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. We review our procedures 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 for Watercress Medical is Judith Jordan, Arden & GEM Head of Integrated Governance.

You can contact her by email at agem.dpo@nhs.net

Or

by telephone on **0121 611 0730**

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;
- Or any other query relating to this Policy and your rights as a patient.

If you wish to make a **Subject Access Request**, the contact for the surgery is Sally Cronk, Care Co-ordinator. All requests for Subject Access requests must be received in writing to Sally Cronk, Care Co-ordinator, Watercress Medical, Mansfield Park Surgery, Lymington Bottom Road, Medstead, Alton, GU34 5EW.

3. ABOUT US

We, at Watercress Medical ('**the Surgery**'), 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, language, disability status, information we need to allow us to provide information in a more accessible format to you;

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. Insurance company – in respect of requests for medical information, with your prior approval.
C. Police – in respect of firearm application you are making.
D. Judicial services
E. Fire and Rescue services
F. Social Services
G. Solicitors – correspondence from the about you
H. Benefits Agency
I. Driving Vehicle Licensing Authority (DVLA)
J. Indeed, any organisation who you give permission to ask for your medical information

6. NATIONAL CARE RECORDS SERVICE (NCRS)

NCRS 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.

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 National Care Records Service - NHS England Digital

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/mydata-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 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 including Community Pharmacies;

D. Nurses and other healthcare professionals (e.g. District Nurses & Midwives);

E. Independent Contractors such as Dentists, Opticians and Pharmacists;

F. Any other person that is involved in providing services related to your general healthcare, including mental health professionals.

e.g. Care Navigators, Pharmacists, Social Prescribers/Wellbeing Advisors

8. OTHER PEOPLE WHO WE PROVIDE YOUR INFORMATION TO

A. Commissioners;

B. Integrated Care Boards;

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. **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 a formal arrangement in place with Prescribing Care Direct. This means, they will have access to your medical record to be able to offer you the service.

H. **Data Extraction by the Integrated Care Boards –** the Integrated Care Board (ICB) 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 Integrated Care Board from **ever** identifying you because 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 Integrated Care Board may require this pseudonymised information, these are as follows:

- For management and monitoring of the GP Practice core contract
- For management and monitoring of the GP Practice enhanced services
- For assurance of compliance with these contracts
- For assurance of the effective spending of public funding
- To conform with delegated responsibilities from NHS England
- To fulfil the ICBs role in ensuring services commissioned meet patient population need and are being delivered in accordance with commissioning intentions

I. **South Central Ambulance Service Foundation Trust (SCAS) –** Patients, who contact 111 for advice, maybe offered the opportunity to book an appointment directly with their registered GP surgery via the 111 clinical team. Local data sharing agreements are in place that allows the healthcare professional, with your consent, to book this appointment using your medical records.

J. **Primary Care Network –** The objective of primary care networks (PCNs) is to group practices together to create more collaborative workforces which ease the pressure of GP's, leaving them better able to focus on patient care.

The practice is a member of the **Winchester Rural North and East Primary Care Network (WRNE PCN)**. Other members of the network are:

Alresford Surgery
West Meon Surgery
Stockbridge Surgery
Gratton Surgery
Two Rivers Surgery

Primary Care Networks work together to provide innovative, cost-effective primary and community services that respond to people's needs. For the WRNE PCN to continue to offer their services to patients within member practices, where necessary, it is required to share relevant patient information. All staff working across the WRNE PCN are duty bound by the same confidentiality regulations, to provide a high quality of care whilst keeping patient information safe and secure.

Service Evaluation –

WRNE PCN from time to time, carries out service evaluations to improve quality and accessibility of primary care services. This may be carried out in a few ways including telephone surveys and online surveys.

Legal Basis – Article 6(1)(e); "necessary… in the exercise of official authority vested in the controller', Article 9(2)(h) "Provision of health and care", Article 6(1)(a) "Consent of the data subject (you)" and Article 9(2)(a) "Explicit consent of the data subject (you)".

