

# KINGSWOODsurgery

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[www.thekingswoodsurgery.nhs.uk](http://www.thekingswoodsurgery.nhs.uk)

## Privacy Notice for General Practice

### How we use your personal information

This fair processing notice explains why the GP practice collects information about you and how that information may be used.

### Medical Records Management

Healthcare professionals who provide you with care maintain records about your health and any treatment, or care, you have previously received from other sources (e.g. NHS Trust, GP Surgery, Walk-in clinic, etc.). These records may be electronic or on paper and we ensure that your information is kept both confidential and secure.

Records which this GP Practice holds about you may include some, or all, of the following information:

- Details about you, such as your address, carer, legal representative, emergency contact details.
- Contact the surgery has had with you, such as appointments, clinic visits, emergency appointments, etc.
- Notes and reports about your health.
- The contents of any telephone calls made into, or out of, the practice, including text messaging.
- 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.

Your data may also be used within the GP practice for clinical audit purposes and to assess the quality of services provided.

In addition to being used to provide personal care to you, data held about you may also be used in the interests of public health protection. 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, if this happens the surgery will always obtain your consent before releasing any data about you.

### Risk Stratification

Risk stratification is used by the NHS to help determine a person's risk of suffering a particular condition which can be prevented through intervention. Information about you is collected from a number of sources including NHS Trusts and Kingswood Surgery. By analysis of your data, a risk score is obtained using software managed by NHS Kent and Medway Health Informatics Service (KMHS). It is only your GP who receives it in an identifiable form. As a result of this process, your GP may be able to offer you specific services intended to improve the quality of your healthcare.

Please note that you have the right to opt out of your data being used in this way.

### Medicines Management Reviews

The practice may conduct review for the purpose of medicines management from time to time. This is a review of the medication prescribed to its patients and is intended to ensure that they receive the most appropriate, up to date and cost effective treatments.

### Appointments Management

The practice uses EMIS Web, which retains electronic records of all appointments attended and missed by patients. This data is used to monitor overall attendance rates and identify opportunities to reduce levels of missed appointments.

### **How do we maintain the confidentiality of your records?**

All personal data, whether electronic or physical, is stored securely and only accessible in accordance with our data protection policy, which ensures that the only people who have access to it are those who have a lawful need to do so.

We are committed to protecting your privacy and will only use information collected lawfully in accordance with:

- General Data Protection Regulations, 'GDPR' (EU 2016/679)
- Data Protection Act 2018
- Human Rights Act 1998
- Common Law Duty of Confidentiality
- Health and Social Care Act 2012
- NHS Codes of Confidentiality, Information Security and Records Management

Every member of staff who works for an NHS organisation has a legal obligation to keep information about you confidential.

We will only ever use or share information about you if there is a genuine need to do so.

We will not disclose your information to any third party without your permission unless there are exceptional circumstances (eg. in life or death situations), where the law requires information to be passed on.

We will follow the framework for information sharing as set out by the Caldicott principles.

### **Who are our partner organisations?**

Subject to the application of strict agreements and protocols on how it will be used, we may share your data with some or all of the following partner organisations who may be involved in your healthcare;

- NHS and other Foundation Trusts, including Ambulance Trusts
- NHS Commissioning Support Units and Clinical Commissioning Groups
- The Care Quality Commission (CQC)
- Other GP surgeries, particularly those within the local Primary Care Network (PCN) and other local healthcare providers such as dentists, opticians and pharmacists
- West Kent Clinical Commissioning Group
- Kent and Medway Sustainability and Transformation Partnership
- Social Care Services either directly or via the Health and Social Care Information Centre (HSCIC)
- Local Authorities and Education Services
- Fire and Rescue Services, Police and Judicial Services
- Voluntary and Private Sector Providers
- AccuRx a messaging services, who send automated SMS text messages to patients on our behalf.
- Medlink; a messaging system which sends automated SMS text messages, inviting patients to update their records.
- Healthy.io; an application designed to monitor patients' urine for indications of chronic kidney disease (CKD), enabling patients to test their kidney function from home.
- Other 'data processors' which you will be informed of via the practice website from time to time.

You will be informed with whom your data is intended to be shared with and you may be asked for explicit consent to allow this to happen, should the need arise.

We may also use external companies to process personal information, such as for archiving and text/SMS messaging purposes. These companies are bound by contractual agreements to ensure that all personal data is kept confidential and secure.

## **Your rights**

Under the provisions of the Data Protection Act 2018, which contains the national interpretation of GDPR, you have the following rights:

- The right of access to your data.
- The right to rectify your data.
- The right to restrict the processing of your data.
- The right to data portability.
- The right to not be subject to a decision based solely on automated processing, including profiling.

Due to the specific nature of the services provided to you by the practice; the rights of erasure (ie the 'right to be forgotten') and to object to the processing of personal data are subject to restrictions on the grounds of the processing being carried out is within the public interest in the particular area of public health provision.

## **Access to your personal information**

You have the right to request access to view, or obtain, copies of whatever information the surgery holds about you and to have it amended, should it be inaccurate. In order to request this, you need to do the following:

- Your request can be made in person, by phone, in writing or by email to the practice, marked for the attention of the Data Protection Officer.
- You have a right of access to a copy of all of the information held about you free of charge.
- We are required to respond to you within one month, unless we identify a genuine need that requires an extension, in which case will inform you of the reason for this.
- 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.

## **Objections / Complaints**

Should you have any concerns about how your information is managed at the practice, please contact the Data Protection Officer for the surgery. 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](http://www.ico.gov.uk)).

If you are happy for your data to be extracted and used for the purposes described in this privacy notice then you do not need to do anything. Please contact us if you have any concerns about how your data is shared.

## **Cookies**

The Kingswood Surgery website is supported by cookies which are intended to improve the user experience of visiting and re-visiting the site. The surgery website is produced and hosted by Tree View Designs, who provide a comprehensive summary of the cookies utilised at this location: <http://www.thekingswoodsurgery.nhs.uk/cookies>

## **Change of Details**

It is important that you tell the person treating you if any of your details such as your name or address have changed or if any of your details such as date of birth is incorrect in order for this to be amended. You have a responsibility to inform us of any changes so our records are accurate and up to date for you.

## **Notification**

The Data Protection Act 2018 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 [www.ico.org.uk](http://www.ico.org.uk). The practice is registered with the Information Commissioners Office (ICO).

## **Who is the Data Controller?**

The Data Controller, responsible for keeping your information secure and confidential is:  
The Kingswood Surgery (ICO No: Z5632877)

## **Complaints**

Should you have any concerns about how your information is managed by the Practice please contact the Practice Manager at the following address:

The Kingswood Surgery  
Kingswood Road  
Tunbridge Wells  
Kent  
TN2 4UH

If you are still unhappy following a review by the Practice you can then complain to the Information Commissioners Office (ICO). **[www.ico.org.uk](http://www.ico.org.uk)**, [casework@ico.org.uk](mailto:casework@ico.org.uk), telephone: 0303 123 1113 (local rate) or 01625 545 745

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