

# Gudge Heath Lane Surgery

## Privacy Notice

We understand how important it is to keep your personal information safe and secure and we take this very seriously. We have taken steps to make sure your personal information is looked after in the best possible way and we review this regularly.

Please read this privacy notice ('Privacy Notice') carefully, as it contains important information about how we use the personal and healthcare information we collect on your behalf.

### **1. WHY WE ARE PROVIDING THIS PRIVACY NOTICE**

We are required to provide you with this Privacy Notice by Law. It explains how we use the personal and healthcare information we collect, store and hold about you. If you are unclear about how we process or use your personal and healthcare information, or you have any questions about this Privacy Notice or any other issue regarding your personal and healthcare information, then please do contact our **Data Protection Officer** (details below).

The Law says:

- A. We must let you know why we collect personal and healthcare information about you;
- B. We must let you know how we use any personal and/or healthcare information we hold on you;
- C. We need to inform you in respect of what we do with it;
- D. We need to tell you about who we share it with or pass it on to and why; and
- E. We need to let you know how long we can keep it for.

### **2. THE DATA PROTECTION OFFICER**

The Data Protection Officer at the Surgery is Caroline Sims. You can contact request for the Practice Manager at Gudge Heath Lane Surgery to contact them with your query on 01329 280887 if:

- You have any questions about how your information is being held;
- Or any other query relating to this Policy and your rights as a patient.

### **3. ABOUT US**

We, at the Gudge Heath Lane Surgery ('the Surgery') situated at 187 Gudge Heath Lane, Fareham, are a **Data Controller** of your information. This means we are responsible for collecting, storing and handling your personal and healthcare information when you register with us as a patient.

There may be times where we also process your information. That means we use it for a particular purpose and, therefore, on those occasions we may also be **Data Processors**. The purposes for which we use your information are set out in this Privacy Notice.

### **4. INFORMATION WE COLLECT FROM YOU**

The information we collect from you will include:

- A. Your contact details (such as your name and email address, including place of work and work contact details);
- B. Details and contact numbers of your next of kin;
- C. Your age range, gender, ethnicity;
- D. Details in relation to your medical history;
- E. The reason for your visit to the Surgery;
- F. Medical notes and details of diagnosis and consultations with our GPs and other health professionals within the Surgery involved in your direct healthcare.

## **5. INFORMATION ABOUT YOU FROM OTHERS**

We also collect personal information about you when it is sent to us from the following:

- A. a hospital, a consultant or any other medical or healthcare professional, or any other person involved with your general healthcare.
- B. Hampshire constabulary- reports and firearms applications
- C. Court orders
- D. Immigrations matters
- E. Her Majesty's Prisons

## **6. YOUR SUMMARY CARE RECORD**

Your summary care record is an electronic record of your healthcare history (and other relevant personal information) held on a national healthcare records database provided and facilitated by NHS England.

This record may be shared with other healthcare professionals and additions to this record may also be made by relevant healthcare professionals and organisations involved in your direct healthcare.

You may have the right to demand that this record is not shared with anyone who is not involved in the provision of your direct healthcare. If you wish to enquire further as to your rights in respect of not sharing information on this record then please contact our Practice Manager.

To find out more about the wider use of confidential personal information, including how your data may be used for research and future planning and to register your choice to opt out if you do not want your data to be used in this way, please visit [www.nhs.uk/my-data-choice](http://www.nhs.uk/my-data-choice).

Note if you do choose to opt out, you can still consent to your data being used for specific purposes. However, if you are happy with this use of information you do not need to do anything. You may however change your choice at any time.

## **7. WHO WE MAY PROVIDE YOUR PERSONAL INFORMATION TO, AND WHY**

Whenever you use a health or care service, such as attending Accident & Emergency or using Community Care Services, important information about you is collected to help ensure you get the best possible care and treatment. This information may be passed to other approved organisations where there is a legal basis, to help with planning services, improving care, research into developing new treatments and preventing illness. All of this helps in providing better care to you and your family and future generations. However, as explained in this privacy notice, confidential information about

your health and care is only used in this way where allowed by law and would never be used for any other purpose without your clear and explicit consent.