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. RECORDED INFORMATION

- **Telephone call recording**

Practice uses Opus Business as its telephony provider for the purpose of providing medical care to patients. Opus allows the practice to record inbound and outbound calls for training and monitoring purposes and in the event of a complaint. Call recording data is cleared every 3 months.

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 contact Sally Cronk, Care Co-ordinator in writing. 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 and current residential address (within the last three months).

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.

From November 2022, all patients with online accounts were given what is known as Prospective 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. This includes information that was added from a previous GP Practice.

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 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.

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 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**.

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.

Currently this is: https://mansfieldparksurgery.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 does not use cookies.

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 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.

23. TEXT MESSAGING, EMAIL, TELEPHONING 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 if 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 contacting you and not another person.

If you do not wish to be contacted by text or email, please notify the surgery.

24. WHERE TO FIND OUR PRIVACY NOTICE

You may find a copy of this Privacy Notice on our website, or a copy may be provided on request.

25. CHANGES TO OUR PRIVACY NOTICE

We regularly review and update our Privacy Notice. This notice was last updated on 21.04.2026.

Appendix A

Who we share your information with and why

Activity	Rationale
Hampshire & Isle of Wight Integrated Care Board	**Purpose –** Anonymous information is shared to plan and design care services within the locality. **Legal Basis –** non identifiable data only. **Data Processor** – NHS Hampshire and IOW Integrated Care Board
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. **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 to assess your needs and commission your care; they will gain your explicit consent to share this. **Data processor** – We ask NHS South, Central and West Commissioning Support Unit (CSU) to do this on our behalf.
Summary Care Records	**Purpose –**The NHS in England uses a national electronic record called the Summary Care Record (SCR) to support patient care. It contains key information from your GP record. Your SCR provides authorised healthcare staff with faster, secure access to essential information about you in an emergency or when you need unplanned care, where such information would otherwise be unavailable. **Legal Basis** – For your Personal Data to be shared or processed, an appropriate 'legal basis' needs to be in place and recorded. The legal bases for direct care via SCR is the same as the legal bases for the

	care you would receive from your own GP, or another healthcare provider: • for the processing of personal data: Article 6.1 (e) of the UK GDPR: 'processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller'. • for the processing of 'Special Category Data' (which includes your medical information): Article 9.2 (h) of the UK GDPR: 'processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services'. Full details of the Summary Care Record supplementary privacy notice can be found here Patients have the right to opt out of having their information shared with the SCR by completion of the form which can be downloaded here and returned to the practice. Please note that by opting out of having your information shared with the Summary Care Record could result in a delay care that may be required in an emergency. **Processor –** NHS England and NHS Digital via GP connect
Test requests and results	**Purpose –** Some basic identifying details, the type of test requested and if required, any relevant information is share with Pathology Laboratories when tests such as blood or urine tests need to be undertaken. The laboratory will also hold the detail of the request and the result. The result/report will be sent electronically to the practice who will hold it in the patient's record. **Legal Basis –** Article 6(1)e 'exercise of official authority' and article 9(2)h 'Provision of health and care' **Controller of test data –** The laboratory that process the request(s) and result are a controller of the data generated by the test process.
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, GPs, and others on caring for patients – you may opt out of having your information shared on this system. **Legal Basis** – This service is for your direct care and in an emergency.

	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. 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. **Legal basis –** You can opt out of this service **Data processor –** NHS SCW
General Practice Extraction Service (GPES)	**Purpose -** Personal confidential and Special Category data will be extracted at source from GP systems for the use of planning and research. **Legal Basis –** Patients who have registered a National Data Opt-out will not have their data extracted for purposes other than their direct care and will be excluded from this data extraction. **Processor -** NHS Digital
General Practice Data for Planning and Research (GPDPR)	**Purpose -** Patients personal confidential data will be extracted and shared with NHS Digital to support vital health and care planning and research. Further information can be found here Patients may opt out of having their information shared for Planning or Research by applying a National Data Opt Out or a Type 1 Opt Out. Details of how to Opt Out can be found on our Privacy Notice. For the National Data Opt Out patients are required to register their preference below. https://www.nhs.uk/your-nhs-data-matters/

