# 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

If you wish to contact the data protection officer, you can contact them on hiowicb-hsi.wistariapractice@nhs.net if:

- You have any questions about how your information is being held;
- If you require access to your information or if you wish to make a change to your information;
- If you wish to make a complaint about anything to do with the personal and

healthcare information we hold about you;

- If you wish to make a subject access request.
- Or any other query relating to this Policy and your rights as a patient

## 3. ABOUT US

We, at Wistaria and Milford Surgeries ('**the Surgery**') situated at Lymington and Milford on Sea, 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 phone numbers, email address and home address details);

B. Details and contact numbers of your next of kin or friends or family members you have told us about

C. Your age, gender, ethnicity;

D. Details in relation to your medical history;

E. The reason for your visits to the Surgery;

F. Electronic medical notes and details of diagnosis and consultations with our GPs (General Practice) and other health professionals within the Surgery involved in your direct healthcare.

G. Photographs you consent to send to the GP (General Practice), in support of a consultation, by text or by email. These images will be added to your patient record. Images may be stored by data service providers, e.g. AccuRx and NHS mail on fully encrypted servers as part of the image delivery system; they are stored for the period of time recommended by the NHS Records Management Code of Practice.

**NHS App**

We use the NHS Account Messaging Service provided by NHS England to send you messages relating to your health and care. You need to be an NHS App user to receive these messages. Further information about the service can be found at the **privacy notice for the NHS App** managed by NHS England."

**AccuRx**

You may be aware that AccuRx allows GPs to request a photo to be sent in to support a patient consultation. The patient should be told that in doing so, the photo will be added to their record, and that AccuRx stores the image as part of the process of transferring to the practice.

The stored photos are on UK servers which are fully encrypted to NHS standards and are inaccessible to any AccuRx staff. They are stored for the period of time recommended by the NHS Records Management Code of Practice

**Klinik Triage**

Klinik is a healthcare technology company who provides automated digital solutions to healthcare providers to help triage and prioritize patients based on the symptoms they provide. Klinik has entered into an arrangement with your GP Practice, to enable you to use the Klinik technology for the purpose of accessing the services you specifically need, based on clinical presentation. That technology has to make use of your personal date, i.e. information relating to you from which you can be identified.

**Klinik as processor**

Klinik will be the processor for the digital interface Patients use to enter their personal details and relevant clinical information. Your GP Practice will be the controller for that personal data. Klinik will also be the processor for the personal data which comprises the suggested diagnosis and clinical urgency Klinik provides to your GP Practice.

Your personal data processed by the Medical Engine is "pseudonymized" meaning that the identifiers have been removed such that you cannot be directly identified from it without using additional information but is still considered personal data in a legal sense.

**LineIn**

Calls are managed effectively, as it frees up time for some staff in the practice to work more efficiently. Call waiting times are reduced and patients are educated how to use the online services, if they are able. **LineIn** offers patients equal access to a digital platform where their admin or clinical queries are assessed, logged and allocated to the right resource, according to their medical needs.

**HIOW POPULATION HEALTH MANAGEMENT PROGRAMME & Population Health Management Analytics**

The data sharing agreement ensures the appropriate and lawful uses of data held in the HealtheIntent by all users. This is based on the principle of role-based access setting out which users can:

- use identifiable data for the purpose of direct care
- use pseudonymised data to understand the needs of the health and care system and support planning and prevention 7.

**How is access to HealtheIntent data controlled?**

Access to data held in the HealtheIntent platform is strictly controlled through the use of role-based access. Users will only be able to see personal identifiable data for patients for whom they are providing clinical care for an organisation which is engaged to provide this care. For example, a GP will only be able to see personal identifiable data for those patients with whom they have a direct care relationship. All

other HealtheIntent users will only be able to see de-identified data.

