Waterfront and Solent
SURGERY

Waterfront and Solent Surgery Practice Privacy Notice

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3	15.06.2020	Vicki Etheridge	Amanda O'Reilly	Update on repeat prescribing
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5	15.01.2021	Vicki Etheridge	Amanda O'Reilly	Update for the Frailty Service
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8	27.05.2021	Vicki Etheridge	Dr Simon Sherwin	GPDPR system
9	17/8/2021	Caroline Sims DPO		Review and annual update
10	10/09/2021	Vicki Etheridge	Caroline Sims DPO	Update COPI extension
11	16/11/2021	Vicki Etheridge	Caroline Sims DPO	Annex updated for Healthy.io
12	10/02/2022	Vicki Etheridge	Caroline Sims DPO	Update for COPI extension
13	06/06/2022	Vicki Etheridge	Caroline Sims DPO	Update for Diabetic monitoring device
14	04.07.2022	Vicki Etheridge	Caroline Sims DPO	Updated for removal of COPI
15	28.07.2022	Vicki Etheridge	Caroline Sims DPO	Annex added for iGPR
16	24.08.2022	Vicki Etheridge	Caroline Sims DPO	COPI extension details
17	23.11.2022	Vicki Etheridge	Caroline Sims DPO	COPI extension details
18	03.05.2023	Vicki Etheridge	Caroline Sims DPO	Covid 19 and COPI notices removal
19	07.09.2023	Vicki Etheridge	Caroline Sims DPO	Updated for data sharing with Oakhaven
20	15.09.2023	Vicki Etheridge	Caroline Sims DPO	Updated for data sharing with GP Connect
21	17.10.2023	Vicki Etheridge	Caroline Sims DPO	Updated for data sharing with PANDO
22	29.12.2023	Vicki Etheridge	Caroline Sims DPO	Updated for records storage
23	09.02.2023	Vicki Etheridge	Caroline Sims DPO	Update for Lung Healthchecks
24	09.05.2024	Vicki Etheridge	Caroline Sims DPO	Update to complaints section
25	21.05.2024	Vicki Etheridge	Caroline Sims DPO	Updated for Data Sharing with CRN Wessex Primary Care
26	01.10.2024	Vicki Etheridge	Caroline Sims DPO	Updated for PPA sharing
27	16.10.2024	Vicki Etheridge	Dr Simon Sherwin	Updated for Introduction of Anima
28	21.01.2025	Vicki Etheridge	Dr Simon Sherwin	Updated for Wessex Cancer Alliance Collaboration
29	08.04.2025	Vicki Etheridge	Dr Simon Sherwin	Updated for Heidi
30	15.04.2025	Vicki Etheridge	Dr Simon Sherwin	Updated for Suevra

31	25.04.2025	Vicki Etheridge	Dr Simon Sherwin	Updated for Interface
32	13.06.2025	Vicki Etheridge	Dr Simon Sherwin	Updated for AccuRx scribe
33	09.09.2025	Vicki Etheridge	Dr Simon Sherwin	Updated for Open Safely
34	22.09.2025	Vicki Etheridge	Dr Simon Sherwin	Update for AccuRx patient initiation contact and remove Anima
35	19.12.2025	Vicki Etheridge	Caroline Sims	Update for Infected Blood Inquiry and remove Suevera
36	29.05.2026	Vicki Etheridge	Caroline Sims	Update CHIE link. Removed Enhanced Technology. Update for Apex
37	02.07.2026	Vicki Etheridge	Caroline Sims	Update for iConnect
38	07.08.2026	Vicki Etheridge	Caroline Sims	Updated for Lexacom AI

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 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.

1. THE DATA PROTECTION OFFICER

The Data Protection Officer at the Surgery is **Caroline Sims**. You can contact her via

hiowicb-hsi.waterfrontandsolent@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.

2. ABOUT US

We, at the Waterfront & Solent Surgery ('**the Surgery**') situated at Jones Lane in Hythe, 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.

3. 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.

G. Recording of telephone calls made between the Surgery and you.

4. USE OF RECORDING EQUIPMENT IN THE SURGERY

- Recordings are made on the Registrars phones using iConnect. Nothing is stored on the Registrars phones it is saved directly onto a secure platform.

5. PHOTOS and PATIENTS

- You may be asked to send photos into the Surgery to help support a consultation. These photos will be added to your medical record and our provider AccuRx stores the image as part of the process of transferring the information to the Practice.

