

Patient Privacy Notice

Your information, what you need to know

This privacy notice explains why we collect information about you, how that information may be used and how we keep it safe and confidential.

Why we collect information about you

Health care professionals that provide you with care are required by law to maintain records about your health and any treatment or care you have received within any NHS organisation. These records help to provide you with the best possible healthcare.

We collect and hold data for the sole purpose of providing healthcare services to our patients.

In carrying out this role we may collect information about you which helps us respond to your queries or secure specialist services. We may keep your information in written form and/or in digital form. The records may include basic details about you, such as your name and address.

They may also contain more sensitive information about your health and also information such as outcomes of needs assessments.

Details we collect about you

Primary Care Sheffield works across a number of services. We have broken down this privacy notice in subsequent pages so that you can see specific details we hold on you, dependent upon which of our services you have accessed. However, in general, we hold the information which is pertinent to our providing care to you.

How we keep your information confidential and safe

Everyone working for the NHS is subject to the Common Law Duty of Confidence. Information provided in confidence will only be used for the purposes advised with consent given by the patient, unless there are other circumstances covered by the law.

Primary Care Sheffield complies with the NHS Confidentiality Code of Conduct. All our staff are required to protect your information, inform you of how your information will be used and allow you to decide if and how your information can be shared.

We hold information in accordance with the Data Protection Act 1998 and the General Data Protection Regulation 2016/679 Act.

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.

How we use your information

We primarily use information to enable our clinicians to better treat you and your healthcare. However, we also use your information to improve our services by:

- Reviewing the care we provide through clinical audit
- Investigating patient queries, complaints and legal claims
- Ensuring we receive payment for the care you receive
- Preparing statistics on NHS performance
- Auditing NHS accounts and services
- Undertaking health research and development (with your consent – you may choose whether or not to be involved)
- Training and educating healthcare professionals.

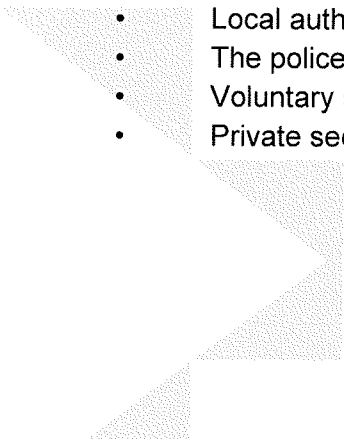
Sharing your information

We share your personal information with other NHS organisations. For example, we may share your information for healthcare purposes with NHS trusts, General Practitioners and ambulance services where they are directly involved in your care.

We may need to share information from your health records with other non-NHS organisations, including Social Services. However, we will not disclose any health information to third parties without your explicit consent to do so, unless there are exceptional circumstances, such as when the health and safety of others is at risk or where the law requires it.

We may also be asked by other statutory bodies to share basic information about you, such as your name and address, but not sensitive information from your health records. This would normally be to assist them to carry out their statutory duties. In these circumstances, where it is not practical to obtain your explicit consent, we are informing you through this notice, which is referred to as a Fair Processing Notice, under the General Data Protection Regulation 2016/679 Data Protection Act that we may share that data.

These non-NHS organisations may include, but are not restricted to:

- Social Services
 - Education services
 - Local authorities
 - The police
 - Voluntary sector providers
 - Private sector providers.
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Sharing of information is, again, dependent upon which of our services you have accessed and this notice therefore breaks that information down by service over subsequent pages. However there are some common areas which apply to all our services:

Invoice Validation

Invoice validation is an important process. It involves using your NHS number to check that the CCG is responsible for paying for your treatment. We can also use your NHS number to check whether your care has been funded through specialist commissioning, which NHS England will pay for. The process makes sure that the organisations providing your care are paid correctly.

The legal basis to use information for invoice validation is provided under Regulations made under section 251 of the NHS Act 2006 and is based on the advice of the Health Research Authority's Confidentiality and Advisory Group (reference CAG 7-07(a) and (b)/2013).

Fraud Prevention

We are required by law to protect the public funds we administer. Primary Care Sheffield may share information provided to it with other bodies responsible for auditing or administering public funds, in order to prevent and detect fraud.

Clinical audit

Information may be used for clinical audit to monitor the quality of the service provided. Some of this information may be held centrally and used for statistical purposes. Where we do this we take strict measures to ensure that individual patients cannot be identified e.g. the National Diabetes Audit.

