

Ordsall Health Surgery
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# **GP Practice Privacy Notice**

# **Updated December 2025**

# **Protecting Your Data**

### Introduction

This privacy notice explains in detail why we use your personal data which we, the GP practice, (Data Controller), collects and processes about you. A Data Controller determines how the data will be processed and used with the GP practice and with others who we share this data with. We are legally responsible for ensuring that all personal data that we hold, and use is done so in a way that meets the data protection principles under the General Data Protection Regulation (GDPR) and Data Protection Act 2018. This notice also explains how we handle that data and keep it safe.

The GP Practice also has a Caldicott Guardian. A Caldicott Guardian is a senior person within a health or social care organisation, preferably a health professional, who makes sure that the personal information about those who use its services is used legally, ethically and appropriately, and that confidentiality is maintained. The non-clinical Caldicott Guardian for the GP practice is:

#### Bernadette Murphy

We will continually review and update this privacy notice to reflect changes in our services and to comply with changes in the Law. When such changes occur, we will revise the last updated date as documented in the version status in the header of this document.

#### What we do?

We are here to provide care and treatment to you as our patients. In order to do this, the GP practice keeps personal demographic data about you such as your name, address, date of birth, telephone numbers, email address, NHS Number etc. and your health and care information.

Dr. K Saxby, MBChB, MRCGP, DRCOG, DFFP Dr. S. Coulson, MBChB, MRCGP, DRCOG, DFPP Dr. R. Nawrocki, MBChB, MRCGP

Dr. M. Adams, MbChB, MRCGP

Practice Manager: Mr. Stuart Wright Assistant Practice Manager: Mrs. A. Dobson



Information is needed so we can provide you with the best possible health and care. We also use your data to:

- Confirm your identity to provide these services and those of your family / carers
- Understand your needs to provide the services that you request
- Obtain your opinion on our services (with consent)
- Prevent and detect fraud and corruption in the use of public funds
- Make sure we meet our statutory obligations, including those related to diversity and equalities
- Adhere to a legal requirement that will allow us to use or provide information (e.g. a formal Court Order or legislation)

## **Definition of Data Types**

We use the following types of information / data:

#### **Personal Data**

This contains details that identify individuals even from one data item or a combination of data items. The following are demographic data items that are considered identifiable such as name, address, NHS Number, full postcode, date of birth. Under GDPR, this now includes location data and online identifiers.

#### Special categories of data (previously known as sensitive data)

This is personal data consisting of information as to: race, ethnic origin, political opinions, health, religious beliefs, trade union membership, sexual life and previous criminal convictions. Under GDPR, this now includes biometric data and genetic data.

#### Personal Confidential Data (PCD)

This term came from the <u>Caldicott review</u> undertaken in 2013 and describes personal information about identified or identifiable individuals, which should be kept private or secret. It includes personal data and special categories of data, but it is adapted to include dead as well as living people and 'confidential' includes both information 'given in confidence' and 'that which is owed a duty of confidence'.

#### **Pseudonymised Data or Coded Data**

Individual-level information where individuals can be distinguished by using a coded reference, which does not reveal their 'real world' identity. When data has been pseudonymised it still retains a level of detail in the replaced data by use of a key / code or pseudonym that should allow tracking back of the data to its original state.

#### **Anonymised Data**

This is data about individuals but with all identifying details removed. Data can be considered anonymised when it does not allow identification of the individuals to

whom it relates, and it is not possible that any individual could be identified from the data by any further processing of that data or by processing it together with other information which is available or likely to be available.

#### **Aggregated Data**

This is statistical information about multiple individuals that has been combined to show general trends or values without identifying individuals within the data.

#### Additional data types

#### **Closed Circuit TV (CCTV)**

Please note that we have installed a CCTV system in the reception waiting and administration area for the safety of our patients/staff and in particular to record and evidence any serious incidents involving patients. We operate this system in accordance with the Law and the codes of practice issued by the Information Commissioners Office as well as other regulatory bodies. Our CCTV is monitored on a [daily/X basis] and only authorised staff will have access to it.