- The stored photos are kept on UK servers which are fully encrypted to NHS standards, and are inaccessible to any AccuRx staff.
- They are stored for the period of time recommended by the NHS Records Management Code of Practice.
- Doctors or Nurses may take images via the PANDO app on their mobile phone. Your NHS number maybe added to link the image with your records. Images are sent via the app, this is after you have consented to share via a NHS secure email. The image will be recorded into your medical record, then the image will be deleted from the app. The images are not stored locally on the phone.

6. 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 companies – in respect of requests for medical information, with your prior approval.
C. Police Service
D. Social Services
E. Solicitors – correspondence from them about you.
F. Benefit Agency.
G. Driving Vehicle Licensing Authority (DVLA).
H. Indeed any organisation who you give permission to ask for your medical information.

7. 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 please visit:

https://digital.nhs.uk/services/summary-care-records-scr Note if you choose to opt out you will need to let the surgery know, we can then add a code to your record to prevent it being shared in this way. 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.

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

Whenever you use a health or care service, such as attending Accident & Emergency or using Community Care Services, important information about you is collected to help ensure you get the

best possible care and treatment. This information may be passed to other approved organisations where there is a legal basis, to help with planning services, improving care, research into developing new treatments and preventing illness. All of this helps in providing better care to you and your family and future generations. However, as explained in this privacy notice, confidential information about your health and care is only used in this way where allowed by law and would never be used for any other purpose without your clear and explicit consent.

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

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

B. Other GPs/Doctors;

C. Pharmacists;

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

E. Dentists;

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.

9. OTHER PEOPLE WHO WE PROVIDE YOUR INFORMATION TO

A. Commissioners;

B. Integrated Care Board;

C. Local authorities;

D. Community health services;

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

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

CHIE :: NHS Hampshire and Isle of Wight

E. For the purposes of complying with the law e.g. Public Health, 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 permission to be disclosed.**

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

The key **Hub** practices are as follows:

- Partnering Health Limited (PHL) – currently offering appointments at Lymington.
- The Frailty Service
- Tri Locality Care (TLC) –currently offering appointments at Totton
- The Urgent Care HUB at Hythe Hospital

H. **Data Extraction by the Local Integrated Care System**
We are part of the:
Hampshire and Isle of Wight Integrated Care System
Home :: Hampshire and Isle of Wight ICS (hantsiowhealthandcare.org.uk) **–** the Integrated Care System 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 System 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 System may require this pseudo-anonymised information, for example, to better plan the provision of services across a wider locality than at Practice level.

10. THIRD PARTY PROCESSORS

In order to deliver the best possible service, the Practice will share data (where required) with other NHS bodies such as other GP Practices and Hospitals. In addition the Practice will use carefully selected third party service providers. When we use a third party service provider to process data on our behalf then we will always have an appropriate agreement in place to ensure that they keep the data secure, they do not use or share information other than in accordance with our instructions

and that they are operating appropriately. Examples of functions that may be carried out by third parties includes:

- Companies that provide IT services & support, including our core clinical systems; systems which manage patient facing services (such as our website and service accessible through the same); data hosting service providers; systems which facilitate appointment bookings or electronic prescription services; document management services etc.
- Phone service provider that helps us to manage our phone system.
- Delivery services (for example if we were to arrange for delivery of any medicines to you).

Further details regarding specific third-party processors can be supplied on request.

11. 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.

12. 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 the surgery 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 28 days to reply to you and give you the information that you require. We would ask, therefore, that any requests you make are in writing and it is made clear to us what and how much information you require.

B. **Online Access**

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

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

C. **Correction**

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

D. **Removal**

You have the right to ask for your information to be removed however, if we require this information to assist us in providing you with appropriate medical services and diagnosis for your healthcare, then removal may not be possible.

E. **Objection**

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

F. **Transfer**

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

13. 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.

14. 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.

15. 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).

16. 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

17. 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.

18. UNDER 16s

We hold a separate Practice Privacy Policy for Under 16-year-olds. This is available on our website or ask at Reception for a copy.

If you require a copy of this Privacy Notice in a different format please contact the surgery.

19. COMPLAINTS

If you have a concern about the way we handle your personal data, or you have a complaint about what we are doing, or how we have used or handled your personal and/or healthcare information, then please contact the Surgery or through our website at Feedback - WATERFRONT and SOLENT SURGERY.

