

## **How the Blackdown Practice Uses Your Information to Measure the Quality of Care and in Medical Research**

### **Checking the quality of care – clinical audit within the Practice**

The Blackdown Practice uses information in medical records so that we can monitor, check and review the quality of the care we provide. This helps us to improve our services to you, plan care and offer patients additional treatment or support as early as possible.

Various IT systems are used inside and outside the surgery to support this. Examples of these include the main system used to hold the electronic medical records. As the GP medical record is the most complete form of medical record, this is held off site within the UK on a secure server. The link between the surgery and the server is via an NHS specific internet connection that is also used to transfer information via e-mail and via the referral management centres to local hospitals. Other systems used in the Practice are ‘tagged onto’ the main clinical record e.g. software to calculate what warfarin dose patients should receive.

The information held will be searched by a computer programme so that we can identify patients who for example need specific blood tests or monitoring, who might be at high risk of developing certain diseases such as heart disease or at risk of a fall or an unplanned admission to hospital. Generally all searches originate in the Practice. Occasionally, for example identifying patients who may be at risk of an unplanned admission to hospital, a search may be completed externally by an organisation within, or bound by contracts with, the NHS. This is because it combines information from our Practice computer system with data from local hospitals, the ambulance service and the out of hours service. This information only uses the NHS number as an identifier and therefore your identity will not be visible to the people processing the data.

### **Checking the quality of care – national clinical audits**

The Blackdown Practice contributes to some national clinical audits so that the overall quality of healthcare of the population can be checked and reviewed. The results of the checks or audits can show where Practices are doing well and where they need to improve.

This information is sent via the secure NHS internet connection to NHS Digital, a national body with legal responsibilities to collect healthcare data.

The data will include information about you, such as your NHS Number, gender and date of birth and information about your health which is recorded in coded form - for example the code for diabetes or high blood pressure.

We will only share your information for national clinical audits or checking purposes when the law allows or where we have provided information detailing specific audits where we feel there is a national public health benefit e.g. the national diabetes audit and the cardiovascular disease prevention audit.

For more information about national clinical audits see the Healthcare Quality Improvements Partnership website: <https://www.hqip.org.uk/a-z-of-nca/> (this is a complete list, not just GP Surgeries) or phone 020 7997 7370.

You have the right to object to your identifiable information being shared in certain circumstances. For further information please see <https://digital.nhs.uk/data-and-information/data-collections-and-data-sets/data-collections/general-practice-data-for-planning-and-research/transparency-notice>) or you can ask our Practice Manager.

## Medical research

The Blackdown Practice shares information from medical records:

- to support medical research when the law allows us to do so, for example to learn more about why people get ill and what treatments might work best;
- we will also use your medical records to carry out research within the practice.

This is important because:

- the use of information from GP medical records is very useful in developing new treatments and medicines;
- medical researchers use information from medical records to help answer important questions about illnesses and disease so that improvements can be made to the care and treatment patients receive.

## General Practice Data for Planning and Research Data Collection (GPDfPR)

Your data may be used by NHS Digital to help improve the way health and social care is delivered to patients and service users throughout England. From the 1st September 2021, NHS Digital will securely extract your information to provide access to patient data to the NHS and other organisations who need to use it, to improve health and social care for everyone.

NHS Digital will primarily use your information in a way that does not identify you (your information will be pseudonymised). However, they will be able to use their software to identify you in certain circumstances, and where there is a valid legal reason to do so. NHS Digital may also share your information with third parties such as Local Authorities, primary care networks (PCNs), clinical commissioning groups (CCGs), research organisations, including universities, and pharmaceutical companies.

At the time of publication (June 2021), patients who have a “**Type 1**” **opt-out**, will be excluded from this programme and will not have their data extracted for this purpose. A type 1 opt-out prevents personal data about you, being extracted from your GP record, and uploaded to any other organisations without your explicit consent. If you wish for a Type 1 opt-out to be applied to your record please complete a “**Type 1**” opt-out form (can be found <https://digital.nhs.uk/data-and-information/data-collections-and-data-sets/data-collections/general-practice-data-for-planning-and-research/transparency-notice>) and hand it in to your usual surgery.

If a patient registers an opt-out with the **National Data Opt-out**, their data will still be extracted. However, the National Data Opt-out will be applied on access or dissemination of the data. This would mean the information is shared with NHS Digital, but that they will not share it to third parties such as universities and charities.

