

PATIENT PRIVACY NOTICE

STOCKWOOD MEDICAL CENTRE

Last updated June 2025

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1 Introduction

1.0 Introduction

We understand how important it is to keep your personal information safe and secure and we take this very seriously. We have taken steps to make sure your personal information is looked after in the best possible way, and we review this regularly.

Please read this privacy notice ('Privacy Notice') carefully, as it contains important information about how we use your personal and special category information (For example Healthcare, Biometric, Genetic,) held at the practice.

This Notice describes how we collect, use, and process your 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.

If you are unclear about how we process or use your personal and healthcare information, or you have any questions about this Privacy Notice or any other issue regarding your personal and healthcare information, then please contact our Data Protection Officer.

1.1 Who we are

We, at the ('the Surgery') situated at Stockwood Medical Centre, Hollway Road, Stockwood, Bristol, BS14 8PT are a Data Controller of your information. This means we are responsible for collecting, storing and handling your personal and healthcare information when you register with us as a patient.

There may be times where we also process your information. That means we use it for a particular purpose and, therefore, on those occasions we may also be Data Processors. The purposes for which we use your information are set out in this Privacy Notice.

1.2 How we use your Information and the Law

The Practice will be what's known as the 'Controller' of the personal data you provide to us.

We are required to provide you with this Privacy Notice by UK Law GDPR General Data Protection Regulation & DPA Data Protection Act 2018. It explains how we use the personal and healthcare information we collect, store and hold about you. The Law says:

- 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 on 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; and
- We need to let you know how long we can keep it for.

We collect basic personal data about you which does not include any special types of information or location-based information. This does however include name, address, contact details such as email and mobile number etc.

We will also collect sensitive confidential data known as "special category personal data", in the form of health information, religious belief (if required in a healthcare setting) ethnicity, and sex during the services we provide to you and or linked to your healthcare through other health providers or third parties.

If you are unclear about how we process or use your personal and healthcare information, or you have any questions about this Privacy Notice or any other issue regarding your personal and healthcare information, then please contact our Data Protection Officer.

1.3 Our Data Protection Officer (DPO)

The Data Protection Officer for the Surgery is Lucy Hunt. You can contact her if:

- You have any questions about how your information is being held.
- If you require access to your information or if you wish to make a change to your information.
- If you wish to make a complaint about anything to do with the personal and healthcare information, we hold about you.
- Or any other query relating to this Policy and your rights as a patient.

Lucy can be contacted here: bnssg.stockwood.medicalcentre@nhs.net

1.4 Why do we need your information

The health care professionals who provide you with care maintain records about your health and any treatment or care you have received previously (eg, NHS Trust, GP Surgery, Walk-in Centre, OOH, etc). These records help to provide you with the best possible healthcare.

NHS health records may be electronic, on paper or a mixture of both, and we use a combination of working practices and technology to ensure that your information is kept confidential and secure. Records which we hold about you may include the following information;

- Details about you, such as your address, carer, legal representative, emergency contact details
- Any contact the surgery has had with you, such as appointments, surgery visits, emergency appointments, etc.
- Notes and reports about your health
- Details about your treatment and care
- Results of investigations such as laboratory tests, x-rays etc
- Relevant information from other health professionals, relatives or those who care for you

To ensure you receive the best possible care, your records are used to facilitate the care you receive. Information held about you may be used to help protect the health of the public and to help us manage the NHS. Information may be used within the GP practice for clinical audit to monitor the quality of the service provided.

2 Call Recording

We use Telephone Call Recording software for quality and training purposes. All telephone calls made or received via the Practice Telephony system may be recorded. Call Recordings are stored securely for 3 years on an external hard drive and can be accessed by the IT & Data Lead and Practice Management Team. We have internal policies that all staff must follow in order to protect your data.

3 Special Category Information

3.1 Special Category Information

The Law states that personal information about your health falls into a special category of information because it is very sensitive. Reasons that may entitle us to use and process your information may be as follows:

- **PUBLIC INTEREST:** Where we may need to handle your personal information when it is in the public interest. For example, when there is an outbreak of a specific disease and we need to contact you for treatment, or we need to pass your information to relevant organisations to ensure you receive advice and/or treatment.
- **CONSENT:** When you have given us consent.
- **VITAL INTEREST:** If you are incapable of giving consent, and we must use your information to protect your vital interests (eg, if you have had an accident and you need emergency treatment).
- **DEFENDING A CLAIM:** If we need your information to defend a legal claim against us by you, or by another party.
- **PROVIDING YOU WITH MEDICAL CARE:** Where we need your information to provide you with medical and healthcare services.

