**Fair Processing Notice**

How we use your personal information

This fair processing notice explains why Severn Fields collects information about you and how that information may be used.

The health care professionals who provide you with care maintain records about your health and any treatment or care you have received previously (e.g. NHS Trust, GP Surgery, Walk-in clinic, 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 this GP Practice hold about you may include the following information;

* Details about you, such as your address, legal representative, emergency contact details
* Any contact the surgery has had with you, such as appointments, clinic 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.

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.

When the Practice is about to participate in any new data-sharing scheme we will make patients aware by displaying prominent notices in the surgery and on our website at least four weeks before the scheme is due to start. We will also explain clearly what you have to do to ‘opt-out’ of each new scheme.

A patient can object to their personal information being shared with other health care providers but if this limits the treatment that you can receive then the doctor will explain this to you at the time.

Risk Stratification

Risk stratification is a process for identifying and managing patients who are at a higher risk of emergency hospital admission. Typically this is because patients have a long term condition such as COPD or cancer. 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 prevent avoidable admissions.

Information about you is collected from a number of sources including NHS Trusts and from this GP Practice. A risk score is then arrived at through an analysis of your anonymous information using computer programmes. Your information is only provided back to your GP or member of your care team in an identifiable form. Risk stratification enables your GP to focus on the prevention of 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 Risk Stratification.

Should you have any concerns about how your information is managed, or wish to opt out of any data collection at the Practice, please contact the Practice Manager or your healthcare professional to discuss how the disclosure of your personal information can be restricted. All patients have the right to change their minds and reverse a previous decision. Please contact the practice if you change your mind regarding any previous choice.

Invoice Validation

If you have received treatment within the NHS,access to your personal information may be required in order to determine which Clinical Commissioning Group should pay for the treatment or procedure you have received.

This information would most likely include information such as your name, address, date of treatment and may be passed on to enable the billing process. These details are held in a secure environment and kept confidential. This information will only be used to validate invoices, and will not be shared for any further purposes.

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 the Data Protection Act 1998 (which is overseen by the Information Commissioner’s Office), Human Rights Act, the Common Law Duty of Confidentiality, and the NHS Codes of Confidentiality and Security.

All of our staff and contractors receive appropriate and on-going training to ensure they are aware of their personal responsibilities and have contractual obligations to uphold confidentiality, enforceable through disciplinary procedures. Only a limited number of authorised staff has access to personal information where it is appropriate to their role and is strictly on a need-to-know basis.

We maintain our duty of confidentiality to you at all times. 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), or where the law requires information to be passed on and / or in accordance with the new information sharing principle following Dame Fiona’s Caldicott 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. The following are examples of the types of organisations that we are likely to share information with:

* NHS and specialist hospitals, Trusts
* Independent Contractors such as dentists, opticians, pharmacists
* Private and Voluntary Sector Providers
* Ambulance Trusts
* Clinical Commissioning Groups and NHS England
* Social Care Services and Local Authorities
* Education Services
* Police, Fire and Rescue Services
* Other ‘data processors’ during specific project work e.g. Diabetes UK

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.

Access to personal information

You have a right under the Data Protection Act 1998 to access/view information the Practice holds about you\*, and to have it amended or removed should it be inaccurate. This is known as ‘the right of subject access’. If we do hold information about you we will:

* give you a description of it;
* tell you why we are holding it;
* tell you who it could be disclosed to; and
* let you have a copy of the information in an intelligible form.

If you would like to make a ‘subject access request’, you need to do the following:

* Your request must be made in writing to the GP - for information from the hospital you should write direct to them
* We are required to respond to you within 40 days
* You will need to give adequate information (for example full name, address, date of birth, NHS number and details of your request) so that your identity can be verified and your records located

Any changes to this notice will be published on our website and on the Practice notice board.

Notification

The Data Protection Act 1998 requires organisations to register a notification with the Information Commissioner to describe the purposes for which they process personal and sensitive information.

This information is publicly available on the Information Commissioners Office website

The practice is registered with the Information Commissioners Office (ICO) as a data controller under the Data Protection Act 1998. The registration number is **Z5578574**  and can be viewed online in the public register at <http://ico.org.uk/what_we_cover/register_of_data_controllers>

**Further information**

Further information about the way in which the NHS uses personal information and your rights in that respect can be found in:

The NHS Care Record Guarantee: <http://www.nigb.nhs.uk/pubs/nhscrg.pdf>

The NHS Constitution: <https://www.gov.uk/government/publications/the-nhs-constitution-for-england>

The HSCIC Guide to Confidentiality gives more information on the rules around information sharing : <http://www.hscic.gov.uk/confguideorg>

An independent review of how information about patients is shared across the health and care system led by Dame Fiona Caldicott was conducted in 2012. The report, Information: To share or not to share? The Information Governance Review, be found at: <https://www.gov.uk/government/publications/the-information-governance-review>

The NHS Commissioning Board – NHS England – Better Data, Informed Commissioning, Driving Improved Outcomes: Clinical Data Sets provides further information about the data flowing within the NHS to support commissioning.<http://www.england.nhs.uk/wp-content/uploads/2012/12/clinical-datasets.pdf>

Please visit the Health and Social Care Information Centre’s website for further information about their work. Information about their responsibility for collecting data from across the health and social care system can be found at: <http://www.hscic.gov.uk/collectingdata>

The Information Commissioner’s Office is the Regulator for the Data Protection Act 1998 and offer independent advice and guidance on the law and personal data, including your rights and how to access your personal information. For further information please visit the Information Commissioner’s Office website at <http://www.ico.gov.uk>.

Objections / Complaints

Should you have any concerns about how your information is managed at the GP, please contact the GP Practice Manager. If you are still unhappy following a review by the GP practice, you can then complain to the Information Commissioners Office (ICO) via their website ([www.ico.gov.uk](file:///%5C%5Cpct.xsalford.nhs.uk%5Cusers%24%5Chome%5Clwinstanley%5Cwww.ico.gov.uk)).

If you are happy for your data to be extracted and used for the purposes described in this fair processing notice then you do not need to do anything.

If you **do not want** your personal data being extracted and leaving the GP practice for any of the purposes described, you need to let us know as soon as possible.

We will then enter clinical codes into your records that will prevent data leaving the practice and / or leaving the central information system at the Health and Social Care Information Centre (HSCIC) for use by secondary providers.