**THE BRIDGE SURGERY**

**PRACTICE FAIR PROCESSING & PRIVACY NOTICE**

**Introduction**

This privacy notice aims to detail how The Bridge Surgery uses patient information to provide healthcare.

This practice keeps medical records confidentially in compliance with the General Data Protection Regulation (GDPR)

We hold your medical record so that we can provide you with safe care and treatment.

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

* We will only share relevant information from your medical record with other health or social care staff or organizations 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.
* Healthcare staff working in A&E, Out of Hours, Extended Access Hub and the community 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: <https://digital.nhs.uk/summary-care-records> .
* You have the right to object to information being shared for your own care. Please speak to the practice if you wish to object and you can opt out of the service. You also have the right to have any mistakes or errors corrected.

**Other important information about how your information is used to provide you with healthcare**

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| **Registering for NHS care*** All patients who receive NHS care are registered on a national database.
* This database holds your name, address, date of birth and NHS Number but it does not hold information about the care you receive.
* The database is held by NHS Digital, a national organisation which has legal responsibilities to collect NHS data.
* More information can be found at: [digital.nhs.uk/summary-care-records](https://digital.nhs.uk/summary-care-records) or for general enquires telephone NHS Digital on 0300 303 5678
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| **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 diabetes.
* 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 practice.
* More information can be found at www.midlandsandlancashirecsu.nhs.uk

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| **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.
* We do not need your consent or agreement to do this.
* For more information see safeguarding leaflet or ask at reception
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**We are required by law to provide you with the following information about how we handle your information.**

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| **Purpose** of the processing | * Medical research and to check the quality of care which is given to patients (this is called the national clinical audit)
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| **Lawful basis** for processing | These purposes are supported under the following sections of the GDPR:*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* *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...”* Healthcare staff will also respect and comply with their obligations under the common law duty of confidence. |
| **Recipient or categories of recipients** of the processed data | * For medical research the data will be shared with clinical research network
* For national clinical audits which check quality of care the data will be shared with NHS digital
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| **Rights to object and national data opt out**  | * You have the right to object under GDPR and the right to ’opt out’ under the national opt-out model. The national provides an easy for you to opt out of

Information that identifies you being used or shared for medical research purposes and quality checking and audit purposes To opt out of your identifiable you being used or shared for medical research or to find out more about your opt-out choices please go to NHS Digitals website :  |
| **Right to access and correct** | * 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 ‘subject access request’ policy on the practice website – www.bridgesurgery.co.uk
* 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.
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| **Retention period** | GP medical records will be kept in line with the law and national guidance. Information on how long records are kept can be found at: <https://digital.nhs.uk/article/1202/Records-Management-Code-of-Practice-for-Health-and-Social-Care-2016>  |
| **Right to complain** | You have the right to complain to the Information Commissioner’s Office. If you wish to complain follow this link <https://ico.org.uk/global/contact-us/> or call the helpline **0303 123 1113** |

**How your information is used for medical research and to measure the quality of care**

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| **Medical research**The Bridge Surgery may share 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 practice,
* we will share information with NHS digital, the Care Quality Commission and Local Health protection team (or Public Health England) when the law requires us to do so
* We must also share your information if a cout of laws orders us to do so

 This is important because:* the use of information from GP medical records is very useful in developing new treatments and medicines;
* Medical researchers use information from medical records to help answer important questions about illnesses and disease so that improvements can be made to the care and treatment patients receive.

We also share information with the following medical research organizations with your explicit consent or when the law allows: Clinical Practice Research Network and National Institute for Health ResearchYou have the right to object to your identifiable information being used or shared for medical research purposes.  |

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| **Checking the quality of care - national clinical audits**The Bridge Surgery contributes to national clinical audits so that healthcare can be checked and reviewed.* Information from medical records can help doctors and other healthcare workers measure and check the quality of care which is provided to you.
* The results of the checks or audits can show where hospitals are doing well and where they need to improve.
* The results of the checks or audits are used to recommend improvements to patient care.
* Data are sent to NHS Digital, 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: <https://www.hqip.org.uk/> or

 phone 020 7997 7370. * You have the right to object to your identifiable information being shared for national clinical audits. Please contact the practice if you wish to object.
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| **How your information is shared so that this practice can meet legal requirements**The law requires The Bridge Surgery to share information from your medical records in certain circumstances. Information is shared so that the NHS or Public Health England can, for example:* plan and manage services;
* check that the care being provided is safe;
* prevent infectious diseases from spreading.