3.2 Retention Period

We carefully consider any personal information that we store about you, and we will not keep your information for longer than is necessary for the purposes as set out in this Privacy Notice.

4 Other NHS and non-NHS Organisations who we share your data with and why

Sometimes the practice shares information with other organisations that do not directly treat you, for example, Integrated Care Board (ICB). Normally, it will not be possible to identify you from this information. This information is used to plan and improve services. The information collected includes data such as the area patients live, age, gender, ethnicity, language preference, country of birth and religion. The ICB also collects information about whether patients have long term conditions such as diabetes, blood pressure, cholesterol levels and medication. However, this information is anonymous and does not include anything written as notes by the GP and cannot be linked to you. Please note this is not an exhaustive list and will change from practice to practice the main systems are included in the list below.

4.1 Sirona

Sirona Community nurses and other health care professionals can access GP information about people on their caseloads who have recently been discharged from hospital, or who are housebound, or who require longer term rehabilitation from the GP record. This information can be read by the healthcare professional to improve the patients care, but they are not able to amend the GP medical record.

You can find more information available on their website and view their Privacy Notice directly using this link: [Policies - Sirona care & health](#)



4.2 Connecting Care

Connecting Care enables a range of health care organisations, including local NHS hospital, the Ambulance Service and the Out of Hours service provided by Brisdoc. This information can be read by the healthcare professional to improve the patients care, but they are not able to amend the GP medical record. This gives them up to date information making your care safer and more efficient.

You can find more information available on their website and view their Privacy Notice directly using this link: [Connecting Care - BNSSG Healthier Together](#)



4.3 One Care

Our practice work in collaboration with One Care. One Care is a Community Interest Company representing and supporting practices in Bristol, North Somerset, and South Gloucestershire (BNSSG). Set up in 2014, it has 76 member general practice partnership across the area, which provide healthcare for more than 1 million patients. It supports practices with various aspects of running their businesses, including: finance: digital; operations; business intelligence, and IT.

This agreement allows patients from the surgery to be seen and treated by GPs from other surgeries in the evening and at weekend. The agreement allows a GP in other localities to access the GP record securely and allows information about the consultation to be written into the record.

You can find more information available on their website and view their Privacy Notice directly using this link: [Privacy policy | One Care](#)



4.4 St Peter's Hospice

This agreement enables hospice staff to read the records of patients in their care. This information can be read by the healthcare professional to improve the patients care, but they are not able to amend the GP medical record.

You can find more information available on their website and view their Privacy Notice directly using this link: [Privacy Policy - St Peter's Hospice](#)



4.5 Accurx

Accurx is a British software company that has developed a messaging service for doctor surgeries to communicate with patients via SMS and Video messaging and assists with appointment booking.

You can find more information available on their website and view their Privacy Notice directly using this link: [Accurx | Privacy Policy](#)



4.6 Accurx Scribe

The practice intends to use 'Accurx Scribe' to process and transcribe clinical conversations using ambient voice technology (AVT), either between a clinician and patients or a clinician dictating their clinical findings/management plan during, before or following patient consultations. From this, a clinical note is generated. The clinician can also generate clinical documents, such as referral letters.

The technology looks to capture relevant details such as different speakers, medical terminology and symptomatology.

You can find more information available on their website and view their Privacy Notice directly using this link: [Accurx | Privacy Policy](#)

4.7 Healthtech-1

The aim of the Healthtech-1's service is to reduce the time practice staff spend on administration and improve the patient's experience of engaging with the practice. For Healthtech-1 to complete an automated patient registration, the primary data source is from the patient who will manually enter their personal details using their digital device onto the website. Additional special category data points are collected from the patient for the purpose of increasing quality of care for that patient at the relevant GP surgery.

healthtech-1

4.8 Optum (formerly EMIS Health)

In 2023 Optum acquired EMIS Health and supplies electronic patient record systems and software used in primary care, acute care and community pharmacy in the United Kingdom.

