



1. Why We Are Providing This Privacy Notice

We are required to provide you with this Privacy Notice by Law. It explains how we use the personal and healthcare information we collect, store and hold about you. If you are unclear about how we do this, if you have any questions about this Privacy Notice or if you have any other issue regarding your personal and healthcare information, please contact Practice Manager.

The Law says:

- A. We must let you know why we collect personal and healthcare information about you.
- B. We must let you know how we use any personal and/or healthcare information we hold on you.
- C. We need to inform you about what we do with it.
- D. We need to tell you about who we share it with or pass it on to and why.
- E. We need to let you know how long we can keep it for.

2. About Us

Practice is responsible for collecting, storing and handling your personal and healthcare information when you register with us as a patient.

There may be times when we also process your information. That means we use it for a particular purpose. The purposes for which we use your information are set out in this Privacy Notice.

3. Information We Collect From You

The information we collect from you will include:

- A. Your contact details (such as your name and email address, including place of work and work contact details).
- B. Details and contact numbers of your next of kin.
- C. Your age range, gender, ethnicity.
- D. Details in relation to your medical history.
- E. The reason for your visit to The Practice.
- F. Medical notes which include details of diagnosis and consultations with our GPs and other health professionals within the Surgery involved in your direct healthcare.
- G. Patient feedback surveys, for example, The Friends and Family Test (FFT). Further information can be found [here](#).

4. Information About You We Collect From Others

We also collect personal information about you when it is sent to us from the following:

- A. A hospital, a consultant or any other medical or healthcare professional, or any other person involved with your general healthcare.
- B. Relevant information from relatives or those who care for you.
- C. The police.
- D. The home office.



E. Solicitors.

F. Insurance companies.

5. Identifying Risk Of Suffering A Particular Condition

The NHS is increasingly collecting patient's medical details to help identify your risk of suffering a particular condition, to help avoid emergency hospital admissions or when to provide preventative measures. Information about you is collected from a number of sources including NHS Trusts and from this GP Practice. That information – in an anonymous form – is checked through specialist software which sends the results back to your GP (who alone will be able to identify you). This procedure known as "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.

Population health management and Risk Stratification carried out by the Hertfordshire & West Essex Integrated Care Board (HWEICB)

What this means for you: informing patients – Practice obligations

The Practice is required under data protection law to ensure that patients are aware of how their data is used. This Programme involves new processing of data and Practices are advised to update their Privacy Notice materials and use whatever other means you have to inform patients about it e.g. through patient participation groups, newsletters etc.

The Programme offers patients the opportunity to opt-out of their data being included in the Programme, even though the analysis is done using de-identified data. It is important that patients are made aware of this too.

HWEICB extracts medical information about you for population health management and risk stratification purposes, the information we pass to them via our computer systems cannot identify you to them. This information only refers to you by way of a code that only your practice can identify (it is pseudo-anonymised). This therefore protects you from anyone who may have access to this information at the Clinical Commissioning Group from ever identifying you as a result of seeing the medical information and we will never give them the information that would enable them to do this.

There are good reasons why the HWEICB may require this pseudo-anonymised information, these are as follows:

- To assist in analysing current health services and proposals for developing future services.
- To develop risk stratification models to help GP's to identify and support patients with long term conditions and to help to prevent un-planned hospital admissions or reduce the risk of certain diseases developing, such as diabetes.
- Using risk stratification to help the ICB to understand the health needs of the local population in order to plan and commission the right services.

Oracle Health is commissioned by the ICB to carry out this process.



What if I do not want information about me to be included (opt out)?

If you do not wish your data to be included in this process (even though it is in a format which does not directly identify you) you can choose to opt-out. In this case, please inform the Receptionist who will apply an opt-out code to your record to ensure that your information is not included.

6. 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 may have the right to demand that this record is not shared with anyone who is not directly 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 Practice Manager.

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 www.nhs.uk/my-data-choice. Note, if you do choose to opt out you can still consent to your data being used for specific purposes. 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.

7. Who We May Provide Your Personal Information To, And Why

Whenever you use a health or care service, such as attending Accident & Emergency or using Community Care Services, important information about you is collected to help ensure you get the best possible care and treatment. This information may be passed to other approved organisations where there is a legal basis, to help with planning services, improving care, conducting research into developing new treatments and preventing illness. All of this helps in providing better care to you and your family and future generations. However, as explained in this privacy notice, confidential information about your health and care is only used in this way where allowed by law and would never be used for any other purpose without your clear and explicit consent.

We may share your personal information on to the following people or organisations, because these organisations may require these details to assist them in the provision of your direct healthcare needs.