	Legal Basis - The legal basis for this activity can be found at this link : General Practice Data for Planning and Research: NHS Digital Transparency Notice - NHS Digital **Processor -** NHS Digital
GP Connect	**Purpose -** 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. GP Connect is not used for any purpose other than direct care. o Authorised Clinicians such as GPs, NHS 111 Clinicians, Care Home Nurses (if you are in a Care Home), Secondary Care Trusts, Social Care Clinicians can access the GP records of the patients they are treating via a secure NHS Digital service called GP connect. o 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. **Legal basis -** For your Personal Data to be shared or processed, an appropriate "legal basis" needs to be in place and recorded. The legal bases for direct care via GP Connect is the same as the legal bases for the care you would receive from your own GP, or another healthcare provider: o for the processing of personal data: Article 6.1 (e) of the UK GDPR: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller". o for the processing of "Special Category Data" (which includes your medical information): Article 9.2 (h) of the UK GDPR: "processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services". **Your rights -** Because the legal bases used for your care using GP Connect are the same as used in other direct care situations, the legal rights you have over this data under UK GDPR will also be the same- these are listed elsewhere in our privacy notice. **Processor** - NHS Digital

Heidi Health	**Purpose -** We use and AI-powered medical scribe, Heidi Health, to aid with documenting consultations, transcribing patient visits and letter dictations. This tool allows us to focus more on the consultation rather than on typing and administrative tasks. **Enhanced Focus on Patient Care -** By automating the documentation process, Heidi Health allows us to spend more time interacting with you, improving the quality of care and communication during consultations. **Efficiency and Accuracy -** The AI scribe ensures that all details of your visit are accurately recorded, reducing the risk of errors and omissions in your medical records. **Streamlined Workflow -** Heidi Health helps in managing various administrative tasks such as generating patient summaries and creating letters, making our workflow more efficient. **Data Security and Privacy -** Heidi Health adheres to stringent UK compliance frameworks, including the Data Protection Act, Cyber Essentials, GDPR and NHS standards such as DCB0129, DTAC and DSPT. This ensures that your personal information is handled securely and confidentially. More information can be found at: https://trust.heidihealth.com https://www.heidihealth.com/uk/legal/ukgdpr-compliance-policy **Local Data Hosting -** All data is hosted within the UK, enhancing security and compliance with local data protection regulations. **Temporary Data Storage -** Audio recordings used for generating notes are not stored permanently. They are processed and then deleted, ensuring data remains private and secure.
OpenSAFELY	NHS England has been directed by the government to establish and operate the OpenSAFELY COVID-19 Service and the OpenSAFELY Data Analytics Service. These services provide a secure environment that supports research, clinical audit, service evaluation and health surveillance for COVID-19 and other purposes. Each GP practice remains the controller of its own GP patient data but is required to let approved users run queries on pseudonymised patient data. This means identifiers are removed and replaced with a pseudonym. Only approved users are allowed to run these queries, and they will not be able to access information that directly or indirectly identifies individuals.