You can find more information available on their website and view their Privacy Notice directly using this link: [Privacy Policy | Optum](#)



4.9 Surgery Connect

Surgery Connect is an award winning cloud based phone system design for health care. Our phone integrates with our clinical medical records system, EMIS, enabling us to identify patient phone numbers on incoming and outbound calls. We can also audit call volumes for operational planning. You can find more information available on their website and view their privacy notice here [Privacy Notice | Surgery Connect Help Centre](#)

The SURGERY CONNECT logo has "SURGERY" in blue and "CONNECT" in orange, with a small circular icon containing a white 'C' between the two words.

4.10 eConsult

eConsult Health is a collection of digital triage solutions for Primary and Emergency Care. eConsult enables NHS based GP practices to offer online consultations to their patients. This allows patients to submit their symptoms or requests to their own GP electronically, and offers around the clock NHS self-help information, signposting to services, and a symptom checker.

You can find more information available on their website and view their Privacy Notice directly using this link: [Privacy Notice - eConsult](#)



4.11 Patient Access

Patient Access-Patient Access connects you to local health services when you need them most. Book GP appointments, order repeat prescriptions and discover local health services for you or your family via your mobile or home computer.

You can find more information available on their website and view their Privacy Notice directly using this link: [Privacy notice | Patient Access Support Portal](#)



4.12 Medi2Data - eMR

eMR is a service enabling GP practices to create digital, GDPR-compliant Subject to Access Requests (SARs) and third party medical reports.

You can find more information available on their website and view their Privacy Notice directly using this link: [Medi2data Privacy Policy v2.0 MASTER](#)



4.13 GetUbetter

GetUbetter app provide NHS Organisations with new ways to support people with common MSK conditions via end-to-end digital injury support and condition management.

You can find more information available on their website and view their Privacy Notice directly using this link: [getUbetter Privacy Policy](#)



4.14 Healthy.IO

The NHS has commissioned Healthy.io, as part of a national NHS programme, to deliver a service providing at-home urine test kits so patients at risk of chronic kidney disease can conduct this important test at home using a smartphone. [Privacy Policy | Healthy.io](#)

4.15 National Obesity Audit

The audit will make use of data already collected from hospitals, community settings and general practices (GPs). This will include data from all weight management services and interventions commissioned (funded) by local authorities and the NHS. You can find out more information here [National Obesity Audit - NHS England Digital](#)

4.16 Anonymised Information

Sometimes we may provide information about you in an anonymised form. If we do so, then none of the information we provide to any other party will identify you as an individual and cannot be traced back to you.

4.17 Additional Support for Third Party Data Sharing

If you require any further information on any of the above, please do not hesitate to ask the Data Protection Officer: Lucy Hunt using the contact details provided in this Privacy Notice

Please note: If you give another person or organisation consent to access your record, we will need to contact you to verify your consent before we release that record. It is important that you are clear and understand how much and what aspects of your record you give consent to be disclosed.

5 Your Patient Rights

The Law gives you certain rights to your personal and healthcare information that we hold, as set out below:

5.1 Subject Access Requests (SAR)

You have the right to see what information we hold about you and to request a copy of this information.

If you would like a copy of the information, we hold about you please contact a member of the practice or contact our Data Protection Officer Lucy Hunt using the contact details provided in this Privacy Notice.

We will provide this information free of charge however, we may in some limited and exceptional circumstances must make an administrative charge for any extra copies if the information requested is excessive, complex or repetitive. We have one month to reply to you and give you the information that you require. We would ask, therefore, that any requests you make are in writing and it is made clear to us what and how much information you require.

5.2 Online Access

You may ask us if you wish to have online access to your medical record and there are several ways you can do this, ie Patient Access, NHS App. However, there will be certain protocols that we have to follow to give you online access, including written consent and production of documents that prove your identity.

Please note that when we give you online access, the responsibility is yours to make sure that you keep your information safe and secure if you do not wish any third party to gain access. Please read the [NHS App privacy policy](#)

Freedom of Information Requests – The Freedom of Information Act 2000 (FOIA) gives you as a patient a general right to certain information held on behalf of public authorities. You can request any non-personal information that the GP practice holds that doesn't fall under an exemption within Data Protection Law. You can find out more information here: [How to access information from a public authority | ICO](#).