These would include:

- A. Hospital professionals (such as doctors, consultants, nurses, etc).
- B. Other GPs/Doctors.
- C. Pharmacists.
- D. Nurses and other healthcare professionals.



E. Dentists.

F. Any other person that is involved in providing services related to your general healthcare, including mental health professionals.

8. Other People To Whom We Provide Your Information

A. Commissioners.

B. Clinical Commissioning Groups.

C. Local authorities.

D. Community health services.

E. For the purposes of complying with the law e.g. Police, Solicitors, Insurance Companies.

F. Anyone you have given your consent to, to view or receive your record, or part of your record. Please note, however, 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 which details you are consenting to be disclosed.

Primary Care Network

We are a member of Manor View Practice Primary Care Network (PCN). This means we will be working closely with other Practices and health and care organisations to provide healthcare services to you.

Extended Access – we provide extended access services to our patients which means you can access medical services outside of our normal working hours. In order to provide you with this service, we have formal arrangements in place with the ICB and with other practices whereby certain key “hub” practices offer appointments on our behalf. This means, those key “hub/PCN” practices will have to have access to your medical record (if an appointment is booked at a hub practice). Please note to ensure that those practices comply with the law and to protect the use of your information, we have very robust data sharing agreements and other clear arrangements in place, so your data is always protected and used for those purposes only.

The key Hub/PCN practices are as follows:

- Manor View Practice

Data Extraction by the Hertfordshire & West Essex ICB

The Clinical Commissioning Group at times extracts medical information about you, but the information we pass to them via our computer systems cannot identify you to them. This information only refers to you by way of a code that only your practice can identify. This therefore protects you from anyone who may have access to this information at the Clinical Commissioning Group from ever identifying you as a result of seeing the medical information and we will never give them the information that would enable them to do this.

There are good reasons why the Clinical commissioning Group may require this information, these are as follows:

- To ensure practices are adhering to local and national guidelines;
- To promote good medical care.



General Practice Transparency Notice for GPES Data for Pandemic Planning and Research (COVID-19)

This practice is supporting vital coronavirus (COVID-19) planning and research by sharing your data with NHS Digital.

The health and social care system is facing significant pressures due to the coronavirus (COVID-19) outbreak. Health and care information is essential to deliver care to individuals, to support health, social care and other public services and to protect public health. Information will also be vital in researching, monitoring, tracking and managing the coronavirus outbreak. In the current emergency it has become even more important to share health and care information across relevant organisations. This practice is supporting vital coronavirus planning and research by sharing your data with NHS Digital, the national safe haven for health and social care data in England.

Our legal basis for sharing data with NHS Digital

NHS Digital has been legally directed to collect and analyse patient data from all GP practices in England to support the coronavirus response for the duration of the outbreak. NHS Digital will become the controller under the General Data Protection Regulation 2016 (GDPR) of the personal data collected and analysed jointly with the Secretary of State for Health and Social Care, who has directed NHS Digital to collect and analyse this data under the [COVID-19 Public Health Directions 2020](#) (COVID-19 Direction).

All GP practices in England are legally required to share data with NHS Digital for this purpose under the Health and Social Care Act 2012 (2012 Act). More information about this requirement is contained in the [data provision notice issued by NHS Digital to GP practices](#).

Under GDPR our legal basis for sharing this personal data with NHS Digital is Article 6(1)(c) – legal obligation. Our legal basis for sharing personal data relating to health, is Article 9(2)(g) – substantial public interest, for the purposes of NHS Digital exercising its statutory functions under the COVID-19 Direction.

The type of personal data we are sharing with NHS Digital

The data being shared with NHS Digital will include information about patients who are currently registered with a GP practice or who have a date of death on or after 1 November 2019 whose record contains coded information relevant to coronavirus planning and research. The data contains NHS Number, postcode, address, surname, forename, sex, ethnicity, date of birth and date of death for those patients. It will also include coded health data which is held in your GP record such as details of:

- diagnoses and findings
- medications and other prescribed items
- investigations, tests and results
- treatments and outcomes
- vaccinations and immunisations

How NHS Digital will use and share your data

NHS Digital will analyse the data they collect and securely and lawfully share data with other appropriate organisations, including health and care organisations, bodies engaged in disease surveillance and research organisations for coronavirus response purposes only. These purposes include protecting public health, planning and providing health, social care and public services, identifying coronavirus trends and risks to public health, monitoring and managing the outbreak and carrying out of vital coronavirus research and



clinical trials. The British Medical Association, the Royal College of General Practitioners and the National Data Guardian are all supportive of this initiative.

NHS Digital has various legal powers to share data for purposes relating to the coronavirus response. It is also required to share data in certain circumstances set out in the COVID-19 Direction and to share confidential patient information to support the response under a legal notice issued to it by the Secretary of State under the Health Service (Control of Patient Information) Regulations 2002 (COPI Regulations).