We will share information with NHS Digital, the Care Quality Commission and local health protection team (or Public Health England) when the law requires us to do so. Please see below for more information.We must also share your information if a court of law orders us to do so. |

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|  **NHS Digital*** NHS Digital is a national body which has legal responsibilities to collect information about health and social care services.

 * It collects information from across the NHS in England and provides reports on how the NHS is performing. These reports help to plan and improve services to patients.

 * This practice must comply with the law and will send data to NHS Digital, for example, when it is told to do so by the Secretary of State for Health or NHS England under the Health and Social Care Act 2012.
* More information about NHS Digital and how it uses information can be found at:

<https://digital.nhs.uk/home>* NHS Digital sometimes shares names and addresses of patients suspected of committing immigration offences with the Home Office. More information on this can be found here: <https://www.gov.uk/government/publications/information-requests-from-the-home-office-to-nhs-digital>
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| **Care Quality Commission (CQC)*** The CQC regulates health and social care services to ensure that safe care is provided.
* The law says that we must report certain serious events to the CQC, for example, when patient safety has been put at risk.
* For more information about the CQC see: <http://www.cqc.org.uk/>
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| **Public Health*** The law requires us to share data for public health reasons, for example to prevent the spread of infectious diseases or other diseases which threaten the health of the population.
* We will report the relevant information to local health protection team or Public Health England.
* For more information about Public Health England and disease reporting see: <https://www.gov.uk/guidance/notifiable-diseases-and-causative-organisms-how-to-report>
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| **Friends and Family Test** * All NHS organisations are required to actively seek feedback on the treatment we provide to all patients
* The process will involve us sending you an SMS message following your attendance at the surgery
* The results of the feedback si then reported monthly using non identifiable information to NHS England who publish the data on the NHS England and NHS choices Websites
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**We are required by law to provide you with the following information about how we handle your information and our legal obligations to share data.**

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| **Purpose** of the processing | Compliance with legal obligations or court order.  |
| **Lawful basis** for processing | The following sections of the GDPR mean that we can share information when the law tells us to.Article 6(1)(c) – ‘processing is necessary for compliance with a legal obligation to which the controller is subject…’Article 9(2)(h) – ‘processing is necessary for the purpose of preventative…medicine…the provision of health or social care or treatment or the management of health or social care systems and services...’ |
| **Recipient or categories of recipients** of the processed data | * The data will be shared with NHS Digital.
* The data will be shared with the Care Quality Commission.
* The data will be shared with our local health protection team or Public Health England.
* The data will be shared with the court if ordered.
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| **Rights to object and the national data opt-out**  | There are very limited rights to object when the law requires information to be shared but government policy allows some rights of objection as set out below.NHS Digital* You have the right to object to information being shared with NHS Digital for reasons other than your own direct care.
* This is called a ‘Type 1’ objection – you can ask your practice to apply this code to your record.
* Please note: The ‘Type 1’ objection, however, will no longer be available after 2020.
* This means you will not be able to object to your data being shared with NHS Digital when it is legally required under the Health and Social Care Act 2012

  The national data op-out model provides you with an easy way of opting-out of identifiable data being used for health service planning and research purposes, including when it is shared by NHS Digital for these reasons. To opt-out or to find out more about your opt-out choices please go to NHS Digital’s website: [www.digital.nhs.uk](http://www.digital.nhs.uk)NHS Digital sharing with the Home Office* There is no right of objection to NHS Digital sharing names and addresses of patients who are suspected of having committed an immigration offence.

Public health* Legally information must be shared under public health legislation. This means that you are unable to object.

Care Quality Commission* Legally information must be shared when the Care Quality Commission needs it for their regulatory functions. This means that you are unable to object.

