



# Teign Estuary Medical Group – Glendevon Medical Centre and Riverside Surgery Fair Use Policy (Patients) and Privacy Notice

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

The health care professionals who provide you with care maintain records about your health and any treatment or care you have received previously (e.g. NHS Trust, GP Surgery, Walk-in clinic, etc.). These records help to provide you with the best possible healthcare.

NHS health records may be electronic, on paper or a mixture of both, and we use a combination of working practices and technology solutions to ensure that your information is kept confidential and secure. Records which this Practice hold about you may include the following information:

- Details about you, such as your address, carer, legal representative, emergency contact details, next of kin
- Any contact the surgery has had with you, such as appointments, telephone, eConsults submitted by you, etc.
- Notes and reports about your health
- Details about your treatment and care
- Results of investigations such as laboratory tests, x-rays etc.
- Relevant information from other health professionals, relatives or those who care for you

To ensure you receive the best possible care, your records are used to facilitate the care you receive. Information held about you may be used to help protect the health of the public and to help us manage the NHS. Information may be used within the GP practice for clinical audit to monitor the quality of the service provided. Some of this information will be held centrally and used for statistical purposes. Where we do this, we take strict measures to ensure that individual patients cannot be identified. Sometimes your information may be requested to be used for research purposes – if this information needs to be identifiable, the surgery will always gain your explicit consent before releasing the information for this purpose.

## **Devon and Cornwall Care Record**

Health and social care services in Devon and Cornwall have developed a system to share patient data efficiently and quickly and, ultimately, improve the care you receive.

This shared system is called the Devon and Cornwall Care Record.

It's important that anyone treating you has access to your shared record so they have all the information they need to care for you. This applies to your routine appointments and also in urgent situations such as going to A&E, calling 111 or going to an out-of-hours appointment.



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It's also quicker for staff to access a shared record than to try to contact other staff by phone or email.

Only authorised staff can access the Devon and Cornwall Care Record and the information they see is carefully checked so that it relates to their job. Also, systems do not share all your data – just data that services have agreed is necessary to include.

For more information about the Devon and Cornwall Care Record, please go to <https://www.devonandcornwallcarerecord.nhs.uk/>

## LumiraDx Care Solutions (formerly INRstar)

INRStar, hosted/provided by [LumiuraDx](#) is the clinical system and decision aid tool used by the practice for the management of warfarin dosing.

## Risk Stratification - Devon Predictive Model

Risk stratification data tools are increasingly being used in the NHS to help determine a person's risk of suffering a particular condition, preventing an unplanned or (re)admission and identifying a need for preventive intervention. Information about you is collected from a number of sources including NHS Trusts and from this GP Practice. A risk score is then arrived at through an analysis of your anonymised information using software managed by our clinical system provider, and is only provided back to your GP as data controller in an identifiable form. 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.

## Medicines Managements

The Practice may conduct Medicines Management Reviews of medications prescribed to its patients. This service performs a review of prescribed medications to ensure patients receive the most appropriate, up to date and cost effective treatments. This service is provided to practices within South Devon through South Devon and Torbay Clinical Commissioning Group.

## Community Hub

The practice works closely with the Community Nursing Team and the Intermediate Care Team to deliver care to patients in their home and to reduce avoidable admissions to hospital. The Community staff includes Matrons, Nurses, Assistant Practitioners, Healthcare Assistants and Administration Staff employed by Torbay and South Devon NHS Foundation Trust, based within the Community and Intermediate Care Team at Dawlish Community Hospital and Teignmouth Community Hospital. Staff that work in the Community Team are all bound by the Confidentiality: NHS Code of Practice and General Data Protection Regulation 2016; and will only access your information in order to provide direct care; for example, before attending visiting you at home.



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## COVID-19 Pandemic

The health and social care system is facing significant pressures due to the Covid-19 outbreak. Health and care information is essential to deliver care to individuals, to support health and social care services and to protect public health. Information will also be vital in researching, monitoring, tracking and managing the outbreak. In the current emergency it has become even more important to share health and care information across relevant organisations.