We may pass your personal information on to the following people or organisations, because these organisations may require your information to assist them in the provision of your direct healthcare needs. It, therefore, may be important for them to be able to access your information in order to ensure they may properly deliver their services to you:

- A. Hospital professionals (such as doctors, consultants, nurses, etc);
- B. Other GPs/Doctors;
- C. Pharmacists;
- D. Nurses and other healthcare professionals;
- E. Dentists;
- F. Any other person that is involved in providing services related to your general healthcare, including mental health professionals.

## **8. OTHER PEOPLE WHO WE PROVIDE YOUR INFORMATION TO**

- A. Commissioners; <https://www.hantsiowhealthandcare.org.uk/icb>
- B. Primary Care Network
- C. Local authorities;
- D. Community health services;
- E. For the purposes of complying with the law e.g. Police, Solicitors, Insurance Companies;
- F. Anyone you have given your consent to, to view or receive your record, or part of your record.

**Please note, if you give another person or organisation consent to access your record we will need to contact you to verify your consent before we release that record. It is important that you are clear and understand how much and what aspects of, your record you give consent to be disclosed.**

- G. **Extended Access** – we provide extended access services to our patients which means you can access medical services outside of our normal working hours. In order to provide you with this service, we have formal arrangements in place with the ICB and with other practices whereby certain key “**hub**” practices offer this service on our behalf for you as a patient to access outside of our opening hours. This means, those key “**hub**” practices will have to have access to your medical record to be able to offer you the service. Please note to ensure that those practices comply with the law and to protect the use of your information, we have very robust data sharing agreements and other clear arrangements in place to ensure your data is always protected and used for those purposes only.

The key **Hub** practice is as follows:

- Fareham and Portchester Primary Care Network Ltd (based at Centre Practice, Fareham)

- H. **Data Extraction by the Integrated Care Board** – the Integrated Care Board at times extracts medical information about you, but the information we pass to them via our computer systems **cannot identify you to them**. This information only refers to you by way of a code that only your practice can identify (it is pseudo-anonymised). This therefore protects you from anyone who may have access to this information at the ICB from **ever** identifying you as a result of seeing the medical information and we will **never** give them the information that would enable them to do this.

There are good reasons why the ICB may require this pseudo- anonymised information, these are as follows:

Audits on Enhanced services provided by the practice (i.e. child immunisations; sexual health;

leg ulcers; minor injuries; vaccinations- such as influenza, shingles and pneumococcal;

- I. This practice is supporting vital health and care planning and research by sharing your data with NHS Digital. For more information about this see the 'GP Practice Privacy Notice for General Practice Data for Planning and Research': (<https://digital.nhs.uk/data-and-information/data-collections-and-data-sets/data-collections/general-practice-data-for-planning-and-research/gp-privacy-notice>)

## **9. Fareham and Portchester Primary Care Network**

The FPPCN is a Network of four local practices (Gudge Heath Lane, Centre Practice, Westlands Medical Centre and Portchester Health Centre) who are working together to share resources, skills & experience to provide cost-effect, patient-centred healthcare for all patient in the local area.

## **10. ANONYMISED INFORMATION**

Sometimes we may provide information about you in an anonymised form. If we do so, then none of the information we provide to any other party will identify you as an individual and cannot be traced back to you.

## **11. YOUR RIGHTS AS A PATIENT**

The Law gives you certain rights to your personal and healthcare information that we hold, as set out below:

### **A. Access and Subject Access Requests**

You have the right to see what information we hold about you and to request a copy of this information.

If you would like a copy of the information we hold about you please write to the practice. We will provide this information free of charge however, we may in some **limited and exceptional** circumstances have to make an administrative charge for any extra copies if the information requested is excessive, complex or repetitive.

We have one month to reply to you and give you the information that you require. We would ask, therefore, that any requests you make are in writing and it is made clear to us what and how much information you require.

### **B. Online Access**

You may ask us if you wish to have online access to your medical record. However, there will be certain protocols that we have to follow in order to give you online access, including written consent and production of documents that prove your identity.

Please note that when we give you online access, the responsibility is yours to make sure that you keep your information safe and secure if you do not wish any third party to gain access.

### **C. Correction**

We want to make sure that your personal information is accurate and up to date. You may ask us to correct any information you think is inaccurate. It is very important that you make sure you tell us if your contact details including your mobile phone number has changed.

### **D. Removal**

You have the right to ask for your information to be removed however, if we require this information to assist us in providing you with appropriate medical services and diagnosis for your healthcare, then

removal may not be possible.