**We are required by law to provide you with the following detailed information about how we handle your information.**

<b>Data Controller</b> contact details	The Blackdown Practice, Station Road, Hemyock, Cullompton. EX15 3SF 01823 680206
<b>Data Protection Officer</b> contact details	A Data Protection Officer, Bex Lovewell, has been appointed on behalf of our Practice and is hosted by DELT Shared Services. Bex may be contacted by e-mail <a href="mailto:bex.lovewell@nhs.net">bex.lovewell@nhs.net</a> or Data Protection Officer, DELT Shared Services Ltd, BUILDING 2 – DELT, Derriford Business Park, Plymouth PL6 5QZ.
<b>Purpose</b> of the processing	<p>To check and review the quality of care within the Practice - this is called internal audit and clinical governance.</p> <p>Check the quality of care which is given to patients via national clinical audits or through medical research.</p>
<b>Lawful basis</b> for processing	<p>These purposes are supported under the following sections of the GDPR – audit within and outside (national audit) the Practice:</p> <ul style="list-style-type: none"> <li>▪ <i>Article (6)(1)(c) ‘...necessary for compliance with a legal obligation to which the controller is subject...’</i></li> </ul> <p>OR</p> <ul style="list-style-type: none"> <li>▪ <i>Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’;</i></li> </ul> <p>And</p> <ul style="list-style-type: none"> <li>▪ <i>Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services...’</i></li> </ul> <p>These purposes are supported under the following sections of the GDPR – participation in medical research:</p> <ul style="list-style-type: none"> <li>▪ <i>Article 6(1)(e) – ‘processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller’.</i></li> </ul> <p>AND</p> <ul style="list-style-type: none"> <li>▪ <i>Article 9(2)(a) – ‘the data subject has given explicit consent...’</i></li> </ul> <p>OR</p> <ul style="list-style-type: none"> <li>▪ <i>Article 9(2)(j) – ‘processing is necessary for... scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member States law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and interests of the data subject’.</i></li> </ul> <p>Healthcare staff will also respect and comply with their obligations under the common law duty of confidentiality.</p>

<b>Recipient or categories of recipients</b> of the processed data	<p>The data will be shared with:</p> <ul style="list-style-type: none"> <li>▪ healthcare professionals and staff in this surgery;</li> <li>▪ specific medical research organisations</li> <li>▪ national clinical audits which check the quality of care the data will be shared with NHS Digital</li> </ul>
<b>Rights to object and the national data opt-out</b>	<p>You have the right to 'opt-out' of national clinical audit and medical research under the national data opt-out model.</p> <p>You have the right to object to information being shared with NHS Digital for reasons other than your own direct care. This is called a '<b>Type 1</b>' objection. There is also a <b>National opt-out</b> objection <a href="https://digital.nhs.uk/services/national-data-opt-out">https://digital.nhs.uk/services/national-data-opt-out</a> which means your data is extracted but not shared with third parties such as universities and charities.</p> <p>To opt-out of your identifiable information being shared for medical research or to find out more about your opt-out choices please go to NHS Digital's website <a href="https://digital.nhs.uk/data-and-information/data-collections-and-data-sets/data-collections/general-practice-data-for-planning-and-research/transparency-notice">https://digital.nhs.uk/data-and-information/data-collections-and-data-sets/data-collections/general-practice-data-for-planning-and-research/transparency-notice</a> or you can ask our Practice Manager.</p>
<b>Right to access and correct</b>	<p>You have the right to access/view what information the surgery holds about you, and have any errors or mistakes corrected. Please speak to a member of staff or look at our 'subject access request' policy on the practice website.</p> <p>We are not aware of any circumstances in which you will have the right to delete correct information from your medical record; although you are free to obtain your own legal advice if you believe there is no lawful purpose for which we hold the information and contact us if you hold a different view.</p>
<b>Retention period</b>	<p>GP medical records will be kept in line with the law and national guidance. Information on how long records are kept can be found at: <a href="https://www.nhs.uk/infomanagement/guidance/records-management-code/">https://www.nhs.uk/infomanagement/guidance/records-management-code/</a> or speak to our Practice Manager.</p>
<b>If you have concerns</b>	<p>Should you have any concerns about how your information is managed at the surgery please contact our Practice Manager to discuss how the disclosure of your personal information can be limited.</p>
<b>Right to complain</b>	<p>You have the right to complain to the Information Commissioner's Office. If you wish to complain follow this link <a href="https://ico.org.uk/global/contact-us/">https://ico.org.uk/global/contact-us/</a> or call the helpline <b>0303 123 1113</b></p>