

## Cartmel Surgery Privacy Notice

### Using and storing your personal information

Cartmel Surgery has a legal duty to explain how we use any personal information we collect about you, as a registered patient, at the practice. Staff at this practice maintains records about your health and the treatment you receive in electronic and paper format.

### What information do we collect about you?

We will collect information such as personal details, including name, address, next of kin, records of appointments, visits, telephone calls, your health records, treatment and medications, test results, X-rays, etc. and any other relevant information to enable us to deliver effective medical care.

### How we will use your information

Your data is collected for the purpose of providing direct patient care; however, we can disclose this information if it is required by law, if you give consent or if it is justified in the public interest.

The practice may be requested to support research; however, we will always gain your consent before sharing your information with medical research databases such as the Clinical Practice Research Datalink and QResearch or others when the law allows.

In order to comply with its legal obligations, this practice may send data to NHS Digital when directed by the Secretary of State for Health under the Health and Social Care Act 2012. Additionally, this practice contributes to national clinical audits and will send the data that is required by NHS Digital when the law allows. This may include demographic data, such as date of birth, and information about your health which is recorded in coded form; for example, the clinical code for diabetes or high blood pressure.

Processing your information in this way and obtaining your consent ensures that we comply with Articles 6(1)(c), 6(1)(e) and 9(2)(h) of the GDPR.

### Maintaining confidentiality and accessing your records

We are committed to maintaining confidentiality and protecting the information we hold about you. We adhere to the General Data Protection Regulation (GDPR), the NHS Codes of Confidentiality and Security, as well as guidance issued by the Information Commissioner's Office (ICO).

You have a right to access the information we hold about you, and if you would like to access this information, you will need to complete a Subject Access Request (SAR).

Please ask at reception for a SAR form and you will be given further information. Furthermore, should you identify any inaccuracies; you have a right to have the inaccurate data corrected.

### Risk stratification

Risk stratification is a mechanism used to identify and subsequently manage those patients deemed as being at high risk of requiring urgent or emergency care. Usually this includes patients with long-term conditions, e.g. cancer.

Your information is collected by a number of sources, including Cartmel Surgery; this information is processed electronically and given a risk score which is relayed to your GP who can then decide on any necessary actions to ensure that you receive the most appropriate care.

### Medicines Management

The Practice may conduct Medicines Management Reviews of medications prescribed to its patients. This service performs a review of prescribed medications to ensure patients receive the most appropriate, up to date and cost effective treatments. This service is provided to practices within Morecambe Bay Clinical Commissioning Group (MBCCG).

### Information: To Share or Not to Share Review

Every member of staff who works for an NHS organisation has a legal obligation to keep information about you confidential.

We will only ever use or pass on information about you if others involved in your care have a genuine need for it. We will not disclose your information to any third party without your permission unless there are exceptional circumstances (i.e. life or death situations), where the law requires information to be passed on and / or in accordance with the new information sharing principle following Dame Fiona Caldicott's information sharing review (Information to share or not to share) where "The duty to share information can be as important as the duty to protect patient confidentiality." This means that health and social care professionals should have the confidence to share information in the best interests of their patients within the framework set out by the Caldicott principles. They should be supported by the policies of their employers, regulators and professional bodies.

### 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 Trusts / Foundation Trusts
- GP's
- NHS Commissioning Support Units



- Independent Contractors such as dentists, opticians, pharmacists
- Private Sector Providers
- Voluntary Sector Providers
- Ambulance Trusts
- Clinical Commissioning Groups
- Social Care Services
- Health and Social Care Information Centre (HSCIC)
- Local Authorities
- Education Services
- Fire and Rescue Services
- Police & Judicial Services
- Voluntary Sector Providers
- Private Sector Providers
- 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 explicit 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.

### Invoice validation

Your information may be shared if you have received treatment to determine which Clinical Commissioning Group (CCG) is responsible for paying for your treatment. This information may include your name, address and treatment date. All of this information is held securely and confidentially; it will not be used for any other purpose or shared with any third parties.

### Opt-outs

You have a right to object to your information being shared. Should you wish to opt out of data collection, please contact a member of staff who will be able to explain how you can opt out and prevent the sharing of your information; this is done by registering a Type 1 opt-out, preventing your information from being shared outside this practice.

### Retention periods

In accordance with the NHS Codes of Practice for Records Management, your healthcare records will be retained for 10 years after death, or if a patient emigrates, for 10 years after the date of emigration.

## What to do if you have any questions

Should you have any questions about our privacy policy or the information we hold about you, you can:

- Contact the practice's data controller via email at [cartmel.a82647@nhs.net](mailto:cartmel.a82647@nhs.net) (GP practices are data controllers for the data they hold about their patients)
- Write to the data controller at Cartmel Surgery, Cartmel, Grange-over-Sands, Cumbria LA11 6PH
- Ask to speak to the Practice Manager Janice Longmire or Karen Boden

The Data Protection Officer (DPO) for Cartmel Surgery is Dr Julie Colclough, GP Partner who can be contacted by Tel: 015395 36366 or email [cartmel.a82647@nhs.net](mailto:cartmel.a82647@nhs.net)

## Changes to our privacy policy

We regularly review our privacy policy and any updates will be published on our website, in our newsletter and on posters to reflect the changes. This policy is to be reviewed 25<sup>th</sup> May 2019.

## Accessing your medical records

As of April 2016, practices have been obliged to allow patients' access to their health record online. This service will enable the patient to view coded information held in their health record. Prior to accessing this information, you will have to visit the practice and undertake an identity check before being granted access to your records.

In addition, you can make a request to be provided with copies of your health record. To do so, you must submit a Data Subject Access Request (DSAR) form; this can be submitted electronically and the DSAR form is available on the practice website. Alternatively, a paper copy of the DSAR is available from reception. You will need to submit the form online or return the completed paper copy of the DSAR to the practice. Patients do not have to pay a fee for copies of their records.

## Time frame

Once the DSAR form is submitted, Cartmel Surgery will aim to process the request within 21 days; however, this may not always be possible. The maximum time permitted to process DSARs is one calendar month.



## Cookies

You can be assured that Cartmel Surgery website which is supplied by My Surgery Website, does not use cookies to track your activity online.

My Surgery Website Limited does not set first party cookies on our website containing any personal data unless specifically instructed to do so by the user. For example, if a user requests to be remembered on a form then a cookie is set to retain the form data for next time.

The Web Site uses third-party Cookies to collect anonymous traffic data about your use of our website. This information is stored by Google and subject to their privacy policy, which can be viewed here: <http://www.google.com/privacy.html>. Google Analytics collects information such as pages you visit on the website, the browser and operating system you use and time spent viewing pages. The purpose of this information is to help us improve the site for future visitors. **These cookies are not used to track you or your activity but if you do not wish these cookies to be stored on your computer, disable cookies in your browser settings.** You may delete Cookies at any time. See the help in your internet browser to find out how to delete your cookies.

## Change of Details

It is important that you tell the person treating you if any of your details such as your name or address have changed or if any of your details such as date of birth is incorrect in order for this to be amended. You have a responsibility to inform us of any changes so our records are accurate and up to date for you.

## Who is the Data Controller?

The Data Controller, responsible for keeping your information secure and confidential is: Dr S D Milligan & Dr H M Lovatt.

## Complaints

Should you have any concerns about how your information is managed by the Practice please contact the Practice Manager at the following address:

Cartmel Surgery, Cartmel, Grange-over-Sands, Cumbria LA11 6PN Or, for further details, visit [ico.org.uk](http://ico.org.uk) and select 'Raising a concern'.