**LOCKSWOOD SURGERY**

**Privacy Notice**

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

1. We must let you know why we collect personal and healthcare information about you;

1. We must let you know how we use any personal and/or healthcare information we hold on you;

1. We need to inform you in respect of what we do with it;

1. We need to tell you about who we share it with or pass it on to and why; and

1. We need to let you know how long we can keep it for.

**2. THE DATA PROTECTION OFFICER**

The Data Protection Officer for Lockswood Surgery is Caroline Sims

You can contact her by email [hiowicb-hsi.lockswood.reception@nhs.net](mailto:hiowicb-hsi.lockswood.reception@nhs.net)

if:

* You have any questions about how your information is being held;

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

**3. ABOUT US**

We, at Lockswood Surgery (‘**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:

1. Your contact details (such as your name and email address, including place of work and work contact details);

1. Details and contact numbers of your next of kin;

1. Your age range, gender, ethnicity, language, disability status, information we need to allow us to provide information in a more accessible format to you;

1. Details in relation to your medical history;

1. The reason for your visit to the Surgery;

1. 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:

1. A hospital, a consultant or any other medical or healthcare professional, or any other person involved with your general healthcare.
2. Insurance company –in respect of requests for medical information, with your prior approval
3. Police service – in respect of a Firearms application you are making
4. Social Services
5. Solicitors – correspondence from them about you
6. Benefit Agency
7. Driving Vehicle Licensing Authority (DVLA)
8. Indeed any organisation who you give permission to ask for your medical information

**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 the Surgery.

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 [**https://digital.nhs.uk/services/summary-care-records-scr**](https://digital.nhs.uk/services/summary-care-records-scr)

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

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

Whenever you use a health or care service, such as attending Accident & Emergency or using Community Care Services, important information about you is collected to help ensure you get the best possible care and treatment. This information may be passed to other approved organisations where there is a legal basis, to help with planning services, improving care, research into developing new treatments and preventing illness. All of this helps in providing better care to you and your family and future generations. However, as explained in this privacy notice, confidential information about your health and care is only used in this way where allowed by law and would never be used for any other purpose without your clear and explicit consent.

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

1. Hospital professionals (such as doctors, consultants, nurses, etc);

1. Other GPs/Doctors;

1. Pharmacists;

1. Nurses and other healthcare professionals (eg District Nurses & Midwives);

1. Dentists;

1. 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, First Contact Physiotherapist.

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

1. Commissioners;

1. Clinical Commissioning Groups;

1. Local authorities;

1. 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/>

1. For the purposes of complying with the law e.g. Police, Solicitors, Insurance Companies;

1. 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.**

1. **Extended Access –** we provide extended access services to our patients this means you can access medical services outside of our normal working hours. In order to provide you with this service, we have formal arrangements in place with the Clinical Commissioning Group 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:

* Fareham Community Hospital, 233A Brook Lane, Sarisbury Green, Southampton, SO31 7DQ.
* Forton Medical Centre, Gosport, PO12 3JP.
* Portchester Health Centre, Fareham, PO16 9TU.

1. **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 Integrated Care Board 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 Integrated Care Board may require this pseudonymised information, these are as follows:

For example; 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. YOUR RIGHTS AS A PATIENT**

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

1. **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 our Practice in writing.We will provide this information free of charge however, we may in some **limited and exceptional** circumstances have to make an administrative charge for any extra copies if the information requested is excessive, complex or repetitive.

We have one month to reply to you and give you the information that you require, in some circumstances we may need longer and can extend this by to three months, but would contact you to let you know. We would ask, therefore, that any requests you make are in writing and we will ask you to complete a SARS form so it is made clear to us what and how much information you require before we commence this work.

1. **Online Access**

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

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

1. **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.

1. **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.

1. **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.

1. **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.

**11. 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.

**12. HOW WE USE THE INFORMATION ABOUT YOU**

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

1. 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;

1. 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.***

**13. 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).

**14. 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

**15. 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.

**16. UNDER 16s**

There is a separate privacy notice for patients under the age of 16.