#### **E. Objection**

We cannot share your information with anyone else for a purpose that is not directly related to your health, e.g. medical research, educational purposes, etc. We would ask you for your consent in order to do this however, you have the right to request that your personal and healthcare information is not shared by the Surgery in this way. Please note the Anonymised Information section in this Privacy Notice.

#### **F. Transfer**

You have the right to request that your personal and/or healthcare information is transferred, in an electronic form (or other form), to another organisation, but we will require your clear consent to be able to do this.

### **12. THIRD PARTIES MENTIONED ON YOUR MEDICAL RECORD**

Sometimes we record information about third parties mentioned by you to us during any consultation. We are under an obligation to make sure we also protect that third party's rights as an individual and to ensure that references to them which may breach their rights to confidentiality, are removed before we send any information to any other party including yourself. Third parties can include: spouses, partners, and other family members.

### **13. HOW WE USE THE INFORMATION ABOUT YOU**

We use your personal and healthcare information in the following ways:

- A. when we need to speak to, or contact other doctors, consultants, nurses or any other medical/healthcare professional or organisation during the course of your diagnosis or treatment or on going healthcare;
- B. when we are required by Law to hand over your information to any other organisation, such as the police, by court order, solicitors, or immigration enforcement.

***We will never pass on your personal information to anyone else who does not need it, or has no right to it, unless you give us clear consent to do so.***

### **14. LEGAL JUSTIFICATION FOR COLLECTING AND USING YOUR INFORMATION**

The Law says we need a **legal basis** to handle your personal and healthcare information.

**CONTRACT:** We have a contract with NHS England to deliver healthcare services to you. This contract provides that we are under a legal obligation to ensure that we deliver medical and healthcare services to the public.

**CONSENT:** Sometimes we also rely on the fact that you give us consent to use your personal and healthcare information so that we can take care of your healthcare needs.

Please note that you have the right to withdraw consent at any time if you no longer wish to receive services from us.

**NECESSARY CARE:** Providing you with the appropriate healthcare, where necessary. The Law refers to this as 'protecting your vital interests' where you may be in a position not to be able to consent.

**LAW:** Sometimes the Law obliges us to provide your information to an organisation (see above).

### **15. SPECIAL CATEGORIES**

The Law states that personal information about your health falls into a special category of information

because it is very sensitive. Reasons that may entitle us to use and process your information may be as follows:

**PUBLIC INTEREST:** Where we may need to handle your personal information when it is considered to be in the public interest. For example, when there is an outbreak of a specific disease and we need to contact you for treatment, or we need to pass your information to relevant organisations to ensure you receive advice and/or treatment;

**CONSENT:** When you have given us consent;

**VITAL INTEREST:** If you are incapable of giving consent, and we have to use your information to protect your vital interests (e.g. if you have had an accident and you need emergency treatment);

**DEFENDING A CLAIM:** If we need your information to defend a legal claim against us by you, or by another party;

**PROVIDING YOU WITH MEDICAL CARE:** Where we need your information to provide you with medical and healthcare services

## **16. HOW LONG WE KEEP YOUR PERSONAL INFORMATION**

We carefully consider any personal information that we store about you, and we will not keep your information for longer than is necessary for the purposes as set out in this Privacy Notice.

## **17. UNDER 16s**

There is a separate privacy notice for patients under the age of 16, a copy of which may be obtained on request.

## **18. COMPLAINTS**

If you have a concern about the way we handle your personal data or you have a complaint about what we are doing, or how we have used or handled your personal and/or healthcare information, please contact our Practice Manager.

However, you have a right to raise any concern or complaint with the UK information regulator, at the Information Commissioner's Office: <https://ico.org.uk/>.

## **19. OUR WEBSITE**

The only website this Privacy Notice applies to is the Surgery's website. If you use a link to any other website from the Surgery's website then you will need to read their respective privacy notice. We take no responsibility (legal or otherwise) for the content of other websites.

## **20. COOKIES**

The Surgery's website uses cookies. For more information on which cookies we use and how we use them, please see our Cookies Policy.

## **21. SECURITY**

We take the security of your information very seriously and we do everything we can to ensure that your information is always protected and secure. We regularly update our processes and systems and we also ensure that our staff are properly trained. We also carry out assessments and audits of the information that we hold about you and make sure that if we provide any other services, we carry out proper assessments and security reviews.

## **22. TEXT MESSAGING AND CONTACTING YOU**

Because we are obliged to protect any confidential information we hold about you and we take this

very seriously, it is imperative that you let us know immediately if you change any of your contact details.

