Fair Use Policy & Privacy Notice

Privacy Notice for Topsham Surgery & Glasshouse Medical Centre

This privacy notice describes the data, the practice holds about you, why we hold it, where and how we store it, how long for and how we protect it. It also tells you about your rights under the Data Protection Legislation and how the law protects you.

Who we are and what do we do?

Topsham Surgery, of Topsham Surgery, Holman Way, Topsham, Exeter, EX3 0EN and Glasshouse Medical Centre, Glasshouse Lane, Exeter, EX2 7BT topshamadmin@nhs.net 01392 874646.

Topsham Surgery is a Data Controller for the data we hold about you. We hold your data in order to provide you with health and care.

What is personal data and what data do we use?

Your personal data is any information that can be connected to you personally. If you can be identified from the data, it is personal data. The types of personal data we use and hold about you are:

- Details about you: your name, address, contact number, email address, date of birth, gender and NHS number. We may also hold information about your emergency contact, next of kin and carer.
- Details about your medical care: medical diagnosis, record of treatment received, referrals, history of prescribed medication, results of investigations such as X-rays etc.
- Information provided by you: this includes correspondence relating to feedback, concerns and complaints about the service you have received.
- Relevant information from other healthcare professionals, relatives or those who care for you.

We may also hold the following information about you:

- Religion or other beliefs of a similar nature,
- Family, lifestyle and/or social circumstances,
- Employment details,
- Financial details.

When we collect your mobile number we use it to text you to remind you of appointments, news and information about the practice and our services, health promotion and direct-care related information.

If you no longer wish to receive communication this way, please let a member of staff know who will be able to update your preferences.

When we collect your email address, we use it for the same purposes as mobile numbers and text messaging above.

If you no longer wish to receive communication this way, please let a member of staff know who will be able to update your preferences.

Why do we process your data and what legal basis do we have to process your data?

In order to process your personal data or share your personal data outside of the practice, we need a legal basis to do so. If we process or share special category data, such as health data, we will need an additional legal basis to do so.

We rely upon Article 6(1)(e) (public interest task) and Article 9(2)(h) (health and social care) for most of our processing and sharing, in particular to:

- Provide you with health and care,
- Share data from, or allow access to, your GP record, for healthcare professionals involved in providing you with health and care,
- Receive data from or access your data on other NHS organisation clinician systems,
- Work effectively with other organisations and healthcare professionals who are involved in your care,
- Ensure that your treatment and advice, and the treatment of others is safe and effective,
- Participate in National Screening Programmes,
- Use a computer program to identify patients who might be at risk from certain diseases or unplanned admissions to Hospitals,
- Help NHS England and the practice to conduct clinical audits to ensure you are being provided with safe, high-quality care,
- Support medical research when the law allows us to do so,
- Supply data to help plan and manage services and prevent infectious diseases from spreading.

We rely upon Article 6(1)(d) (vital interest) and Article 9(2)(c) (vital interests) to share information about you with another healthcare professional in a medical emergency.

We rely upon Article 6(1)(e) (public interest task) and Article 9(2)(g) (substantial public interest) to support safeguarding for patients who, for instance, may be particularly vulnerable to protect them from harm or other forms of abuse.

We rely upon Article 6(1)(c) (legal obligation) and Article 9(2)(h) to share your information for mandatory disclosures of information such as public inquiries. The kind of organisations we may be required to share information with may include NHS England, CQC, UK Health Security Agency and Office for Health Improvement and Disparities).

We rely upon Article 6(1)(c) (legal obligation) and Article 9(2)(f) (legal claims) to help us investigate legal claims and if a court orders us to do so.

We rely upon Article 6(1)(a) (consent) and Article 9(2)(a) (explicit consent), in order to:

- Help the practice investigate any feedback, including patient surveys, complaints or concerns you may have about contact with the practice,
- Help manage how we provide you with services from the practice, for example, when you nominate individuals to contact the practice on your behalf,
- Send you our newsletter,
- Contact you if you have signed up to our patient participation group,
- Share your information with third parties, for example, insurance companies and medical research organisations.

We also use anonymised data to plan and improve health care services. Specifically, we use it to:

- Review the care being provided to make sure it is of the highest standard,
- Check the quality and efficiency of the services we provide,
- Prepare performance reports on the services we provide.