We will not keep images captured on CCTV for longer than is necessary.

- 1. CCTV recordings are kept on the Digital Video Recorder for 3 months then recorded over
- 2. The information is stored on a data hard drive in the reception admin office.
- 3. If the recordings are to be viewed, a request must be made to: The practice Management team and a registered member of staff will view them. Please note that this usually requires a crime reference number if a request comes from Greater Manchester Police.
- 4. All recordings are deleted when they are automatically recorded over.

If a member of the public believes that their image has been captured on our CCTV they have a right to request to see it. Please contact our Data Protection Officer, who will be able to assist with this enquiry.

#### Telephone call recordings

We will always inform callers to or from the practice if we record or monitor any telephone call that are made with the practice staff. Callers will be given the option to have the call recorded or not.

Callers have the right to request copies of any calls that they are involved in. This request must be made in writing to the practice manager, who will liaise with the practice data protection officer.

All call recordings are to be kept secure in a cloud-based storage, and the data retained for a period of 3 years by **Storacall Technology Ltd**, trading as X-On Cloud Communications the digital service provider for the practice and who are the data processers for the information retained.

## Our data processing activities

The law on data protection under the GDPR sets out a number of different reasons for which personal data can be processed for. The law states that we must inform you what the legal basis is for processing personal data and also if we process special category of data such as health data what the condition is for processing.

The types of processing we carry out in the GP practice and the legal bases and conditions we use to do this are outlined below:

### Provision of Direct Care and administrative purposes within the GP practice

Type of Data	Personal Data – demographics
	Special category of data – Health data
Source of Data	Patient and other health and care providers
Legal basis for	Article 6 (1)(e) - Processing is necessary for the performance of a task
processing personal	carried out in the public interest or in the exercise of official authority
data	
and	Article 9(2)(h) - Processing is necessary for the purposes of preventative or
Condition for	occupational medicine for the assessment of the working capacity of the
processing special	employee, medical diagnosis, the provision of health and social care or
category of data	treatment or the management of health and social care systems
Common Law Duty of	Implied Consent
Confidentiality basis	

Direct care means a clinical, social or public health activity concerned with the prevention, investigation and treatment of illness and the alleviation of suffering of individuals. This is carried out by one or more registered and regulated health or social care professionals and their team with whom the individual has a legitimate relationship with. In addition, this also covers administrative purposes which are in the patient's reasonable expectations.

To explain this, a patient has a legitimate relationship with a GP in order for them to be treated and the GP practice staff process the data in order to keep up to date records and to send referral letters etc.

Other local administrative purposes include waiting list management, performance against national targets, activity monitoring, local clinical audit and production of datasets to submit for national collections.

This processing covers the majority of our tasks to deliver health and care services to you. When we use the above legal basis and condition to process your data for direct care, consent under GDPR is not needed. However, we must still satisfy the common law duty of confidentiality, and we rely on implied consent. For example, where a patient agrees to a

referral from one healthcare professional to another and where the patient agrees this implies their consent.

#### **Medicines Management and Optimisation**

Type of Data	Personal Data – demographics
	Special category of data – Health data
Source of Data	GP Practice
Legal Basis and	Article 6 (1)(e) - Processing is necessary for the performance of a task
Condition for	carried out in the public interest or in the exercise of official authority
processing special	
category of data	Article 9 (2)(h) - Processing is necessary for the purposes of preventative or
under GDPR	occupational medicine for the assessment of the working capacity of the
	employee, medical diagnosis, the provision of health and social care or
	treatment or the management of health and social care systems
Common Law Duty of	Implied Consent
Confidentiality basis	

Salford pharmacists work with GP practices to provide advice on medicines and prescribing queries, process repeat prescription requests and review prescribing of medicines to ensure that it is safe and cost-effective. This may require the use of identifiable information.