5.3 Right to Rectification

We want to make sure that your personal information is accurate and up to date. You may ask us to correct any information you think is inaccurate. It is very important that you make sure you tell us if your contact details including your mobile phone number has changed.

If considered appropriate, a retrospective entry can be made by a clinician if you have concerns regarding the accuracy of your clinical record.

5.4 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 30 days (although we may be allowed to extend this period in certain cases). Generally, we will only disagree with you if certain limited conditions apply ie, safeguarding reasons.

We cannot share your information with anyone else for a purpose that is not directly related to your health, eg, medical research, educational purposes, etc. We would ask you for your consent in order

to do this however, you have the right to request that your personal and healthcare information is not shared by the Surgery in this way. Please note the anonymised Information section in this Privacy Notice.

5.5 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.

5.6 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.

You have the right to ask for your information to be removed however, if we require this information to assist us in providing you with appropriate medical services and diagnosis for your healthcare, then removal may not be possible.

5.7 Right of Data Portability

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.

If you wish, you have the right to transfer your data from us to another data controller. We will help with this with a GP-to-GP data transfer and transfer of your hard copy notes.

6 Under 16s

Up until the age of 16 your parents will be able to access your medical information. This means they can discuss your care with staff at the Practice and may request to see copies of your medical information unless you request us to withhold this information from them.

If you do not want your parents to have access to your medical information, please speak to a member of the Practice team. (Please see Privacy Notice for 13–16-year-olds on our website).

If English is not your first language you can request a translation of this Privacy Notice. Please contact our Data Protection Officer; Lucy Hunt using the contact details provided in this Privacy Notice.

7 Why NHS England Collects General Practice Data

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.

NHS England collected patient data from general practices using a service called the General Practice Extraction Service (GPES).

NHS England has engaged with doctors, patients, data, and governance experts to design a new approach to collect data from general practice that:

- reduces burden on GP practices
- explains clearly how data is used
- supports processes that manage and enable lawful access to patient data to improve health and social care

8 About the General Practice Data for Planning and Research Programme

NHS England collects data from general practice, this framework for data extraction is called the General Practice Data for Planning and Research data collection (GPDPR). The goal of this system is to:

- reduce burden on GP practices in managing access to patient data and maintain compliance with relevant data protection legislation
- improve protections through the consistent and rigorous review of all applications for access to patient data
- make it easier for patients to understand how their health and care data is being used, including increasing use of Trusted Secure Environments that avoids data flowing outside the NHS

This NHS England service will collect data from GP practices in England and will analyse, publish statistical data and provide safe, secure, lawful and appropriate access to GP data for health and social care purposes. This will include planning, commissioning, policy development, public health purposes (including COVID-19) and research.

8.1 Expansion of the OpenSAFELY Platform and Use of Patient Data

NHS England has expanded the OpenSAFELY platform to enable secure analysis of patient data for research and planning purposes that benefit the health and care system. OpenSAFELY is a trusted research environment that allows approved researchers to run data analyses in a secure, pseudonymised setting without accessing identifiable patient information.

This expansion supports valuable health research, including understanding disease patterns, assessing the effectiveness of interventions, and improving healthcare delivery. Access to data through OpenSAFELY is strictly controlled and limited to approved researchers working within organisations that meet stringent governance and security standards.

Approved research organisations include:

- NHS organisations and academic institutions,
- Public health bodies,
- Government health agencies,
- Universities and not-for-profit research institutes.

No commercial or private companies are given access to OpenSAFELY for marketing or insurance purposes, and researchers must demonstrate that their work is in the public interest.

The expansion of OpenSAFELY has been developed in close collaboration with key professional and regulatory bodies, including the British Medical Association (BMA), the General Medical Council (GMC), and the Royal College of General Practitioners (RCGP). These organisations have been involved to ensure that the use of patient data aligns with professional standards, safeguards confidentiality, and retains public trust.

You have the right to opt out of your confidential patient information being used for purposes beyond your individual care. More information about how your data is used and your choices can be found at: [Choose if data from your health records is shared for research and planning - NHS](#)

8.2 Opt-Outs

We are obliged to be transparent about how your information is used and shared. If you specifically object to your information being shared for the purpose of your individual care, we will not share it unless it is in the overriding public interest, eg if not sharing the information would put other individuals at risk of harm.