Clinical Research

Sometimes your information may be requested to be used for research purposes. Primary Care Sheffield will always gain your consent before releasing the information for this purpose.

Cabinet Office

The use of data by the Cabinet Office for data matching is carried out with statutory authority under Part 6 of the Local Audit and Accountability Act 2014. It does not require the consent of the individuals concerned under the Data Protection Act 1998.

Data matching by the Cabinet Office is subject to a Code of Practice. You can view further information on the Cabinet Office's legal powers and the reasons why it matches particular information.

<https://www.gov.uk/government/publications/code-of-data-matching-practice-for-national-fraud-initiative>



Safeguarding

To ensure that adult and children's safeguarding matters are managed appropriately, access to identifiable information will be shared in some limited circumstances where it's legally required for the safety of the individuals concerned.

Data Retention

We will approach the management of patient records in line with the Records Management NHS Code of Practice for Health and Social Care which sets the required standards of practice in the management of records for those who work within or under contract to NHS organisations in England, based on current legal requirements and professional best practice. Any specific details of data retention by service are detailed in subsequent pages.

Access to your information

Under the General Data Protection Regulation everybody has the right to see, or have a copy, of data we hold that can identify you, with some exceptions. You do not need to give a reason to see your data.

If you want to access your data you must make the request in writing. Under special circumstances, some information may be withheld. If you wish to have a copy of the information we hold about you, please contact us in writing at:

Subject Access Requests
Primary Care Sheffield
290 Main Road
Darnall
Sheffield
S9 4QH

Your right to withdraw consent for us to share your personal information

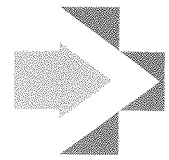
At any time you have the right to refuse/withdraw consent to information sharing. The possible consequences will be fully explained to you and could include delays in receiving care. If you wish to discuss this, please contact either the reception at the service you are accessing or by emailing us at enquiries@primarycaresheffield.org.uk detailing which services you currently access and the best way for us to contact you to discuss the consent withdrawal.

Mobile telephone number

If you provide us with your mobile phone number we may use this to send you reminders about your appointments or other health screening information. Please let us know if you do not wish to receive reminders on your mobile.

Notification

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



We are registered as a data controller and our registration can be viewed online in the public register at: [http://ico.org.uk/what we cover/register of data controllers](http://ico.org.uk/what_we_cover/register_of_data_controllers)

Any changes to this notice will be published on our website and in a prominent area at the Practice.

Complaints

If you have concerns or are unhappy about any of our services, please contact us using the details below:

Complaints
Primary Care Sheffield
290 Main Road
Darnall
Sheffield
S9 4QH

0114 226 4500

For independent advice about data protection, privacy and data-sharing issues, you can contact:

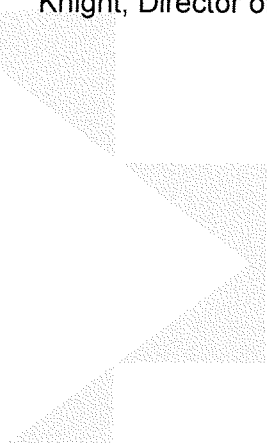
The Information Commissioner
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

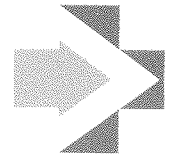
Phone: 0303 123 1113 Website: www.ico.gov.uk

Responsible individuals

The following individuals are our named leads for information handling within Primary Care Sheffield.

- Senior Information Responsible Officer: Dr Andy Hilton, Chief Executive Officer.
- Data Protection Officer, Caldicott Guardian and Information Governance Lead: Stephen Knight, Director of Primary Care.





GP Practices

Primary Care Sheffield operates a number of GP surgeries within Sheffield, in collaboration with Sheffield Health and Social Care Foundation Trust. Our surgeries are Heeley Green Surgery, Buchanan Road Surgery, Jordanthorpe Health Centre, Clover City practice, Mulberry practice, Darnall Primary Care Centre and Highgate Surgery.

The information we hold

Whilst you are registered at one of our surgeries, we will keep records of any health care and treatment you have received either from ourselves or other clinicians previously (including GPs, NHS Trusts, Walk-in centres etc). These records help to provide you with the best possible healthcare.

Records we may hold about you include:

- Your age, contact details and next of kin
- Details of your appointments, clinic visits etc.
- Records about your health, illness, treatment and care
- Results of investigations, like laboratory tests, x-rays, etc.
- Information from other health professionals.

