BARTLETT GROUP PRACTICE

FAIR PROCESSING (PRIVACY) NOTICE

Fair Processing & Privacy Notice (Patient Information)

Last updated: June 2026

Your Personal Information – What You Need to Know

Bartlett Group Practice (BGP) is committed to protecting your privacy and keeping your personal information secure. This notice explains:

- What information we collect about you
- How and why we use it
- Who we share it with
- How long we keep it
- Your rights

We process your personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, ensuring that your information is handled fairly, lawfully and transparently.

Who We Are

Bartlett Group Practice is the Data Controller responsible for your personal data.

Contact details:
Address: Bartlett Group Practice, Frimley Green Medical Centre, Beech Road, Frimley Green, Camberley, GU16 6QQ
Phone: 01252 317551
Email: frimleyicb.bartlettgp.admin@nhs.net

Data Protection Officer (DPO):
Our DPO is: Laura Taw (External to BGP)
Email: GP-IGEnquiries.scwcsu@nhs.net

Your information, what you need to know

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

We use:

- Secure NHS-approved IT systems
- Access controls (only authorised staff can view records)
- Confidentiality training for all staff

All NHS staff have a legal duty to keep your information confidential.

Why we collect information about you

We use your information to:

1. Provide Direct Care

- Diagnose and treat you
- Arrange appointments and referrals
- Coordinate care with other NHS providers

2. Manage and Improve Services

- Audit and monitor quality of care
- Train staff and improve services
- Plan services for future patient needs

3. Legal and Regulatory Requirements

- Comply with NHS and legal obligations
- Support public health and safeguarding

4. Research and Planning

- Contribute to NHS research (where appropriate)
- Support planning and population health management

GP practices are required to maintain accurate medical records to ensure safe and effective care.

Our Commitment to Data Privacy and Confidentiality Issues

As a GP practice, all of our GPs, staff and associated practitioners are committed to protecting your privacy. We only process your personal data in accordance with applicable data protection laws.

This includes the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, which require that personal data is processed lawfully, fairly and transparently, and only where there is a valid legal basis for doing so.

We also comply with other laws and guidance relating to privacy and confidentiality, including:

- The Human Rights Act 1998
- The Health and Social Care Act 2012 (as amended)
- The common law duty of confidentiality
- The Privacy and Electronic Communications Regulations (PECR)

These frameworks ensure that your personal information is handled securely, confidentially, and only shared where appropriate and necessary.

What Information We Collect About You

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

- Personal Data – means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

- Special Categories of Personal Data – this term describes personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

- Confidential Patient Information – this term describes information or data relating to their health and other matters disclosed to another (e.g. patient to clinician) in circumstances where it is reasonable to expect that the information will be held in confidence. Including both information 'given in confidence' and 'that which is owed a duty of confidence'. As described in the Confidentiality: NHS code of Practice: Department of Health guidance on confidentiality 2003.

- Pseudonymised – The process of distinguishing individuals in a dataset by using a unique identifier which does not reveal their 'real world' identity.

- Anonymised – Data in a form that does not identify individuals and where identification through its combination with other data is not likely to take place

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

We may receive your information directly from you, or from other organisations involved in your care (e.g. hospitals, community services, or social care providers).

How we use your information

Improvements in information technology are also making it possible for us to share data with other healthcare organisations for the purpose of providing you, your family and your community with better care. For example, it is possible for healthcare professionals in other services to access your record with or without your permission when the practice is closed. Where your record is accessed without your permission it is necessary for them to have a legitimate basis in law. This is explained further in the Local Information Sharing at Appendix A.

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

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

- improving the quality and standards of care provided by the service
- research into the development of new treatments and care pathways

- preventing illness and diseases
- monitoring safety
- planning services
- risk stratification
- Population Health Management

Who We Share Your Information With

We only share information when necessary, legally required, or in your best interests.
We may share your data with:

- NHS hospitals and community services
- Integrated Care Boards (ICBs)
- NHS England / NHS Digital
- Social care services
- Other GP practices (when you register or move)
- Approved IT system providers (data processors)

All organisations we share data with are required to keep your information secure and confidential. Sharing information supports safe and effective care across the NHS.

