



Fair Processing (Privacy) Notice

Your Personal Information – What You Need to Know

This fair processing (or privacy) notice explains why we collect information about you, how that information will be used, how we keep it safe and confidential and what your rights are in relation to this.

Why we collect information about you

Health care professionals who provide you with care are required by law to maintain records about your health and any treatment or care you have received. These records help to provide you with the best possible healthcare and help us to protect your safety.

We collect and hold data for the purpose of providing healthcare services to our patients and running our organisation which includes monitoring the quality of care that we provide. In carrying out this role we will collect information about you which helps us respond to your queries or secure specialist services. We will keep your information in written form and/or in digital form.

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 may hold about you may include the following information:

- Details about you, such as address and next of kin
- 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

Our Commitment to Data Privacy and Confidentiality Issues

As a GP practice, all of our GPs, staff and associated practitioners are committed to protecting your privacy and will only process data in accordance with the Data Protection Legislation. The legislation requires us to process personal data only if there is a legitimate basis for doing so and that any processing must be fair and lawful.

In addition, consideration will also be given to all applicable Law concerning privacy, confidentiality, the processing and sharing of personal data including the Human Rights Act 1998, the Health and Social Care Act 2012 as amended by the Health and Social Care (Safety and Quality) Act 2015, the common law duty of confidentiality and the Privacy and Electronic Communications (EC Directive) Regulations.

Data we collect about you

Records which this GP Practice will hold or share about you will include the following:

- Personal Data – means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- Special Categories of Personal Data – this term describes personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.
- Confidential Patient Information – this term describes information or data relating to their health and other matters disclosed to another (e.g., patient to clinician) in circumstances where it is reasonable to expect that the information will be held in confidence. Including both information 'given in confidence' and 'that which is owed a duty of confidence'. As described in the Confidentiality: NHS code of Practice: Department of Health guidance on confidentiality 2003.
- Pseudonymised – the process of distinguishing individuals in a dataset by using a unique identifier which does not reveal their 'real world' identity.
- Anonymised – data in a form that does not identify individuals and where identification through its combination with other data is not likely to take place.

- Aggregated – statistical data about several individuals that has been combined to show general trends or values without identifying individuals within the data.

How the NHS and care services use your information

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

Whenever you use a health or care service, such as attending Accident & Emergency or using Community Care services, important information about you is collected in a patient record for that service. Collecting this information helps to ensure you get the best possible care and treatment.

The information collected about you when you use these services can also be used and provided to other organisations for purposes beyond your individual care, for instance to help with:

- Improving the quality and standards of care provided
- Research into the development of new treatments
- Preventing illness and diseases
- Monitoring safety
- Planning services

This may only take place when there is a clear legal basis to use this information. All these uses help 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 where allowed by law.

Most of the time, anonymised data is used for research and planning so that you cannot be identified in which case your confidential patient information isn't needed.

You have a choice about whether you want your confidential patient information to be used in this way. If you are happy with this use of information you do not need to do anything. If you do choose to opt out your confidential patient information will still be used to support your individual care.

To find out more or to register your choice to opt out, please visit www.nhs.uk/your-nhs-data-matters. On this web page you will:

- See what is meant by confidential patient information
- Find examples of when confidential patient information is used for individual care and examples of when it is used for purposes beyond individual care
- Find out more about the benefits of sharing data
- Understand more about who uses the data
- Find out how your data is protected
- Be able to access the system to view, set or change your opt-out setting
- Find the contact telephone number if you want to know any more or to set/change your opt-out by phone
- See the situations where the opt-out will not apply

You can also find out more about how patient information is used at: <https://www.hra.nhs.uk/information-about-patients/> (which covers health and care research); and <https://understandingpatientdata.org.uk/what-you-need-know> (which covers how and why patient information is used, the safeguards and how decisions are made).

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.

Health and care organisations have until 2020 to put systems and processes in place so they can be compliant with the national data opt-out and apply your choice to any confidential patient information they use or share for purposes beyond your individual care. Our organisation is currently compliant with the national data opt-out policy.

A full list of details including the legal basis, any Data Processor involvement and the purposes for processing information can be found in Appendix A.

Who are our partner organisations?