Court order* Your information must be shared if it ordered by a court. This means that you are unable to object.
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| **Right to access and correct** | * 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 ‘subject access request’ policy on the practice website – www.bridgesurgery.co.uk.
* 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.
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| **Retention period** | GP medical records will be kept in line with the law and national guidance. Information on how long records are kept can be found at: <https://digital.nhs.uk/article/1202/Records-Management-Code-of-Practice-for-Health-and-Social-Care-2016> or speak to the practice. |
| **Right to complain** | You have the right to complain to the Information Commissioner’s Office. If you wish to complain follow this link <https://ico.org.uk/global/contact-us/> or call the helpline **0303 123 1113** |

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| **National screening programmes*** The NHS provides national screening programs so that certain diseases can be detected at an early stage.
* These screening programmes include bowel cancer, breast cancer, cervical cancer, aortic aneurysms and a diabetic eye screening service.
* The law allows us to share your contact information with Public Health England so that you can be invited to the relevant screening programme.
* More information can be found at: <https://www.gov.uk/topic/population-screening-programmes>.
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**We are required by law to provide you with the following information about how we handle your information in relation to our legal obligations to share data.**

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| **Purpose** of the processing | * The NHS provides several national health screening programmes to detect diseases or conditions early such as cervical and breast cancer, aortic aneurysm and diabetes.
* The information is shared so that the correct people are invited for screening. This means those who are most at risk can be offered treatment.
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| **Lawful basis** for processing | The following sections of the GDPR allow us to contact patients for screening.Article 6(1)(e) – ‘processing is necessary…in the exercise of official authority vested in the controller...’’Article 9(2)(h) – ‘processing is necessary for the purpose of preventative…medicine…the provision of health or social care or treatment or the management of health or social care systems and services...’ |
| **Recipient or categories of recipients** of the processed data | The data will be shared with all National Screening Programmes. |
| **Rights to object** | For national screening programmes: you can opt so that you no longer receive an invitation to a screening programme. See: <https://www.gov.uk/government/publications/opting-out-of-the-nhs-population-screening-programmes> |
| **Right to access and correct** | * 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 ‘subject access request’ policy on the practice website – birdgesurgery.co.uk.
* 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.
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| **Retention period** | GP medical records will be kept in line with the law and national guidance. Information on how long records can be kept can be found at: <https://digital.nhs.uk/article/1202/Records-Management-Code-of-Practice-for-Health-and-Social-Care-2016> or speak to the practice. |
| **Right to complain** | You have the right to complain to the Information Commissioner’s Office. If you wish to complain follow this link <https://ico.org.uk/global/contact-us/> or call the helpline 0303 123 1113  |
| **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. |

**Appendix 1. Patient Disclaimer**

**The Bridge Surgery has a medical partnership with the Primary Care Network working alongside other local organisations in the NHS health and care system to improve care for patients and the public**

Whenever you use a health or care service such as attending accident and emergency or using a community care service, important information about you is collected in patient records for that service. Collection this information helps to ensure you get the best possible care and treatment

The following Information collected about you when you use these services can also be used to provide other organisations for purposes beyond your individual care for instance to help with :

* Improving quality and standards of care provides
* Research and development of new treatments
* Preventing illness and disease
* Monitoring safety
* Planning services

This may only take place when there is a clear legal basis to use this information. All these uses help to provide better health and care for you, your family and future generations. Confidential patient information about your health and care is only used like this where allowed by law

Most of the time, anonymised data is used for research and planning so that you cannot be identified in which case your confidential patient information isn’t needed.

You have a choice about whether you want your confidential patient information to be used in this way. If you are happy with is 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 individual care.

To find out more or register your choice to opt out please visit

 [www.nhs.uk/your-nhs-data-matters](http://www.nhs.uk/your-nhs-data-matters)

* See what is meant by confidential patient information
* Find examples of when confidential patient information is used for individual care and examples or 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 access the system to view , set or change your opt out settings
* Find the contact telephone number if you want to any more or set/change your opt-out by phone
* See the situations where the opt-out will not apply

You can also find out more about how patient information is used at <https://www.hra.nhs.uk/information-about-patients/>

This covers health and care research

And <https://understandingpatientdata.org.uk/what-you-need-know>

This covers how and why patient information is used, the safeguards and how decisions are made