We may contact you using SMS texting to your mobile phone in the event that we need to notify you about appointments and other services that we provide to you involving your direct care, therefore you must ensure that we have your up-to-date details. This is to ensure we are sure we are actually contacting you and not another person.

Please also note that the data protection and electronic communication laws do not stop us from sending public health messages to you, either by phone, text or email as these messages are not direct marketing.

It may also be necessary, where the latest technology allows us to do so, to use your information and health data to facilitate digital consultations and diagnoses and we will always do this with your security in mind.

If you are concerned about how your information is being used, please contact our Practice Manager using the contact details provided in this Privacy Notice.

### **23. ACR project for patients with diabetes (and/or other conditions)**

The data is being processed for the purpose of delivery of a programme, sponsored by NHS Digital, to monitor urine for indications of chronic kidney disease (CKD) which is recommended to be undertaken annually for patients at risk of chronic kidney disease e.g., patients living with diabetes. The programme enables patients to test their kidney function from home. We will share your contact details with Healthy.io to enable them to contact you and send you a test kit. This will help identify patients at risk of kidney disease and help us agree any early interventions that can be put in place for the benefit of your care. Healthy.io will only use your data for the purposes of delivering their service to you. If you do not wish to receive a home test kit from Healthy.io we will continue to manage your care within the Practice. Healthy.io are required to hold data we send them in line with retention periods outlined in the Records Management code of Practice for Health and Social Care. Further information about this is available at: <https://lp.healthy.io/minuteinfo/>.

### **24. Artificial Intelligence (AI ) Tools**

Heidi is an AI transcribing software, which is a helpful tool that allows your doctor to focus entirely on you during your visit while still allowing them to accurately capture medical information, ensuring a comprehensive and precise record of your care. Heidi transcribes clinical encounters (both telephone and face-to-face) and streams them via desktop microphone to a transcription service, that is shown on the PC in form of a clinical note.

Please understand that your information will be handled with the utmost care, and using this software is aimed solely at improving your healthcare experience at the surgery.

For more Information please visit HeidiHealth website: <https://www.heidihealth.com/uk>

Tortus uses 'ambient' technology. This means it can turn words spoken by you, your relative, and the clinician, into written words (text). You might notice that the clinician wears a microphone, or that there is a microphone on a table or desk in the room. Tortus uses artificial intelligence (AI), which has been tested by clinicians. Tortus has been programmed to listen to all of the words spoken during the appointment. At the end of the appointment, Tortus summarises the important clinical content. The clinician will check any documents it produces for accuracy and completeness before approving them.

For more information, please visit Tortus website: <https://tortus.ai>

Pando Ai is a clinical communications platform that offers a variety of features built for health and social care. Secure messaging, image sharing, patient lists, open forums, active directory and file sharing enable clinical professionals to deliver the best possible care.

For more information, please visit Pando Ai website: <https://network.hellopando.com/>

## **25. Use of OpenSAFELY for Health Data Analytics**

We work with NHS England and use the **OpenSAFELY** platform to help plan and improve health services and conduct health research.

OpenSAFELY is a secure data analytics platform developed to allow analysis of pseudonymised patient records within the trusted environments of GP software providers (EMIS and TPP). This means that patient data **never leaves the secure servers**, and no one outside the environment has direct access to individual records.

### **Purpose of data use:**

We use OpenSAFELY for:

- Public health planning
- Health services research
- Service evaluation and audit
- 

### **What data is used?**

Your electronic health record is used in a **pseudonymised** form, meaning your name and other direct identifiers are removed and replaced with coded references.

### **Who has access?**

Approved researchers and analysts from NHS England and its research partners may write analysis code, which runs securely within the system. They can only export **aggregate results**, not individual data.

### **Legal basis for processing:**

- **Article 6(1)(e)** – Performance of a task carried out in the public interest
- **Article 9(2)(h)** – Management of health or social care systems and services

For more information about OpenSAFELY, visit:

 <https://opensafely.org/>

## **26. Online Consultation Tools including NHS App**

As of 1<sup>st</sup> October 2025, all Practices in England are required to have an Online Consultation platform to offer routine appointments.

We use Rapid Health AI as our practice Online Consultation Triage tool. Rapid health is a triage tool approved by the NHS which allows you to book appointments quickly and offers more patient choice and availability by offering you the right appointment with the right clinician first time.