We may share your information, subject to strict agreements on how it will be used, with the following organisations:

- NHS Trusts
- Specialist Trusts
- Independent Contractors e.g., Dentists, Opticians, Pharmacists
- Private Sector Providers
- Voluntary Sector Providers
- Ambulance Trusts

- Out of Hours services including NHS111
- Extended Hours Services
- Clinical Commissioning Groups (CCGs)
- Social Care Services
- Local Authorities
- Education Services
- Fire and Rescue Services
- Police
- HM Coroner
- Research Organisations
- Other Data Processors

How long do we hold information for?

All records held by the Practice will be kept for the duration specified by national guidance from NHS Digital, Health and Social Care Records Code of Practice. Once information that we hold has been identified for destruction it will be disposed of in the most appropriate way for the type of information it is. Personal confidential and commercially confidential information will be disposed of by approved and secure confidential waste procedures. We keep a record of retention schedules within our information asset registers, [in line with the NHSX Records Management Code of Practice 2021](#).

Individual Rights under UK GDPR

Under UK GDPR 2016 the Law provides the following rights for individuals.

The NHS upholds these rights in a number of ways:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure (not an absolute right) only applies in certain circumstances
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling.

Your right to opt-out of data sharing and processing

The NHS Constitution states, 'You have a right to request that your personal and confidential information is not used beyond your own care and treatment and to have your objections considered'. For further information please visit: [The NHS Constitution](#).

National Data Opt-Out – data held by NHS Digital

The national data opt-out was introduced on 25 May 2018, enabling patients to opt-out from the use of their data for research or planning purposes, in line with the recommendations of the National Data Guardian in her Review of Data Security, Consent and Opt-Outs.

By 2020 all health and care organisations are required to apply national data opt-outs where confidential patient information is used for research and planning purposes. NHS Digital has been applying national data opt-outs since 25 May 2018. Public Health England has been applying national data opt-outs since September 2018.

The national data opt-out replaces the previous 'type 2' opt-out, which required NHS Digital not to share a patient's confidential patient information for purposes beyond their individual care. Any patient that had a type 2 opt-out recorded on or before 11 October 2018 has had it automatically converted to a national data opt-out. Those aged 13 or over were sent a letter giving them more information and a leaflet explaining the national data opt-out. For more information go to [NHS Digital - Opting out of sharing your confidential patient information](#).

To find out more or to register your choice to opt out, please visit www.nhs.uk/your-nhs-data-matters. You can also register your choice in alternative ways via the NHS app or NHS Digital. You can make or change a choice for yourself or someone else by phone, email or post to NHS Digital. NHS Digital Contact Centre phone number: 0300 303 5678 – Monday to Friday, 9am to 5pm (excluding bank holidays). If you're a parent or legal guardian and you want to opt your children out, you must complete the [opt-out form](#). Once you've completed the form, you can email it to the Contact Centre – enquiries@nhsdigital.nhs.uk. Alternatively, you can post the form to: National Data Opt-Out, Contact Centre, NHS Digital, HM Government, 7-8 Wellington Place, Leeds LS1 4AP.

Full documentation about the national data opt-out policy can be found on the following link – <https://digital.nhs.uk/services/national-data-opt-out/operational-policy-guidance-document>

Type 1 Opt-Out – data held by your GP Practice

This is an objection that prevents an individual's personal confidential information from being shared outside of their general practice except when it is being used for the purposes of direct care, or in particular circumstances required by law, such as a public health emergency like an outbreak of a pandemic disease. If you wish to apply a Type 1 Opt-Out to your GP medical records you should make your wishes known to the practice by completing this [Type 1 Opt-Out form](#) or you can download from the practice website or ask reception for a copy.

General Practice Data for Planning and Research (GPDPR) – NHS Digital

We are providing data to NHS Digital as part of the General Practice Data for Planning and Research data collection, so that patient data can be used to help improve everyone's health and care. NHS Digital is part of the NHS. Data sharing with NHS Digital started on 1 July 2021.

The NHS needs data about the patients it treats in order to plan and deliver its services and to ensure that care and treatment provided is safe and effective. The General Practice Data for Planning and Research data collection will help the NHS to improve health and care services for everyone by collecting patient data that can be used to do this. For example, patient data can help the NHS to:

- monitor the long-term safety and effectiveness of care
- plan how to deliver better health and care services
- prevent the spread of infectious diseases
- identify new treatments and medicines through health research

GP practices already share patient data for these purposes through the [General Practice Extraction Service \(GPES\)](#), but this new data collection will be more efficient and effective.