	Patients who do not wish for their data to be used as part of this process can register a type 1 opt out with their GP (see next page for more information about opt out). **Here you can find** additional information about OpenSAFELY
iGPR Technologies Limited (iGPR – Intelligent General Practice Reporting)	**Purpose -** We use a processor, iGPR Technologies Limited ("iGPR"), to assist us with responding to report requests relating to your patient data, such as subject access requests that you submit to us (or that someone acting on your behalf submits to us) and report requests that insurers submit to us under the Access to Medical Records Act 1988 in relation to a life insurance policy that you hold or that you are applying for. iGPR manages the reporting process for us by reviewing and responding to requests in accordance with our instructions and all applicable laws, including UK data protection laws. The instructions we issue to iGPR include general instructions on responding to requests and specific instructions on issues that will require further consultation with the GP responsible for your care. iGPR will only access the clinical record on behalf of either the patient themselves (e.g., subject access request), a third party where the patient has given their consent (e.g., insurance report) or the information is required by the Government (e.g. DWP forms). The aim of asking iGPR to process certain requests for information (where a clinical judgement is not required) is to reduce the administrative burden from GPs, allowing additional time to be available for clinical work. If you have made a subject access request, or an organisation has made a request with your consent and you do not wish your data to be processed by iGPR, you can write or email the Practice to advise us of this. **Processor -** iGPR
North & Mid Hampshire Medical Examiner Office – Hampshire Hospitals NHS Trust	**Purpose -** Medical records associated with deceased patients are outside scope of the UK GDPR. However, next of kin details are within the scope of the UK GDPR. We will share specified deceased patient records and next of kin details with the Medical Examiners within Hampshire Hospitals NHS Trust. **Legal Basis -** Article 6(1)c "It is necessary under a legal obligation to which the controller is subject" Article 9(2)h "processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical

	diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services" **Processor -** Medical Examiner's Office – Hampshire Hospitals NHS Trust
Population Health Management	**Purpose -** Health and care services work together as 'Integrated Care Systems' (ICS) and are sharing data to: • Understanding the health and care needs of the care system's population, including health inequalities. • Provide support to where it will have the most impact. • Identify early actions to keep people well, not only focusing on people in direct contact with services but looking to join up care across different partners. **Type of Data –** Identifiable/Pseudonymised/Anonymised/Aggregate Data. NB only organisations that provide your individual care will see your identifiable data. **Legal Basis –** Article 6(1)(e); "necessary… in the exercise of official authority vested in the controller' And Article 9(2)(h) Provision of health and care **Processor to which data is disclosed:** Cerner Ltd, Optum Ltd, NECS CSU **Population Health Management also incorporates the use of risk stratification tools as an integral part of the purpose.**
Other GP practices	**Purpose -** 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. **Legal Basis** – 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. **Data processor** – Your registered surgery will continue to be responsible for your full medical record.
Child Health Information Service	**Purpose** – We wish to make sure that your child has the opportunity to have immunisations and health checks when they are due. We share information about childhood immunisations, the 6–8-week new baby check and breast-feeding status with health visitors and school nurse.

