

Privacy Notice - what you need to know...

Westlands Medical centre - Your information, what you need to know

(If you want to speak to us about your data, please see our 'contact' page)

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

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

Why we are providing this Privacy notice

We are required to provide you with this Privacy notice by law. It explains how we will use your personal healthcare information that we collect, store and hold about you. If you are unclear about how we process your personal data or if you have any questions then please do contact our Data Protection Officer.

Data Protection Officer

Should you have any questions or concerns about your data, please contact our Data Protection Officer:

Caroline Sims

Telephone: 023 92 377514

Email: hiowicb-his.westlandsmc@nhs.net

The law states:

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

Why we collect information about you

Your records are used to ensure you get the best possible care. Your information helps them to make the best decisions about your care and helps provide you with proactive advice and guidance. Important information is also collected to help us to remind you about specific treatment which you might need, such as health checks, immunisations for children and reminders for screening appointments. We work with other NHS services to co-ordinate these.

Information held about you may be used to help protect the health of the public and to help us to improve NHS services. Information may be used within the GP practice to monitor the quality of the service provided (known as 'clinical audit').

What data do we collect and receive about you?

Records are stored electronically and on paper and include personal details about you such as your address, carers, legal representatives, emergency contact details, as well as:

- Your contact details, age, gender, ethnicity, language and disability status
- Any appointments, visits, emergency appointments
- Notes and reports about your health
- Details about your diagnosis, treatment and care
- Details about any medication you are taking
- Results of investigations such as laboratory tests, x-rays
- Relevant information from health and care professionals, relatives or carers

We also receive information from other organisations that are caring for you that we hold in your record. This will include letters and test results.

How we use your information: For providing your care

Prescriptions

Where you have agreed we will send information on your prescriptions to pharmacies, either by electronic systems or by paper.

Test requests and results

Where we undertake tests on you, such as blood tests, we will send the sample and details of the tests we are requesting to the most appropriate pathology laboratory. The data shared with the laboratory will include your NHS number, name, the type of test requested and any health information relevant to doing the test and producing the result or report. We will receive the test results back from the laboratory electronically and these will be stored in your patient record.

Extended services and out of hours

We work closely with neighbouring practices and 'out of hours' providers including NHS 111 to ensure that if you need care from a doctor outside of normal hours that they have access to your records when needed to give you the best possible care. This may be delivered over the phone or via video consultation as appropriate. Services may be run by 'GP Federations' and 'Primary Care Networks'.

Patient referrals

With your agreement, your GP or Nurse may refer you to other services not provided by the practice, or they may work with other services to provide your care in the practice. Information will be shared by letters, emails and shared record systems.

Once you have been seen, the other care agency will tell us about the treatment they have provided for you and any support which your GP needs to provide. This information is then included in your record. Referrals can be to lots of different services, such as smoking cessation services, social prescribers, voluntary services and other health and care agencies, as appropriate, for your care.

Hospital, Community or Social Care Services

Sometimes the staff caring for you need to share some of your information with others who are also supporting you. This could include hospital or community based specialists, nurses, health visitors, therapists



or social care services. Information will be shared to organisations where you receive care, whether that is local or further away, if you need specialist care or emergency care in another.

Shared computer systems

Health and Social care services are developing shared systems to share data efficiently and quickly. It is important for anyone treating you to be able to access your shared record so that they have all the information they need to care for you. This will be during your routine appointments and also in urgent situations such as going to A&E, calling 111 or going to an Out of hours appointment. It is also quicker for staff to access a shared record than to try to contact other staff by phone or email.

Only authorised staff can access the systems and the information they see is carefully checked so that it relates to their job. Systems do not share all your data, just data which services have agreed is necessary to include.

For more information about shared care records, please go to <https://www.westlandsmedicalcentre.nhs.uk/practice-information/>

Safeguarding of children or vulnerable adults

If we have significant concerns or hear about an individual child or vulnerable adult being at risk of harm, we may share relevant information with other organisations, such as local authorities and the Police, involved in ensuring their safety.

Ensuring medicines work well

We work with the local Medicines Management team of the Clinical Commissioning Group to help get the best out of medicines for patients and ensure they are effective in managing conditions. This generally uses anonymous data, but occasionally they will assist in reviews of medication for patients with complex needs. Doctors may also seek advice and guidance on prescribing queries.