**Healthy IO – ACR project for patients with Diabetes**

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 confirm that you wish them to send you a test kit. This will help identify patients at risk of kidney disease and help us agree to any early interventions that can be put in place for the benefit of your care. Healthy.io will only use your data for the purpose 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 http://bit.ly/uACRtest.

## 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. Insurance company –in respect of requests for medical information, with your prior approval

C. Police service – in respect of a firearms application you are making

D. Social Services

E. Solicitors – correspondence from them about you

F. Benefit Agency

G. Driving Vehicle Licensing Authority (DVLA)

H. Any organisation who you give permission to ask for your medical information

I. Information submitted to the surgery by you or other family members or friends or external bodies, where that information is pertinent to your care.

## 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 Data Protection Officer.

To find out more about the wider use of confidential personal information 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.

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 for 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 were 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, Care Navigators, Pharmacists, Social Prescribers.

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

A. Commissioners;

B. Integrated Care Board;

C. Local authorities;

D. Community health services;

e.g. Care and Health Information Exchange (CHIE) – formerly **Hampshire Health Record**

The CHIE is an electronic summary record for people living in Hampshire, Portsmouth, and Southampton. GP Surgeries, hospitals, social care, and community care teams collect information about you and store it electronically on separate computer systems. The Care and Health Information Exchange stores summary information from these organisations in one place so that – with your consent – professionals can view it to deliver better care to you. This record contains more information than the SCR but is only available to organisations in Hampshire. For more information Visit http://chie.org.uk/

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. **Enhanced & Extended Access –** we provide extended access services to our patients, which means you can access medical services outside of our normal working hours. To provide you with this service, we have formal arrangements in place with the Primary Care Network and our Integrated Care Board 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** practices are as follows:

- New Forest Primary Care Network
- Partnering Health Limited (PHL) – currently offering appointments at Ringwood, Lymington and Winchester
- The Acute Frailty Intervention team

H. **Data Extraction by the Integrated Care Board –** the clinical commissioning group 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 Clinical Commissioning Group 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 Clinical commissioning Group may require this pseudo- anonymised information, these are as follows:

1. To confirm that the Surgery is providing services which have been agreed contractually
2. To better plan the provision of services across a wider locality than practice level.

## 9. 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.

## 10. OFF-SITE NOTE STORAGE

The Hampshire and Isle of Wight Integrated Care Board have contracted Restore to securely store your paper medical records in off-site storage facilities. This service will include the secure transportation of required records to and from our Practice. Restore meets CQC requirements for records storage security standards.

## 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 may email our Data Protection Officer. We will provide this information free of charge. However, we may in some **limited and exceptional** circumstances must 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 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 especially 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 you. 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, refer, or contact other doctors, consultants, nurses, or any other medical/healthcare professional or organisation during 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 overly 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 must 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 set out in this Privacy Notice.

## 17. UNDER 16s

We are in the process of creating a separate privacy notice for patients under the age of 16, a copy of which will be available at a future date on our website.

## 18. IF ENGLISH IS NOT YOUR FIRST LANGUAGE

If English is not your first language you can request a translation of this Privacy Notice. Please contact our Data Protection Officer.

## 19. 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, then please contact our Data Protection Officer at hiowicb-hsi.wistariapractice@nhs.net

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/.

## 20. OUR WEBSITE

The only website this Privacy Notice applies to is the Surgery's website www.wistariaandmilford.nhs.uk 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.

## 21. 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 on the Surgery's website.

## 22. 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 professionally 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.

## 23. CONTACTING YOU

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. The surgery has a policy of actively contacting patients who appear to have incorrect contact details on record, to identify and make corrections.

Please also let us know if your date of birth is incorrect for this to be amended. You have a responsibility to inform us of any changes, so our records are accurate and up to date.