Legal notices under the COPI Regulations have also been issued to other health and social care organisations requiring those organisations to process and share confidential patient information to respond to the coronavirus outbreak. Any information used or shared during the outbreak under these legal notices or the COPI Regulations will be limited to the period of the outbreak unless there is another legal basis for organisations to continue to use the information.

Data which is shared by NHS Digital will be subject to robust rules relating to privacy, security and confidentiality and only the minimum amount of data necessary to achieve the coronavirus purpose will be shared. Organisations using your data will also need to have a clear legal basis to do so and will enter into a data sharing agreement with NHS Digital. Information about the data that NHS Digital shares, including who with and for what purpose will be published in the NHS Digital data release register.

For more information about how NHS Digital will use your data please see the NHS Digital Transparency Notice for GP Data for Pandemic Planning and Research (COVID-19).

National Data Opt-Out

The application of the National Data Opt-Out to information shared by NHS Digital will be considered on a case by case basis and may or may not apply depending on the specific purposes for which the data is to be used. This is because during this period of emergency, the National Data Opt-Out will not generally apply where data is used to support the coronavirus outbreak, due to the public interest and legal requirements to share information.

Your rights over your personal data

To read more about the health and care information NHS Digital collects, its legal basis for collecting this information and what choices and rights you have in relation to the processing by NHS Digital of your personal data, see:

- the NHS Digital GPES Data for Pandemic Planning and Research (COVID-19) Transparency Notice
- the NHS Digital Coronavirus (COVID-19) Response Transparency Notice
- the NHS Digital General Transparency Notice
- how NHS Digital looks after your health and care information

SOUTH OXHEY SURGERY



9. Who Are Our Partner Software Suppliers/Businesses?

Name	Description	Privacy Link
Emis Web	EMIS Web is a clinical software system that allows GP practices to securely store, access, and manage patient medical records and information, enabling efficient delivery of healthcare services and continuity of care. Records are stored in a safe and secure manner in data centres owned and operated by Amazon Web Services which has been approved by NHS Digital.	https://www.emishealth.com/privacy-policy
Surgery Connect	Surgery Connect telephone system enables GP practices to securely store and access patient information through its cloud-based platform. It facilitates efficient communication between healthcare providers while ensuring patient data privacy by employing robust encryption and access controls for storing sensitive medical records in compliance with data protection regulations	https://www.x-on.co.uk/privacy-notice/
Accurx (Online Triage)	AccuRx Patient Triage is a secure messaging platform that allows GP practices to safely communicate with patients, triage symptoms, and manage medical queries. It stores patient information in an encrypted format on secure servers, ensuring data privacy and compliance with healthcare regulations while facilitating efficient access to care.	https://www accurx.com/privacy-policy
Docman	DocMan is a document management system used by GP practices to securely store and manage patient medical records and correspondence digitally. It allows authorised healthcare staff to access, share, and update patient documents while ensuring data privacy through encryption and access controls compliant with healthcare regulations.	https://www.docman.com/privacy-policy/
ITS Digital	ITS Digital is the practice's primary general IT support provider. Their support staff are able to remotely dial in with the consent of our staff for technical problem solving.	https://itsdigital.co.uk/privacy-policy/
IGPR	iGPR is an electronic patient record system used by GP practices to securely store and manage patient medical information digitally. It allows authorised healthcare professionals to access and update patient records while ensuring data privacy and compliance through robust access controls and encryption of sensitive health data.	https://www.igpr.co.uk/privacy-policy/
DXS Systems	DXS provides a clinical knowledge platform that integrates evidence-based guidance, treatment pathways, and patient information into GP workflows, enabling efficient access to up-to-date medical knowledge to improve patient care and outcomes.	https://www.dxs-systems.co.uk/privacy.php
Microsoft Suite	In GP surgeries, Microsoft Suite is essential: Word is used for documentation and patient letters, Excel for data analysis and tracking, Outlook for secure communication, and Teams for virtual meetings and collaboration. It's a key provider to the NHS, streamlining operations and enhancing patient care efficiency.	https://privacy.microsoft.com/en-gb/privacystatement
Patient Access	Patient Access connects you to healthcare services when you need them most. Book GP appointments, order repeat prescriptions and explore your local pharmacy services. You must be a registered patient at a participating practice to use the GP-linked features in Patient Access.	https://patient.info/privacy-policy
NHS app	The NHS App allows GP practices to securely share medical records and enable patients to access health services like booking appointments, ordering prescriptions, and viewing their GP health data, facilitating efficient digital healthcare delivery while ensuring proper access controls over sensitive patient information	https://www.nhs.uk/our-policies/privacy-policy/
Healthy.io	Healthy.io - MinuteKidney service has enabled us to identify and prioritise follow-up care for people who may have early-stage chronic kidney disease that could have otherwise gone undetected. It allows us to offer our patients a new way of engaging with their care that is more convenient for both patients and staff. It is a simple urine test to help you take care of your kidney health, as easily as taking a picture with your smartphone.	https://healthy.io/eu/privacy-policy/



10. 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.