If you wish to opt-out of local care, we will explain to you the potential consequences of not sharing your information. If you wish to continue with opting-out, please note that any required treatment cannot be arranged by the practice.

If you do not wish your GP to share your information (not including for direct care), you can opt-out of sharing your information by completing a [Type 1 opt-out form](#). There is discussion to replace the Type 1 opt-out but as of May 2025 there is no confirmed date.

If you wish to stop NHS England and other healthcare providers from sharing your data for the purpose of research and planning, you can [opt-out online via the National Data Opt-out](#). We will only share your data if there is a legal requirement to do so.

9 Data Security and Governance

The Government has committed that access to GP data will only be via a Trusted Research Environment (TRE) and never copied or shipped outside the NHS secure environment, except where individuals have consented to their data being accessed eg, written consent for a research study. This is intended to give both GPs and patients a very high degree of confidence that their data will be safe, and their privacy protected.

Once the data is collected, it will only be used for the purposes of improving health and care. Patient data is not for sale and will never be for sale.

10 Transparency, Communications and Engagement

NHS England is developing a communications strategy delivered through four phases.

- **Listening** - where we listen to stakeholders and gather views on how best to communicate with the profession, patients and the public and give them the opportunity to inform the development of the programme in areas such as opt-outs, trusted research environments and other significant areas

- **Consultation** - a series of events where we can explain the programme, listen and capture feedback and co-design the information campaign
- **Demonstration** - show how feedback is being used to develop the programme and shape communications to the healthcare system and the public
- **Delivery** - of an information campaign to inform the healthcare system and the public about changes to how their GP data is used, that utilises the first three phases to ensure the campaign is accessible, has wide reach and is effective

Data saves lives. The vaccine rollout for COVID-19 could not have been achieved without patient data. The discovery that the steroid Dexamethasone could save the lives of one third of the most vulnerable patients with COVID-19 – those on ventilators - could not have been made without patient data from GP practices in England. That insight has gone on to save a million lives around the globe. That is why this programme is so important.

The NHS England web pages also provide further information at [General Practice Data for Planning and Research \(GPDPR\) - NHS England Digital](#)

11 NHS England

NHS England is a national body which has legal responsibilities to collect information about health and social care services. It collects information from across NHS providers in England and provides reports on how the NHS is performing. These reports help plan and improve services to patients. This practice must comply with the law and send data to NHS England when it is told to do so by the Secretary of State for Health or NHS England under the Health & Social Care Act 2012.

More information about NHS Digital and how it uses information can be found at: [Home - NHS England Digital](#)

The NHS shares some data, in which nobody can identify you, with trusted third parties, in order to improve the NHS for you and everyone else.

This includes with:

- NHS planners
- university researchers
- scientists researching medicines

We only share data when there is a proven benefit to the NHS, and access is strictly controlled:

- Your data is not shared for commercial purposes
- Your data is not shared with insurers
- Your data is not sold

11.1 How NHS England use your information

The Practice is one of many organisations working in the health and care system to improve care for patients and the public.

[General Practice Data for Planning and Research \(GPDPR\) - NHS Digital](#)

NHS England will collect data from GP medical records about patients who have registered a National Data Opt-out. The National Data Opt-out applies to identifiable patient data about your health, which is called confidential patient information.

NHS England won't share any confidential patient information about you - this includes GP data, or other data we hold, such as hospital data - with other organisations, unless there is an exemption to this.

You can change your mind about your choice at any time.

Data being used or shared for purposes beyond individual care does not include your data being shared with insurance companies or used for marketing purposes and data would only be used in this way with your specific agreement.

11.2 Opting Out

If you don't want your identifiable patient data to be shared for purposes except for your own care, you can opt-out by registering a Type 1 Opt-out or a National Data Opt-out, or both. These opt-outs are different, and they are explained in more detail below. Your individual care will not be affected if you opt-out using either option.

TYPE 1 OPT-OUT (OPTING OUT OF NHS ENGLAND COLLECTING YOUR DATA)

NHS England collect data from GP practices about patients who have registered a Type 1 Opt-out with their practice. More information about Type 1 Opt-outs is in the GP Data for Planning and Research Transparency Notice, including a form that you can complete and send to your GP practice.