Identifying health risks

Systems known as 'risk stratification tools' are used to help determine a person's risk of suffering particular conditions and enable us to focus on preventing ill health before it develops. Information in these systems comes from a number of sources, such as hospitals and the practice. This can help us identify and offer you additional services to improve your health.

Multi-disciplinary team meetings

For some long-term conditions, such as diabetes, the practice participates in meetings with staff from other agencies involved in providing care, to help plan the best way to provide care to patients with these conditions.

Multi-disciplinary team meetings

For some long-term conditions, such as diabetes, the practice participates in meetings with staff from other agencies involved in providing care, to help plan the best way to provide care to patients with these conditions.

National Services (including screening programmes)

There are some national services like National Diabetes Audit and the National Cancer Screening Programmes that collect and keep information from across the NHS. This is how the NHS knows when to contact you about services like cervical, breast or bowel cancer screening.

You can find out more about how the NHS holds and shares your information for national programmes on the NHS screening website (<https://www.nhs.uk/conditions/nhs-screening/>)

Data may also be shared on anyone who contracts a 'communicable disease', such as Covid 19, in order to manage public health and safety.



If you would like to opt out of National services including screening programmes, please contact the Practice. However, if you do opt out you will still be contacted in the future as this is a part of our duty of care and allows patients the chance to change their minds.

Call recording

Recordings of calls made and received by Westlands Medical Centre may be used to support the learning and development of our staff and to improve the service we provide to our patients.

They may also be used when reviewing incidents, compliments or complaints.

Call recordings will be managed in the same way as all other personal information processed by us and in line with current data protection legislation.

CCTV footage

Westlands Medical Centre uses Close Circuit Television (CCTV) to record images within public areas of the practice for the safety and security of our patients and staff.

CCTV footage is managed in the same way as all other personal data processed by us and in line with current legislation.

How we use your information: beyond providing your care

The information collected about you when you use our services can also be used and provided to other organisations for purposes beyond your individual care, for instance to help with:

- improving the quality and standards of care
- research into the development of new treatments
- preventing illness and diseases
- monitoring safety
- planning new services
- public health screening
- assisting the Care Quality Commission with any investigations
- investigating fraud

Wherever possible data used for these purposes is anonymised so that you cannot be identified. If information cannot be completely anonymous, then this may only take place when the law allows the information to be used. All these uses help to provide better health and care for you, your family and future generations.

Statutory disclosures

Sometimes we are duty bound by laws to disclose information to organisations such as the Care Quality Commission, the Driver and Vehicle Licencing Agency, the General Medical Council, Her Majesty's Revenue and Customs and Counter Fraud services. In these circumstances we will always try to inform you before we are required to disclose and we only disclose the minimum information that the law requires us to do so.

Objecting to the use of data for purposes beyond your care

The NHS Constitution states 'You have a right to request that your personal and confidential information is not used beyond your own care and treatment and to have your objections considered'. For further information please visit: [The NHS Constitution](#)

Type 1 Opt Out

This is an objection that prevents an individual's confidential patient information from being shared outside of their general practice except when it is being used for the purposes of direct care, or in particular circumstances required by law, such as a public health emergency like an outbreak of a pandemic disease. If



you wish to apply a Type 1 Opt Out to their record you should make your wishes known to the practice manager. It does not apply if data extracted is not identifiable.

National data opt-out

The national data opt-out enables patients to opt-out from the use of their personal confidential data for research or planning purposes. To find out more or to register to opt out, please visit www.nhs.uk/your-nhs-data-matters.

If you have any concerns about use of your data not covered by the National Data opt out, please contact the practice.

How long do we hold information for?

Records are kept for the lifetime of the patient or in line with the [NHS Records Management Code of Practice 2021](#). If you move to a new practice, your record will be transferred. If the practice you have left need to access your record, for example to deal with a historic complaint, they will let you know. When information has been identified for destruction or deletion it will be disposed of using approved confidential disposal procedures.

Your rights:

Data Protection laws give you a number of rights, including access to your data, correction, erasure, objection and restriction of use of your data. Details on how to request access to your data are set out below. If you have any concerns about the accuracy and use of your records, please contact us.