Common law duty of confidentiality

Healthcare staff will respect and comply with their obligations under the common law duty of confidence. We meet the duty of confidentiality under one of the following:

- You have provided us with your explicit consent,
- For direct care, we rely on implied consent,
- We have approval from the Confidentiality Advisory Group (CAG),
- We have a legal requirement to collect, share and use the data,
- On a case-by-case basis, we will share information in the public interest.

How do we collect your data?

The practice collects data that you provide when you:

- Receive treatment or care from the practice,
- Contact the practice by telephone (all telephone calls received and made by the practice are recorded), online via an online triage system, or in person,
- Complete a form electronically or in paper,
- Where Accurx Smart Triage Questions are enabled, additional information may be collected through AI-generated follow-up questions asked during the completion of an online triage request
- Contact the practice via a Social Network
- Visit the practice's website.

We may also collect data from family members or carers to support your care.

We receive information about you from other providers to ensure that we provide you with effective and comprehensive treatment. These providers may include:

- The GP Practices within the Outer Exeter Primary Care Network Primary Care Network
- Other GP Practices
- NHS Trusts/Foundation Trusts
- NHS Commissioning Support Units (CSUs)
- Community Services (District Nurses, Rehabilitation Services and out of hours services)
- Ambulance or emergency services
- Independent contractors such as Pharmacies, Dentists and Opticians
- Devon Integrated Care Board (ICB)
- NHS England
- Local authorities
- Multi-Agency Safeguarding Hub (MASH)
- Police and Judicial Services
- Educational Services
- Fire and Rescue Services
- NHS 111
- The Care Quality Commission (CQC), ICO and other regulators
- UK Health Security Agency
- Office for Health Improvement and Disparities
- Non-NHS health care providers
- Research providers

Who do we share your data with?

In order to deliver and coordinate your health and care, we may sometimes share information with other organisations. We will only ever share information about you if other agencies involved in your care have a genuine need for it. Anyone who receives information from the practice is under a legal duty to keep it confidential and secure. Please be aware that there may be certain circumstances, such as assisting the police with the investigation of a serious crime, where it may be necessary for the practice to share your personal information with external agencies without your knowledge or consent.

We may share information with the following organisations:

- The GP Practices (Ide Lane Surgery, Pinhoe Surgery, Cranbrook Medical Practice, Westbank Practice and Wonford Green Surgery) within the Outer Exeter PCN Primary Care Network
- Other GP Practices
- NHS Trusts/Foundation Trusts
- Devon Integrated Care Board (ICB)
- NHS Commissioning Support Units

- Community Services (District Nurses, Rehabilitation Services and out of hours services)
- Ambulance or emergency services
- Independent contractors such as Pharmacies, Dentists and Opticians
- Local authorities
- Multi-Agency Safeguarding Hub (MASH)
- Police and Judicial Services
- Educational Services
- Fire and Rescue Services
- NHS 111
- The Care Quality Commission, ICO and other regulators
- UK Health Security Agency
- Office for Health Improvement and Disparities
- NHS England
- Non-NHS health care providers
- Governmental departments such as the DWP, DVLA and Home Office
- Service providers such as remote pharmacist services (Prescribing Care Direct) and medication and treatment optimisation services (Interface Clinical Service and Oberoi Consulting)
- Accurx Limited
- Research providers such as the NIHR

In addition to sharing data with the above services, the practice will also use carefully selected third party service providers that process data on behalf of the practice. When we use a third-party service provider, we will always have an appropriate agreement in place to ensure that they keep the data secure, that they do not use or share information other than in accordance with our instructions and that they are operating responsibly to ensure the protection of your data. Examples of functions that may be carried out by third parties includes:

- Organisations that provide IT services & support, including our core clinical systems; systems which manage patient facing services (such as our website and service accessible through the same); data hosting service providers; systems which facilitate video consultation, appointment bookings or electronic prescription services; document management services etc.

- Organisations who are delivering services on behalf of the practice (for example conducting Medicines Management Reviews to ensure that you receive the most appropriate, up to date and cost-effective treatments or supporting practices in offering choices of providers and appointments to patients who are being referred via the NHS E-Referral system).
- Delivery services (for example if we were to arrange for delivery of any medicines to you).

- Payment providers (if for example you were paying for a prescription or a service such as travel vaccinations).