Your data may also be used for:

- GP Data for Planning and Research (GPDPR)
- Population health management
- Risk stratification

Where possible, data is anonymised.

You can opt out of your data being used for purposes beyond your direct care via the National Data Opt-Out.

Our Lawful Basis for Processing

Under UK GDPR, we process your data using:

- **Article 6 (1)(e)** – Public task (providing healthcare)
- **Article 9 (2)(h)** – Health and social care purposes

Where applicable, we may rely on:

- Consent (e.g. research participation)
- Legal obligation

How We Use Modern Technology (Including AI)

We use digital systems to improve access and care, including:

- Online consultation tools
- Electronic patient record systems (e.g. EMIS)
- Secure messaging systems (e.g. NHS App, SMS reminders)
- Telephone and digital triage systems, including AI-supported or automated tools

These systems may:

- Record or process information you provide
- Assist staff in triaging or responding to requests

All decisions affecting your care are reviewed by appropriate healthcare professionals. We do not rely solely on automated decision-making.

Safeguarding of children or vulnerable adults

If we have significant concerns or hear about an individual child or vulnerable adult being at risk of harm, we may share relevant information with other organisations, such as local authorities and the Police, involved in ensuring their safety.

Statutory disclosures

Sometimes we are duty bound by laws to disclose information to organisations such as the Care Quality Commission, the Driver and Vehicle Licencing Agency, the General Medical Council, Her Majesty's Revenue and Customs and Counter Fraud services. In these circumstances we will always try to inform you before we are required to disclose and we only disclose the minimum information that the law requires us to do so

This may only take place when there is a clear legal basis to use this information. All these uses help to provide better health and care for you, your family and future generations. Confidential patient information about your health and care is only used like this where allowed by law or with consent.

Pseudonymised or anonymised data is generally used for research and planning so that you cannot be identified.

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

How long do we hold information for?

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

Individuals Rights under UK GDPR

Under UK GDPR 2016 the Law provides the following rights for individuals. The NHS upholds these rights in a number of ways:

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

Your right to opt out of data sharing and processing

The NHS Constitution states, 'You have a right to request that your personal and confidential information is not used beyond your own care and treatment and to have your objections considered'.

Type 1 Opt-Out (GP Practice Level)
A Type 1 Opt-Out allows you to prevent your confidential patient information from being shared outside of this GP practice for purposes beyond your direct care.

This means your information will not be used for planning or research purposes, except in specific circumstances where sharing is required by law, such as:

- Public health emergencies (e.g. pandemics)
- National screening programmes
- Legal obligations

If you wish to apply a Type 1 Opt-Out, please contact the Practice Manager. We will record your preference on your GP record.

National Data Opt-Out (NDOO)
The National Data Opt-Out allows you to choose whether your confidential patient information is used for research and planning purposes across the wider NHS.

This was introduced on 25 May 2018, following recommendations from the National Data Guardian. It replaces the previous "Type 2" opt-out. If you previously registered a Type 2 opt-out before 11 October 2018, it will have been automatically converted to a National Data Opt-Out.

How to Set or Change Your Choice

To find out more or to register or manage your choice, please visit:
www.nhs.uk/your-nhs-data-matters

On this website you can:

- Learn what is meant by confidential patient information
- See how your data is used for both individual care and wider purposes
- Understand the benefits of sharing data
- Find out who may use your data

- Learn how your information is protected
- Set, view, or change your opt-out preference
- Access contact details if you prefer to manage your choice by phone
- Understand situations where your opt-out will not apply

Right of Access to your information (Subject Access Request)

Under Data Protection Legislation, you have the right to request access to, or a copy of, the personal information we hold about you. This is known as a Subject Access Request (SAR) and includes access to your medical records.