If you register a Type 1 Opt-out after this collection has started, no more of your data will be shared. We will however still hold the patient data which was shared with us before you registered the Type 1 Opt-out.

If you do not want NHS England to share your identifiable patient data with anyone else for purposes beyond your own care, then you can also register a National Data Opt-out.

11.3 National Data OPT-OUT (Opting Out of NHS England Sharing your Data)

NHS England collect data from GP medical records about patients who have registered a National Data Opt-out. The National Data Opt-out applies to identifiable patient data about your health, which is called confidential patient information.

NHS England won't share any confidential patient information about you - this includes GP data, or other data we hold, such as hospital data - with other organisations, unless there is an exemption to this.

To find out more information and to register a National Data Opt-Out, please read the [General Practice Data for Planning and Research \(GDPR\) - NHS England Digital](#).

The Practice is one of many organisations working in the health and care system to improve care for patients and the public.

11.4 How long will we store your Information

We are required under UK law to keep your information and data for the full retention periods as specified by the NHS Records management code of practice for health and social care and national archives requirements.

More information on records retention can be found online on the NHS website: [Records Management Code of Practice - NHS Transformation Directorate](#)

11.5 How we lawfully use your Data

We need to know your personal, sensitive, and confidential data to provide you with healthcare services as a General Practice, under the General Data Protection Regulation we will be lawfully using your information in accordance with: –

Article 6, (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.

Article 9, (h) processing is necessary for the purposes of preventive 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

This Privacy Notice applies to the personal data of our patients and the data you have given us about your carers/family members.

12 Your summary Care Record

Your summary care record is an electronic record of your healthcare history (and other relevant personal information) held on a national healthcare records database provided and facilitated by NHS England. This record may be shared with other healthcare professionals and additions to this record may also be made by relevant healthcare professionals and organisations involved in your direct healthcare. You have the choice of what information you would like to share and with whom.

- Authorised healthcare staff can only view your SCR with your permission.
- The information shared will solely be used for the benefit of your care.
- Your options are outlined below.
 - a) Express consent for medication, allergies, and adverse reactions only. You wish to share information about medication, allergies, and adverse reactions only.
 - b) Express consent for medication, allergies, adverse reactions, and additional information. You wish to share information about medication, allergies and adverse reactions and further medical information that includes: Your significant illnesses and health problems, operations, and vaccinations you have had in the past, how you would like to be treated (such as where you would prefer to receive care), what support you might need and who should be contacted for more information about you.
 - c) Express dissent for Summary Care Record (opt out). Select this option, if you DO NOT want any information shared with other healthcare professionals involved in your care.

Please note that it is not compulsory for you to complete a consent form. If you choose not to complete a consent form, a Summary Care Record containing information about your medication, allergies and adverse reactions and additional further medical information will be created for you as described in point b) above.

You may have the right to demand that this record is not shared with anyone who is not involved in the provision of your direct healthcare. If you wish to enquire further as to your rights in respect of not sharing information on this record, then please contact our Data Protection Officer.

To find out more about the wider use of confidential personal information and to register your choice to opt out if you do not want your data to be used in this way, please visit: [Choose if data from your health records is shared for research and planning - NHS](#)

Please note: if you do choose to opt out, you can still consent to your data being used for specific purposes. However, if you are happy with this use of information you do not need to do anything. You may however change your choice at any time.

13 Risk Stratification

Risk stratification data tools are increasingly being used in the NHS to help determine a person's risk of suffering a condition, preventing an unplanned or (re)admission and identifying a need for preventive intervention. Information about you is collected from several sources including NHS Trusts and from this GP Practice. A risk score is then arrived at through an analysis of your de-identified information is only provided back to your GP as data controller in an identifiable form. Risk stratification enables your GP to focus on preventing ill health and not just the treatment of sickness. If necessary, your GP may be able to offer you additional services. Please note that you have the right to opt out of your data being used in this way, however you should be aware that your decision may have a negative impact on the timely and proactive provision of your direct care.