We have agreed to share the patient data we look after in our practice with NHS Digital who will securely store, analyse, publish and share this patient data to improve health and care services for everyone. This includes:

- informing and developing health and social care policy
- planning and commissioning health and care services
- taking steps to protect public health (including managing and monitoring the coronavirus pandemic)
- in exceptional circumstances, providing you with individual care
- enabling healthcare and scientific research

This means that we can get on with looking after our patients and NHS Digital can provide controlled access to patient data to the NHS and other organisations who need to use it to improve health and care for everyone.

Contributing to research projects will benefit us all as better and safer treatments are introduced more quickly and effectively without compromising your privacy and confidentiality.

NHS Digital has engaged with the [British Medical Association \(BMA\)](#), [Royal College of GPs \(RCGP\)](#) and the [National Data Guardian \(NDG\)](#) to ensure relevant safeguards are in place for patients and GP practices.

Further information on why the NHS needs data and how it will be used can be found on the following link – <https://digital.nhs.uk/data-and-information/data-collections-and-data-sets/data-collections/general-practice-data-for-planning-and-research/advice-for-the-public>

NHS Digital Data Collection

We will only collect structured and coded data from patient medical records that is needed for specific health and social care purposes explained above.

Data that directly identifies you as an individual patient, including your NHS number, General Practice Local Patient Number, full postcode, date of birth and if relevant date of death, is replaced with unique codes produced by de-identification software before it is sent to NHS Digital. This means that no one will be able to directly identify you in the data.

NHS Digital will be able to use software to convert unique codes back to data that could directly identify you in certain circumstances, and where there is a valid legal reason. This would mean that the data became personally identifiable. Only NHS Digital has the ability to do this. An example would be where you consent to your identifiable data being shared with a research project or clinical trial in which you are participating, as they need to know the data is about you. It will still be held securely and protected, including when it is shared by NHS Digital.

NHS Digital will collect:

- data on your sex, ethnicity and sexual orientation
- clinical codes and data about diagnoses, symptoms, observations, test results, medications, allergies, immunisations, referrals and recalls, and appointments, including information about your physical, mental and sexual health

- data about staff who have treated you

NHS Digital does not collect:

- your name and address (except for your postcode in unique coded form)
- written notes (free text), such as the details of conversations with doctors and nurses
- images, letters and documents
- coded data that is not needed due to its age – for example medication, referral and appointment data that is over 10 years old
- coded data that GPs are not permitted to share by law – for example certain codes about IVF treatment, and certain information about gender re-assignment

NHS Digital will not approve requests for data to be used for:

- insurance or marketing purposes
- promoting or selling products or services
- market research
- advertising

NHS Digital will not sell your data.

More detailed information about the patient data we collect and how it is used is available on the [GDPR Data Provision Notice](#) and [General Practice Data for Planning and Research Directions 2021](#) websites with additional links to policies and supporting information.

Opting-Out of Data Sharing

If you have already registered a Type 1 Opt-Out with your GP practice your data will not be shared with NHS Digital. If you wish to register a Type 1 Opt-Out with your GP practice this should be done by [returning this form](#) to them. If you have previously registered a Type 1 Opt-Out and you would like to withdraw this, you can also use the form to do this. You can send the form by post or email to your GP practice or call 0300 3035678 for a form to be sent out to you. If you register a Type 1 Opt-Out after your patient data has already been shared with NHS Digital, no more of your data will be shared with NHS Digital. NHS Digital will however still hold the patient data which was shared with them before you registered the Type 1 Opt-Out.

If you don't want your confidential patient information to be shared by NHS Digital with other organisations for purposes except your own care - either GP data, or other data it holds, such as hospital data – you can register a [National Data Opt-Out](#).

If you have registered a National Data Opt-Out, NHS Digital won't share any confidential patient information about you with other organisations, unless there is an exemption to this, such as where there is a legal requirement or where it is in the public interest to do so, such as helping to manage contagious diseases like coronavirus. You can find out more about [exemptions on the NHS website](#).