You do not need to provide a reason for your request. Requests can be made verbally or in writing. To help us process your request accurately and efficiently, we may ask you to complete a request form.

We aim to provide access to your information within the required statutory timeframe. However, there are certain circumstances where some information may be withheld or redacted. This includes where:

- Disclosure may be likely to cause serious harm to your physical or mental health, or that of another individual
- The information relates to a third party who has not consented to the disclosure and where it is reasonable to withhold that information

To protect your confidentiality, you will be required to provide proof of identity before information is released. We will not disclose your information to anyone else without your explicit consent, unless we are legally required to do so or provided with appropriate legal authority.

The first copy of your information will be provided free of charge. Where multiple copies are requested, we may charge a reasonable administrative fee.

In most cases, we will respond to your request within one calendar month of receiving sufficient information to process it.

Online Access to Your Records

You may also choose to access your GP record online via the NHS App or the practice's online services.

If you would like to register for online access, please contact the practice.

Further information about how your data is processed through the NHS App is available via NHS England's privacy notice.

Change of Details

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

Mobile Telephone Number & Emails

If you provide us with your mobile phone number or email, we will use this to send you reminders about your appointments or other health related information. It is within our legal duty as a public authority to keep our patients updated with important information.

We also use the NHS Account Messaging Service provided by NHS England to send you messages relating to your health and care. You need to be an NHS App user to receive these messages. Further information about the service can be found at the **privacy notice for the NHS App** managed by NHS England.

If you do not wish to receive communications by text or email, please let us know.

Notification

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

We are registered as a Data Controller and our registration can be viewed online in the public register at: http://ico.org.uk/what_we_cover/register_of_data_controllers

Any changes to this notice will be published on our website and in a prominent area at the Practice.

Data Protection Officer

Should you have any data protection questions or concerns, please contact our Data Protection Officer.

Our DPO is: Laura Taw (External to BGP)
Email: GP-IGEnquiries.scwcsu@nhs.net

What is the right to know?

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

Right to Complain

If you have concerns or are unhappy about any of our services, please contact the Practice Manager via our email: frimleyicb.bgpfgpatientservicemanager@nhs.net Or via the ICO details listed below.

For independent advice about data protection, privacy, and data-sharing issues, you can contact:

The Information Commissioner
Wycliffe House, Water Lane, Wilmslow, Cheshire

SK9 5AF

Phone: 0303 123 1113 Website: https://ico.org.uk

The NHS Constitution

The NHS Constitution establishes the principles and values of the NHS in England. It sets out the rights patients, the public and staff are entitled to. These rights cover how patients access health services, the quality of care you'll receive, the treatments and programs available to you, confidentiality, information, and your right to complain if things go wrong.
The NHS Constitution for England - GOV.UK (www.gov.uk)

Document Control

This document was created by NHS South Central and West Commissioning Support Unit (SCW) and as such the Intellectual Property Rights of this document belong to SCW.

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Privacy Notice *Primary Care template*	4.0	Published	Bartlett Group Practice
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Change record

Date	Author	Version	Page	Reason for Change
21.07.2020	SCW	2	All	Review for Website publication
25.08.2021	SCW	3	All	Review for Website publication, minor changes made to links and addition of covid and online access.
24.12.2021	SCW	3.1	5 & 7	NHS Care Record guarantee link and Document control page updated
31.05.2022	SCW	3.2	All	Reviewed
28.09.22	SCW	3.3	5	NHS Care Record Guarantee & NHS Constitution removed as per NHSE guidance
30.11.22	SCW	3.4	6	NHS Constitution - new link provided by NHSE
23.08.23	SCW	3.5	5	Addition of NHS Account Messaging service
29.09.2023	SCW	3.6	All	Final review
27.10.2023	SCW	3.6	4	Reviewed and updated link for NHS APP Privacy notices

10/06/2026	BGP	4.0	All	Review and updated including AI and digital systems.