Our supplementary privacy notice can be viewed here, which is enforced alongside our standard privacy notice which can be found on our website:

<https://www.teignestuarymedical.co.uk/about/your-data/>

## COVID-19 Vaccination Campaign (CVP)

General Practice is at the forefront of delivering the CVP across the Country. The Practice is working with The Coastal Primary Care Network (Channel View Medical Group and Dawlish Medical Group) to deliver the CVP to our shared population. In order to provide such a complex and large scale vaccination campaign, it is necessary for members of Channel View Medical Group and Dawlish Medical Group to have access to our clinical system. Access to the clinical system is necessary to provide direct patient care.

All staff are bound by confidentiality, and have signed agreements with the practice before obtaining access.

Access to the clinical system is restricted for duties directly related to delivering the CVP:

- Call and recall (invitation) of eligible patients
- Recording bookings and declined vaccinations
- Recording vaccinations given at the Local Vaccination Centre
- Checking health information, at the time of your appointment, if requested to do so by a registered Healthcare Professional (GP/Nurse), with your explicit consent.

## GPES (General Practice Extraction Service) – Pandemic planning and research (COVID-19)

Coronavirus (COVID-19) has led to increased demand on general practices, including an increasing number of requests to provide patient data to inform planning and support vital research on the cause, effects, treatments and outcomes for patients of the virus.

To support the response to the coronavirus outbreak, NHS Digital has been legally directed to collect and analyse healthcare information about patients, including from their GP record, for the duration of the coronavirus emergency period, 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. More information about this requirement is contained in the [Data Provision Notice issued by NHS Digital to GP practices](#).



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This collection will reduce burden on general practices, allowing them to focus on patient care and support the coronavirus response.

Full information on the GPES Pandemic Planning and Research extractions can be viewed on NHS Digital's website: <https://digital.nhs.uk/coronavirus/gpes-data-for-pandemic-planning-and-research>

## **GPES (General Practice Extraction Service) – Physical Health Checks for people with Severe Mental Illness (SMI)**

NHS England has directed NHS Digital to collect and analyse data in connection with Physical Health Checks for people with Severe Mental Illness.

The data will allow monitoring of progress towards commitments set out in the Five Year Forward View for Mental Health, reiterated in the NHS Long Term Plan and associated Mental Health Implementation Plan, to increase the number of people with Severe Mental Illness receiving physical health checks.

Further information about the GPES for Physical Health Checks for people with SMI can be viewed on NHS Digital's website here: <https://digital.nhs.uk/about-nhs-digital/corporate-information-and-documents/directions-and-data-provision-notice/data-provision-notice-dpns/physical-health-checks-severe-mental-illness>

## **GPES (General Practice Extraction Service) – Cardiovascular Disease Prevention**

The General Practice Extraction Service (GPES) collects information for a wide range of purposes, including providing GP payments. It works with the Calculating Quality Reporting Service (CQRS) and GP clinical systems as part of the GP Collections service.

NHS England has directed NHS Digital to collect and analyse data in connection with Cardiovascular Disease Prevention Audit (referred hereafter to as “**CVDPREVENT Audit**”).

The NHS Long Term Plan identifies cardiovascular disease (**CVD**) as a clinical priority and the single biggest condition where lives can be saved by the NHS over the next 10 years. CVD causes a quarter of all deaths in the UK and is the largest cause of premature mortality in deprived areas.

The CVDPREVENT Audit is a new national primary care audit being commissioned by NHS England to support the implementation of the NHS Long Term Plan, the annually negotiated General Medical Services contract and the national CVD Prevention programme.

NHS Digital has been directed by NHS England under section 254 of the Health and Social Care Act 2012 (2012 Act) to establish and operate a system for the collection and analysis of the information specified for this service.

All GP Practices in England are legally required to share data with NHS Digital for this purpose under section 259(1)(a) and (5) of the 2012 Act



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## Rowcroft Hospice

Rowcroft Hospice provide End of Life and Palliative Care Services to patients in South Devon. Patients who are nearing the end of the life may be referred to the specialist team at Rowcroft Hospice for further care. This will be done with your consent.

Rowcroft Hospice are able to view a “read only” copy of the GP record when a patient is under their care. This is in order for Rowcroft Hospice to provide direct patient care.