	Legal Basis – Article 6(1)e 'exercise of official authority' and article 9(2)h 'Provision of health and care' **Controller to which data is disclosed** **- https://www.southernhealth.nhs.uk/**
Community Nursing - Complex Care Team Diabetes Team Home Visiting Service Leg Ulcer Service Heart Failure Service Multi-Disciplinary Team District 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 nurses for the services listed. **Legal Basis** – 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 **Data processor** – Your registered surgery will continue to be responsible for your full medical record
Pharmacists from the Hampshire & Isle of Wight ICB	**Purpose –** To provide monitoring and advice in line with the national directive for prescribing. Anonymous data is collected by the ICB. **Legal Basis** – direct care. **Data Processor** – NHS Hampshire & IOW ICB
Medicines Optimisation	**Purpose** – We use software packages linked to our patient record system to aid when prescribing drugs. These ensure that prescribing is effective. We do not share your identifiable data with the companies that provide these packages. **Legal Basis -** Article 6(1)e 'exercise of official authority' and article 9(2)h 'Provision of health and care'.
MASH – Multi Agency Safeguarding Board - Safeguarding Children Safeguarding Adults	**Purpose –** We share information with health and social care authorities for safeguarding issues. **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. **Data Processor** – Multi Agency Safeguarding Authorities.
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 **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. **Processor** – Pharmacy of choice
Risk Stratification	**Purpose –** Risk stratification is a process for identifying and managing patients who are at 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. GPs will be able to identify which of their patients are at risk to offer a preventative service to them. **Legal Basis -** Risk stratification has been approved by the Secretary of State, through the Confidentiality Advisory Group of the Health Research Authority 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. **Data Processors** – NHS South, Central and West Commissioning Support Unit (CSU) to assist us with providing Risk Stratification tools. **Data Processing activities for Risk Stratification –** The GP practice instructs its GP IT system supplier to provide primary care data identifiable by your NHS Number. **Opting Out** - 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: https://www.england.nhs.uk/ourwork/tsd/ig/risk-stratification/
Quality monitoring, concerns, and serious incidents	**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 health care professional looking after you may decide that we need to know in order to help make improvements. **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. 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. **Data processor** – We share your information with health care professionals that may include details of the care you have received and any concerns about that care. To look into these concerns, we may need to talk to other organisations 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.
Commissioning, planning, contract monitoring and evaluation	**Purpose –** We share aggregated, anonymous, patient data about services we have provided. **Legal Basis -** 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. 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. **Data Processor** – Various organisations, ICB , third party organisations commissioned by the NHS to perform actuarial services, NHS England **eConsult** – anonymised aggregated numbers of contacts are shared for the online consultation tool.
Clinical Audit	**Purpose –** Information will be used by the ICB for clinical audit to monitor the quality of the service provided to patients with long term conditions. When required, information will be held centrally and used for statistical purposes (e.g. the National Diabetes Audit). When this happens, strict measures are taken to ensure that individual patients cannot be identified from the data.
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 ***available on the CQC website***
Surveys and asking for your feedback	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. **Legal Basis** – 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. **Data Processor** – accuRx
Research	**Purpose -** To support research-oriented proposals and activities in our commissioning system **Legal Basis -** Your consent will be obtained by the organisation holding your records before identifiable information 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 Independent Group Advising on the Release of Data (IGARD) Digital NHS UK - IGARD We may write to you offering you the opportunity to take part in research, for which your consent will be sought.
Screening	**Purpose -** To support disease monitoring and health prevention for specific patients **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.
Hampshire County Council	**Purpose -** To support disease monitoring and health prevention for specific patients **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.
Other organisations who provide support services to us	**Purpose** - The Practice may use the services of additional organisations (other than those listed above), who will provide additional expertise to support the Practice.

	Legal Basis - We have entered contracts with other organisations to provide some services for us or on our behalf. **Confidential waste** – Restore Datashred provide confidential waste destruction services. **Records Management** – Restore Records Management provide the storage and transfer of patient paper notes off site to a secure storage facility. They are transported between the practice and the storage facility in secure transport by trained staff. This is to provide much needed space at the practice. NHS England use City Sprint to transfer medical records. Language Line Solutions for Translation and Interpreting. Continence and Stoma Service – for direct care in providing continence/stoma products and monitoring. InHealth Intelligence – Diabetic Retinopathy Eye Screening Service NHS Talking Therapies Smoke Free Hampshire Sign posters Dementia Friendly Health Visitors North and Mid Hants Targeted Lung Health programme Palliative Nurses Clinical Waste IT service providers: accuRx APEX for Capacity and Demand Management Arden's QMaster Arden's Manager and Portal Arden's GEMs Docman 10 (One Advanced) Optum (EMIS Web) Engage – Patient check in system Immform Opus Telephony System Primary Care Support England (PCSE) Trusted Technology Partnership – IT support and services
Patient Record database support	**Purpose –** The practice uses electronic patient records. Our supplier of the electronic patient record system is: EMIS WEB

	Our supplier does not access identifiable records without permission of the practice, and this is only given where it is necessary to investigate issues on a particular record. **Legal Basis -** Article 6(1)e 'exercise of official authority' and article 9(2)h 'Management of health and care services'
Payments	**Purpose** – Payments to the practice come in many different forms. Some payments are based on the number of patients that receive specific services, such as diabetic reviews and immunisation programmes. To make patient-based payments basic and relevant necessary data about you, needs to be sent to the various payment services, this data contains limited identity if needed, such as your NHS number. The release of this data is required by English laws. **Legal Basis** – Article 6(1)(c) "processing is necessary for compliance with a legal obligation to which the controller is subject." And Article 9(2)(h) 'as stated below **Controllers that data is disclosed to** – NHS England, NHSIOW ICB, Public Health, PCSE
National Fraud Initiative – Cabinet Office	**Purpose –** The use of data by the Cabinet Office for data matching is carried out with statutory authority. It does not require the consent of the individuals concerned under Data Protection legislation. Data matching by the Cabinet Office is subject to a Code of Practice. For further information see: https://www.gov.uk/government/publications/code-of-data-matching-practice-for-national-fraud-initiative NFI activities vary each year, so data would only be disclosed if required by the focus of their activities **Legal Basis –** Part 6 of the Local Audit and Accountability Act 2014 **Controller –** Cabinet Office
Mid Hampshire Healthcare	**Purpose** - Lawful reason for sharing is 9.2h to deliver direct healthcare services **Legal Basis** - 6.1e – under NHS Contract