Right of Access to your information (Subject Access Request)

You have the right to have a copy of the information we hold about you. There are some safeguards regarding what you will have access to and you may find information has been removed for the following reasons.

- Where your doctor has decided that some information may cause significant harm to you or someone else
- Where the information is about someone else (third party) and we do not have their consent to share it.

You can make a request by asking or writing to the practice. We may ask you to complete a form so that we have a record of your request. You will need to provide proof of identity.

If you would like to access your GP record online click here:

<https://www.westlandsmedicalcentre.nhs.uk/practice-information/>

Lawful basis for processing:

The use of personal data for providing care is supported under the following Article 6 and 9 conditions of the GDPR:

- Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and
- Article 9(2)(h) ‘necessary for the purposes of preventative 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...’



Change of Details

It is important that you tell us as soon as you can if any of your details such as your name or address, email address or mobile number have changed. This is to make sure no information about you is sent to an old address and that your current details are accurate and up to date.

Mobile telephone number

If you provide us with your mobile phone number, we may use this to send you text reminders about your appointments or other health screening information. Please let us know if you do not wish to receive text reminders on your mobile.

Email address

Where you have provided us with your email address we will use this to send you information relating to your health and the services we provide. If you do not wish to receive communications by email, please let us know.

Right to complain

If you have concerns or are unhappy about any of our services, please contact the Operations Manager.

For independent advice about data protection, privacy and data-sharing issues, you can contact:

The Information Commissioner
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Phone: 0303 123 1113 Website: <https://ico.org.uk/global/contact-us>

Data Retention

We manage patient records in line with the <https://www.nhs.uk/information-governance/guidance/records-management-code/> which sets the required standards of practice in the management of records for those who work within or under contract to NHS organisations in England, based on current legal requirements and professional best practice. If you transfer to another GP and we are asked to transfer your records we will do this to ensure your care is continued. Currently the NHS is required to keep GP records for 10 years after a patient has died. Exceptions to these rules are detailed in the code of practice.

Who are our partner organisations?

We may also have to share your information, subject to strict agreements on how it will be used, with the following organisations:

- NHS Trusts
- Specialist Trusts
- GP Federations
- Independent Contractors such as dentists, opticians, pharmacists
- Private Sector Providers



▪ Voluntary Sector Providers

- Ambulance Trusts
- Clinical Commissioning Groups
- Social Care Services
- Local Authorities
- Education Services
- Fire and Rescue Services
- Police
- Other 'data processors'

We will never share your information outside of health partner organisations without your explicit consent unless there are exceptional circumstances such as when the health or safety of others is at risk, where the law requires it or to carry out a statutory function.

Within the health partner organisations (NHS and Specialist Trusts) and in relation to the above mentioned themes – Risk Stratification, Invoice Validation, Supporting Medicines Management, Summary Care Record – we will assume you are happy for your information to be shared unless you choose to opt-out (see below).

This means you will need to express an explicit wish to not have your information shared with the other organisations; otherwise it will be automatically shared. We are required by law to report certain information to the appropriate authorities. This is only provided after formal permission has been given by a qualified health professional. There are occasions when we must pass on information, such as notification of new births, where we encounter infectious diseases which may endanger the safety of others, such as meningitis or measles (but not HIV/AIDS), and where a formal court order has been issued. Our guiding principle is that we are holding your records in strictest confidence.

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. The additional data extracted during the Covid-19 pandemic will continue to be extracted under a legal notice issue by the Secretary of State for Health and Social care. If a patient has expressed consent to only have the core summary information in the SCR or to opt out of the SCR completed (see below) this will be respected and their data will not be extracted.

National data sharing GP connect and Summary Care record additional information

The temporary changes made to GP Connect and Summary Care Record Additional Information in response to the COVID-19 pandemic will continue beyond the end of the Control of Patient Information (COPI) Notice.

There is further information about this at: <https://digital.nhs.uk/services/summary-care-records-scr/sr-coronavirus-covid-19-supplementary-privacy-notice>



Notification

Data Protection Legislation requires organisations to register a notification with the Information Commissioner to describe the purposes for which they process personal and sensitive information.

We are registered as a Data Controller and our registration can be viewed online in the public register at: http://ico.org.uk/what_we_cover/register_of_data_controllers.