For further information of who we share your personal data with and our third-party processors, please contact the Practice Manager via topshamadmin@nhs.net.

Where do we store your data?

We use a number of IT systems and tools to store and process your data, on behalf of the practice. Examples of tools we use include our Core Clinical System

- TPP
- NHSmail
- Microsoft 365
- AccuRx (including Patient Triage and Smart Triage Questions)
- INRstar
- iGPR
- Medi2Data / Lalu
- GP in The Cloud (GPiTC)
- Dictate.IT
- Heidi Health
- Gov Notify
- X-ON Surgery Connect
- LineIn
- BetterLetter

For further information on this, please contact the Practice Manager via topshamadmin@nhs.net.

Artificial Intelligence (AI) Supported Services
The practice may use approved NHS healthcare technologies that include artificial intelligence (AI) functionality to support the delivery of services. These technologies are used to assist with administrative processes or information gathering and do not make decisions about your care without human involvement. Where AI functionality is used, appropriately trained staff remain responsible for reviewing information and making decisions. The practice does not use solely automated decision-making for patient care.

GPConnect/Interoperability/Enhanced Data Sharing Module:

We share your record using GP Connect, Interoperability and Enhanced Data Sharing Module to make sure that, whether you are visiting the practice, attending hospital, or being seen in the community or at home by a care professional, everyone knows the care you need and how you want to be treated. Your electronic health record is available to the practices in the Outer Exeter Primary Care Network and other local providers including Devon Partnership Trust, Hospiscare, NHS111, Royal Devon University Hospital Trust, Torbay & South Devon NHS Foundation Trust and University Plymouth Healthcare Trust who are involved in your care. This includes the sharing of personal contact details, diagnosis, medications, allergies, and test results. Your records will be treated with the strictest confidence and can only be viewed if you use their service.

You can find more information about GP Connect at: https://digital.nhs.uk/services/gp-connect/gp-connect-in-your-organisation/transparency-notice

You can also search for organisations who use GP Connect here: https://transparency.ndsp.gpconnect.nhs.uk/Name

Please note that if you have previously dissented (opted-out) to sharing your records, this decision will be upheld, and your record will only be accessed by the practice. Should you wish to opt-out of, please speak to the Practice Manager on topshamadmin@nhs.net who will be able to update your personal preferences. **Please note that by opting out of this sharing, other health professionals may not be able to see important medical information, which may impact on the care you receive.**

Summary Care Record (SCR)

NHS England have implemented the SCR which contains information about you; including your name, address, data of birth, NHS number, medication you are taking and any bad reactions to medication that you have had in the past. This information is automatically extracted from your records and uploaded onto a central system.
Many patients who are seen outside of their GP Practice are understandably not able to provide a full account of their care or may not be in a position to do so. The SCR means patients do not have to repeat their medical history at every care setting and the healthcare professional they are seeing is able to access their SCR. The SCR can only be viewed within the NHS on NHS smartcard-controlled screens or by organisations, such as pharmacies, contracted to the NHS.
As well as this basic record, additional information can be added to include further information. However, any additional data will only be uploaded of you specifically request it and with your consent. You can find out more about the SCR here: https://digital.nhs.uk/services/summary-care-records-scr

Devon & Cornwall Care Record (DCCR)

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.

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

Only authorised health and care 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/

National Screening Programmes

The NHS provides national screening programmes so that certain diseases can be detected at early stages. These screening programmes include bowel cancer, breast cancer, cervical cancer, aortic aneurysms and a diabetic eye screening service. More information on the national screening programmes can be found at: https://www.gov.uk/topic/population-screening-programmes

Risk Stratification

Your medical records will be searched by a computer program so that we can identify patients who might be at high risk from certain diseases such as heart disease or unplanned admissions to hospital. This means we can offer patients additional care or support as early as possible.

This process will involve linking information from your GP record with information from other health or social care services you have used. Information which identifies you will only be seen by this practice. More information can be found at https://www.england.nhs.uk/ig/risk-stratification/ or speak to the practice.

One Devon Dataset

As well as using your data to support the delivery of care to you, your data may be used to help improve the way health and social care is delivered to patients and service users throughout Devon using Population Health Management methods.