## Prescribing Care Direct (PCD)

PCD provide the Primary Care Network and its member Practices with remote Pharmacists. These are additional support to our clinical team for the purpose of carrying out medication reviews, request and queries.

## GPInTheCloud (GPiTC)

GPiTC provide remote access to the practice clinical system (SystemOne) and medical records to enable GP locums (“stand in doctors”) to carry out consultations, answer patient related queries and provide patient care, remotely outside of the practice.

## Child Health Immunisation Service (CHIS)

Health-Intelligence (HI) on behalf of the NHS locally extra data using Strategic Reporting from the GP system in relation to the registration, vaccination and immunisation status of patients 0-19 years and 364 days. This information is extracted from the GP system to ensure the ongoing maintenance of the Child Health Information Service, which is responsible for the call and recall (invitation), uptake and monitoring, of immunisations for children and adolescents. The DPIA for this sharing mechanism can be found here:



TPP SystemOne  
Strategic Reporting

## Enhanced Access – Southern Primary Care Collaborative Board SystemOne to SystemOne

As part of our Improved Access Initiative, Teign Estuary Medical Group’s patients will be able to book evening and weekend appointments at other local GP Practices, these practices are: Barton Surgery (Dawlish), Channel View Medical Practice, Teignmouth Medical Group (The Den & Richmond House), Cricketfield Surgery (Newton Abbot). This will benefit you as a patient as it ensures that there are more appointments available to you at times that are more convenient out of the practice’s usual hours.

To ensure that the Clinician has full access to your medical records, when you book your appointment the Administrator will ask you to consent to sharing your medical records, which will ensure an effective and safe service.



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This sharing occurs electronically through our clinical system and the sharing only occurs when you choose to book an appointment at another practice. You will be reminded of this when you book the appointment and your consent to share your medical record is taken.

Your data will be kept secure using the same clinical system used to access your medical record when you visit us for an appointment. The clinician you visit will be required to gain your consent prior to accessing your record. If you change your mind and do not wish to consent, the clinician will only be able to access your Summary Care Record. This will contain limited medical information and will restrict the care that you can be offered. We will be notified of your record being accessed and of any changes made to your medical record. We will review this to ensure any follow up is actioned.

If you have any concerns about this, or object to the sharing of your medical record in this way, please speak to one of our reception team, who will be able to record your decision and change the settings for your record.

## Teignmouth and Dawlish Clinical Research Hub

The practices in Teignmouth and Dawlish work together to deliver Research studies and trials to patients registered at the 3 practices (and their branch sites). Staff employed by your GP practice will access your information in order to determine whether you are suitable to be invited to participate in a particular study.

Staff working for the Teignmouth and Dawlish Clinical Research Hub are also employees of practices within Teignmouth / Dawlish, and are bound by the same confidentiality rules. The Research Hub team will not access your information without your **explicit consent**, unless they are employed by, or on behalf, of your GP Practice and are carrying out the record review in line with their ordinary job. Staff employed by the Hub includes a Data Manager, Research Nurse and a Healthcare Assistant. These individuals have undertaken training for the delivery of research (Good Clinical Practice) and are all bound by the Confidentiality: NHS Code of Practice and General Data Protection Regulation 2016.

## Devon & Cornwall Care Record (DCCR)

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

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

- General Data Protection Regulation 2018
- 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
- Information: To Share or Not to Share Review
- 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 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), where the law requires information to be passed on and / or in accordance with the new information sharing principle following Dame Fiona Caldicott's information sharing review (Information to share or not to share) where "The duty to share information can be as important as the duty to protect patient confidentiality." This means that health and social care professionals should have the confidence to share information in the best interests of their patients within the framework set out by the Caldicott principles. They should be supported by the policies of their employers, regulators and professional bodies.