From 1 October 2021, the National Data Opt-Out will also apply to any confidential patient information shared by the GP practice with other organisations for purposes except your individual care. It won't apply to this data being shared by GP practices with NHS Digital, as it is a legal requirement for us to share this data with NHS Digital and the National Data Opt-Out does not apply where there is a legal requirement to share data.

You can find out more about and register a National Data Opt-Out or change your choice on nhs.uk/your-nhs-data-matters or by using the NHS app or by calling NHS Digital on 0300 3035678.

Summary Care Record (SCR)

Summary Care Records (SCR) are an electronic record of important patient information, created from GP medical records. They can be seen and used by authorised staff in other areas of the health and care system, throughout England, involved in your direct care. Access to SCR information means that care in other settings is safer, reducing the risk of prescribing errors and can avoid delays in urgent or emergency care, which will improve your healthcare experience. Before accessing your SCR, your consent will be asked, unless it is an emergency and you are unable to do so.

Your SCR holds important information about your:

- current or recent medication
- allergies and details of any previous bad reactions to medicines
- name, address, date of birth and NHS number

Additional Information in the SCR (SCRAI), such as details of long-term conditions (e.g., diabetes, dementia, heart disease), significant medical history, treatment preferences (care planning), carer's details, and specific communications needs (e.g., hearing difficulties or interpreter requirements), is now included by default for patients with an SCR, unless you have previously told the NHS that you did not want this information to be shared.

Including Additional Information means that healthcare staff can give you better care if you are away from your usual GP, for example:

- in an emergency
- when you are on holiday
- when your GP practice is closed
- visiting a pharmacist
- attending an out-patient appointment

Patient groups who benefit most from including Additional Information in their SCR include:

- frail patients who can use SCR to give out of hours or emergency health care staff more complete information, making unwanted admission less likely
- patients with long term conditions
- patients eligible for flu vaccinations
- those with dementia or learning disabilities
- patients planning for end of life, who can use SCRs to share information about their preferences, Lasting Power of Attorney and advance decisions
- patients with physical, sensory or other disabilities, who can benefit from recording any specific needs, for example communication needs, so that health and care staff can make reasonable adjustments
- non-English speakers
- patients with carers whose details they want to share or who have appointed someone to have Health and Welfare Lasting Power of Attorney
- patients with specific care preferences

If you wish to opt-out of the SCR or SCRAI, or change your preferences, please complete the following form - [SCR patient consent preference form - NHS Digital](#). There are three options to choose how you want your information shared:

1. Summary Care Record with Additional Information shared (SCRAI): this means that any authorised, registered and regulated health and care professionals will be able to see an enriched Summary Care Record if they need to provide you with direct care.
2. Summary Care Record with core information only (SCR): this means that any authorised, registered and regulated health and care professionals will be able to see information about allergies and medications only in your Summary Care Record if they need to provide you with direct care.
3. Opt-out of having a Summary Care Record altogether: this means that you do not want any information shared with other authorised, registered and regulated health and care professionals involved in your direct care, including in an emergency.

Further information about SCR including explanations about data security, access and confidentiality is available on the following website <https://digital.nhs.uk/services/summary-care-records-scr/summary-care-records-scr-information-for-patients>. Information about extending the use of SCRAI by default beyond the COPI Notice (issued during COVID-19 pandemic) can be found on the following website <https://digital.nhs.uk/coronavirus/coronavirus-covid-19-response-information-governance-hub/control-of-patient-information-copi-notice/national-data-sharing-gp-connect-and-scra>.

During the pandemic, the Department of Health and Social Care removed the requirement for a patient's prior explicit consent to share Additional Information as part of the Summary Care Record.

This is because the Secretary of State for Health and Social Care issued a [legal notice to healthcare bodies requiring them to share confidential patient information with other healthcare bodies where this is required to diagnose, control and prevent the spread of the virus and manage the pandemic](#) called a COPI (Control of Patient Information) notice. This included sharing Additional Information through Summary Care Records, unless a patient objected to this.

If you have already expressed a preference to only have Core information shared in your Summary Care Record, or to opt-out completely of having a Summary Care Record, these preferences will continue to be respected and this change will not apply to you. For everyone else, the Summary Care Record will be updated to include the Additional Information.