In cases where identifiable data is required, this is done with practice agreement and in the case of repeat prescription processing with patient consent. No data is removed from the practice's clinical system and no changes are made to patient's records without permission from the GP. Patient records are viewed in the GP practice.

Where specialist support is required (e.g. to order a drug that comes in solid form in gas or liquid form) Salford CCG medicines optimisation pharmacists will order this on behalf of a GP to support your care. Identifiable data is used for this purpose.

Identifiable data is also used by our pharmacists in order to review and authorise (if appropriate) requests for high-cost drugs which are not routinely funded. In cases where identifiable data is used, this is done with the consent of the patients.

### Purposes other than direct care (secondary use)

This is information which is used for non-healthcare purposes. Generally, this could be for research purposes, audits, service management, safeguarding, commissioning, complaints and patient and public involvement.

When your personal information is used for secondary use, this should, where appropriate, be limited and de-identified so that the secondary uses process is confidential.

### Safeguarding

Type of Data	Personal Data – demographics
	Special category of data – Health data
Source of Data	Patient and other health and care providers
Legal Basis and	Article 6 (1)(e) - Processing is necessary for the performance of a task
Condition for	carried out in the public interest or in the exercise of official authority
processing special	
category of data	Article 9 (2)(b) - Processing is necessary for the purposes of carrying out the
under GDPR	obligations and exercising the specific rights of the controller or the data
	subject in the field ofsocial protection law
<b>Common Law Duty of</b>	Overriding Public Interest / children and adult safeguarding legislation
Confidentiality basis	

Information is provided to care providers to ensure that adult and children's safeguarding matters are managed appropriately. Access to personal data and health information will be shared in some limited circumstances where it's legally required for the safety of the individuals concerned. For the purposes of safeguarding children and vulnerable adults, personal and healthcare data is disclosed under the provisions of the Children Acts 1989 and 2006 and Care Act 2014.

#### **Risk Stratification**

Type of Data	Personal Data – demographics
	Special category of data – Health data
Source of Data	GP Practice and other care providers
Legal Basis and	Article 6 (1)(c) - Processing is necessary for compliance with a legal
Condition for	obligation
processing special	
category of data	Article 9(2)(h) - Processing is necessary for the purposes of preventative or
under GDPR	occupational medicine for the assessment of the working capacity of the
	employee, medical diagnosis, the provision of health and social care or
	treatment or the management of health and social care systems
	Section 251 NHS Act 2006

Risk stratification entails applying computer-based algorithms, or calculations to identify those patients who are most at risk from certain medical conditions and who will benefit from clinical care to help prevent or better treat their condition. To identify those patients individually from the patient community would be a lengthy and time-consuming process which would by its nature potentially not identify individuals quickly and increase the time to improve care. A GP / health professional will review this information before a decision is made.

The use of personal and health data for risk stratification has been approved by the Secretary of State, through the Confidentiality Advisory Group of the Health Research Authority (known as Section 251 approval). Further information on Section 251 can be obtained by clicking here. This approval allows your GP or staff within your GP Practice who are responsible for providing your care, to see information that identifies you, but CCG staff will only be able to see information in a format that does not reveal your identity.

NHS England encourages GPs to use risk stratification tools as part of their local strategies for supporting patients with long-term conditions and to help and prevent avoidable admissions.

Knowledge of the risk profile of our population helps to commission appropriate preventative services and to promote quality improvement.

Risk stratification tools use various combinations of historic information about patients, for example, age, gender, diagnoses and patterns of hospital attendance and admission and primary care data collected in GP practice systems.

Our data processor for Risk Stratification purposes is Mandy Dobson – Practice Manager

If you do not wish information about you to be included in our risk stratification programme, please contact the GP Practice. We can add a code to your records that will stop your information from being used for this purpose. Please see the section below regarding objections for using data for secondary uses.

