PATIENT PRIVACY NOTICE

How We Use Your Personal Information

1. Introduction – Your Information

We are committed to protecting your privacy and maintaining the confidentiality and security of your personal information.

This privacy notice explains how we collect, use, store and share your personal information when you receive care or services from our practice.

It also explains your rights under data protection legislation and how you can access your medical records or raise concerns about the way your information is handled.

2. Why We Collect Information About You

To provide you with safe and effective healthcare, we need to maintain accurate records about you, your health and the care and treatment we provide or arrange.

We hold information electronically and, where necessary, in paper records. These records help us to:

- Provide appropriate healthcare, diagnosis and treatment.
- Ensure healthcare professionals involved in your care have access to relevant and accurate information.
- Arrange appointments, investigations, referrals and follow-up care.
- Invite you for routine treatment, including immunisations, screening and long-term condition reviews.
- Monitor and improve the quality and safety of the services we provide.
- Meet our legal, regulatory and contractual responsibilities.
- Support the effective management and planning of NHS services.

3. What Information Do We Hold About You?

The information we hold may include:

- Personal details such as your name, address, date of birth, telephone number and next of kin.
- NHS number and other identification details.
- Details of consultations, appointments and communications with the practice.
- Medical history, diagnoses, symptoms and clinical observations.
- Details of medication, prescriptions, allergies and treatment.
- Results of blood tests, X-rays, scans and other investigations.
- Referral letters, hospital correspondence and reports from other healthcare professionals.
- Information about your physical and mental health.

- Relevant information provided by family members, carers or other professionals involved in your care.
- Information relating to safeguarding, where appropriate.

4. Where Does Your Information Come From?

Most of the information we hold is provided directly by you or someone acting on your behalf.

We may also receive information from other sources, including:

- Other GP practices.
- NHS hospitals and specialist services.
- Community healthcare teams and nursing services.
- Community pharmacies.
- Ambulance and emergency services.
- Social services and safeguarding organisations.
- Other healthcare professionals involved in your treatment.

This information helps us maintain an accurate medical record and provide coordinated care.

5. How Do We Use Your Information and What Is Our Lawful Basis?

We process your personal information in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other applicable legislation.

We do not generally rely on your consent as the lawful basis for processing information required to provide routine healthcare. Instead, we rely on the legal grounds available to healthcare providers.

These include:

For your personal information:

- Article 6(1)(e) – processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority.

For your health information (special category data):

- Article 9(2)(h) – processing necessary for medical diagnosis, the provision of healthcare or treatment, or the management of health and social care services.
- Data Protection Act 2018, Schedule 1, Part 1, Paragraph 2, which provides the relevant condition for healthcare processing.

Other lawful bases may apply to particular activities, such as meeting legal obligations or protecting public health.

We only process information where there is an appropriate legal basis and where it is necessary for the purpose concerned.

You have certain rights regarding how your information is used, including the right to object to particular types of processing. However, this does not mean that all processing necessary for your healthcare can be stopped. If you have concerns, please speak to the Practice Manager.

6. Who May We Share Your Information With?

Your information may need to be shared with other organisations and healthcare professionals involved in your care, to ensure you receive appropriate and coordinated treatment.

These may include:

- Other GP practices and NHS hospitals.
- Cwm Taf Morgannwg University Health Board.
- Community nurses and other community healthcare services.
- Out-of-hours and urgent care providers.
- Ambulance services.
- Community pharmacies.
- Social services and safeguarding organisations.
- NHS Wales and other authorised NHS bodies.
- Organisations providing clinical systems, IT and administrative support to the practice.
- Regulatory bodies and organisations undertaking authorised clinical audits or investigations.

Information may also be shared where required by law, for safeguarding purposes, or to protect individuals or the wider public.

We will ensure that:

- Only relevant information necessary for the purpose is shared.
- Information is shared securely and appropriately.
- Organisations receiving information are subject to appropriate confidentiality and data protection requirements.
- Information is not disclosed without an appropriate legal basis.

7. Confidentiality and Information Security

Everyone working within the practice has a legal and professional duty to maintain the confidentiality of patient information.

We take appropriate technical and organisational measures to protect your information against unauthorised access, loss, misuse, alteration or disclosure.

Access to patient records is restricted to authorised individuals who need the information to carry out their duties.

We regularly review our information security arrangements to help ensure your information remains safe and secure.

8. Use of Artificial Intelligence (AI) in Clinical Consultations - Lexacom Ambient AI

The practice uses Lexacom Ambient AI technology to assist healthcare professionals with documenting patient consultations.

The technology captures audio during a consultation and converts spoken conversations into written text. This information is then used to generate draft clinical notes, summaries or other clinical documents, helping to reduce administrative work and allowing clinicians to concentrate more fully on patients.