However, you have a right to raise any concern or complaint with the UK information regulator, at the Information Commissioner's Office:

Contact us | ICO

Tel: 0303 123 1113

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

20. OUR WEBSITE

Currently this is: www.waterfrontandsolent.co.uk

There is a privacy notice regarding the website found at the foot of the webpage: WATERFRONT and SOLENT SURGERY

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

21. COOKIES

The Surgery's website uses cookies. For more information on which cookies we use and how we use them, please see our Cookies Policy. This is in a link at the bottom of our homepage on our website www.waterfrontandsolent.co.uk

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. ORGANISATIONAL SECURITY

CCTV is in place outside our Practice. It has been installed solely for the safety and security of our patients and staff; to prevent and deter crime.

Images are recorded only when there is movement detected outside the building. The images are stored on a tape and only those authorised at the Practice and those delivering technical support services will have access to the system.

The CCTV only records images and does not record audio.

There are signs outside the Practice telling you that CCTV is in place.

We will only ever share information with the relevant internal personnel/authorities in connection with the safety and security of patients and staff and will not share with any other third parties.

24. TEXT MESSAGING, EMAIL AND CONTACTING YOU

We are obliged to protect any confidential information we hold about you and we take this very seriously, it is imperative that you let us know immediately if you change any of your contact details.

We may contact you using SMS texting to your mobile phone or by E-mail 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 contact 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.

25. PAPER COPIES OF MEDICAL RECORDS

We have contracted Restore (who manage paper records for practice across the UK) to securely store our paper medical records in off-site storage facilities. This service will include the secure transportation of required records to and from our Practice. Restore meets CQC requirements for records storage security standards.

26. 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.

27. CHANGES TO OUR PRIVACY NOTICE

We regularly review and update our Privacy Notice.

This Privacy Notice was last updated on 07.08.2026.

Appendix A

Who we share your information with and why

Activity	Rationale
Integrated Care System	**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 Wight ICS
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 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	**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** – Direct Care Full details of the Summary Care Record 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 to care that may be required in an emergency. **Processor –** NHS England and NHS Digital via GP connect
CHIE	**Purpose –** To provide Healthcare Professionals with complete, accurate and up to date information in the Hampshire area. 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 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
Population Health Platform	**Purpose:** Direct Care & other uses: • Risk stratification and segmentation, including provision of such data to providers of care to undertake direct care interventions • Planning & improvement of services • Understanding needs of the care system's population including inequalities • Targeting support to areas of most impact

	• Support for Child Health Information Services Vaccs & Imms reporting and service support Patients GP record that is coded to prevent sharing for direct care (e.g. 93c1 "refused consent for upload to local shared care record) are not included. GP record "type 1" opt outs are uploaded so data can be used for direct care purposes, but are excluded from any other identifiable use. National Data Opt out applicable for a non-direct care use of confidential patient information. Other than the CAG S251 supported activities there are no use cases currently for this form of activity as all other data access is pseu **Legal Basis :** The legal basis for this activity can be found at this link : How confidential patient information is used - NHS **Processor:** NHS Digital
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)€; "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
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.
Community Nursing – Complex Care Team 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.

Home Visiting Service Leg Ulcer Service Heart Failure Service Multi-Disciplinary Team District Nurses Midwives School Nurses Health Visitors Frailty Team	**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 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** – Hampshire, Southampton and Isle of Wight ICB
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 patients we will rely on a statutory basis rather than consent to share information for this use. **Data Processor** – Multi Agency Safeguarding Authorities.
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: Population health management :: NHS Hampshire and Isle of Wight
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. In order to look into these concerns we may need to talk to other organisations such Hampshire, Southampton and Isle of Wight 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.
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.
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.
Freestyle Libre – Diabetic Monitor (Abbott)	Device for monitoring of diabetics with an App on the patient mobile phone. Patient gives explicit consent **Legal basis for offering** – 6.1.e and 9.2.h NHS contract to provide direct health care. Abbott privacy notice at Privacy Policy | FreeStyle Libre | Abbott
Niche Health – iGPR Managed Service	Niche Health offer a iGPR which allows practices to produce reports and SARs from the clinical system with all redactions marked. They now provide a Managed Service to support the practice, which will allow a team of trained staff to produce all reports and SARs saving practice staff time, and ensuring that they are produced to the required standard and within the required time frames. The service is approved by NHS GP IT Futures, and has the required security to protect patient information Legal basis for sharing this data: 6.1.e necessary under official authority vested in the controller. 9.2.h processing is necessary for the management of health care systems
Restore	Restore securely stores our paper medical records in off-site storage facilities. This service includes the delivery of required records to our Practice and the collection of new patient records and records that need to be returned to secure storage. 6.1.e necessary under official authority vested in the controller. 9.2.h processing is necessary for the management of health care systems
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 Privacy statement - Care Quality Commission