Additional Information Sharing from our GP practices

In addition to the general details of information sharing detailed on page 2 of this leaflet, our GP practices are specifically required to share information for the following purposes:

Risk Stratification

Risk stratification is a process for pro-actively identifying and managing patients who are statistically at-risk of unplanned admission to hospital or likely to require additional healthcare input. Information about you is collected from a number of sources including NHS Trusts and GP Practices. A risk score is then arrived at through an analysis of your de-identified information using software managed by an agreed 3rd party provider and is then provided back to your GP practice (which may be one of Primary Care Sheffield's managed practices). If necessary we may be able to offer you additional services, following this risk stratification process.

Risk stratification is commissioned by the NHS Sheffield Clinical Commissioning Group (CCG). Section 251 of the NHS Act 2006 provides a statutory legal basis to process data for risk stratification purposes. Further information about risk stratification is available from:

<https://www.england.nhs.uk/ourwork/tsd/ig/risk-stratification/>

If you are registered with one of our practices and do not wish information about you to be included in the risk stratification programme, please let us know. We can add a code to your records that will stop your information from being used for this purpose. Our other services are not subject to Risk Stratification purposes.

Individual Funding Request

An 'Individual Funding Request' is a request made on your behalf, with your consent, by a clinician, for funding of specialised healthcare which falls outside the range of services and treatments that CCG has agreed to commission for the local population. An Individual Funding Request is taken under consideration when a case can be set out by a patient's clinician that there are exceptional clinical circumstances which make the patient's case different from other patients with the same condition who are at the same stage of their disease, or when the request is for a treatment that is regarded as new or experimental and where there are no other similar patients who would benefit from this treatment. A detailed response, including the criteria considered in arriving at the decision, will be provided to the patient's clinician.

Supporting Medicines Management

CCGs support local GP practices with prescribing queries which generally don't require identifiable information. CCG pharmacists work with all Sheffield practices to provide advice on medicines and prescribing queries, and review prescribing of medicines to ensure that it is safe and cost-effective. Where specialist support is required e.g. to order a drug that comes in solid form, in gas or liquid, the CCG medicines management team will order this on behalf of the practice to support your care.

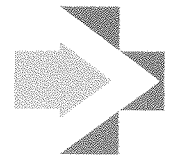
Summary Care Record (SCR)

The NHS in England uses a national electronic record called the Summary Care Record (SCR) to support patient care. It contains key information from your GP record. Your SCR provides authorised healthcare staff with faster, secure access to essential information about you in an emergency or when you need unplanned care, where such information would otherwise be unavailable.

Summary Care Records are there to improve the safety and quality of your care. SCR core information comprises your allergies, adverse reactions and medications. An SCR with additional information can also include reason for medication, vaccinations, significant diagnoses / problems, significant procedures, anticipatory care information and end of life care information. Additional information can only be added to your SCR with your agreement.

Please be aware that if you choose to opt-out of SCR, NHS healthcare staff caring for you outside of this surgery may not be aware of your current medications, allergies you suffer from and any bad reactions to medicines you have had, in order to treat you safely in an emergency. Your records will stay as they are now with information being shared by letter, email, fax or phone. If you wish to opt-out of having an SCR please let us know at your registered practice.

Data Retention



We will approach the management of patient records in line with the Records Management NHS Code of Practice for Health and Social Care which sets the required standards of practice in the management of records for those who work within or under contract to NHS organisations in England, based on current legal requirements and professional best practice.

Further Information

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

The NHS Care Record Guarantee

The NHS Care Record Guarantee for England sets out the rules that govern how patient information is used in the NHS, what control the patient can have over this, the rights individuals have to request copies of their data and how data is protected under the Data Protection Act 1998.

<http://systems.digital.nhs.uk/infogov/links/nhscrg.pdf>

The NHS Constitution

The NHS Constitution establishes the principles and values of the NHS in England. It sets out the rights patients, the public and staff are entitled to. These rights cover how patients access health services, the quality of care you'll receive, the treatments and programmes available to you, confidentiality, information and your right to complain if things go wrong.

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

NHS Digital

NHS Digital collects health information from the records health and social care providers keep about the care and treatment they give, to promote health or support improvements in the delivery of care services in England.

<http://content.digital.nhs.uk/article/4963/What-we-collect>

