

<b>OAKLEY HEALTH GROUP</b>	
<b>SUMMARY CARE RECORD 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>01.04.19</b>

## **Background**

1. Oakley Health Group uploads personal confidential information to the Summary Care Record (SCR), which is a contractual obligation.
2. The SCR processes information for *primary* purposes only. There are no secondary uses of the uploaded data.
3. This policy will ensure compliance with the EU GDPR and the DPA 2018.

## **Provision of fair processing information**

4. The practice will provide information about the SCR 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.
5. 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 the 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.

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

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

7. 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 SCR.
8. Patients can opt-out of the SCR via the form, in person, or by fax/letter/e-mail.
9. Patients will be made aware that the National Data Opt Out (effectively the Type 2 9Nu4 objection) will not opt them out of the SCR.

### ***The SCR and the HHR***

10. It is the current policy of EMIS Web to automatically prevent extraction and uploading of data to the HHR in the presence of the SCR opt-out code (9Ndo), irrespective of how Graphnet handles the presence of that code.
11. Patients will be made aware that opting out of the SCR also opts them out of the HHR.

### **Assistance for patients**

12. Patients who wish for more information can contact Dr Neil Bhatia (Caldicott Guardian) by email or telephone.
13. The decision to have an "enriched" SCR created must be a joint decision, made by the patient in conjunction with their GP. The patient's explicit consent is required before this can happen.
14. The surgery will make information available to patients about the implications of an "enriched" SCR (by means of a handout, publicly available at <http://s691044752.websitehome.co.uk/SCR/enriched/EWPATFS.pdf> ).
15. Dr Neil Bhatia is the practice's nominated "SCR expert".

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

16. Dr Neil Bhatia will be responsible for ensuring that the policy is maintained accordingly.

### **Freedom of information**

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