### **NHS login**

If you access Rapid Health using your NHS login details, the identity verification services are managed by NHS England. NHS England is the controller for any personal information you provided to NHS England to get an NHS login account and verify your identity and uses that personal information solely for that single purpose. For this personal information, our role is a “data processor” only and we must act under the instructions provided by NHS England (as the “data controller”) when verifying your identity.

### **NHS App**

You can access Rapid Health on the NHS App using your NHS login details. If you sign in using NHS login, we will ask your permission to share your NHS login information with our service. This allows us to fill in some personal details for you, such as your name, date of birth and contact details. We will



not use your NHS login information for any other purposes. You can only share your NHS login information if you have proved your identity to NHS login. You can choose not to share your NHS login information with Rapid Health but you will need to enter your information yourself whilst using the service.

For more information, see the [NHS login privacy notice](#).

## Appendix A

### Who we share your information with and why

Activity	Rationale
Integrated Care Board	<p><b>Purpose</b> – Anonymous information is shared to plan and design care services within the locality.</p> <p><b>Legal Basis</b> – non identifiable data only.</p> <p><b>Data Processor</b> – Hampshire and Isle of Wight ICB</p>
Individual Funding Requests – The CSU	<p><b>Purpose</b> – We may need to share your information with the IFR team for the funding of treatment that is not normally covered in the standard contract.</p> <p><b>Legal Basis</b> – The clinical professional who first identifies that you may need the treatment will explain to you the information that is needed to be collected and processed in order to assess your needs and commission your care; they will gain your explicit consent to share this.</p> <p><b>Data processor</b> – We ask NHS South, Central and West Commissioning Support Unit (CSU) to do this on our behalf.</p>
NCRS	<p><b>Purpose</b> – NCRS (National Care Record Service) is a service that allows health and social care professionals to access and update a range of patient and safeguarding information across regional Integrated Care Systems (ICS) boundaries.</p> <p>The service provides a summary of health and care information for care settings where the full patient record is not required to support their direct care. The service is a web-based application and can be accessed regardless of what IT system an organisation is using and is the improved successor to the <u>Summary Care Record application (SCRa)</u>.”</p> <p><b>Legal Basis</b> – Direct Care</p> <p>Patients have the right to opt out of having their information shared with NCRS by informing the practice. Please note that by opting out of having your information shared with the National Care Record Service could result in a delay care that may be required in an emergency.</p> <p><b>Data Processor</b> – NHS England and NHS Digital via GP connect</p>

CHIE	<p><b>Purpose</b> – To provide Healthcare Professionals with complete, accurate and up to date information. This information comes from a variety of sources including GP practices, community providers, acute hospitals and social care providers. CHIE is used by GP out of hours, acute hospital doctors, ambulance service, GPs and others on caring for patients – you may opt out of having your information shared on this system.</p> <p><b>Legal Basis</b> – This service is for your direct care and in an emergency.</p> <p><b>Data Processor</b> – NHS SCW.</p>
CHIA	<p><b>Purpose</b> – Is a database used for analysing trends in population health in order to identify better ways of treating patients. CHIA is a physically separate database, which receives some data from CHIE. Prior to this transfer from CHIE to CHIA patient identifiers are removed from the data. This includes names, initials, addresses, dates of birth and postcodes. NHS numbers are encrypted in the extract and cannot be read. This process is called ‘pseudonymisation’. This subset of data does not include information typed in by hand, so there is no possibility of it containing references to family members or other people. It contains only coded entries for things like allergies and prescribed drugs. It is not possible to identify any patient by looking at the ‘pseudonymised’ data on the CHIA database. People who have access to CHIA do not have access to CHIE. Data in CHIA is used to plan how health and care services will be delivered in future, based on what types of diseases are being recorded and how many are being referred to hospital etc. Data is also used to help research into new treatments for diseases.</p> <p><b>Legal basis</b> – You can opt out of this service</p> <p><b>Data processor</b> – NHS SCW</p>
GP Connect	<p>We use a facility called GP Connect to support your direct care. GP Connect makes patient information available to all appropriate clinicians when and where they need it, to support direct patients care, leading to improvements in both care and outcomes.</p> <p>The NHS 111 service (and other services determined locally e.g. Other GP practices in a Primary Care Network) will be able to book appointments for patients at GP practices and other local services.</p> <p>GP Connect is not used for any purpose other than direct care.</p> <p>Legal basis - 6.1.e - NHS Contract authority 9.2.h - delivery of direct health care</p>

