

<b>OAKLEY HEALTH GROUP</b>	
<b>EMIS WEB DATA STREAMING POLICY</b>	
<b>REVIEW DATE:</b>	<b>25.05.18</b>
<b>REVIEWED BY:</b>	<b>Dr Neil Bhatia</b>
<b>NEXT REVIEW:</b>	<b>01.01.19</b>

## **Background**

1. In February 2016, NEHFCCG announced the commissioning of Healthcare Gateway's MIG data streaming facility for both A&E at Frimley Park Hospital and for Frimley Primary Care Service (NHUC) GP OOH centre.
2. This will enable both those organisations to access the detailed GP record of a patient, with their contemporaneous and explicit consent, attending when the surgery is closed.
3. The MIG is a read-only, "view" only, data streaming product – no information from the GP record is extracted, uploaded or "sent" anywhere, in contrast to the SCR, the HHR, and other secondary uses (e.g. risk stratification and the national audits).
4. The MIG processes information for direct clinical care, and so for *primary* purposes only.
5. This policy will ensure compliance with the EU GDPR and the DPA 2018.

## **Provision of fair processing information**

6. The practice will provide information about the MIG and make that information widely accessible. We will make full use of the technology available to us to promote transparency and fairness as regards our approach.
7. The practice will make the information available in as many ways as possible, including:
  - a. Posters in our lobby and waiting room
  - b. Factsheets available from the lobby, from reception and from the waiting room
  - c. Our practice website, where factsheets & opt-out forms, and this policy, will be downloadable
  - d. Our practice booklet
  - e. Practice newsletters
  - f. Leaflets given to newly-registering patients
  - g. Links to other sources of information

#### h. Amendments to our confidentiality policy

The factsheet will provide detailed information to patients about our policy, in line with the guidance produced by the ICO in their "Privacy notices code of practice" booklet, as well as links to further information and contact details if they have further questions.

8. The practice will strive to ensure that patients understand the differences between the MIG and other NHS data sharing schemes, such as the SCR, the HHR, and other secondary uses of information.

#### **Patients who wish to opt-out (object)**

9. Patients have the right to prevent their personal confidential information from being shared outside of the GP surgery for primary purposes - and that includes via the MIG.
10. Patients can opt-out of the MIG via the form, in person, or by fax/letter/e-mail.
11. It will be made clear to patients, in the factsheet, that opting out of the MIG automatically opts them out of the HHR (as they share a common exemption code, 93C1).
12. However, patients who wish to opt out of the HHR, or are already opted out of the HHR, will have that objection recorded by means of the 9Nd1 read code, which will *not* automatically disable the MIG.
13. Patients will be made aware that the National Data Opt Out (effectively the Type 2 9Nu4 objection) will not opt them out of the MIG.

#### **Assistance for patients**

14. Patients who wish for more information can contact Dr Neil Bhatia (Caldicott Guardian) by email or telephone.
15. Limiting the information shared via the MIG, by means of a confidentiality policy, should (in most cases) be a joint decision, made by the patient in conjunction with their GP.
16. Dr Neil Bhatia is the practice's nominated "MIG Expert".

#### **Ongoing maintenance of the policy**

17. Dr Neil Bhatia will be responsible for ensuring that the policy is maintained accordingly. EMIS Web data sharing will need to be disabled for all patients who opt-out and Dr Bhatia will be responsible for this.

## **Freedom of information**

18. This policy will be available if requested under the FOI Act.
19. This policy will be downloadable from our website.