This change has continued after the coronavirus (COVID-19) pandemic period when the COPI notice was withdrawn on 1st July 2022 - [National data sharing GP Connect and Summary Care Record Additional Information - NHS Digital](#). Full details of the Summary Care Record supplementary privacy notice can be found [here](#).

To find out which organisations have accessed your information through an SCR you can make a Subject Access Request (SAR) to NHS Digital - [How to make a subject access request - NHS Digital](#). If it is regarding other types of data access and usage of your medical records held by your GP practice's computer system, you will need to request an SAR from your GP practice directly.

Note: SCR is about sharing of information for individual healthcare purposes only; National Data Opt-Out is regarding data sharing for research and planning purposes.

GP Connect

We use a facility called GP Connect to support your direct care. GP Connect makes patient information available to all appropriate clinicians when and where they need it, to support direct patients care, leading to improvements in both care and outcomes. GP Connect is not used for any purpose other than direct care.

Authorised Clinicians such as GPs, NHS 111 Clinicians, Care Home Nurses (if you are in a Care Home), Secondary Care Trusts, Social Care Clinicians are able to access the GP records of the patients they are treating via a secure NHS Digital service called GP connect.

The NHS 111 service (and other services determined locally e.g. Other GP practices in a Primary Care Network) will be able to book appointments for patients at GP practices and other local services.

Further information about GP Connect can be found at the following NHS Digital websites:

[Summary of GP Connect service - NHS Digital](#)

[GP Connect - NHS Digital](#)

[GP Connect: GDPR information - NHS Digital](#)

[GP Connect Transparency Notice - NHS Digital](#)

[GP Connect privacy notice - NHS Digital](#)

Research

WellBN is approved as an organisation for research – ‘Research Ready’ GP Practice – and works with the Primary Care Research Network, National Institute for Health and Care Research (NIHR), and Royal College of General Practitioners (RCGP).

TPP (SystemOne) who provides the patient record database service works with UK Biobank and ResearchOne for those individual patients who have opted-in for these research programmes.

Background information about each research organisation:

- ResearchOne is an ethically-approved health and care research database developed by TPP in partnership with the University of Leeds and the UK Government’s Technology Strategy Board. The database consists of de-identified clinical and administrative data drawn from the electronic patient records currently held on SystemOne. For further information please visit www.researchone.org.
- UK Biobank is a national health research study set up with the aim of improving the prevention, diagnosis and treatment of a wide range of serious and life-threatening illnesses. It is funded primarily by the MRC (Medical Research Council) and the Wellcome Trust. The study requires data relating to specific patients who have given informed consent for their medical records to be used for this health research. The primary care data extract for UK Biobank has been reviewed, and is supported, by the Royal College of General Practitioners, the joint RCGP / BMA GP IT Committee, and NHS Digital. Full details regarding UK Biobank, the work they do, participant consent and the data requested can be found at <https://www.ukbiobank.ac.uk/general-practice/>. Data will be extracted for any UK Biobank participant - living or dead - registered with your practice. Only coded information is extracted; no narrative text, letters or attachments are included. To facilitate this process UK Biobank will provide TPP with a list of all individuals who have consented to be participants in the UK Biobank research study. It is only their data that will be shared with UK Biobank following activation of this data sharing agreement.

Research is strictly regulated with various laws and guidelines focussing upon participant safety and data quality which is laid down in the Research Governance Framework for Health and Social Care, Department of Health (2015). Staff involved with research must follow Good Clinical Practice (GCP) for research guidelines – [NIHR GCP info](#). Research is completely voluntary and to be involved patients will be provided with information prior to being part of any project. Personally identifiable information will only be shared with consent. Anonymised data can be collected for research purposes without consent unless opted-out which can be done using the following online form to register your decision – [National Data Opt-Out](#).

Right of Access to Your Information (Subject Access Request)

Under Data Protection Legislation everybody has the right to have access to, or request a copy of, information we hold that can identify you, and to have it amended or removed should it be inaccurate, this includes your medical record. There are some safeguards regarding what you will have access and you may find information has been redacted or removed for the following reasons:

- Does not cause harm to the patient
- That legal confidentiality obligations for the non-disclosure of third-party information are adhered to

Subject access requests (SARs) can be made verbally or in writing, although we may ask you to complete a form in order that we can ensure that you have the correct information you require. You do not need to give a reason to see your data. However, you will need to provide proof of identity to receive this information.