How your information is processed

- Audio is captured through a microphone while the technology is in use.
- The audio is converted into a written transcript.
- Lexacom's Patient Shield technology automatically redacts personally identifiable information from the transcript before it is passed to the AI processing stage.
- The AI technology uses the processed information to generate draft clinical notes or documents.
- The clinician reviews, edits and approves the final information before it is added to your medical record.

Storage and retention
The original transcription and any AI-generated drafts are available within the Lexacom session while the clinician is working on the consultation.

Once the clinician has completed the process and selects the ‘Clear Session’ function, Lexacom's published guidance states that the original transcription, processed transcription and patient details are no longer retained within that session.

The final approved clinical notes are transferred into your electronic medical record and retained in accordance with NHS Wales records management requirements.

Your choice
You will be informed before Lexacom Ambient AI is used during your consultation. You can choose not to use this technology, and your consultation will continue without it. You can also ask for it to be stopped at any point.

The technology is used solely to assist with clinical documentation. It does not diagnose conditions or make decisions about your healthcare. Your healthcare professional remains responsible for reviewing and approving all clinical documentation.

Lexacom's published information states that patient identifiable information is redacted before AI processing and that consultation information is not used to train its AI systems. If you have any questions or concerns about the use of this technology, please speak to your healthcare professional or the Practice Manager.

9. Use of Information for Research and Planning

Your information may sometimes be used to support approved medical research, clinical audit, service evaluation and NHS planning.
Where information is used for these purposes, appropriate confidentiality safeguards and legal requirements will be followed.

Where identifiable information is required, this will only take place where there is an appropriate legal basis and the necessary permissions or safeguards are in place.

10. How Long Do We Keep Your Information?

We retain patient records in accordance with the NHS Wales Records Management Code of Practice and applicable retention requirements.

Different types of records are subject to different retention periods.

When information is no longer required, it will be securely destroyed or disposed of in accordance with the relevant guidance.

11. Your Rights Under Data Protection Law

You have a number of rights regarding the personal information we hold about you. These include:

The right to be informed
You have the right to understand how and why we collect and use your personal information. This privacy notice explains these arrangements.

The right of access
You can request a copy of the personal information we hold about you, including your medical records.

The right to rectification
You can ask us to correct information that you believe is inaccurate or incomplete. However, clinical opinions and professional judgements will not necessarily be removed or changed simply because you disagree with them. You may ask for your disagreement to be recorded.

The right to erasure
In certain circumstances, you can request that your personal information is erased. This right is not absolute, and we may be legally required to retain medical records.

The right to restrict processing
In certain circumstances, you can ask us to restrict how your information is used.

The right to object
You have the right to object to certain types of processing of your personal information. Whether we can comply will depend on the legal basis for processing and the circumstances involved.

The right to data portability
In certain circumstances, you may request that information is provided to you or transferred to another organisation in a structured, commonly used and machine-readable format.

The right to withdraw consent
Where we rely on your consent for a particular use of your information, you can withdraw that consent at any time. This does not affect processing that has already taken place lawfully.

Not all rights apply in every circumstance, and some are subject to legal exemptions.

12. Accessing Your Medical Records
You have the right to request access to your personal information and medical records under data protection legislation.

Requests are commonly known as Subject Access Requests (SARs).

You can make a request by contacting the practice or following the Subject Access Request guidance available on our website under Patient Information.

We will normally respond within one calendar month of receiving a valid request, although this period may be extended in certain circumstances in accordance with data protection legislation.

There are some circumstances where information may be withheld or redacted, for example where disclosure would adversely affect the rights of another person or where a legal exemption applies.

For further information, please contact:
Matthew Haynes
Practice Manager
North Cornelly Surgery
Heol Fach
North Cornelly
CF33 4LD

13. Information We Are Required to Provide

Providing certain personal information may be necessary for us to register you, provide healthcare or meet our legal obligations.

If you choose not to provide information that is necessary for your care, this may affect our ability to provide certain services or make appropriate clinical decisions. We will explain this where relevant.

14. Data Protection Officer
The practice is supported by a Data Protection Officer (DPO), who provides advice and guidance on data protection and information governance matters.

If you have questions about how your information is used or wish to raise a data protection concern, you can contact:
Data Protection Officer: Matthew Hayes
Contact details: North Cornelly Surgery, 01656 740345, Practice.mANA

15. Complaints and Further Information
If you have any concerns about how your personal information is collected, stored or used, please contact the Practice Manager in the first instance.
If you remain dissatisfied, you have the right to raise a complaint with the Information Commissioner's Office (ICO), which is the UK's independent authority responsible for upholding information rights.

Information Commissioner's Office (ICO)
Website: https://ico.org.uk/
Telephone: 0303 123 1113
Address: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

16. Review of This Privacy Notice

This privacy notice will be reviewed regularly and updated when necessary to reflect changes in legislation, guidance, practice procedures or the way we use personal information.