14 National Screening Programmes

The NHS provides national screening programmes 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 program. More information can be found at [Population screening programmes - GOV.UK](#)

15 Medical 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.

16 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 General Data Protection Regulations 2016
- Human Rights Act 1998
- Common Law Duty of Confidentiality
- Access to Medical Records Act 1990
- Health and Social Care Act 2012
- NHS Codes of Confidentiality, Information Security and Records Management
- Information: To Share or Not to Share Review

All our staff receive appropriate and regular training to ensure they are aware of their personal responsibilities and have legal and contractual obligations to uphold confidentiality, enforceable through disciplinary procedures. Our staff have access to personal information where it is appropriate to their role and is strictly on a need-to-know basis. 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 (ie, life or death situations), where the law requires information to be passed on and / or in accordance with the 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.

Our practice policy is to respect the privacy of our patients, their families and our staff and to maintain compliance with the General Data Protection Regulations (GDPR) and all UK specific Data Protection Requirements. Our policy is to ensure all personal data related to our patients will be protected.

All employees and sub-contractors engaged by our practice are asked to sign a confidentiality agreement. The practice will, if required, sign a separate confidentiality agreement if the client deems it necessary. If a sub-contractor acts as a data processor for the practice an appropriate contract (GDPR articles 24-28) will be established for the processing of your information.

In certain circumstances you may have the right to withdraw your consent to the processing of data. Please contact the Practice Manager in writing if you wish to withdraw your consent. In some circumstances we may need to store your data after your consent has been withdrawn to comply with a legislative requirement.

Some of this information will be held centrally and used for statistical purposes. Where we do this, we take strict measures to ensure that individual patients cannot be identified. Sometimes your information may be requested to be used for research purposes – the surgery will always gain your consent before releasing the information for this purpose in an identifiable format. In some circumstances you can Opt-out of the surgery sharing any of your information for research purposes.

We would however like to use your name, contact details and email address to inform you of services that may benefit you, with your consent only. There may be occasions where authorised research facilities would like you to take part in innovations, research, improving services or identifying trends.

At any stage where we would like to use your data for anything other than the specified purposes and where there is no lawful requirement for us to share or process your data, we will ensure that you have the ability to consent and opt out prior to any data processing taking place.

This information is not shared with third parties or used for any marketing and you can unsubscribe at any time via phone, email or by informing the Practice Manager.

17 Updating your Record

Under your 'Right to rectification' you can ask us to amend your details at any time if they are incorrect. For example, if you change your address or if you need to update your mobile or email address with us. It's important that we have the most up to date contact details for you as we may need to contact you in the event of an emergency. If you do provide us with your mobile phone number, we may use this to send you reminders about any appointments or other health screening information being carried out. You can opt out of being contacted if you wish to, but we may need to contact you due to public interest for example for COVID reasons. This is usually a government requirement, and we must comply by law so we will have a legal obligation to comply with this, GDPR Article 6 (c).

18 Third Parties

Sometimes we record information about third parties mentioned by you to us during any consultation. We are under an obligation to make sure we also protect that third party's rights as an individual and to ensure that references to them which may breach their rights to confidentiality, are removed before we send any information to any other party including yourself. Third parties can include: spouses, partners, and other family members.

18.1 Services that may send us your personal data

- Hospital, a consultant or any other medical or healthcare professional, or any other person involved with your general healthcare.
- Avon & Somerset Police Firearms department
- Court Orders
- Immigration matters
- Solicitors
- Fire Brigade
- Social Services
- Education

19 Who are the 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
- Out of Hours / Extended Hours services 111
- GPs
- NHS Commissioning Support Units
- Independent Contractors such as dentists, opticians, pharmacists
- Private Sector Providers
- Voluntary Sector Providers
- Ambulance Trusts
- Integrated Care Boards
- Social Care Services
- NHS England (NHSE) and NHS Digital (NHSD)
- Local Authorities
- Education Services

- Fire and Rescue Services
- Police & Judicial Services
- Voluntary Sector Providers
- Private Sector Providers
- Other 'data processors' 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.

20 Social Prescribers

Social prescribing is when health professionals refer patients to support in the community, in order to improve their health and wellbeing. The concept has gained support in the NHS organisations of the United Kingdom as well as in Ireland and the Netherlands and forms part of the NHS Long Term Plan, also known as the NHS 10-Year Plan.