We may contact you using SMS texting to your mobile phone or by email to:

- Remind you about appointments
- Inform you about healthcare services relevant to your care
- Invite you for vaccinations which you are eligible for
- Inform you of your test results
- Enable clinicians to contact you directly about your health
- Inform you that we are trying to contact you about a health-related issue
- Provide and resolve queries with the Patient Online Access service
- Ask you for your feedback using the NHS Friends and Family Test

You may opt in or out of receiving texts or emails at any point by contacting the surgery.

## 24. RECORDED TELEPHONE CALLS

All telephone calls made to and from the surgery may be recorded for training purposes. These recordings are held on a secure web portal provided by our telephone supplier.

Telephone recordings are only accessed and listened to by the Practice Manager and one other nominated person, to identify any staff feedback which might be needed or to assist in investigation of complaints.

## 25. CCTV

We have CCTV to monitor our upstairs waiting room at Wistaria Surgery, Lymington, which is viewed from our downstairs reception. This is for the safety of our patients, staff, and surgery premises. No video recordings are made or kept.

**Premises CCTV** – This has been installed and is managed by our landlords to keep the Practice property well-lit and safe for our Patients. Recordings are overwritten within a monthly cycle.

## 26. WHERE TO FIND OUR PRIVACY NOTICE

You may find a copy of this Privacy Notice for viewing in the Surgery's reception, on our website, or a printed copy may be provided on request.

## 27. CHANGES TO OUR PRIVACY NOTICE

We regularly review and update our Privacy Notice. This Privacy Notice was last updated on 22nd April 2025.

## Appendix A

## Who we share your information with and why

| Activity | Rationale |
|---|---|
| Integrated Care Board | **Purpose –** Anonymous information is shared to plan and design care services within the locality.<br><br>**Legal Basis –** non identifiable data only.<br>**Data Processor** – NHS Hampshire and Isle of Wight ICB (Integrated Care Boards) Integrated Care Board: Hampshire and Isle of Wight ICS (hantsiowhealthandcare.org.uk) |
| Individual Funding Requests – The CSU | Purpose – 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.<br><br>Legal Basis – 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.<br><br>Data processor – We ask NHS South, Central and West Commissioning Support Unit (CSU) to do this on our behalf. |
| CHIE | **Purpose –** 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, GP's, and others for caring for patients – you may opt out of having your information shared on this system.<br><br>**Legal Basis** – This service is for your direct care and in an emergency.<br>**Data Processor –** NHS SCW |
| CHIA | **Purpose –** Is a database used for analysing trends in population health 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.<br>This process is called 'pseudonymisation." This is subject of data does not include information typed 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 access CHIA do not have access<br>to CHIE. Data in CHIA is used to plan how health and care services will be delivered in the future, based on what types of diseases are being recorded and how many are being reffered to hospital etc. Data is also used to help research into new treatments for diseases.<br>**Legal Basis – You can opt out of the service.**<br>**Data Processor – NHS SCW** |

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| Other GP practices | **Purpose –** We will enable other GP'S and staff in other GP practices to have access to your medical record to allow you to receive acute medical care within that service.<br><br>**Legal Basis** – this service is for your direct care and is fully consented to, permission to share your medical record will be gained prior to an appointment being made in the service and again you are in the consultation.<br><br>**Data Processor –** Your registered surgery will continue to be responsible for your full medical record. |
| Community Nursing – Complex Care Team<br><br>Diabetes Team<br>Home Visiting<br>Service Leg<br>Ulcer Service<br>Heart Failure<br>Service<br>Multi-Disciplinary<br>Team District<br>Nurses Midwives | **Purpose –** We will enable the Community Nursing Team to have access to your medical record to allow you to receive care from the community for the services listed.<br><br>**Legal Basis** – these services are for your direct care and are fully consented to, permission to share your medical record will be gained prior to an appointment being made in the service.<br><br>**Data Processor –** Your registered surgery will continue to be responsible for your full medical record. |
| Pharmacists from the ICB | **Purpose –** to provide monitoring and advice in line with national directive for prescribing. Anonymous data is collected by the ICB.<br><br>**Legal Basis** – Direct Care.<br><br>**Data Processor –** NHS Hampshire and Isle of Wight ICB |
| CUSAP Service | Hampshire and Isle of Wight Integrated Commissioning Board commission a centralised continence and stoma prescribing service in the South Eastern Hants part of HIOW. This service takes the prescribing activity for continence appliances and related products away from GPs, into a single centralised service. To do this a patient management system, COBWEB has been used to keep a clinical record for each patient. Patients will consent and agree to join the service to COBWEB to enable the service to administer care and prescriptions for continence and stoma items. All patients will be referred to the service when needing care requiring continence appliances and associated products. |