**17. 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 the surgery.

**18. COMPLAINTS**

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

However, you have a right to raise any concern or complaint with the UK information regulator, at the Information Commissioner’s Office: [https://ico.org.uk/.](https://ico.org.uk/)

**19. OUR WEBSITE**

The only website this Privacy Notice applies to is the Surgery’s website.

Currently this is: [hiowicb-hsi.lockswood.reception@nhs.net](mailto:hiowicb-hsi.lockswood.reception@nhs.net)

If you use a link to any other website from the Surgery’s website then you will need to read their respective privacy notice. We take no responsibility (legal or otherwise) for the content of other websites.

**20. COOKIES**

The Surgery’s website uses cookies. For more information on which cookies we use and how we use them, please see our Cookies Policy. This is in the ‘Practice Policies’ section at the bottom of our homepage.

**21. SECURITY**

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

**22. TEXT MESSAGING, 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 in the event that we need to notify you about appointments and other services that we provide to you involving your direct care, therefore you must ensure that we have your up-to-date details. This is to ensure we are sure we are actually contacting you and not another person.

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

1. **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.

1. **CHANGES TO OUR PRIVACY NOTICE**

We regularly review and update our Privacy Notice.

**25.REVIEW OF PRIVACY NOTICE**

This Privacy Notice was last updated on 07/05/2024

Uploading of images to online consultation

Please note any digital image submitted to the practice as part of an online or video consultation will be stored within your clinical notes.

Please DO NOT UPLOAD any images of children without being asked to do so by a clinician.

Phone calls and CCTV

All phone calls to our main reception number are recorded for purposes of training and monitoring.

Your calls are recorded and stored on Call Recording. The recordings are kept in a secure environment that cannot be accessed externally except by authenticated users

Only the practice manager has access to these calls they will only be retrieved for purposes of training or in the event of a complaint. The recordings are stored for a retention period of 1 month and are then destroyed.

CCTV cameras are located around the premises for purpose of monitoring safety with staff and the practice patients. The agreed retention period for CCTV recordings is a period of 30 days. The system is access controlled and is only available to Practice Manager,

AI and healthcare

Heidi Health is an advanced AI tool designed to assist us by transcribing patient visits, generating clinical notes, and filling out necessary documents. It helps us focus more on you, the patient, by reducing the time spent on typing and administrative tasks.

It is important to note that the AI does not automatically add notes to your medical record or make any decisions for your care. All notes generated by Heidi Health are carefully reviewed and edited by your healthcare provider to ensure accuracy before they are added to your medical record.

Benefits of Using Heidi Health

* Clearer, More Accessible Notes: By using Heidi Health, we can create clearer, more detailed notes that are easier for you to understand. These notes are available on the NHS app, allowing you to see your medical information more clearly.
* Improved Patient Care: With the time saved on documentation, we can spend more time focusing on you, improving the quality of your care and communication during your consultation.
* Accuracy and Precision: The AI helps capture all relevant details of your visit, and because these notes are reviewed and edited by our team, we ensure that your medical record is accurate and complete.
* Streamlined Workflow: Heidi Health assists in handling various administrative tasks, such as generating summaries and filling out forms, helping us manage our practice more efficiently.
* Medical Management: Heidi Health will not be used to influence your medical care, it is only used to improve the accuracy and legibility of the clinical records.

**How Your Data is Handled using AI.**

* Data Security and Privacy: Heidi Health follows strict UK compliance regulations, including the Data Protection Act, GDPR, and NHS standards, ensuring that your personal information is securely handled and kept confidential. Your data is NOT used to improve any AI learning and is NOT available to online search bots. Other AI tools are not safe for use as they do not offer the protection and security offered by Heidi health.
* Local Data Hosting: All short term data is stored within the UK, complying with local data protection laws to keep your information safe.
* Temporary Data Retention: Consultations are not recorded in an audio format, only transcribed and after they are processed, they are deleted, ensuring your data remains private and secure. We do not retain any audio recordings at any time from clinical consultations using AI.