The NHS Care Record Guarantee

The NHS Care Record Guarantee for England sets out the rules that govern how patient information is used in the NHS, what control the patient can have over this, the rights individuals have to request copies of their data and how data is protected under Data Protection Legislation.

<http://systems.digital.nhs.uk/infogov/links/nhscrg.pdf>

The NHS Constitution

The NHS Constitution establishes the principles and values of the NHS in England. It sets out the rights patients, the public and staff are entitled to. These rights cover how patients access health services, the quality of care you'll receive, the treatments and programmes available to you, confidentiality, information and your right to complain if things go wrong.

<https://www.gov.uk/government/publications/the-nhs-constitution-for-england>

NHS Digital

NHS Digital collects health information from the records health and social care providers keep about the care and treatment they give, to promote health or support improvements in the delivery of care services in England.

<http://content.digital.nhs.uk/article/4963/What-we-collect>

Reviews of and Changes to our Privacy Notice

We will keep our Privacy Notice under regular review. This notice was last reviewed in September 2023.

Any changes to this notice will be published on our website and in a prominent area at the Practice.

Who we share your information with and why

The following table builds upon the information in our Privacy notice and is published to ensure transparency. This list is not exhaustive. Where the offering of a service to a patient will inform them about the sharing of their data, e.g. support from smoking cessation services, it is not necessarily included here. This list does not set out uses of anonymous data where identity has been completely removed (such as anonymised data to the Department for Work and Pensions on provision of 'fit notes').

Organisation/Activity	Rationale
Shared Care Records	<p>Purpose</p> <p>To ensure you receive effective, safe care, we will, through digital means enable your record to be available to those providing your care in whichever care setting you are seen, such as an A&E attendance, a physiotherapy appointment, a social care needs assessment.</p> <p>In order to achieve this, the aim of Shared Care Records is to enable health and care staff to view your information, to save valuable time in getting you the right treatment. Your information will only be available to the staff involved in your direct care, and not at any other time, or for any other reason.</p>



	<p>Further information can be found here (https://www.england.nhs.uk/digitaltechnology/connecteddigitalsystems/health-and-care-data/joining-up-health-and-care-data/)</p> <p>Legal Basis – Article 6(1)e ‘exercise of official authority’ and article 9(2)h ‘Provision of health and care’</p>
Other GP practices	<p>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.</p> <p>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.</p> <p>Data processor – Your registered surgery will continue to be responsible for your full medical record.</p>
Community Nursing - Complex Care Team Diabetes Team Home Visiting Service Leg Ulcer Service Heart Failure Service Multi-Disciplinary Team District Nurses Midwives	<p>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.</p> <p>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</p> <p>Data processor – Your registered surgery will continue to be responsible for your full medical record</p>
MASH – Multi Agency Safeguarding Board - Safeguarding Children Safeguarding Adults	<p>Purpose – We share information with health and social care authorities for safeguarding issues.</p> <p>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.</p> <p>Data Processor – Multi Agency Safeguarding Authorities.</p>
Summary Care Record	<p>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.</p> <p>Legal Basis – Article 6(1)e ‘exercise of official authority’ and article 9(2)h ‘Provision of health and care’</p> <p>Further information can be found here</p> <p>Controller of summary care record data – NHS Digital</p>
Test requests and results	<p>Purpose – Some basic identifying details, the type of test requested and if required any relevant health information is shared with Pathology Laboratories when tests such as blood or urine tests need to be undertaken. The laboratory will also hold the details 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.</p> <p>Legal Basis – Article 6(1)e ‘exercise of official authority’ and article 9(2)h ‘Provision of health and care’</p> <p>Controller of test data – The laboratory that process the request and result are a controller of the data generated by the test process.</p>