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.
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.
Phone Provider	**Purpose –** To help managers, receptionists and clinical staff achieve critical goals. Linking the telephony and patient management system speeds up patient verification, improves patient service and assists with metrics. **Legal Basis :** Article 6(1)(e); "necessary… in the exercise of official authority vested in the controller' And Article 9(2)(h).
Oakhaven Hospice	**Purpose -** Collected for the delivery of care/treatment of patients registered with the GP Practice and Oakhaven Hospice, to provide: • A quicker response time to referrals between partners • Less duplication of clinical information on duplicate systems Access for clinicians to appropriate clinical information, without the need to ask the patient. **Legal Basis:** Article 6(1)(e) • exercising official authority (for example, a public body's tasks, functions, duties or powers) which is laid down by law. Article 9(2)(h) the provision of health care or treatment;

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. The NHS 111 service (and other services determined locally e.g. Other GP practices in a Primary Care Network) will be able to book appointments for patients at GP practices and other local services. GP Connect is not used for any purpose other than direct care. **Legal basis** - 6.1.e - NHS Contract authority 9.2.h - delivery of direct health care
PANDO App	**Purpose –** The use of this App is to support patient Dermatology referrals. Consent is obtained and recorded. No data is stored outside of the NHS network or clinical systems. **Legal Basis** – 6.1.a – the data subject has given explicit consent 6.1.e – For a task carried out in the Public Interest 9.2.a – the data subject has given explicit consent 9.2.h – the provision of health care or treatment
iConnect App	**Purpose -** iConnect, is a secure digital platform that enables trainee healthcare students, healthcare professionals, supervisors, and trainers to record, share, and review learning and practice-based activities through a role-based login system. Once uploaded, recordings, reflective notes, or case-based discussions can be selectively shared with supervisors, trainers, or peer groups within the organisation, or across partner institutions, subject to approval by Data Protection Officers. The platform provides tools that enable analysis of recorded practice, structured feedback, and reflective discussion in line with high-quality professional education and training standards. Trainees and professionals can use iConnect to reflect on their clinical practice, receive constructive input from supervisors, and access examples of best practice. Over time, the system supports healthcare professionals to refine their clinical and professional skills, strengthening both individual competence and overall quality of care. **Legal Basis** – 6.1.a – the data subject has given explicit consent 6.1e – For a task carried out in the Public Interest 9.2.a – the data subject has given explicit consent 9.2.h – the provision of health care or treatment
Lung Cancer Screening Programme Data	The practice plans to take part in the Targeted Lung health checks, which is a national programme to be offered to all appropriate patients, this will identify early diagnoses of lung cancer or other disease.. https://www.nhs.uk/conditions/lung-health-checks

	Patients will be identified and their details share with UHS who will offer a free lung check. **Legal Basis** – 6.1.a – the data subject has given explicit consent 6.1.e – For a task carried out in the Public Interest 9.2.a – the data subject has given explicit consent 9.2.h – the provision of health care or treatment
CRN Wessex Primary Care	**Purpose –** The Practice is to take part in Research trials to improve patient care and wellbeing. We will work with the research networks and trial sponsors to deliver research in the local area for the management of long-term illnesses, prevention of future health conditions and promoting healthier lifestyles. **Legal Basis –** – 6.1.a – the data subject has given explicit consent 6.1.e – For a task carried out in the Public Interest 9.2.a – the data subject has given explicit consent 9.2.h – the provision of health care or treatment
AccuRx Patient Initiated Care	**Purpose –** The purpose of using the Accurx platform is for healthcare staff to communicate with patients (and each other regarding patients) for the provision of healthcare or social care services. **Legal Basis –** 6 (1) e – For a task carried out in the Public Interest 9 (2) h – the provision of health care or treatment
Wessex Cancer Alliance Collaboration	**Purpose -** As part of a local improvement scheme, PCNs/GP practices will be asked to complete a retrospective cancer audit of all of their lung, pancreatic and oesophageal cancers diagnosed within the financial year 23/24, exploring details of the primary care interval leading up to the point of diagnosis. The outcomes of the audit will be analysed and learning from the audit will be shared externally for learning and quality improvement projects to improve early cancer diagnosis. **Legal Basis –** 6(1)e – For a task carried out in the public interest. 9(2)h – the provision of healthcare or treatment
Heidi	**Purpose** - The practice plan to use Heidi – standalone software -to support clinicians in writing clinical records by transcribing clinician consultations, and documents. Heidi is an AI scribe system which will learn the natural language of the users and categorise the data into the appropriate sections of the electronic patient record. The resulting record can be integrated into the clinical system **Legal Basis –** 6(1)a – The data subject has given explicit consent.