## Who are our partner organisations?

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

- NHS Trusts / Foundation Trusts
- GP's
- NHS Commissioning Support Units
- Independent Contractors such as dentists, opticians, pharmacists
- Private Sector Providers
- Voluntary Sector Providers
- Ambulance Trusts
- Clinical Commissioning Groups
- Research providers such as NIHR and SWP CRN



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- Public Health Screening and Prevention Teams
- Social Care Services
- Health and Social Care Information Centre (HSCIC)
- Local Authorities
- Education Services
- Fire and Rescue Services
- Police & Judicial Services
- Voluntary Sector Providers
- Private Sector Providers
- Other 'data processors' which you will be informed of

## Others:

You will be informed who your data will be shared with and in some cases asked for explicit consent for this happen when this is required.

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

## Who are our partner software suppliers / businesses?

We use a number of pieces of software and organisations outside of the NHS to facilitate your healthcare and enable our staff to contact you. These are as follows:

Name	Description	Can employees of the organisation access patient information?	GDPR statement
SystemOne (TPP)	Clinical system holds patient demographic and medical information – remote server	The servers and the connection to the practice are encrypted, so TPP staff are not able to access patient information in this way. TPP support staff are able to dial in remotely with the consent of our staff for problem solving.	<a href="https://www.tpp-uk.com/legal/privacy-policy">https://www.tpp-uk.com/legal/privacy-policy</a>





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iGPR	iGPR is a software tool that assists us with creating insurance reports.	iGPR staff have no access to patient information as it is fully encrypted whilst being transmitted to the insurer.	<a href="http://www.igpr.co.uk/privacy/">http://www.igpr.co.uk/privacy/</a>
South Devon Health Informatics Service (HIS)	The practice's primary general IT support provider.	The HIS support staff are able to remotely dial in with the consent of our staff for problem solving.	<a href="https://www.torbayandsouthdevon.nhs.uk/about-us/data-protection/privacy-and-cookies/">https://www.torbayandsouthdevon.nhs.uk/about-us/data-protection/privacy-and-cookies/</a>
Devon Contract Waste	Shred paper on which is printed patient or other confidential data	Representative comes to sites and collects the three shredding bins full of paper. These are securely transported to the depot in Exeter where it is then securely shredded. Destruction certificates are issued after each collection is shredded.	<a href="https://irp-cdn.multiscreensite.com/928c62bd/files/uploaded/DCW%20privacy%20policy.pdf">https://irp-cdn.multiscreensite.com/928c62bd/files/uploaded/DCW%20privacy%20policy.pdf</a>
MDU / MPS / MDDUS	Indemnity organisations	We will sometimes send by email or discuss by phone identifiable information when the organisation is supporting a GP in a patient complaint or litigation. Information will be redacted where possible.	<a href="https://www.themdu.com/privacy-policy">https://www.themdu.com/privacy-policy</a> <a href="https://www.medicalprotection.org/home/privacy-cookies-policy">https://www.medicalprotection.org/home/privacy-cookies-policy</a> <a href="https://www.mddus.com/mddus-policies/privacy-notice">https://www.mddus.com/mddus-policies/privacy-notice</a>
eConsult	Provides the platform for online consultations requests	Patient data is encrypted, consultation information is stored in pseudonymised form on eConsult servers.	<a href="https://oakleyhealth.webgp.com/staticLegalContent/privacyPolicy">https://oakleyhealth.webgp.com/staticLegalContent/privacyPolicy</a>
Health Intelligence	Manage recall and screening of diabetic	The Diabetic Eye Screening Programme is operated by Health Intelligence (commissioned by NHS	<a href="https://health-intelligence.com/how-it-works/privacy-notice/">https://health-intelligence.com/how-it-works/privacy-notice/</a>