Research	<p>Purpose – We may share personal confidential or anonymous information with research companies. Where you have opted out of having your identifiable information shared for this purpose then it will not be used. Details on how to opt out are here.</p> <p>Legal Basis – consent is required to share confidential patient information for research, unless there is have support under the Health Service (Control of Patient Information Regulations) 2002 ('section 251 support') applying via the Confidentiality Advisory Group in England and Wales</p> <p>The organisation leading the research will be the controller of data disclosed to them Westlands Medical Centre is an approved practice for research by NIHR (National Institute for Health Research)</p>
Individual Funding Requests	<p>Purpose – We may need to process your personal information where we are required to apply for funding for a specific treatment for you for a particular condition that is not routinely available.</p> <p>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 authority' and article 9(2)h 'Provision of health and care'</p> <p>Your data will be disclosed to the Clinical Commissioning Group who manages the individual funding request process. gain your explicit consent to share this. You have the right to withdraw your consent at any time. If you are happy for the request to be made, the basis for processing your data is: Article 6(1)e 'exercise of official authority' and article 9(2)h 'Provision of health and care'</p> <p>Your data will be disclosed to the Clinical Commissioning Group who manages the individual funding request process.</p>
Child Health Information Service	<p>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 nurses.</p> <p>Legal Basis – Article 6(1)e 'exercise of official authority' and article 9(2)h 'Provision of health and care'</p> <p>Controller to which data is disclosed: Child Health Services, St James Hospital, Portsmouth</p>
Risk Stratification – Preventative Care	<p>Purpose - 'Risk stratification for case finding' is a process for identifying and managing patients who have or may be at-risk of health conditions (such as diabetes) or who are most likely to need healthcare services (such as people with frailty). Risk stratification tools used in the NHS help determine a person's risk of suffering a particular condition and enable us to focus on preventing ill health before it develops.</p> <p>Information about you is collected from a number of sources including NHS Trusts and your GP Practice. A risk score is then arrived at to help us identify and offer you additional services to improve your health.</p> <p>In addition, data with your identity removed is used to inform the development and delivery of services across the local area.</p> <p>If you do not wish information about you to be included in any risk stratification programmes, please let us know. We can add a code to your records that will stop your information from being used for this purpose. Please be aware that this may limit the</p>



	<p>ability of healthcare professionals to identify if you have or are at risk of developing certain serious health conditions.</p> <p>Legal Basis Article 6(1)e 'exercise of official authority' and article 9(2)h 'Provision of health and care'.</p> <p>Risk stratification has been approved by the Secretary of State, through the Confidentiality Advisory Group of the Health Research Authority (approval reference (CAG 7-04)(a)/2013)) and this approval has been extended to the end of September 2020 NHS England Risk Stratification which gives us a statutory legal basis under Section 251 of the NHS Act 2006 to process data for risk stratification purposes which sets aside the duty of confidentiality. We are committed to conducting risk stratification effectively, in ways that are consistent with the laws that protect your confidentiality.</p> <p>Controller to which data is disclosed: NHS South, Central and West Commissioning Support Unit (CSU) (NB identifiable data is not disclosed to other controllers)</p>
<p>Public Health Screening programmes (identifiable)</p> <p>Notifiable disease information (identifiable)</p> <p>Smoking cessation (anonymous)</p> <p>Sexual health (anonymous)</p>	<p>Purpose – The NHS provides national screening programmes so that certain diseases can be detected at an early stage. These currently apply to bowel cancer, breast cancer, aortic aneurysms, lung health and diabetic retinal screening service. The law allows us to share your contact information with Public Health England so that you can be invited to the relevant screening programme. Personal identifiable and anonymous data is shared. More information can be found at: https://www.gov.uk/guidance/nhs-population-screening-explained or speak to the practice</p> <p>Legal Basis Article 6(1)e 'exercise of official authority' and article 9(2)h 'Provision of health and care'.</p> <p>Controller to which data is disclosed: Public Health Services (England), & Fareham Borough Council</p> <p>Processors of data:</p> <ul style="list-style-type: none"> InHealth Intelligence (targeted lung health check programme)
Population Health Management	<p>Purpose – Health and care services work together as 'Integrated Care Systems' (ICS) and are sharing data in order to:</p> <ul style="list-style-type: none"> 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. <p>Type of Data – Identifiable/Pseudonymised/Anonymised/Aggregate Data. NB only organisations that provide your individual care will see your identifiable data.</p> <p>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</p> <p>Processor to which data is disclosed: Cerner Ltd, Optum Ltd, NECS CSU</p> <p>Population Health Management also incorporates the use of risk stratification tools as an integral part of the purpose</p>