We will use a pseudonymised extract (i.e., ***not*** identifiable information) which will be sent securely to NHS Devon ICB (Integrated Care Board) and in partnership with the Local Authorities. Data will be used to support the Devon Integrated Care System to improve short-term and medium-term health outcomes for local populations. If you would benefit from some additional care or support, your information will be shared back to the practice, or another local provider involved in your care, so that they can offer you direct care.

Further information about Population Health Management can be found here:
https://www.england.nhs.uk/integratedcare/what-is-integrated-care/phm/
Further information about the One Devon Dataset can be found here:
https://devon.icb.nhs.uk/privacy-notice/
We will rely on public interest task as the legal basis for processing your data for this purpose. You have a right to object to your information being used in this way. If you wish to discuss this further, please contact the Practice Manager on topshamadmin@nhs.net.

Research

We're excited to share news of our partnership with seasoned NIHR RRDN (National Institute for Health Research Regional Research Delivery Network) experts, seamlessly integrated into our practice team. In the pursuit of advancing medical research, these professionals, alongside our practice team, may access your patient record for pre-

consented activities. This involves identifying potential eligibility for research opportunities and supporting recruitment and follow-up for clinical trials. This process operates under the lawful bases of Article 6 (public task) and Article 9 (substantial public interest) of the GDPR. Be assured, that your privacy and data security are rigorously safeguarded. This collaboration also supports NIHR and NHS's pursuit in improving equality to access research. Any eligible individuals will be contacted by the practice, and their consent will be requested before any further processing takes place.

Devon Partnership Trust

Where patients are under the care of the Practice and Devon Partnership Trust (DPT), records are shared using the Enhanced Data Sharing Model inbuilt within SystmOne. This enables both the practice and DPT to see the GP or DPT record respectively. The information shared includes demographic and contact information, diagnosis, medications, allergies, test results and documents relating to the patient. Records are treated in the strictest of confidence and can only be viewed by the service when the patient is registered with /under the care of their service, for the purposes of direct patient care. DPTs privacy notice can be found here: https://www.dpt.nhs.uk/legals/privacy/privacy-notice-for-the-website

Interface Clinical Solutions (Interface)

Interface provide clinical review services, usually commissioned by the practice or the Pharmacuitical industry to review and optimize patient care, treatment and medications. Members of the Interface team with access to patient information have reviewed and signed the practice's confidentiality policy, and are registered healthcare professionals who work within the requirement of their governing body i.e. the Nursing Midwifery Council, General Pharmaceutical Council, the General Medical Council or other regulatory professional body.

Interface Clinical Services, Schofield House, Gate Way Drive, Yeadon, Leeds, LS19 7XY. dataprotectionofficer@interface-cs.co.uk 0113 202 9799

Oberoi Consulting Limited

Oberoi Consulting Limited provide clinical review services, usually commissioned by the practice or the Pharmacuitical industry to review and optimize patient care, treatments and medications. Members of the Oberoi Consulting team with access to patient information have reviewed and signed the practice's confidentiality policy, and are registered healthcare professionals who work within the requirement of their governing body i.e. the Nursing Midwifery Council, General Pharmaceutical Council, the General Medical Council or other regulatory professional body. Further information can be found here: https://oberoi-consulting.com/privacy-policy/. Data Protection Officer at Oberoi Consulting Limited, 19 St Christophers Way, Pride Park, Derby, DE248JY or email admin@oberoi-consulting.com

Immedicare

For some of our Care Home Residents we share your records using the Enhanced Data Sharing Module with Immedicare so that they are able to provide a virtual clinical support service, 24/7, for when you may need to be cared for.

The information being shared can be personal contact details, diagnosis, medications, allergies and test results. Your records will be treated with the strictest confidence and can only be viewed if you use their service. Further information regarding Immedicare can be found here: https://Immedicare.co.uk/privacy-notice/

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.

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.

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 Digitals website here: https://digital.nhs.uk/about-nhs-digital/corporate-information-and- documents/directions-and-data-provision-notices/data-provision-notices-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.

OpenSAFELY
NHS England has been directed by the government to establish and operate the OpenSAFELY COVID-19 Service and the OpenSAFELY Data Analytics Service. These services provide a secure environment that supports research, clinical audit, service evaluation and health surveillance for COVID-19 and other purposes.

Each GP practice remains the controller of its own GP patient data but is required to let approved users run queries on pseudonymised patient data. This means identifiers are

removed and replaced with a pseudonym.