#### **National Clinical Audits**

Type of Data	Personal Data – demographics
	Special category of data – Health data
	Pseudonymised
	Anonymised
Source of Data	GP Practice and other care providers
Legal Basis and	Article 6 (1)(c) - Processing is necessary for compliance with a legal
Condition for	obligation
processing special	
category of data	Article 9(2)(h) - Processing is necessary for the purposes of preventative or
under GDPR	occupational medicine for the assessment of the working capacity of the
	employee, medical diagnosis, the provision of health and social care or
	treatment or the management of health and social care systems
	Section 251 NHS Act 2006, NHS Constitution (Health and Social Care Act
	2012)

The GP practice contributes to national clinical audits and will send the data which are required by NHS Digital when the law allows. This may include demographic data such as data of birth and information about your health which is recorded in coded form, for example, the clinical code for diabetes or high blood pressure.

### **Purposes requiring consent**

There are also other areas of processing undertaken where consent is required from you. Under GDPR, consent must be freely given, specific, you must be informed, and a record must be made that you have given your consent, to confirm you have understood.

#### **Patient and Public Involvement**

Type of Data	Personal Data – demographics
Source of Data	GP Practice
Legal Basis and	Article 6 (1)(a) – Explicit Consent
Condition for	
processing special	Article 9 (2)(a) – Explicit Consent
category of data	
under GDPR	

If you have asked us to keep you regularly informed and up to date about the work of the GP Practice or if you are actively involved in our engagement and consultation activities or patient participation groups, we will collect and process personal confidential data which you share with us.

We obtain your consent for this purpose. Where you submit your details to us for involvement purposes, we will only use your information for this purpose. You can opt out at any time by contacting us using our contact details at the end of this document.

#### **Medical Research**

Type of Data	Personal Data – demographics				
	Special category of data – health data				
Source of Data	GP Practice				
Legal Basis and	Article 6 (1)(a) – Explicit Consent				
Condition for					
processing special	Article 9 (2)(j) - Processing is necessary forscientific or historical research				
category of data	purposes				
under GDPR					
	Common law duty of confidentiality – explicit consent or if there is a legal				
	statute for this which you will be informed of				

If you wish to take part in a research study, we obtain your consent for this purpose. Where you submit your details to us for research purposes, we will only use your information for this purpose. You can opt out at any time by contacting us using our contact details at the end of this document.

#### Complaints

Type of Data	Personal Data – demographics
	Special category of data – health data
Source of Data	Data Subject, Primary Care, Secondary Care and Community Care
Legal Basis and	Article 6 (1)(a) – Explicit Consent
Condition for	
processing special	Article 9 (2)(h) - Processing is necessary for the purposes of preventative or
category of data under	occupational medicine for the assessment of the working capacity of the employee,
GDPR	medical diagnosis, the provision of health and social care or treatment or the
	management of health and social care systems
	Common law duty of confidentiality – explicit consent

If you contact the GP Practice about a complaint, we require your explicit consent to process this complaint for you. You will be informed of how and with whom your data will be shared by us, including if you have or you are a representative you wish the GP practice to deal with on your behalf.

#### **Text Messaging Reminders**

Type of Data	Personal Data – demographics
	Special category of data – health data
Source of Data	GP Practice
Legal Basis and	Article 6 (1)(a) – Explicit Consent
<b>Condition for</b>	
processing special	Article 9 (2)(h) - Processing is necessary for the purposes of preventative or
category of data	occupational medicine for the assessment of the working capacity of the
under GDPR	employee, medical diagnosis, the provision of health and social care or
	treatment or the management of health and social care systems
	Common law duty of confidentiality – explicit consent

With your consent the surgery can send you text messages to remind you about appointments. We need your signed consent beforehand as there is risk that your family and friends could see the messages and you may not want them to.

Please speak to a member of staff if you want us to send text messages to you.

You will be asked for your consent regarding any other service provided to you via text messages and you can opt out after consenting at any time by contacting the surgery directly and speaking to a member of staff.