NHS Trusts	<p>Purpose – Personal information is shared with Hospitals, Community Services, Mental Health Services and others in order to provide you with care services. This could be for a range of services, including treatment, operations, physio, and community nursing, ambulance service.</p> <p>Legal Basis Article 6(1)e ‘exercise of official authority’ and article 9(2)h ‘Provision of health and care’.</p> <p>Controller to which data is disclosed: Southern Health</p>
Clinical Commissioning Group	<p>Purpose – Anonymous information is shared to plan and design care services within the locality.</p> <p>Legal Basis – non identifiable data only.</p> <p>Data Processor – Fareham & Gosport & SE Hants CCG</p>
Hampshire County Council	<p>Purpose - To support disease monitoring and health prevention for specific patients</p> <p>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.</p>
Care Quality Commission	<p>Purpose – The CQC is the regulator for the English Health and Social Care services to ensure that safe care is provided. They will inspect and produce reports back to the GP practice on a regular basis. The Law allows the CQC to access identifiable data but only where it is needed to conduct their services. More detail on how they ensure compliance with data protection law (including GDPR) and their privacy statement is available on CQC website: https://www.cqc.org.uk/about-us/our-policies/privacy-statement</p> <p>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 ‘management of health and care services’</p> <p>Controller data is disclosed to – Care Quality Commission</p>
Payments	<p>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. In order 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.</p> <p>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</p> <p>Controllers that data is disclosed to – NHS England, CCG, Public Health</p>
CHIE	<p>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.</p>

	<p>Legal Basis – This service is for your direct care and in an emergency.</p> <p>Data Processor – NHS SCW.</p>
CHIA	<p>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.</p> <p>Legal basis – You can opt out of this service</p> <p>Data processor – NHS SCW</p>
Patient Record data base support	<p>Purpose – The practice uses electronic patient records. Our supplier of the electronic patient record system is: EMIS Health</p> <p>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</p> <p>Legal Basis Article 6(1)e ‘exercise of official authority’ and article 9(2)h ‘management of health and care services’.</p>
Medicines optimisation	<p>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</p> <p>Legal Basis Article 6(1)e ‘exercise of official authority’ and article 9(2)h ‘Provision of health and care’.</p>
Medical student placements	<p>Purpose – to support the training of medical students.</p> <p>Legal Basis - As part of this programme, medical students will work in the practice and may be involved in your care. If staff would like a student to be present they will always ask for your permission before the start of the consultation. The treatment or care you receive will not be affected if you refuse to have a student present during your appointment. It is usual for GPs to discuss patient case histories as part of their continuing medical education or for the purpose of training GPs and/or medical students. In these situations the identity of the patient concerned will not be revealed.</p>
General Practice Extraction Service (GPES)	<p>Purpose : The General Practice Extraction Service (GPES) collects information for a wide range of purposes including providing GP payments for services they deliver, such as immunisations. Anonymised data can be used without patient consent and patient identifiable data may be used when the information is supported by law or directly benefits patient care.</p> <p>Further information is available at: https://digital.nhs.uk/services/general-practice-extraction-service</p>



	<p>Personal confidential and special category data will be extracted at source from GP systems for the use of planning and research. Requests for data will be approved by the NHS Health Research Authority.</p> <p>Patients can register an opt out from their data being used for research and future planning by NHS England by visiting https://www.nhs.uk/your-nhs-data-matters/ or calling 0300 303 5678</p> <p>Processor : NHS Digital</p>
General Practice Data for Planning and Research (GPDPR)	<p>Purpose: Patients personal confidential data will be extracted and shared with NHS Digital in order to support vital health and care planning and research. Further information can be found here</p> <p>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</p> <p>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</p> <p>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</p> <p>Processor: NHS Digital</p>
Clinical Audit	<p>Purpose – Information will be used by the CCG 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.</p> <p>Legal Basis Article 6(1)e ‘exercise of official authority’ and article 9(2)h ‘management of health and care services’.</p> <p>Controller – Somerset Clinical Commissioning Group</p>
Healthy.io	<p>Purpose - This practice is working with a company called Healthy.io to provide a pilot programme sponsored by NHS Digital to monitor urine albumin:creatinine ratio (ACR) annually for patients with diabetes. This enables patients with diabetes to test their kidney function from home. With your permission, we will share your contact details with Healthy.io to enable them to contact you and send you a test kit. This will help identify those at risk of kidney disease and proactively manage early interventions for the benefit of patient care.</p> <p>Legal Basis - This is undertaken with the legal basis of 6.1.e, and 9.2.h as the practice under contract to deliver direct health care</p>
National Fraud Initiative - Cabinet Office	<p>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:</p>