Only approved users are allowed to run these queries, and they will not be able to access information that directly or indirectly identifies individuals.

Patients who do not wish for their data to be used as part of this process can register a type 1 opt out with their GP.

Here you can find additional information about OpenSAFELY.

Hospiscare

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

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

Prescribing Care Direct (PCD)

PCD provide the Practice with remote Pharmacists. These are additional support to our clinical team for the purpose of carrying out medication reviews, request and queries.

Heidi Health

Heidi Health is an AI Scribe tool used by clinicians. Heidi transcribes consultations and creates a digital summary which the GP will add to the medical record. Heidi enables clinicians to spend more time focusing on the patient by reducing time manually typing each consultation. Consultation data is deleted at the end of each clinic and is not shared or stored outside of the GPs own user account.

More information regarding Heidi Health can be found here:
https://www.heidihealth.com/uk/compliance/gdpr
https://www.heidihealth.com/uk/compliance/uk

GPinTheCloud (GPiTC)

GPiTC provide remote access to the practice clinical system (SystmOne) 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.

HealthTech-1

HealthTech1 provide automated patients registrations (for new or returning patients) registering with the practice.

(TLHC) Targeted Lunch Health Check (InHealth)
Peninsula Cancer Alliance is introducing the Targeted Lung Health Check (TLHC) programme to Devon. The service aims to invite people identified as being at increased risk of lung cancer due to their age and smoking history, for a lung health check. Depending on the results, people may then be offered a CT scan in a convenient place, close to home.

More information about this service and how they use your data can be found here: https://www.inhealthgroup.com/lung-health-checks/

If you have any queries or concerns about how InHealth handle your personal data, please contact: InHealth Intelligence, Universal House, E.r.F Way, Middlewich, Cheshire, CW10 0QJ Email: dpo@inhealth-intelligence.com Telephone: 01270 765124

Medi2Data and eMR+
From April 2025, our practice will be outsourcing some medical reports to Medi2data, who will process your report on our behalf, using their system eMR.
Medi2data are able to complete most types of factual reports, and in most cases can do so in a much quicker turnaround time than the practice is able to. For example,

Medi2data aim to complete a report within 14-28 days; however, during busy periods this can take the practice up to 6-8 weeks.

By contracting Medi2data to undertake this work, it also means that the GPs can spend more time with patients and less time completing reports for insurers and other bodies.

Medi2data is an NHS accredited supplier to GP Surgeries across the UK, who have developed a digital system called eMR, which enables Medi2Data to create digital, medical reports.

If you have any queries or concerns about how Medi2Data handle your personal data, more information can be found: https://www.medi2data.com/keeping-data-safe/

iGPR and iGPR Managed Service
From October 2025, our practice will be outsourcing some medical reports to iGPR, who will process your report on our behalf, using their system iGPR.

We use a processor, iGPR Technologies Limited("iGPR"), to assist us with responding to report requests relating to your patient data, such as subject access requests that you submit to us (or that someone acting on your behalf submits to us) and report requests that insurers submit to us under the Access to Medical Records Act 1988 in relation to a life insurance policy that you hold or that you are applying for.

iGPR manages the reporting process for us by reviewing and responding to requests in accordance with our instructions and all applicable laws, including UK data protection laws.

The instructions we issue to iGPR include general instructions on responding to requests and specific instructions on issues that will require further consultation with the GP

responsible for your care.

iGPR are able to complete most types of factual reports, and in most cases can do so in a much quicker turnaround time than the practice is able to. For example, iGPR aim to complete a report within 14-28 days; however, during busy periods this can take the practice up to 6-8 weeks.

By contracting iGPR to undertake this work, it also means that the GPs can spend more time with patients and less time completing reports for insurers and other bodies.

iGPR is an NHS accredited supplier to GP Surgeries across the UK, who have developed a digital system called iGPR, which enables them to create digital, medical reports.