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	patients for diabetic retinopathy	England). This supports invitation for eye screening and ongoing care. This data may be shared with any Hospital Eye Services a patient is under the care of to support further treatment and with other healthcare professionals involved in patient care.	
Health Intelligence	Manage the recall of the Childhood Immunisation Service (CHIS)	Child Health Information Services (CHIS) are commissioned by NHS England to support the monitoring of the care delivered to children.	<a href="https://health-intelligence.com/how-it-works/privacy-notice/">https://health-intelligence.com/how-it-works/privacy-notice/</a>
Devon Referrals Service (DRSS)	Processing referrals	No – Only information sent to DRSS as part of a referral made by a Healthcare Professional at the surgery	<a href="https://devonccg.nhs.uk/health-services/referral-support">https://devonccg.nhs.uk/health-services/referral-support</a>
Channel View Medical Group	Primary Care Network member practice	Yes – For the purpose of delivering the COVID-19 Vaccination Programme. This is monitored and audited.	<a href="https://www.channelviewmedicalpractice.com/patient-info/privacy-notice/#">https://www.channelviewmedicalpractice.com/patient-info/privacy-notice/#</a>
Dawlish Medical Group (Barton Surgery Dawlish)	Primary Care Network member practice	Yes – For the purpose of delivering the COVID-19 Vaccination Programme. This is monitored and audited.	<a href="https://www.bartonsurgery.co.uk/patient-info/gdpr-patient-privacy-notice/">https://www.bartonsurgery.co.uk/patient-info/gdpr-patient-privacy-notice/</a>
Torbay & South Devon NHS Foundation Trust	Secondary Care (Hospital) and Community Service (District Nurses etc)	Yes The Community Services have their own instances of SystemOne whereby they can access the records for mutual patients, when the patient is under their care and consent has been correctly recorded as outlined in this document	<a href="https://www.torbayandsouthdevon.nhs.uk/about-us/data-protection/">https://www.torbayandsouthdevon.nhs.uk/about-us/data-protection/</a>
Rowcroft	End of Life	Yes The Rowcroft Hospice have	<a href="https://rowcrofthospice.org.uk/wp-content/uploads/GDPR-leaflet-">https://rowcrofthospice.org.uk/wp-content/uploads/GDPR-leaflet-</a>



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Hospice	and Palliative Care service	their own instances of SystemOne whereby they can access the records for mutual patients, when the patient is under their care and consent has been correctly recorded as outlined in this document	<a href="#">2018 Web.pdf</a>
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## Access to personal information

You have a right under the General Data Protection Regulations 2016 to request access to view or to obtain copies of what 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 should be made to the practice using the Subject Access Request (SARs) Form
- For information from the hospital you should write directly to them – Please ask for their details
- A copy of the data we hold on your will be provided free of charge in an encrypted electronic format (CD-ROM)
- We are required to respond to you within **one calendar month** from the date your form is **received and ID verified** by a member of the practice staff.

## Objections / Complaints

Should you have any concerns about how your information is managed at the practice, please contact the Practice Manager – Mr Will Moyle. If you are still unhappy following a review by the 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. If you have any concerns about how your data is shared then please contact the practice.

## Cookies

Our website uses cookies.

A cookie is a small file, typically of letters and numbers, downloaded on to a device (like your computer or smart phone) when you accesses certain websites.

Cookies allow a website to recognise a user's device.

Some cookies help websites to remember choices you make (e.g. which language you prefer if you use the Google Translate feature). Analytical cookies are to help us measure the number of visitors to a website. The two types we use are 'Session' and 'Persistent' cookies. Some cookies are



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temporary and disappear when you close your web browser, others may remain on your computer for a set period of time.

We do not knowingly collect or intend to collect any personal information about you using cookies. We do not share your personal information with anyone.

## What can I do to manage cookies on my devices?

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>.

If you are concerned about cookies and would like to ask further questions please do not hesitate to write to our website developers – [support@gpsurgery.net](mailto:support@gpsurgery.net)

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

This information is publicly available on the Information Commissioners Office website [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:

Dr's Squires, Venton and Peirce – T/A Teign Estuary Medical Group

## Who is the Data Protection Officer?

Bex Lovewell  
DELT Shared Services Ltd, Building 2 DELT  
Derriford Business Park  
Plymouth  
PL6 5QZ



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01752 580321

## National Data Opt Out

*You have the right to object to your information being shared under the national data opt-out model. The national data opt-out model provides an easy way for you to opt-out of sharing information that identifies you being used or shared for medical research purposes and quality checking or audit purposes.*

*To opt-out of your identifiable information being shared for medical research or to find out more about your opt-out choices please ask a member of staff or go to NHS Digital's website:*

***<https://digital.nhs.uk/services/national-data-opt-out-programme>***

## Complaints

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

Glendevon Medical Centre,  
3 Carlton Place,  
Teignmouth,  
TQ14 8AB

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