Other GP practices	<p><b>Purpose</b> - We will enable other GPs and staff in other GP practices to have access to your medical record to allow you to receive acute medical care within that service.</p> <p><b>Legal Basis</b> – this service is for your direct care and is fully consented, permission to share your medical record will be gained prior to an appointment being made in the service and again once you are in the consultation.</p> <p><b>Data processor</b> – Your registered surgery will continue to be responsible for your full medical record.</p>
Community Nursing - Complex Care Team Diabetes Team Home Visiting Service Leg Ulcer Service Heart Failure Service Multi-Disciplinary Team District Nurses Midwives	<p><b>Purpose</b> - We will enable the Community Nursing Team to have access to your medical record to allow you to receive care from the community nurses for the services listed.</p> <p><b>Legal Basis</b> – these services are for your direct care and is fully consented, permission to share your medical record will be gained prior to an appointment being made in the service</p> <p><b>Data processor</b> – Your registered surgery will continue to be responsible for your full medical record</p>
Pharmacists from the ICB	<p><b>Purpose</b> – to provide monitoring and advice in line with the national directive for prescribing. Anonymous data is collected by the ICB.</p> <p><b>Legal Basis</b> – direct care.</p> <p><b>Data Processor</b> – Hampshire and Isle of Wight ICB.</p>
MASH – Multi Agency Safeguarding Board - Safeguarding Children Safeguarding Adults	<p><b>Purpose</b> – We share information with health and social care authorities for safeguarding issues.</p> <p><b>Legal Basis</b> - Because of public Interest issues, e.g. to protect the safety and welfare of Safeguarding we will rely on a statutory basis rather than consent to share information for this use.</p> <p><b>Data Processor</b> – Multi Agency Safeguarding Authorities.</p>
Risk Stratification	<p><b>Purpose</b> – Risk stratification is a process for identifying and managing patients who are at high risk of emergency hospital admission.</p> <p>Risk stratification tools use various combinations of historic information about patients, for example, age, gender, diagnoses and patterns of hospital attendance and admission and primary care data collected from GP practice record systems.</p> <p>GPs will be able to identify which of their patients are at risk in order to offer a preventative service to them.</p> <p><b>Legal Basis</b> - Risk stratification has been approved by the Secretary of State, through the Confidentiality Advisory Group of the Health Research Authority</p> <p>NHS England encourages GPs to use risk stratification tools as part of their local strategies for supporting patients with long-term conditions and to help and prevent avoidable hospital admissions and to promote quality improvement in GP practices.</p>

	<p><b>Data Processors</b> – NHS South, Central and West Commissioning Support Unit (CSU) to assist us with providing Risk Stratification tools.</p> <p><b>Data Processing activities for Risk Stratification</b> – The GP practice instructs its GP IT system supplier to provide primary care data identifiable by your NHS Number.</p> <p><b>Opting Out</b> - If you do not wish information about you to be included in our risk stratification programme, please contact the GP Practice. They can add a code to your records that will stop your information from being used for this purpose. Further information about risk stratification is available from: <a href="https://www.england.nhs.uk/ourwork/tsd/ig/risk-stratification/">https://www.england.nhs.uk/ourwork/tsd/ig/risk-stratification/</a></p>
Quality monitoring, concerns and serious incidents	<p><b>Purpose</b> – We need to ensure that the health services you receive are safe, effective and of excellent quality. Sometimes concerns are raised about the care provided or an incident has happened that we need to investigate. You may not have made a complaint to us directly but the health care professional looking after you may decide that we need to know in order to help make improvements.</p> <p><b>Legal Basis</b> – The health care professional raising the concern or reporting the incident should make every attempt to talk to you about this and gain your consent to share information about you with us. Sometimes they can do this without telling us who you are. We have a statutory duty under the Health and Social Care Act 2012, Part 1, Section 26, in securing continuous improvement in the quality of services provided.</p> <p><b>Data processor</b> – We share your information with health care professionals that may include details of the care you have received and any concerns about that care. In order to look into these concerns we may need to talk to other organisations such as Fareham &amp; Gosport and SE Hants ICB as well as other Public bodies and Government agencies such as NHS Improvement, the Care Quality Commission, NHS England as well as the providers of your care.</p>
Commissioning, planning, contract monitoring and evaluation	<p><b>Purpose</b> – We share aggregated, anonymous, patient data about services we have provided.</p> <p><b>Legal Basis</b> - Our legal basis for collecting and processing information for this purpose is statutory. We set our reporting requirements as part of our contracts with NHS service providers and do not ask them to give us identifiable data about you.</p> <p>If patient level data was required for clarity and extensive evaluation of a service, consent will be gained for the surgery to share this information.</p> <p><b>Data Processor</b> – Various organisations, ICB, third party organisations commissioned by the NHS to perform actuarial services, NHS England</p> <p><b>Rapid Health</b> – anonymised aggregated numbers of contacts are shared for the online consultation tool.</p>