If you change your mobile telephone number, please tell us as soon as possible so we can continue the reminder service to your mobile phone.

### Using anonymous or coded information

This type of data may be used to help assess the needs of the general population and make informed decisions about the provision of future services. Information can also be used to conduct health research and development and monitor NHS performance where the law allows this. Where information is used for statistical purposes, stringent measures are taken to ensure individual patients cannot be identified. Anonymous statistical information may also be passed to organisations with a legitimate interest, including universities, community safety units and research institutions.

# How we protect your personal data

We will use the information in a manner that conforms to the General Data Protection Regulations (GDPR) and Data Protection Act 2018. The information you provide will be subject to rigorous measures and procedures to make sure it can't be seen, accessed or disclosed to any inappropriate persons. We have an Information Governance Framework that explains the approach within the GP practice, our commitments and responsibilities to your privacy and cover a range of information and technology security areas.

Access to your personal confidential data is password protected on secure systems and securely locked in filing cabinet when on paper.

Our IT Services provider, Greater Manchester Shared Service regularly monitor our system for potential vulnerabilities and attacks and look to always ensure security is strengthened.

All our staff have received up to date data security and protection training. They are obliged in their employment contracts to uphold confidentiality and may face disciplinary procedures if they do not do so. We have incident reporting and management processes in place for reporting any data breaches or incidents. We learn from such events to help prevent further issues and inform patients of breaches when required.

## How long do we keep your personal data?

Whenever we collect or process your data, we will only keep it for as long as is necessary for the purpose it was collected. For a GP practice, we comply with the <u>Records Management NHS Code of Practice</u> which states that we keep records for 10 years after date of death. Following this time, the records are securely destroyed if stored on paper or archived for research purposes where this applies.

#### **Destruction**

This will only happen following a review of the information at the end of its retention period. Where data has been identified for disposal, we have the following responsibilities:

- to ensure that information held in manual form is destroyed using a crosscut shredder or contracted to a reputable confidential waste company Shred-It that complies with European Standard EN15713 and obtain certificates of destruction.
- to ensure that electronic storage media used to hold or process information are destroyed or overwritten to national standards.

## Who we share your data with?

As stated above, where your data is being processed for direct care, this will be shared with other care providers who are providing direct care to you such as:

- NHS Trusts / Foundation Trusts
- GP's
- Independent Contractors such as dentists, opticians, pharmacists
- Private Sector Providers
- Voluntary Sector Providers
- Ambulance Trusts
- Social Care Services
- Out of hours providers
- Walk in centres
- Clinics
- Local PCN GP hubs

### > NHS England

NHSEngland has been directed by the government to establish and operate the OpenSAFELY COVID-19 Service and the OpenSAFELY Data Analytics Service. These services provide a secure environment that supports research, clinical audit, service evaluation and health surveillance for COVID-19 and other purposes.

Each GP practice remains the controller of its own GP patient data but is required to let approved users run queries on pseudonymised patient data. This means identifiers are removed and replaced with a pseudonym.

Only approved users are allowed to run these queries, and they will not be able to access information that directly or indirectly identifies individuals.

Patients who do not wish for their data to be used as part of this process can register type 1 opt out with their GP.

#### Find additional information about OpenSAFELY.

We work with third parties and suppliers (data processors) to be able for us to provide a service to you. These include:

- Emis Health to provide our electronic clinical system
- NHS Greater Manchester Shared service to provide our IT services
- Docman to provide our scanning facility to scan correspondence into patient records
- Shred Station Ltd to comply with our confidential waste policy
- NHS Digital to use a secure email service for sending / receiving patient information

A little more information about the AI tools we use at the practice is detailed below.

#### **Use of AI-Powered Tools in Patient Record Management**

At Ordsall Health Surgery, we use approved AI tools to support the creation and management of clinical records. These systems are designed to improve efficiency and safety but are always used under the control of a clinician. They do not make clinical decisions.