Appendix B

Name	Description	Can employees of the organisation access patient information?	Privacy notice information
accuRx	Messaging System	If patients sign up to receiving SMS and email reminders/invitations. This system is used to process the messages. SMS and email messages are used to communicate with patients regarding practice information, appointment reminders, review invitations, follow-up care, and test results. These messages are used solely for direct patient care and not for marketing purposes.	Accurx | Privacy Policy Accurx | Data Processing Agreement
Optum (previously EMIS)	Clinical system holds patient demographic and medical information – remote server	The servers and connections to the practice are encrypted, ensuring that EMIS staff cannot access patient information through this route. EMIS support staff may only access systems remotely with the explicit consent of practice staff and solely for troubleshooting purposes.	Privacy Policy | Optum
Docman 10 (One Advanced)	Provides practice with software and cloud-based storage for electronic documents regarding our patients. This includes letters that we receive, scan and upload to the patient record, as well as letters that we receive in an electronic format.	Docman support staff may access systems remotely with the consent of practice staff for the purpose of problem resolution.	Website Privacy Notice

Trusted Technology Partnership	The practice's primary general IT support provider.	Remote access by TTP support staff is permitted only with the consent of practice staff and solely for troubleshooting and support purposes.	Trusted Technology Partnership
iGPR	Software for securely processing patient medical reports electronically. Production of reports for third parties (SARs) and checking records for patient online access requests.	iGPR support staff may access systems remotely with the consent of practice staff for the purpose of problem resolution.	Privacy Policy | iGPR
Restore Datashred	Paper/hardware containing patient or other confidential information is securely shredded.	A representative attends the site to collect shredding bins containing paper, which is securely shredded off site.	Website Privacy Notice - Restore
MDU	Providing medical indemnity for clinical negligence claims and advice	In some circumstances, identifiable information may be communicated by email or telephone when the organisation is providing support to a GP involved in a patient complaint or litigation. Where feasible, information will be redacted.	Privacy policy - The MDU
Numed	Providing software and support services for our ECG machine	Remote access by Numed support staff is permitted only with the consent of practice staff and solely for troubleshooting and support purposes.	GDPR Statement of Compliance
eConsult	Form based online consultation and	Patient data is encrypted; consultation information is stored in	Privacy Notice - eConsult

	triage platform that collects medical or administrative patient requests	pseudonymised form on eConsult servers.	
InHealth	Providing diabetic eye screening services aimed at detecting diabetic retinopathy	The Diabetic Eye Screening Programme is delivered by Health Intelligence, commissioned by NHS England. The programme supports the invitation of patients for eye screening and their ongoing care. Relevant data may be shared with Hospital Eye Services involved in the patient's care and with other healthcare professionals as necessary to support treatment.	Privacy Policy - InHealth Group
Register with a GP surgery - NHS	The online registration service allows patients to register with an NHS GP practice, enabling access to primary medical care and a GP responsible for coordinating their healthcare.	The Register with a GP surgery is digital and paper registration service from NHS England. It lets patients register online or in person at a time convenient to them. The service gathers patient demographic and medical information in accordance with practice needs and current NHS policy.	Understanding WCAG 2.2 - Service Manual - GOV.UK Your privacy on the NHS website - NHS

Disclaimer: The surgery does not accept any responsibility for the content of any websites in the links provided in this document.