Lockswood Surgery Privacy Notice

**Appendix A - Who we share your information with and why**

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| **Activity** | **Rationale** |
| **Integrated Care Board (previously know as CCG)** | **Purpose:**  Anonymous information is shared to plan and design care services within the locality.    **Legal Basis:** non identifiable data only.    **Data Processor: Hampshire and Isle of White ICB** |
| **CSU –**  **Individual Funding Requests** | **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 in order 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**  **(SCR)** | **Purpose:** During the Covid19 pandemic practices have been told to share details of patient’s personal confidential and special category data onto the summary care record**.** 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:** Direct Care  The relevant COPI notice states that its purpose: “…is to require organisations to process confidential patient information for the purposes set out in Regulation 3(1) of COPI to support the Secretary of State’s response to Covid-19 (Covid-19 Purpose). “Processing” for these purposes is defined in Regulation 3(2) and includes dissemination of confidential patient information to persons and organisations permitted to process confidential patient information under Regulation 3(3) of COPI.”  Full details of the Summary Care Record supplementary privacy notice can be found [here](https://digital.nhs.uk/services/summary-care-records-scr/scr-coronavirus-covid-19-supplementary-privacy-notice)  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](https://digital.nhs.uk/services/summary-care-records-scr/scr-patient-consent-preference-form) 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 Englandand NHS Digital via GP connect |
| **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. |
| **Community Staff:**  **Complex Care Team**  **Home Visiting Service**  **District Nurses**  **Community Matrons**  **Leg Ulcer Service**  **Heart Failure Service**  **Multi-Disciplinary Team**  **Palliative Care Nurses**  **Midwives**  **Health Visitor**  **Diabetes Team** | **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 |
| **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***](http://links.govdelivery.com/track?type=click&enid=ZWFzPTEmbXNpZD0mYXVpZD0mbWFpbGluZ2lkPTIwMTgxMjIxLjk5Mzg4MDcxJm1lc3NhZ2VpZD1NREItUFJELUJVTC0yMDE4MTIyMS45OTM4ODA3MSZkYXRhYmFzZWlkPTEwMDEmc2VyaWFsPTE3MzQ2MzQxJmVtYWlsaWQ9aWFpbi5yZWRtaWxsQG5ocy5uZXQmdXNlcmlkPWlhaW4ucmVkbWlsbEBuaHMubmV0JnRhcmdldGlkPSZmbD0mbXZpZD0mZXh0cmE9JiYm&&&107&&&https://www.cqc.org.uk/about-us/our-policies/privacy-statement) |
| **CHIA** | **Purpose:** Is a database used for analysing trends in population health in order to identify better ways of treating patients.   CHIA is a physically separate database, which receives some data from CHIE.  Prior to this transfer from CHIE to CHIA patient identifiers are removed from the data.  This includes names, initials, addresses, dates of birth and postcodes.  NHS numbers are encrypted in the extract and cannot be read.  This process is called ‘pseudonymisation’.  This subset of data does not include information typed in by hand, so there is no possibility of it containing references to family members or other people.  It contains only coded entries for things like allergies and prescribed drugs.  It is not possible to identify any patient by looking at the ‘pseudonymised’ data on the CHIA database.  People who have access to CHIA do not have access to CHIE.  Data in CHIA is used  to plan how health and care services will be delivered in  future, based on what types of diseases are being recorded and how many are being referred to hospital etc.  Data is also used to help research into new treatments for diseases.    **Legal Basis:**You can opt out of this service    **Data Processor:** NHS SCW |
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| **General Practice Data for Planning and Research (GPDPR)** | **Purpose:** Patients personal confidential data will be extracted and shared with NHS Digital in order to support vital health and care planning and research.  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/>  For Type 1 Opt Out they can complete the form and return it to their registered practice for action. <https://nhs-prod.global.ssl.fastly.net/binaries/content/assets/website-assets/data-and-information/data-collections/general-practice-data-for-planning-and-research/type-1-opt-out-form.docx>  **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](https://digital.nhs.uk/data-and-information/data-collections-and-data-sets/data-collections/general-practice-data-for-planning-and-research/transparency-notice#our-legal-basis-for-collecting-analysing-and-sharing-patient-data)  **Processor:** NHS Digital |
| **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. |
| **Pharmacists from the CCG** | **Purpose:** To provide monitoring and advice in line with the national directive for prescribing. Anonymous data is collected by the CCG.    **Legal Basis:** Direct care.    **Data Processor:** Southampton CCG |
| **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. |
| **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. |