#### The tools currently used are:

- Heidi Health assists GPs and other clinical staff by transcribing and summarising consultation notes. A clinician reviews and confirms all content before it is saved into your health record.
- Similarly practice non-clinical staff may use the Heidi Healthcare software to process data, update medical records and maintain a record of information for us in conjunction of managing the practice.

#### What data is processed?

These tools may process:

- Information spoken or written during consultations
- Clinical documents and letters from hospitals or other providers
- · Medical history, medications, diagnoses and symptoms

### Is my data safe?

Yes. These systems are operated under contracts that meet NHS data protection standards. We have completed Data Protection Impact Assessments (DPIAs), and your data is never stored permanently by these tools. The final information is only saved in your GP health record after clinician review.

#### Your rights

You have the right to know when your data is processed by AI-assisted tools. You may contact us with any questions or to request more details. These tools are used to support clinicians — not to replace their judgment.

For further information, please contact our Practice Manager, Mr Stuart Wright

There may be occasions whereby these organisations have potential access to your personal data, for example, if they are fixing an IT fault on the system. To protect your data, we have contracts and / or Information Sharing Agreements in place stipulating the data protection compliance they must have and re-enforce their responsibilities as a data processor to ensure your data is securely protected at all times.

We will not disclose your information to any 3<sup>rd</sup> party without your consent unless:

- there are exceptional circumstances (life or death situations)
- where the law requires information to be passed on as stated above
- required for fraud management we may share information about fraudulent activity in our premises or systems. This may include sharing data about individuals with law enforcement bodies.
- It is required to be disclosed to the police or other enforcement, regulatory or government body for prevention and / or detection of crime

# **Coronavirus epidemic special arrangements**

This practice is supporting vital coronavirus (COVID-19) planning and research by sharing your data with NHS Digital. For more information about this see the <u>General Practice</u> <u>Transparency Notice for GPES Data for Pandemic Planning and Research (COVID-19).</u>

## Where is your data processed?

Your data is processed with the GP surgery and by other third parties as stated above who are UK based. Your personal data is not sent outside of the UK for processing.

Where information sharing is required with a country outside of the EU you will be informed of this, and we will have a relevant Information Sharing Agreement in place. We will not disclose any health information without an appropriate lawful principle, unless there are exceptional circumstances such as when the health or safety of others is at risk, where the law requires it, or to carry out a statutory function i.e. reporting to external bodies to meet legal obligations

## What are your rights over your personal data?

You have the following rights over your data we hold:

- Subject Access Rights you can request access to and or copies of personal data we hold about you, free of charge (subject to exemptions) and provided to you within 1 calendar month. We request that you provide us with adequate information in writing to process your request such as full name, address, date of birth, NHS number and details of your request and documents to verify your identity so we can process the request efficiently. However, you can make this request verbally, but we need to ensure that we have verified your identity. On processing a request, there may be occasions when information may be withheld if the organisation believes that releasing the information to you could cause serious harm to your physical or mental health. Information may also be withheld if another person (i.e., third party) is identified in the record, and they do not want their information disclosed to you. However, if the other person was acting in their professional capacity in caring for you, in normal circumstances they could not prevent you from having access to that information.
- Right to rectification The correction of personal data when incorrect, out of date or incomplete which must be acted upon within 1 calendar month of receipt of such request. Please ensure the GP practice has the correct contact details for you.
- Right to withdraw consent If we have your explicit consent for any processing we do, you have the right to withdraw that consent at any time and have the right to have data portability (data provided to you in a commonly used and machine-readable format) and erasure (right to be 'forgotten')
- Right to object to processing you have the right to object to processing however please note if we can demonstrate compelling legitimate grounds which outweighs the interest of you then processing can continue. If we didn't process any information about you and your health care if would be very difficult for us to care and treat you.

