

RISK STRATIFICATION AND OAKLEY HEALTH GROUP (Your GP records)

From January 2019, Oakley Health Group will (once again) allow extraction and uploading of information extracted from GP records for the purposes of risk stratification for case finding. This leaflet explains what risk stratification is, and how you can opt-out of such a secondary use of your personal confidential data, should you wish to.

Risk stratification is a process that uses personal data from health care services to determine which people are at high risk of experiencing certain outcomes, such as unplanned/emergency hospital admissions. Those patients can then be offered targeted preventative medical and/or social support to try to reduce those risks (this is known as '*risk stratification for case finding*'). It is regarded as "profiling" under data protection laws.

The data that will be extracted from Oakley Health Group will be uploaded to South, Central and West CSU for processing and analysis. As such, the CSU will be acting as a *data processor*. Oakley Health Group remains the *data controller* for the uploaded information.

Information from the GP records of every adult (18yrs+) patient of the surgery (including diagnoses, operations, medication and allergies) are uploaded and combined by the CSU with information extracted from hospital records (unless the individual has opted out).

Any results of such analysis are only ever made available to members of the primary care team working at the surgery.

Risk stratification is a "secondary use" of personal data, that is for purposes *other than your direct medical care*, and as such:

- 1) The legal basis for this data extraction is section 251 of the NHS Act 2006, which allows extraction of this data without explicit patient consent – in other words, *we are not required to ask for your permission first*
- 2) GP surgeries are required by law to make fair processing information available to patients about risk stratification (such as this leaflet)

3) Patients have the right to object to this use of their data (i.e. to *opt-out*). This will not affect your entitlement to medical care in any way, either from the surgery or from any hospital.

You can opt-out of all secondary uses of your GP information, including risk stratification, by filling in our opt-out form at the back of this leaflet (and which you can also find in our “Your Medical Records” booklet).

If you have already opted out of secondary uses (e.g. if you had opted out of *care.data*), or have opted out of the Hampshire Health Record, or have opted out of EMIS Web data streaming, then your data will automatically be prohibited from extraction and uploading for risk stratification purposes. You do not need to opt-out again (though you can if you so wish).

More information about risk stratification can be found via NHS England:

<https://www.england.nhs.uk/ourwork/tsd/ig/risk-stratification>

Opting out of this scheme will ensure that any data about you that has already been uploaded will be deleted.

In line with GDPR requirements, Oakley Health Group undertook a data protection impact assessment (DPIA), which can be downloaded [from our website](#).

In addition, our [data processor agreement](#) with the CSU, and our [information sharing agreement](#) between the joint data controllers (the surgery and the CCG) can also be downloaded from our website.

Our GDPR privacy notice is also [available to download](#).

What will opting out of risk stratification mean?

A Type 1 secondary use objection will in no way affect how healthcare professionals provide you with direct medical care or prevent them from accessing your medical record if and when appropriate, and with your explicit consent.

Secondary uses are not about information sharing between healthcare professionals. No healthcare professional outside of the surgery has access to the analysis of your information (or indeed, the information itself).

Risk stratification (in this way) is just *one* tool that GP surgeries can use to try to identify patients at risk or in need of additional and targeted medical and social care support. We are able to identify patients in potential need of additional support in a multitude of ways.

So, if you opt out, we won't be able to use the risk stratification tool on your medical information. However, we can continue to use any of the other many ways to help us identify if you might benefit from additional medical or social input.

More information about Type 1 secondary use objections can be found in our dedicated factsheet, [downloadable from our website](#).

If you would like any further information about primary or secondary uses of your GP record, opting out, the NHS Databases, access to your medical record, confidentiality, or about any other aspect of NHS data sharing or your medical records, then please do contact the surgery's Caldicott Guardian/Information Governance lead/Data Protection Officer:

Dr Neil Bhatia

Neil.Bhatia@nhs.net

OPT OUT FORM – MEDICAL RECORDS

Dear Oakley Health Group,

I do not wish to allow my medical records to be used for any purpose other than my medical care.

Please ensure my dissent to secondary uses is recorded by whatever means possible, which includes adding the following code to my GP record:

- Uploading information from my GP record

Type 1 objection: 9Nu0/XaZ89

I understand that I can opt back in to any or all of these at any time in the future.

Name:

Signature:

DOB:

Your name/signature & relationship if applying on behalf of another person (e.g. parent/legal guardian):

Please hand this form into reception, or post/fax it to the surgery
or email it to Dr Neil Bhatia (Neil.Bhatia@nhs.net)