be asked for your view and experiences in relation to;

- How the Practice can achieve its aims in providing best possible provision to its patients
- What developments in the community that may impact healthcare have occurred
- What other health services are doing and providing feedback to the Practice
- What patients and individuals who have not accessed our services think of the Practice

The practice will aim to hold a standard PPG every 3 months if that is the agreement of the group, but we may hold fewer or additional PPGs for more bespoke topics or alternative events. We will tell you whether the PPG will be held in person or via video conference. Where PPGs are held remotely, we will provide you instructions for joining ahead of the meeting.

Each PPG will have up to 10 patients in attendance plus relevant members of the working Healthcare team. Your identity and any views or comments you express at the PPG will therefore be shared with the other attendees.

## **How do we lawfully use your data?**

As a healthcare provider, we are regulated by the Care Quality Commission (CQC) and have established our PPG to support us to meet our CQC requirements. Specifically, the PPG assists us in responding to the CQC's Key Lines of Enquiry relating to 'well-led' domain.

The output of the PPG will be used to help influence how we provide our healthcare services which we have been commissioned to provide under the NHS Act 2006 and the Health and Social Care Act 2012.

Article 6 (1) (e) – the 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.

Article 9 (2) (h) -processing is necessary for...the provision of health or social care or treatment or the management of health or social care systems and services...”

## **Changing your mind**

You can withdraw from the PPG at any time. We will remove your contact details from our PPG register, and you will not receive any further contact relating to our PPG.

If you wish to withdraw from the PPG, please email [nnicb-nn.c84059@nhs.net](mailto:nnicb-nn.c84059@nhs.net)

Your Direct Care will not be impacted in any way should you choose not to take part.

## **How do we maintain the confidentiality of your records?**

We are committed to protecting your privacy and will only use information collected lawfully in accordance with:

- Data Protection Act 2018
- The UK General Data Protection Regulation 2016
- Human Rights Act 1998
- Common Law Duty of Confidentiality
- NHS Codes of Confidentiality, Information Security and Records Management

We will only ever use or pass on information about you if others who have a genuine need for it. We will not disclose your information to any third party without your permission unless there are exceptional circumstances (i.e., life or death situations), where the law requires information to be passed on.

Our practice policy is to respect the privacy of our members and to maintain compliance with the UK General Data Protection Regulation (UK GDPR) and all UK specific Data Protection Requirements. Our policy is to ensure all personal data will be protected.

All employees and sub-contractors engaged by our practice are asked to sign a confidentiality agreement.

### **Where do we store your information Electronically?**

All the personal data we process is processed in the UK however for the purposes of IT hosting and maintenance this information may be located on servers within the European Union.

No 3rd parties have access to your personal data unless the law allows them to do so, and appropriate safeguards have been put in place. We have a Data Protection regime in place to oversee the effective and secure processing of your personal and or special category (sensitive, confidential) data.

### **USE OF AI DICTATION SOFTWARE**

Heidi AI

As part of the Digital First National programme of work, GP Practices are required to record accurate data about patient interaction, especially within consultations. To assist with this administrative task, the practice is using a new technology known as Heidi AI.

The primary purposes include improving clinical documentation, aiding healthcare professionals in notetaking, and generating consult summaries. Heidi technology enables clinicians to focus on patients during the consultation, contributing to improved patient care. It also acts as a valuable tool for medical practitioners, saving them hours of administrative time per week.

Heidi works by transcribing speech into text from a healthcare encounter such as conversations between clinicians and patients or by clinicians dictating their clinical findings, impression and/or management plans before, during and after the healthcare encounter. The clinician can also add additional contextual notes about the healthcare encounter.

This system is designed to alleviate the administrative burden on healthcare professionals, allowing them to focus more on patient care rather than paperwork. The Heidi Scribe will leverage natural language processing (NLP), speech recognition technology, and machine learning algorithms to understand and interpret complex medical dialogue, identify key health information, and categorise data into the appropriate sections of an Electronic Health Record (EHR).