To request a copy or request access to information we hold about you and / or to request information to be corrected if it is inaccurate, please contact:

Stuart Wright – Practice Manager

Email: gmicb-sal.practicemanagement@nhs.net

Postal Address: Ordsall Health Surgery, 118 Phoebe Street Salford M5 3PH

### Objections to processing for secondary purposes (other than direct care)

The NHS Constitution states, "You have the right to request that your confidential information is not used beyond your own care and treatment and to have your objections considered". The possible consequences (i.e. lack of joined up care, delay in treatment if information has to be sourced from elsewhere, medication complications which all lead to the possibility of difficulties in providing the best level of care and treatment) will be fully explained to you to allow you to make an informed decision.

If you wish to opt out of your data being processed and / or shared onwards with other organisations for purposes not related to your direct care, please contact the Practice Manager Stuart Wright on <a href="mailto:sml.practicemanagement@nhs.net">sml.practicemanagement@nhs.net</a>

There are several forms of opt-outs available at different levels. These include for example:

A. Information directly collected by the surgery:

Your choices can be exercised by withdrawing your consent for the sharing of information that identifies you, unless there is an overriding legal obligation.

B. Information not directly collected by the surgery but collected by organisations that provide NHS services.

#### National data opt-out

You can choose whether your confidential patient information is used for research and planning. To find out more visit <a href="https://nhs.uk/your-nhs-data-matters">nhs.uk/your-nhs-data-matters</a>.

You do not need to do anything if you are happy about how your confidential patient information is used. You can change your choice at any time.

### Type 1 opt-out

If you do not want personal confidential data information that identifies you to be shared outside your GP practice, for purposes beyond your direct care you can register a type 1 opt-out with your GP practice. This prevents your personal confidential information from being used other than in particular circumstances required by law, such as a public health emergency like an outbreak of a pandemic disease.

Patients are only able to register the opt-out at their GP practice. To do so complete the Type 1 opt-out form (Appendix A) and return this to your GP Practice.

Records for patients who have registered a type 2 opt-out will be identified using a particular code that will be applied to your medical records that will stop your records from being shared outside of your GP Practice.

Type 2 opt-out

NHS Digital collects information from a range of places where people receive care, such as hospitals and community services.

To support those NHS constitutional rights, patients within England are able to opt out of their personal confidential data being shared by NHS Digital for purposes other than their own direct care, this is known as the 'Type 2 opt-out'

From 25 May 2018 the type 2 opt-out has been replaced by the national data opt-out and all type 2 opt-outs previously held by NHS Digital up to 25 May 2018 were converted to national data opt-outs. If you had a type 2 opt-out it will have been automatically converted.

#### **Notification:**

The Data Protection Act 1998, requires organisations to register a notification with the ICO (Information Commissioner Organisation) to describe the purposes for which they process personal and sensitive information. This information is publicly available on the ICO website <a href="https://www.ico.org.uk">www.ico.org.uk</a>

Ordsall Health Surgery, is registered with the ICO.

#### Who is the Data Controller?

The Data Controller, responsible for keeping your information secure and confidential is:

Ordsall Health Surgery.

#### Who is the Data Protection Officer?

The Data Protection Officer for Ordsall Health Surgery is: Dr Susan Coulson.

# **Complaints / Contacting the Regulator**

If you feel that your data has not been handled correctly or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, please contact our Data Protection Officer / Practice Manager at the following contact details:

Email us at: gmicb-sal.practicemanagement@nhs.net - 0161 983 0080

Data Protection Officer: Dr S Coulson - 0161 983 0080

Or write to us at: Ordsall Health Surgery 118 Phoebe Street, Salford M5 3PH

If you are not happy with our responses and wish to take your complaint to an independent body, you have the right to lodge a complaint with the Information Commissioner's Office. You can contact them by calling 0303 123 1133 or go online to <a href="www.ico.org.uk/concerns">www.ico.org.uk/concerns</a> (opens a new window, please note that we cannot be responsible for the content of external websites)