National Registries	National Registries (such as the Learning Disabilities Register) have statutory permission under Section 251 of the NHS Act 2006, to collect and hold service user identifiable information without the need to seek informed consent from each individual service user.
Care Quality Commission	CQC has powers under the Health and Social Care Act 2008 to access and use information where they consider it is necessary to carry out their functions as a regulator. CQC relies on its legal powers to access information rather than consent, therefore may use its powers to access records even in cases where objections have been raised. CQC Privacy Notice is <a href="#">available on the CQC website</a>
Surveys and asking for your feedback	<b>Purpose</b> – Sometimes we may offer you the opportunity to take part in a survey that the practice is running. We will not generally ask you to give us any personal confidential information as part of any survey.  <b>Legal Basis</b> – you are under no obligation to take part and where you do, we consider your participation as consent to hold and use the responses you give us.  <b>Data Processor</b> – Survey Monkey
Screening	<b>Purpose</b> - To support disease monitoring and health prevention for specific patients  <b>Legal Basis</b> - Your consent is sought either implicitly or explicitly. You are invited to be screened either by the practice or the screening provider directly. You can choose to consent or dissent at any point in the screening.
Hampshire County Council	<b>Purpose</b> - To support disease monitoring and health prevention for specific patients  <b>Legal Basis</b> - Your consent is sought either implicitly or explicitly. You are invited to be screened either by the practice or the screening provider directly. You can choose to consent or dissent at any point in the screening.
Other organisations who provide support services for us	<b>Purpose</b> - The Practice may use the services of additional organisations (other than those listed above), who will provide additional expertise to support the Practice.  <b>Legal Basis</b> - We have entered into contracts with other organisations to provide some services for us or on our behalf.  <b>Confidential</b> – Shred-It provide confidential waste destruction services  Restore for the storage and transfer of patient notes  NHS England use City Sprint to transfer medical records  Continence and Stoma Service – for direct care in providing

	<p>continence/stoma products and monitoring.</p> <p>i-Talk Counselling service</p> <p>Signposters</p> <p>Dementia Friendly Springboard Health Visitors</p>
Southern Health Foundation Trust – Frailty Support Team	<p><b>The SHFT Frailty Team have access to the patient records at the practice to enable them to review the clinical information to provide support to appropriate patients. They will also maintain a record within the SHFT clinical record.</b></p> <p><b>Legal basis</b></p> <p><b>6.1.e – under authority of a contract to deliver NHS services</b></p> <p><b>9.2.h – delivery and management of direct health care</b></p> <p><b>Common Law Duty of Confidence – explicit consent</b></p>
Medication/Prescribing	<p><b>Purpose :</b> Prescriptions containing personal identifiable and health data will be shared with chemists/pharmacies, in order to provide patients with essential medication or treatment as their health needs dictate. This process is achieved either by face to face contact with the patient or electronically. Where patients have specified a nominated pharmacy they may wish their repeat or acute prescriptions to be ordered and sent directly to the pharmacy making a more efficient process. Arrangements can also be made with the pharmacy to deliver medication</p> <p><b>Legal Basis :</b> Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) as stated below</p> <p>Patients will be required to nominate a preferred pharmacy.</p> <p><b>Processor – Pharmacy of choice</b></p>

#### **24. WHERE TO FIND OUR PRIVACY NOTICE**

You may find a summary of this Privacy Notice in the Surgery’s reception, and a full copy on our website ([www.gudgeheathsurgery.co.uk](http://www.gudgeheathsurgery.co.uk)) or a copy may be provided on request.

#### **25. CHANGES TO OUR PRIVACY NOTICE**

We regularly review and update our Privacy Notice. This Privacy Notice was last updated on 08/12/2025