	6(1)e – For a task carried out in the public interest or under official authority vested in the controller. 9(2)a – The data subject has given explicit consent. 9(2)h – The provision of healthcare or treatment
Interface	**Purpose –** Working with pharmacists to review patient data of patients with long term conditions to help provide them with the best care. **Legal Basis –** 6(1)e – For a task carried out in the public interest or under official authority vested in the controller. 9(2)h – processing is necessary for the purposes of preventative or occupational medicine, for the provision of healthcare or treatment.
AccuRx Scribe	**Purpose** - As part of our commitment to improving the accuracy and quality of the care we provide, clinicians may use a secure, NHS-approved artificial intelligence (AI) Ambient Scribe/ Heidi etc during consultations. This software transcribes the conversation in real time to assist with clinical documentation. Before using this tool, your clinician will always ask for your consent and your response will be recorded in your medical record. If you prefer not to have this tool used during your consultation, please let your clinician know. Your choice will always be respected and the clinician will use traditional note taking instead. The software does not retain any audio recordings, and the transcribed notes are reviewed and approved by your clinician before being saved into your medical record. All data is processed securely in the UK/EU and complies with NHS information governance standards. **Legal Basis –** 6(1)a – The data subject has given explicit consent. 6(1)e – For a task carried out in the public interest or under official authority vested in the controller. 9(2)a – The data subject has given explicit consent. 9(2)h – The provision of healthcare or treatment
Lexacom Ambient AI	**Purpose** - Lexacom is used as a transcription tool by The Waterfront and Solent Surgery to transcribe live clinician-patient consultations in real time. This tool listens to the conversation between the clinician and patient, generating consultation notes based on that interaction. Explicit patient consent is obtained before each session, informing patients of how their data will be processed and used. **Legal Basis –** 6(1)a – The data subject has given explicit consent. 6(1)e – For a task carried out in the public interest or under official authority vested in the controller.

	9(2)a – The data subject has given explicit consent. 9(2)h – The provision of healthcare or treatment
NHS England OpenSAFELY Data Analytics Service	**Purpose -** "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. Here you can find additional information about OpenSAFELY." **Legal Basis –** 6(1)c - processing is necessary for compliance with a legal obligation to which the controller is subject (the Directions). 9(2)g - processing is necessary for reasons of substantial public interest, on the basis of domestic law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject, by virtue of compliance with a direction supplemented by: Data Protection Act 2018 basis Data Protection Act 2018 (DPA 2018) Schedule 1, Part 2, paragraph 6: Statutory etc and government purposes.
Infected Blood Inquiry	**Purpose -** If you have made a claim for compensation through the Infected Blood Compensation Authority (IBCA), The Waterfront and Solent Surgery may provide IBCA with relevant information from your medical records to support your claim. You can read more about how IBCA uses your information in their privacy notice. **Legal Basis –** 6(1)(a) – The individual has given clear consent for you to process their personal data for a specific purpose. 6(1)© - In relation to responding to freedom of information and data subject requests, the legal basis for processing your personal data is that it is necessary to comply with a legal obligation placed on us as the data controller.

	6(1)(e) – 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 as set out by the Victims and Prisoners Act 2024. 6(1)(f) – It is necessary for the purposes of our legitimate interests. 9(2)(a) – Our legal basis for processing special category data is that the data subject has given explicit consent to the processing of those personal data for one or more specified purposes. *https://www.infectedbloodinquiry.org.uk/* *Sharing information relating to Infected Blood Compensation Authority claims - NHS Transformation Directorate*
NUMED	**Purpose:** NUMED provide services which allow the secure transmission of ECG datafiles to the patient's electronic record. They provide support, maintenance, monitoring and security functions. **Legal Basis** – 6.1.a – the data subject has given explicit consent 6.1.e – For a task carried out in the Public Interest 9.2.a – the data subject has given explicit consent 9.2.h – the provision of health care or treatment
Other organisations who provide support services for 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 into contracts with other organisations to provide some services for us or on our behalf. NHS England use City Sprint to transfer medical records Continence and Stoma Service – for direct care in providing continence/stoma products and monitoring. i-Talk Counselling service Signposters Dementia Friendly Springboard Health Visitors Palliative Nurses Clinical Waste Midwives Frailty Service