Where multiple copies of the same information is requested the surgery may charge a reasonable fee for the extra copies.

If we do hold information about you, through a subject access request, we will:

- Give you a description of it
- Tell you why we are holding it
- Tell you who it could be disclosed to
- Let you have a copy of the information in an intelligible form

If you would like to access your GP records online click here: https://www.wellbn.co.uk/nhs-services/medical_records.

Accessing your GP-held records via the NHS app, NHS website or other patient online access service

As your GP practice, we have been asked to provide you with, no later than 31 October 2023, access to your full medical record going forward (prospective access to data recorded after this date) via the NHS app (and NHS website) if you have a suitable NHS login. Alternative ways to access your medical records include your SystmOnline account and the Airmid app provided by TPP SystmOne (GP patient records database software provider). Whichever service you choose you will need to register for each separately. You will automatically receive a SystmOnline account if you apply for any patient online access service, for example for booking appointments or ordering prescriptions.

For many years now, WellBN has already been providing full online access to patients' medical records including both retrospective and prospective data, i.e. all information recorded is accessible regardless of date entered, and this will continue for newer applicants.

Your GP medical record contains consultation notes based on conversations between you, your GP and their team: medicines prescribed to you; all test results including hospital investigations; allergies; vaccines; and your medical conditions along with documents that may have been sent from local hospitals, clinics or other agencies, e.g. the police. There is likely to be sensitive and personal information within your medical record.

We are fully supportive of providing you with access to your record, but we wish to do this safely and make you aware that this is happening so that you can opt out, if you so wish. You may wish to speak with us first to understand what it is that you will see, and the risks which may be involved in having such confidential data either on your smartphone with the NHS app installed or online if other people might have access to that information through your devices. If you are in a difficult or pressured relationship for example, you may prefer your records to remain accessible only to those treating you, with them not appearing on your smartphone or online. The Government has been clear that if a patient does not wish to have access, then we do not have to provide it. This is one reason why we have asked if you wish to opt out, or have it switched off for the time being.

For those who would like access, we are happy to explain the different levels you might like. Everyone can have access to their medication history and allergies, for example, and will be able to order their repeat prescriptions. It's also possible to request access to what we call your 'coded record' where you can see a list of medical problems and results. You can also request access to the 'full' record where you will be able to see everything, including the notes which have been written by doctors, nurses and others involved in your care, at the GP surgery, and elsewhere. If you already have a patient online access service, you may need to apply to request access to your medical records.

It's important to remember that these documents may, at times, contain information that could be upsetting, especially if they contain news of a serious condition. It can also be a cause for worry seeing results online when it isn't clear what the results might mean, and no one is available to ask, as can be the case during the evening or at weekends, for example.

Sometimes people with a mental health condition might prefer not to see documents that remind them of difficult times in their life. Letters from mental health teams sometimes go into detail about past events, and great care would be needed in deciding whether you would want to see these letters. It is possible for individual items to be hidden (redacted) at your request and your GP or admin team member would be happy to talk about any concerns you may have.

WellBN has developed processes to identify medical records with potentially sensitive information which will be hidden from online viewing before authorising online access. Note that hiding or redacting information will not delete it from your records but it will stop information being seen online.

Great care is also needed in case private details might cause harm at home, should people in a difficult or pressured relationship be forced to show their medical record to an abusive partner. Anyone in such a position should make this clear to us at the practice, so we can take steps to keep you safe. This might mean removing access through the NHS app for the time being, or through a careful process where we hide sensitive things. We would talk this through with you.

Requesting access – what do I need to do?

The easiest way to get access is to create an NHS login through the NHS app. Although you can also access your GP records via the internet on a computer. Go to [How to get your medical records - NHS \(www.nhs.uk\)](https://www.nhs.uk) to start the process to register for an online NHS account. However, the first bit is easiest if done through a smartphone by downloading the NHS app. If you don't have one, you may have a family member or friend you trust who can help you. You can also ask your practice receptionist, but you'll need some proof of who you are, e.g. a passport, driving licence or household bill.