11. Your Rights As A Patient

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

A. Access and Subject Access Requests

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 (01923) 247446. We will provide this information free of charge however, we may in some limited and exceptional circumstances have to 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.

B. Online Access

You may ask us if you wish to have online access to your medical record. However, there will be certain protocols that we have to follow in order to give you online access, including written consent and verification process to 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.

C. Correction

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.

D. Removal

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.

E. Objection

We cannot share your information with anyone else for a purpose that is not directly related to your health, e.g. 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.



F. Transfer

You have the right to request that your personal and/or healthcare information is transferred, in an electronic form (or other form), to another organisation, but we will require your clear consent to be able to do this.

12. Third Parties Mentioned On Your Medical Record

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.

13. How We Use The Information About You

We use your personal and healthcare information in the following ways:

- when we need to speak to, or contact other doctors, consultants, nurses or any other medical/healthcare professional or organisation during the course of your diagnosis or treatment or on going healthcare.
- when we are required by Law to hand over your information to any other organisation, such as the police, by court order, solicitors, or immigration enforcement. We will normally ask you for your consent, but there are times when we may be required by law to share your information without your consent, for example:
 - where there is a serious risk of harm or abuse to you or other people.
 - where a serious crime, such as assault, is being investigated or where it could be prevented.
 - notification of new births.
 - where we encounter infectious diseases that may endanger the safety of others, such as meningitis or measles (but not HIV/AIDS).
 - where a formal court order has been issued.
 - where there is a legal requirement, for example if you had committed a Road Traffic Offence.

14. Legal Justification For Collecting And Using Your Information

The Law says we need a **legal basis** to handle your personal and healthcare information.

CONTRACT: We have a contract with NHS England to deliver healthcare services to you. This contract provides that we are under a legal obligation to ensure that we deliver medical and healthcare services to the public.

CONSENT: Sometimes we also rely on the fact that you give us consent to use your personal and healthcare information so that we can take care of your healthcare needs.

Please note that you have the right to withdraw consent at any time if you no longer wish to receive services from us.



NECESSARY CARE: Providing you with the appropriate healthcare, where necessary. The Law refers to this as 'protecting your vital interests' where you may be in a position not to be able to consent.

LAW: Sometimes the Law obliges us to provide your information to an organisation (see above).

15. Special Categories

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 have to use your information to protect your vital interests (e.g. 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

16. How Long We Keep Your Personal Information

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

17. Patient Participation Group (PPG)

When you express interest in joining the PPG, you will be asked to provide the following information:

- Title
- Full name
- Gender
- Date of birth
- Telephone numbers
- Email address
- Ethnic group
- Frequency of visits to the practice

Contact information that you have provided to the PPG is held by the group. This will solely be used for PPG purposes. It will not be shared with any third parties or used for any other purposes without your explicit consent. If you want your details removed, please contact the practice by email: southoxheysurgery@nhs.net, and your request will be processed promptly.



18. Complaints

If you have a concern about the way we handle your personal data or have a complaint about what we are doing, or how we have used or handled your personal and/or healthcare information, then please contact Practice Manager at 02084215224, alternatively you can also use the complaints form on our website.

However, you have a right to raise any concern or complaint with the UK information regulator, at the Information Commissioner's Office: <https://ico.org.uk/> and the Information Commissioner's Office can be contacted by post, phone, or email as follows:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

19. Our website

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

20. Cookies

The Surgery's website uses cookies. For more information on which cookies are used and how they are used, please see its Cookies Policy [Cookie Policy - South Oxhey Surgery](#)

21. Security

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.

22. Text Messaging and Contacting You

Since we are obliged to protect any confidential information, we hold about you and we take this very seriously, it is imperative that you let us know immediately if you change any of your contact details.

We may contact you using SMS texting to your mobile phone in the event that we need to notify you about appointments and other services that we provide to you involving your direct care, therefore you must ensure that we have your up-to-date details. This is to ensure we are sure we are contacting directly to you and not another person.

23. Where To Find Our Privacy Notice

You may find a copy of this Privacy Notice on our website, or you can request a copy at Surgery's reception.

24. Changes To Our Privacy Notice

We regularly review and update our Privacy Notice. This Privacy Notice was last updated in July 2024