If you have any queries or concerns about how iGPR handle your personal data, more information can be found: https://www.igpr.co.uk/trust-and-transparency

Devon EPR (Electronic Patient Record)

We can access certain patient information through the Devon Electronic Patient Record, to support your care, where you access our services and have a patient record with either of the Trusts. For further information, please see the Devon EPR Privacy Notice, where you can also learn how to opt out of this sharing. https://www.royaldevon.nhs.uk/about-us/information-governance/fair-collection-privacy-notice/devon-electronic-patient-record-epr-privacy-notice/

Gov Notify

We use GOV.UK Notify (Gov Notify) to send some of our letters and email communications. GOV.UK Notify is a secure government service provided by the Government Digital Service that allows us to send messages safely and reliably. When we use this service, only the minimum personal information necessary to deliver the message (such as your name, email address or postal address, and the content of the correspondence) is shared with GOV.UK Notify. The service processes this information on our behalf and in accordance with UK data protection legislation. GOV.UK Notify does not use your personal information for marketing purposes. Further information can be found in the Gov Notify privacy statement: https://www.notifications.service.gov.uk/privacy

BetterLetter

From November 2026, the practice will be using BetterLetter, an artificial intelligence-supported document management system provided by Dyad Artificial Intelligence Limited, to assist with processing clinical correspondence received from hospitals and other healthcare providers.

BetterLetter reviews correspondence and suggests relevant information such as

diagnoses, medication changes, clinical codes and actions for the practice.

BetterLetter does not make decisions about your care. All correspondence and suggested information are checked and approved by a trained member of the Topsham Surgery team before being filed in your medical record. No correspondence is automatically filed without human review (by the practice staff).
We use the BetterLetter software only and do not use its outsourced coding service. Dyad Artificial Intelligence Limited processes patient information on behalf of the practice and in accordance with our instructions. More information is available at: www.betterletter.ai/patients.

Patients can opt out of BetterLetter processing their correspondence by emailing **dpo@betterletter.ai** and asking to be added to the exclusion list. Correspondence will then be returned to the practice for manual processing.

LineIn

From November 2026, the practice will use LineIn to provide additional telephone call-handling and care-navigation support. Initially, LineIn staff will answer calls on behalf of Topsham Surgery between 8.30am and 1.30pm, Monday to Friday, although these hours may change according to patient demand and the needs of the practice.

LineIn staff will work as part of the practice team and follow our procedures and care-navigation arrangements. They may book, change or cancel appointments, record the reason for a call, create tasks or messages for practice staff, deal with certain routine prescription and test-result enquiries and make outbound calls where required. They will not make clinical decisions, and enquiries outside their agreed role will be referred to an appropriate member of the Topsham Surgery team.

Authorised LineIn staff will have secure access to SystmOne where this is necessary to deal with patient enquiries. LineIn processes patient information on behalf of the practice and in accordance with our instructions. Access is controlled and auditable, and information is accessed within an approved secure environment (GP in the Cloud) rather than stored on a call handler's local device. We are using human call handlers only and will not be using LineIn's Voice AI service.

Calls will continue to be recorded using the practice's existing telephone system. Further information is available at: www.linein.co.uk/privacy-compliance.

Accurx Patient Triage and Smart Triage Questions (STQ)

We use Accurx Patient Triage to allow patients to submit clinical and administrative requests online. Information you provide may include details about your health,

administrative requests, free-text information, supporting documents and photographs.

As part of this service, Accurx may use a feature called Smart Triage Questions (STQ). This feature uses artificial intelligence (AI) technology to generate additional follow-up questions based on the information entered in your request. The purpose of these questions is to collect further relevant information to support the practice in reviewing your request.

To generate these additional questions, the system uses information you provide within your request together with your date of birth and sex. The AI does not access your GP medical record, previous consultations, medication history or test results when generating questions.

The AI functionality does not diagnose conditions, assess urgency, recommend treatment or make decisions about your care. All requests are reviewed by appropriately trained practice staff, and all clinical decisions remain the responsibility of healthcare professionals.

Patients are informed when Smart Triage Questions are being used and may choose to continue with a standard triage request instead. Participation in Smart Triage Questions is optional.

Information submitted through Smart Triage Questions is not used to train or improve the underlying AI model.

If you do not wish to use online triage services or Smart Triage Questions, you may continue to contact the practice via alternative routes, including telephone or in person where appropriate.

How long do we hold your data?

We only hold your data for as long as necessary and are required to hold your data in line with the NHS Records Management Code of Practice 2023 Retention Schedule. Further information can be found online at:

https://transform.england.nhs.uk/information-governance/guidance/records-management-code/

What rights do you have?