If you use the NHS app, you'll have to set up an account using a unique e-mail address and then 'authenticate' yourself to the NHS system to prove you are who you say you are. This will involve confirming your name, date of birth and contact details. The NHS login has several levels of authentication and to gain access to your records you'll need the highest level of authentication. This generally involves you recording a short video of yourself to prove you are a real person as well as uploading a copy of a suitable identification document. Your GP practice can bypass this step if you are struggling, but we'd ask you to try to sign up to the NHS app yourself.

Once you have suitably authenticated yourself to the NHS app and created your NHS login you can approach your practice and ask for access, being mindful of the risks associated with access and the importance of not sharing passwords or having them stored in your smartphone if you think other people might want to see them without your permission. If you have any concerns, you should explain these to your GP practice team who can guide you.

Your GP practice will have a form they will ask you to complete, with your NHS login (this will be the email address you used to sign up) and then you will have a chat about access and your agreement and understanding will be requested. Once you are happy to get online access, your request will be passed to the admin team to review. It may be that the practice wishes to contact you to discuss your request if there are any concerns raised so that access can be given safely. We're not sure how many people will ask for access all at once so there may be a wait, but we will do our best to get you online access as soon as we can.

The form to request access can be downloaded here [Online Medical Records \(wellbn.co.uk\)](https://www.wellbn.co.uk) or you can ask for a form at reception.

NHS COVID Pass

Patients may access their COVID passport via [NHS COVID Pass](https://www.nhs.uk), the practice cannot provide this document as it is not held in the practice record. If you have any issues gaining access to your COVID Passport or letter you should call: NHS 119.

Your Change of Details

It is important that you tell the surgery if any of your contact details such as your name, address or other communication details have changed, especially if any of your details are incorrect. It is important that we are made aware of any changes immediately in order that no information is shared in error.

Your Mobile Telephone Number

If you provide us with your mobile phone number, we will use this to send you text reminders about your appointments or other health screening information and use it to support or facilitate consultations. Please let us know if you do not wish us to use your mobile telephone in this way.

Your Email Address

Where you have provided us with your email address, with your consent we will use this to send you information relating to your health and the services we provide and use it to support or facilitate consultations. If you do not wish to receive communications by email, please let us know.

Use of Your Contact Details

Your contact details will be shared with other organisations within the NHS and external organisations providing health or social care services with whom you have given your consent to refer. Subsequently those organisations will be responsible for how they communicate with you and by which methods.

Note that it is not possible to request complex variations in usage of your contact details due to limitations in technology and practical considerations. If you opt-out from a method of communication with the practice you may miss out on important information or other useful services. You are able to specify a preferred method of communication depending on your accessibility requirements.

Notification

Data Protection Legislation requires organisations to register a notification with the Information Commissioner to describe the purposes for which they process personal and sensitive information. Any changes to this notice will be published on our website and in a prominent area at the Practice.

Registration

We are registered as a Data Controller and our registration can be viewed online in the public register at: <https://ico.org.uk/ESDWebPages/Entry/Z4963600>.

Data Protection Champion (Information Governance Lead)

Should you have any data protection questions or concerns, please contact our Information Governance / Data Protection Champion, Ruby O'Shea (Medical Secretary & Team Leader) via email at ruby.o'shea@nhs.net or phone the practice on 01273 772020. Each site at WellBN has a nominated Data Protection Champion.

What is the Right to Know?

The Freedom of Information Act 2000 (FOIA) gives people a general right of access to information held by or on behalf of public authorities, promoting a culture of openness and accountability across the public sector. You can request any non-personal information that the GP Practice holds, that does not fall under an exemption. You may not ask for information that is covered by the Data Protection Legislation under FOIA. However, you can request this under a right of access request call a 'Subject Access Request' – see section above 'Right of Access to Your Information'.

Right to Complain

If you have concerns or are unhappy about any of our services, please contact Louise Bridle (Deputy Practice Manager & Complaints Manager) via email at wellbn.complaints@nhs.net or phone the practice on 01273 772020.

Independent Advice

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: <https://ico.org.uk/global/contact-us>

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 programs available to you, confidentiality, information and your right to complain if things go wrong. Further information: <https://www.gov.uk/government/publications/the-nhs-constitution-for-england>.

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 Data Protection Legislation. Further information: <http://systems.digital.nhs.uk/infogov/links/nhscrg.pdf>.

*Fair processing notice updated 14th October 2023
Dr Francis Richards (GP Partner & Caldicott Guardian)*