	<p>https://www.gov.uk/government/publications/code-of-data-matching-practice-for-national-fraud-initiative</p> <p>NFI activities vary each year, so data would only be disclosed if required by the focus of their activities</p> <p>Legal Basis – Part 6 of the Local Audit and Accountability Act 2014</p> <p>Controller – Cabinet Office</p>
Q-Covid	<p>Purpose - To support healthcare professionals in better understanding how at-risk a patient might be of catching Covid-19 and being admitted to hospital. (online tool)</p> <p>Legal Basis - Our legal basis for collecting and processing information for this purpose is statutory. DPIA covid-19-clinical-risk-assessment-tool-dpia---version-1.0-template-16-february-2021 (1).docx</p>
National Registries	<p>Purpose – 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.</p> <p>Legal Basis – Section 251 of the NHS Act 2006</p>
Police	<p>Purpose – The police may request information in relation to on-going enquiries, all requests are reviewed and only appropriate information will be shared under legislation.</p> <p>Legal Basis –</p> <p>Article 6(1)e – task carried out in the public interest</p> <p>Article 9(2)c - Vital Interests</p> <p>Article 9(2)f - Legal claims or judicial acts</p> <p>Article 9(2)g - Reasons of substantial public</p> <p>Controller disclosed to – Police</p>
Other organisations who provide support services for us	<p>Purpose - The Practice may use the services of additional organisations (other than those listed above), who will provide additional expertise to support the Practice.</p> <p>Legal Basis - We have entered into contracts with other organisations to provide some services for us or on our behalf.</p> <p>Confidential – Shred-It provide confidential waste destruction services</p> <p>Continence and Stoma Service – for direct care in providing continence/stoma products and monitoring.</p> <p>i-Talk Counselling service</p> <p>MIND Wellbeing service</p> <p>Dementia Friendly</p> <p>Health Visitors</p> <p>Palliative Nurses</p> <p>Clinical Waste</p>



Microtech Surgery Pod	<p>The Surgery Pod allows patients to enter basic information which can support their health care such as blood pressure, weight and height. Information entered is added to the patient medical record via a secure link.</p> <p>The Duty of Confidentiality is with explicit consent. Legal Basis Article 6.1.e – under authority vested in the controller. Article 9.2.h – for the management of health or social care.</p>
Insight Solutions	<p>To support the delivery of health reviews for patients with long term conditions the practice have contracted Insight Solutions to run specific reports for us. This will enable us to offer patients the right review appointments and support their health care.</p> <p>Legal basis 6.1.e NHS contract Lawful basis for sharing 9.2.h Management of Health care.</p>
Healthtech – 1 Ltd https://www.healthtech1.uk/	<p>The practice uses Healthtech – 1 to provide an online registration service to new patients. This relieves the pressure on staff and helps to speed up the registration process. Patients can choose to use the online service or to attend the practice to register.</p> <p>This is part of the NHS requirements under the NHS contract (6.1.e) and enables us to deliver patient care (9.2.h)</p>
GP Connect	<p>We use a facility called GP Connect to support your direct care. GP Connect makes patient information available to all appropriate clinicians when and where they need it, to support direct patients care, leading to improvements in both care and outcomes.</p> <p>The NHS 111 service (and other services determined locally e.g. Other GP practices in a Primary Care Network) will be able to book appointments for patients at GP practices and other local services.</p> <p>GP Connect is not used for any purpose other than direct care.</p> <p>Legal basis - 6.1.e - NHS Contract authority 9.2.h - delivery of direct health care</p>
Sleep Station	<p>Legal basis - 6.1.e - NHS Contract authority 9.2.h - delivery of direct health care</p>



<p>Ash Lane Consulting</p> <p>https://www.ashlane.co.uk/</p>	<p>ALC will access the data to audit the Personally Prescribed Items to ensure that the practice are claiming appropriately. Patient data will only be used to identify the items prescribed and not stored outside of the practice.</p> <p>Legal basis 6.1.e – Under NHS contract Lawful basis 9.2.h – Management of health care systems.</p>
<p>iGPR</p>	<p>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.</p>