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| **MASH**<br>Multi Agency Safeguarding Board Safeguarding Children Safeguarding Adults | **Purpose –** We share information with health and social care authorities for safeguarding issues.<br><br>**Legal Basis** – 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.<br><br>**Data Processor –** Multi Agency Safeguarding Authorities. |
| Risk Stratification | **Purpose –** Risk Stratification is a process for identifying and managing patients where there is high risk of emergency hospital admission. 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. GP's will be able to identify which of the patients are at risk in order to offer a preventative service to them.<br><br>**Legal Basis** – Risk Stratification has been approved by the Secretary of State, through the Confidentiality Advisory Group of the Health Research Authority.<br>NHS England encourages GP'S 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.<br><br>**Data Processor –** NHS South, Central and West Commissioning Unit (CSU) to assist us with providing Risk Stratification tools.<br><br>**Data Processing activities for Risk Stratification –** The GP practice instructs its GP IT (Information Technology) system supplier to provide primary care data identifiable by your NHS Number.<br><br>**Opting Out –** If you do not wish information about you to be included in our Risk Stratification programme, please contact 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. |

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| GP Connect | 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 patient care, leading to improvements in both care and outcomes.<br>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. GP Connect is not used for any purpose other than direct care.<br>**Legal basis - 6.1.e - NHS Contract authority**<br>**9.2.h - delivery of direct health care** |

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| Quality monitoring, concerns, and serious incidents | **From** https://www.england.nhs.uk/ig/risk-stratification/<br>**Purpose –** 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 healthcare professional looking after you may decide that we need to know to help make improvements.<br><br>**Legal Basis –** 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.<br>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. |

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| Commissioning, planning, contract monitoring and evaluation | **Purpose –** We share aggregated, anonymous, patient data about services that have been provided.<br><br>**Legal Basis –** Our legal basis for collecting and processing information for this purpose is satisfactory. 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. 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.<br><br>**Data Processor –** Various organisations, ICB, third party organisations commissioned by the NHS to perform actuarial services, NHS England<br><br>**Klinik –** anonymised aggregated numbers of contracts are shared for the online consultation tool. |
| 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. |

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| Care Quality Commision | CQC has powers under the Health and Social Care Act 2008 to access and use information where they consider it necessary to carry out their functions are 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 available on the CQC website https://www.cqc.org.uk/about-us/our-policies/privacy-statement |
| Surveys and asking for your feedback | Sometimes we may offer you the opportunity to take part in a survey that the practice is conducting. We will not generally ask you to give us any personal confidential information as part of any survey. |

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| Research | **Purpose** – To support research orientated proposals and actives in our commissioning system<br>**Legal Basis** – Your consent will be obtained by the organisation holding your records before identifiable information about you is disclosed for any research. If this is not possible then the organisation wishing to use your information will need to seek formal approval from The<br>Independent Group Advising on the Release of Data (IGARD) |
| Screening | **Purpose** – To support disease monitoring and health prevention for specific patients<br><br>**Legal Basis** – 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<br>the screening |
| Hampshire County Council | **Purpose** – To support disease monitoring and health prevention for specific patients<br><br>**Legal Basis** – 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 |