The practice uses the following Social Prescribers who will have access to your data for these specified purposes and will ask for your consent before any information is shared between your GP and the social prescriber there will also be a Data Sharing Agreement between the practice and the Social Prescriber so that we all keep your information safe.

Our Social Prescribers use a system called Elemental when they receive a patient referral which has been approved by NHS. Elemental Software offers a social prescribing platform that helps scale and measure the impact of social prescribing projects. The partnership will see EMIS-Health deliver the Elemental's Social Prescription Connector to GP practices. The hope is that connecting primary care to social prescribing data will free up GP appointments while also helping patients make positive lifestyle changes. Please read the Elemental Software Privacy Policy here [Privacy Notice | The Access Group](#)

21 What is Population Health Management

This work is aimed at improving the health of an entire population. It is about improving the physical and mental health outcomes and wellbeing of people and making sure that access to services is fair and equal. It helps to reduce the occurrence of ill-health and looks at all the wider factors that affect health and care.

The project requires health care organisations to work together with communities and partner agencies. The organisations will share information with each other to get a view of health and services for the population in a particular area.

In your area, a population health management programme has been introduced. The programme will combine information from GP practices, community service providers, hospitals and other health and care providers.

21.1 How will your personal data be used

The information will include information about your health care.

The information will be combined and anything that can identify you (like your name or NHS Number) will be removed and replaced with a code.

This means that the people working with the data will only see the code and cannot see which patient the information relates to.

If we see that an individual might benefit from some additional care or support, we will send the information back to your GP or hospital provider and they will use the code to identify you and offer you services.

The information will be used for a number of healthcare related activities such as;

- improving the quality and standards of care provided
- research into the development of new treatments
- preventing illness and diseases
- monitoring safety
- planning services

21.2 Who will your personal data be shared with

The Your GP and hospital providers will send the information they hold on their systems to the South Central and West Commissioning Support Unit, who are part of NHS England.

They will link all the information together to review and make decisions about the whole population or patients that might need support. During this process any identifiable data will be removed before it is shared with Optum Healthcare.

Both the Commissioning Support Unit and Optum are required to protect your information and maintain confidentiality in the same way that your doctor or hospital provider is.

21.3 Is using your information lawful

Health Care Providers are permitted by data protection law to use information where it is 'necessary for medical purposes. This includes caring for you directly as well as management of health services more generally.

Some of the work that happens at a national level with your information is required by other parts of the law. For more information, speak to our Data Protection Officer.

Sharing and using your information in this way helps 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 were allowed by law and in the majority of cases, anonymised data is used so that you cannot be identified.

21.4 What will happen to you information when the project is finished

Once the 20-week programme has completed the information will be securely destroyed. You have a right to object to information being used in this way. You also have several other information rights. See our main privacy policy for more information.

To find out more or to register your choice to opt out, please visit [Choose if data from your health records is shared for research and planning - NHS](#)

22 Information Commissioner

Should you have any concerns about how your information is managed at the GP practice, please contact the Practice Manager.

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.

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 Manager.

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; Lucy Hunt using the contact details provided in this Privacy Notice.

23 Our Practice Website

The only website this Privacy Notice applies to is the Surgery's website . If you use a link to any other website from the Surgery's website, then you will need to read their respective privacy notice. We take no responsibility (legal or otherwise) for the content of other websites.

24 Security

We take the security of your information very seriously and we do everything we can to ensure that your information is always protected and secure. We regularly update our processes and systems, and we also ensure that our staff are properly trained. We also carry out assessments and audits of the information that we hold about you and make sure that if we provide any other services, we carry out proper assessments and security reviews.

25 Data Storage

NHS England sub-contract Amazon Web Services (AWS) to store your patient data. We have been informed that the data will always remain in the UK and will be fully encrypted both in transit and at rest. We have further been advised that AWS offers the very highest levels of security and support. The Practice do not have any influence over how the data is stored as this is decided centrally by NHS England.

26 If English isn't your first language

If English is not your first language you can request a translation of this Privacy Notice. Please contact our Data Protection Officer.

27 Cookies

The Surgery's website uses cookies. For more information on which cookies, we use and how we use them, please contact our Data Protection Officer.

28 Last Updated

This Privacy Notice was last updated June 2025