| **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 in order 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’ hat may include details of the care you have received and any concerns about that care. In order to look into these concerns, we may need to talk to other organisations such as Fareham & Gosport and SE Hants CCG 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. |
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| **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, CCG, third party organisations commissioned by the NHS to perform actuarial services, NHS England    **eConsult: A**nonymised aggregated numbers of contacts are shared for the online consultation tool. |
| **Surveys & asking for your feedback** | Sometimes we may offer you the opportunity to take part in a survey, t that the practice is running or the Friends & Family Feedback. We will not generally ask you to give us any personal confidential information as part of any survey.    **Legal Basis: Y**ou 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:** Survey Monkey, we love surveys,  Fourteen Fish (for friends & Family Feedback) |
| **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. |
| **Medication & Prescribing** | **Purpose:** Prescriptions containing personal identifiable and health data will be shared with chemists/pharmacies, in order to provide patients with essential medication or treatment as their health needs dictate. This process is achieved either by face-to-face contact with the patient or electronically.Where patients have specified a nominated pharmacy, they may wish their repeat or acute prescriptions to be  ordered and sent directly to the pharmacy making a more efficient process. Arrangements can also be made with the pharmacy to deliver medication  **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 |
| **MJOG** | **Purpose:** A fully automated text and email messaging service designed to allow a fast and easy stream of communication between the surgery and patients. All communications are saved to the relevant patient’s medical record. |
| **AccuRX video consultations** | **Purpose:** We will be offering patients video consultations through AccuRX as another way for patients to consult with their GP.  *The video link is via your mobile phone, through a secure encrypted link*. Patients are sent an SMS link to join the consultation.  **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**: AccruRx.  The SMS message will be stored on the patient’s clinical record. A GP may request a photo to support a patient’s consultation. The photo will be added to the patient’s medical record and AccuRx stores the image as part of the process of transferring the information to the practice. The stored photos are on UK servers which are fully encrypted to NHS standards, and are inaccessible by any AccuRx staff.  They are stored for the period of time recommended by the NHS Records Management Code of Practice. Video consultations are not recorded or stored by AccuRX or The Practice.  GP’s will record written notes as they do with all other consultation types.  AccruRx create anonymous usage statistics, ensuring no personal data remains (e.g. reporting at practice level or above). AccruRx share these usage stats publicly and with certain third party organisations. |
| **ACR project**  **Healthy.io for**  **patients with diabetes** | **Purpose:** The data is being processed for the purpose of delivery of a programme, sponsored by NHS Digital, to monitor urine for indications of chronic kidney disease (CKD) which is recommended to be undertaken annually for patients at risk of chronic kidney disease e.g., patients living with diabetes. The programme enables patients to test their kidney function from home.  **Data Processor:** Healthy.io  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 any early interventions that can be put in place for the benefit of your care.  **Legal Basis:** Healthy.io will only use your data for the purposes of delivering their service to you. If you do not wish to receive a home test kit from Healthy.io we will continue to manage your care within the Practice. Healthy.io are required to hold data we send them in line with retention periods outlined in the Records Management code of Practice for Health and Social Care. Further information about this is available at: <http://bit.ly/uACRtest>. |
| **Other organisations who provide support services for us** | **OTHER ORGANISATION PROVIDING SUPPORT SERVICES**  **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 into contracts with other organisations to provide some services for us or on our behalf.    As Follows:   * Stericare (SPCL): For the collection, transportation and safe disposal of Hazardous Waste, this includes sharps, disposable medical equipment, Infectious and Pharmaceutical Waste   (appointed by the CCG for all Southampton practices)   * Restore DataShred Ltd: Provide secure receptacles for waste storage, collection, safe destruction service for all confidential administration waste.      * City Sprint: Appointed by NHS England to transport medical records securely      * Continence and Stoma Service: Direct patient care in providing continence/stoma products and monitoring. * Steps To Wellbeing: Therapists deliver a Counselling Service |

This Privacy Notice was last updated on 07/05/2024.