You have various rights under the UK GDPR and Data Protection Act 2018:

Right of access:

You have the right to request access to view or request copies of the personal data, we hold about you; this is known as a Subject Access Request (SAR). In order to request access, you should: contact the practice either by phone, in person or via email topshamadmin@nhs.net

Please note that you are entitled to a copy of your data that we hold free of charge; however, we are entitled to charge in certain circumstances where the law permits us to do so. We are also entitled to refuse a request, where the law permits us to do so. If we require a fee or are unable to comply with your request, we will notify you within 1 calendar month of your request.

Right to restrict or object the use of your information:

There are certain circumstances in which you can object from your data being shared. Information regarding your rights to opt-out is detailed below:

Consent:

If the practice is relying on the consent as the basis for processing your data, you have the right to withdraw your consent at any time. Once you have withdrawn your consent, we will stop processing your data for this purpose.
However, this will only apply in circumstances on which we rely on your consent to use your personal data. Please be aware that if you do withdraw your consent, we may not be able to provide certain services to you. If this is the case, we will let you know.

Summary Care Record:

The SCR improves care; however, if you do not want one, you have the right to object to sharing your data or to restrict access to specific elements of your records. This will mean that the information recorded by the practice will not be visible at any other care setting.
If you wish to discuss your options regarding the SCR, please speak to a member of staff at the practice. You can also reinstate your consent at any time by giving your permission to override your previous dissent.

National Screening Programmes:

If you do not wish to receive an invitation to the screening programmes, you can opt out at https://www.gov.uk/government/publications/opting-out-of-the-nhs-population-screening-programmes or speak to the practice.

Type 1 Opt-out:

You have the right to object to your confidential patient data being shared for purposes beyond your direct care by asking the practice to apply a Type 1 opt-out to your medical records. 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 contact the Practice Manager on topshamadmin@nhs.net

National Data Opt-out:

You have the right to object to your data 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 data that identifies you being used or shared for medical research purposes and quality checking or audit purposes.

To opt-out of your identifiable data 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

National Disease Registration Service

The National Disease Registration Service (NDRS) is run by NHS England and collects patient data on cancer, congenital anomalies and rare diseases, and provides analysis to support clinical teams, academics, charities and policy makers to help plan and improve treatments and healthcare in England.

Further information regarding the registry and your right to opt-out can be found at:
https://digital.nhs.uk/services/national-disease-registration-service

Right to rectification:

You have the right to have any errors or mistakes corrected within your medical records. This applies to matters of fact, not opinion. If the information is of clinical nature, this will need to be reviewed and investigated by the practice. If you wish to have your records amended, please contact the Practice Manager on topshamadmin@nhs.net.

If your personal information changes, such as your contact address or number, you should notify the practice immediately so that we can update the information on our system. We will also ask you from time to time to confirm the information we hold for you, is correct.

Right to erasure:

The practice is not aware of any circumstances in which you will have the right to delete correct data from your medical record, which the practice is legally bound to retain. Although you are free to obtain your own legal advice if you believe there is no lawful purpose for which we hold the data and contact the practice if you hold a different view.

Right to complain:
Please let us know if you wish to discuss how we have used your personal data, raise a concern, make a complaint or compliment. You can contact us at contact the Practice Manager on topshamadmin@nhs.net.

Following this, if you are still unhappy with how we have used your data, you can then complain to the ICO.

If you wish to complain to the ICO follow this link: **https://ico.org.uk/global/contact-us/** or call the helpline on **0303 123 1113.**

Data outside EEA

We do not send your personal data outside of the EEA. However, if this is required, the practice would only do so, with your explicit consent.

Data Protection Officer

The Data Protection Officer for the practice is Bex Lovewell and can be contacted via email on d-icb.deltdpo@nhs.net or by post: Delt Shared Services Limited, BUILDING 2 – Delt, Derriford Business Park, Plymouth, PL6 5QZ.

Cookies

The practice's 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 access 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 our website. The two types of cookies used by the practice are 'Session' and 'Persistent' cookies.

Some cookies are temporary and disappear when you close your web browser, others may remain on your computer for a set period. 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 http://www.allaboutcookies.org/ If you are concerned about cookies and would like to discuss this, please contact the Practice Manager on topshamadmin@nhs.net.

Changes to privacy notice

The practice reviews this privacy notice regularly and may amend the notice from time to time. If you wish to discuss any elements of this privacy notice, please contact the Practice Manager on topshamadmin@nhs.net.