Your consent will be sought for consultations that are transcribed using the Heidi AI tool. Heidi also uses aggregated de-identified information from these consults to improve its models and outputs, ultimately improving both patient care and clinician experience.

All Data that identifies you stays within the practice and its servers which are UK based, no identifiable data is used by the Heidi tool for machine learning.

Heidi AI will not make decisions about your care, it only transcribes verbal interactions with

the practice, with your consent.

More information about the model can be found on the Heidi website here: -

<https://www.heidihealth.com/uk>

### **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 Commissioning Support Units
- Clinical Commissioning Groups
- NHS England (NHSE) and NHS Digital (NHSD)
- Local Authorities
- CQC
- Private Sector Providers providing employment services
- 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 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. All employees and sub-contractors engaged by our practice are asked to sign a confidentiality agreement. If a sub-contractor acts as a data processor for Sherwood Medical Partnership an appropriate contract (art 24-28) will be established for the processing of your information.

### **How long will we store your information?**

We are required under UK tax law to keep your information and data for the full retention periods as specified by NHS England, which currently is up to 6 years.

### **How can you access, amend move the personal data that you have given to us?**

Even if we already hold your personal data, you still have various rights in relation to it. To get in touch about these, please contact us. We will seek to deal with your request without undue delay, and in any event in accordance with the requirements of any applicable laws. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

**Right to object:** If we are using your data because we deem it necessary for our legitimate interests to do so, and you do not agree, you have the right to object. We will respond to your request within 1 Month (although we may be allowed to extend this period in certain cases). Generally, we will only disagree with you if certain limited conditions apply.

**Right to withdraw consent:** Where we have obtained your consent to process your personal data for certain activities (for example for a research project), or consent to market to you, you may withdraw your consent at any time.

**Right to erasure:** In certain situations (for example, where we have processed your data unlawfully), you have the right to request us to "erase" 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. If we do agree to your request, we will Delete your data but will generally assume that you would prefer us to keep a note of your name on our register of individuals who would prefer not to be contacted. That way, we will minimise the chances of you being contacted in the future where your data are collected in unconnected circumstances. If you would prefer us not to do this, you are free to say so.

**Right of data portability:** If you wish, you have the right to transfer your data from us to another data controller.

### **Access to your personal information**

**Data Subject Access Requests (DSAR):** You have a right under the Data Protection legislation 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. To request this, you need to do the following:

- Your request should be made in writing to the Practice
- There is no charge to have a copy of the information held about you
- We are required to respond to you within one month

### **What should you do if your personal information changes?**

You should tell us so that we can update our records please contact the Practice Manager as soon as any of your details change, this is especially important for changes of address or contact details (such as your mobile phone number), the practice will from time to time ask you to confirm that the information we currently hold is accurate and up to date.

## Objections / Complaints

Should you have any concerns about how your information is managed at the Surgery, please contact the GP Practice Manager or the Data Protection Officer as above. If you are still unhappy following a review by the GP practice, you have a right to lodge a complaint with a supervisory authority: You have a right to complain to the UK supervisory Authority as below.

Information Commissioner:  
Wycliffe house  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Tel: 01625 545745  
<https://ico.org.uk/>

If you are happy for your data to be extracted and used for the purposes described in this privacy notice, then you do not need to do anything. If you have any concerns about how your data is shared, then please contact the Practice Data Protection Officer.

If you would like to know more about your rights in respect of the personal data we hold about you, please contact the Data Protection Officer as below.

## Data Protection Officer:

The Practice Data Protection Officer is Paul Couldrey of PCIG Consulting Limited. Any queries in regard to Data Protection issues should be addressed to him at: -

Email: [Couldrey@me.com](mailto:Couldrey@me.com)  
Postal: PCIG Consulting Limited  
7 Westacre Drive  
Quarry Bank  
Dudley  
West Midlands  
DY5 2EE

## 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 Data Protection Officer.