# **Further Information / Contact Us**

We hope that the Privacy Notice has been helpful in setting out the way we handle your personal data and your rights to control it. Should you have any questions / or would like further information, please visit the following website <a href="www.ico.org,uk/concerns">www.ico.org,uk/concerns</a> or contact either our CG (Caldicott Guardian) / DPO (Data Protection Officer) / PM (Practice Manager) at the following contact details:

PM: gmicb-sal.practicemanagement@nhs.net

CG: Bernardette Murphy – gmicb-sal.ordsallhealthadmin@nhs.net

DPO: Dr S Coulson on the following number: 0161 983 0080

Alternatively write to us at: Ordsall Health Surgery, 118 Phoebe Street, Salford. M5 3PH

#### **Links**

If you would like to find out more information on the wider health and care system approach to using personal information or other useful information, please click and / or search for the following on the internet:

- Information Commissioners Office
- Information Governance Alliance
- NHS Constitution
- NHS Care Record Guarantee
- NHS Digital Guide to Confidentiality in Health and Social Care
- Health Research Authority
- Health Research Authority Confidentiality Advisory Group (CAG)

### Appendix A

# **Register your Type 1 Opt-out preference**

The data held in your GP medical records is shared with other healthcare professionals for the purposes of your individual care. It is also shared with other organisations to support health and care planning and research.

If you do not want your personally identifiable patient data to be shared outside of your GP practice for purposes except your own care, you can register an opt-out with your GP practice. This is known as a Type 1 Opt-out.

Type 1 Opt-outs may be discontinued in the future. If this happens then they may be turned into a National Data Opt-out. Your GP practice will tell you if this is going to happen and if you need to do anything. More information about the National Data Opt-out is here: <a href="https://www.nhs.uk/your-nhs-data-matters/">https://www.nhs.uk/your-nhs-data-matters/</a>

You can use this form to:

- register a Type 1 Opt-out, for yourself or for a dependent (if you are the parent or legal guardian of the patient) (to Opt-out)
- withdraw an existing Type 1 Opt-out, for yourself or a dependent (if you are the parent or legal guardian of the patient) if you have changed your preference (**Opt-in**)

This decision will not affect individual care and you can change your choice at any time, using this form. This form, once completed, should be sent to your GP practice by email or post.

#### **Details of the patient**

Title					
Forename(s)					
Surname					
Address					
Phone number					
Date of birth					
NHS Number (if known)					

# **Details of parent or legal guardian**

If you are filling in this form on behalf of a dependent e.g. a child, the GP practice will first check that you have the authority to do so. Please complete the details below:

Name						
Addres	SS					
Relatio	onship to patient					
Your d	lecision					
	Opt-out					
	I do not allow my iden for purposes except m	tifiable patient data to be shared outside of the GP practice y own care.				
	OR					
	I do not allow the patient above's identifiable patient data to be shared outside of the GP practice for purposes except their own care.					
П	Withdraw Opt-out (Opt-in)					
_	I do allow my identifiable patient data to be shared outside of the GP practice for purposes beyond my own care.					
	OR					
	I do allow the patient above's identifiable patient data to be shared outside of the GP practice for purposes beyond their own care.					
Your d	leclaration					
I confi	rm that:					
•	<ul> <li>the information I have given in this form is correct</li> <li>I am the parent or legal guardian of the dependent person I am making a choice for set out above (if appliable)</li> </ul>					
Signatu	ure					
Date si	gned					

# When complete, please post or send by email to your GP practice

# For GP Practice Use Only

Date received		
Date applied		
Tick to select the codes applied	Opt – Out - Dissent code:  9Nu0 (827241000000103   Dissent from secondary use of general practitioner patient identifiable data (finding) )	
	Opt – In - Dissent withdrawal code:  9Nu1 (827261000000102   Dissent withdrawn for secondary use of general practitioner patient identifiable data (finding) )]	