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| Other organisations who provide support services for us | **Purpose** – The practice may use the services for additional organisations (other than those listed above), who will provide additional expertise to support the practice.<br>**Legal Basis** – We have entered contracts with other organisations to provide some services for us or on our behalf.<br><br>**Confidential** – Restore provides confidential waste destruction services.<br>Restore for the storage and transfer of patient notes<br>NHS England use City Sprint to transfer medical records<br>Continence and Stoma Service – for direct care in providing continence/stoma products and monitoring.<br>i-talk Counselling service<br>Sign posters<br>Dementia<br>Friendly<br>Springboard<br>Health Visitors<br>Palliative<br>Nurses<br>Clinical Waste |
| Medication/Prescribing | **Purpose** – Prescriptions containing personal identifiable and health data will be shared with chemists/pharmacies, 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.<br><br>**Legal Basis** – Article 6(1)(e): "necessary...in the exercise of official authority vested in the controller" And article 9(2)(h) as stated below patients will be required to nominate a preferred pharmacy.<br><br>**Processor –** Pharmacy of choice |

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| Solent Mind | All patients with Serious Mental Illness are required to have a physical health check each year, this ensures their general health which can deteriorate as a result of their Mental illness.<br>Solent Mind carry out the health checks on behalf of our practice. Legal basis – 6.1.e under the NHS Contract<br>Lawful basis – 9.2.h to manage patient health care. |
| Klinik | Klinik is software available to all patients form the practice website, it allows you to enter your medical symptoms and be directed to be assessed by our health-care professionals.<br>The legal basis for the use of the software is:<br>6.1.e - under the NHS contract<br>9.2.h – to deliver health services. |

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| LineIn | Patient calls are managed effectively, as it frees up time for some staff in the practice to work more efficiently. Call waiting times are reduced and patients are educated how to use the online services, if they are able.<br><br>LineIn offers patients equal access to a digital platform where their admin or clinical queries are assessed, logged and allocated to the right resource, according to their medical needs.<br>**6.1.e - under the NHS contract**<br>**9.2.h – to deliver health services.** | | |
| Clinical Practice Research Datalink | CPRD works with GP practices by collecting de-identified coded medical data. No patient identifiers or free text are collected. This data supports vital patient safety work without adding to practice workload or costing anything. It is provided to academics, industry and regulators who have a licence to carry out public health research (including COVID-19 vaccine monitoring). No identifiable data is shared, and patients can opt out. | | |
| GP in the Cloud | This is a cloud-based service which supports the practice by providing Locums with remote access. It helps to manage the demand for clinical time in the practice and provide a safe healthcare service for patients delivering locum direct healthcare. | Legal basis 6.1.e – NHS contract Lawful basis 9.2.h delivery and management of direct healthcare. | https://gpinthecloud.com/ |
| **Our Partner organisations** | • NHS Trusts / Foundation Trusts<br>• Southern Health Foundation Trust<br>• Oakhaven Hospice & care homes (with consent)<br>• Solent Mind<br>• GP's<br>• eMBED Health<br>• Independent Contractors such as dentists, opticians, pharmacists<br>• Private Sector Providers | | |

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| We may also have to share your information, subject to strict agreements on how it will be used, with the following organisations; | • Voluntary Sector Providers<br>• Ambulance Trusts<br>• Integrated Care Board<br>• Social Care Services<br>• NHS England (NHSE) and NHS Digital (NHSD)<br>• Local Authorities<br>• Education Services<br>• Fire and Rescue Services<br>• Police & Judicial Services<br>• Other 'data processors' which you will be informed of |

You will be informed who your data will be shared with and in some cases asked for consent for this to happen when this is required.

We may also use external companies to process personal information, such as for archiving purposes. These companies are bound by contractual agreements to ensure information is kept confidential and secure. All employees and sub-contractors engaged by our practice are asked to sign a confidentiality agreement. If a sub- contractor acts as a data processor for the Practice an appropriate contract (art 24-28) will be established for the processing of your information.