Privacy Notice

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

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

Please note that the data protection and electronic communication laws do not stop us from sending public health messages to you, either by phone, text or email as these messages are not direct marketing.

It may also be necessary, where the latest technology allows us to do so, to use your information and health data to facilitate digital consultations and diagnoses and we will always do this with your security in mind.

1. WHY WE ARE PROVIDING THIS PRIVACY NOTICE

We are required to provide you with this Privacy Notice by Law. It explains how we use the personal and healthcare information we collect, store and hold about you. If you are unclear about how we process or use your personal and healthcare information, or you have any questions about this Privacy Notice or any other issue regarding your personal and healthcare information, then please do contact our **Data Protection Officer** (details below).

The Law says:

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

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

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

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

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

2. THE DATA PROTECTION OFFICER

Our Data Protection Officer is **Caroline Sims**.

If you need to contact the DPO you can contact her via The Denmead Practice, Hambledon Road, Denmead, Waterlooville, Hampshire PO7 6NR or hiowicb-hsi.denmeadHC@nhs.net or on 023 9223 9630 if:

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

- Any other query relating to this Policy and your rights as a patient.

3. ABOUT US

We, at The Denmead Practice ('**the Surgery**') situated at Hambledon Road, Denmead, Waterlooville, Hampshire PO7 6NR, are a **Data Controller** of your information. This means we are responsible for collecting, storing and handling your personal and healthcare information when you register with us as a patient.

There may be times where we also process your information. That means we use it for a particular purpose and, therefore, on those occasions we may also be **Data Processors**. The purposes for which we use your information are set out in this Privacy Notice.

4. INFORMATION WE COLLECT FROM YOU

The information we collect from you will include:

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

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

C. Your age range, gender, ethnicity;

D. Details in relation to your medical history;

E. The reason for your visit to the Surgery;

F. Medical notes and details of diagnosis and consultations with our GPs and other health professionals within the Surgery involved in your direct healthcare.

5. INFORMATION ABOUT YOU FROM OTHERS

We also collect personal information about you when it is sent to us from the following:

A. A hospital, a consultant or any other medical or healthcare professional, or any other person involved with your general healthcare.
B. The Police and other authorities when information is required with regards to Firearms applications and licenses.

6. NATIONAL CARE RECORD SERVICE (NCRS)

NCRS is a service that allows health and social care professionals to access and update a range of patient and safeguarding information across regional Integrated Care Systems (ICS) boundaries.

The service provides a summary of health and care information for care settings where the full patient record is not required to support their direct care. The service is a web-based application and can be accessed regardless of what IT system an organisation is using and is the improved successor to the Summary Care Record application (SCRa) - NHS England Digital

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

Whenever you use a health or care service, such as attending Accident & Emergency or using Community Care Services, important information about you is collected to help ensure you get the best possible care and treatment. This information may be passed to other approved organisations where there is a legal basis, to help with planning services, improving care, research into developing new treatments and preventing illness. All of this helps in proving 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. Dentists;

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

8. OTHER PEOPLE WHO WE PROVIDE YOUR INFORMATION TO

A. Commissioners;

B. Integrated Care Boards;

C. Local authorities;

D. Community health services;

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

F. Anyone you have given your consent to, to view or receive your record, or part of your record. **Please note, if you give another person or organisation consent to access your record we will need to contact you to verify your consent before we release that record. It is important that you are clear and understand how much and what aspects of, your record you give consent to be disclosed.**

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

- Waterlooville Health Centre
- Petersfield Hospital
- Havant Health Centre
- Badgerswood Surgery, Bordon
- Fareham Community Hospital
- Gosport War Memorial Hospital

H. **Data Extraction by the ICB –** the ICB at times extracts information about your care, but the information they extract 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 pseudonymised). We will **never** give the ICB access to any system or information that would enable them to identify you.

The ICGrequires this pseudonymised information for the following purposes:

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

I. **Primary Care Networks (PCN's) –** The PCN is made up of a group of local practices to work collaboratively in order to commission and offer extended services to the population within those practices.
The practices that make up Havant & Waterlooville PCN are:
    - Denmead Practice

- Oaks Medical Practice
- Village Practice
- Bosmere Medical Centre
- Blossom Healthcare

I **Additional in-house and local services that have been set up** where information can be accessed /shared in order to offer additional services to benefit your health:

a) **Home Visiting Service** – your information may be shared with a GP/Paramedic in order to visit you at home.
b) **Heart Failure clinics** – a Community Heart Specialist Nurse is holding clinics locally to help reduce the wait for follow up care. Clinics will be held at Waterlooville Health Centre and access to your record will only be gained with your explicit consent.
c) **Stoma and Continence items** – for direct care should you require the use of items relating to stoma and continence
d) **Restore Datashred** – Provide confidential waste destruction services
e) **Docmail** – third party mailing house for distributing patient letters in volume
f) **Anima** – as above
g) **X-on communications –** third party telephone recording service to allow access to calls if required. A strict policy is followed and an audit kept of any call monitoring. Accessed by a named senior staff member for staff training purposes or as a result of a complaint and the calls held on an encrypted memory stick.
h) **E-Consult –** for direct care via our practice web site as an alternative to a face to face or telephone consultation
i) **Medical Research –** we work alongside Southampton University, Oxford University and the Wessex Clinical Research Network (CRN) to support non-commercial medical studies. The Practice will run searches to identify any patients who may benefit or be eligible to assist with research, however express consent is required prior to any information being shared with the research teams.
j) **Accu-Rx –** for direct care, the GP is able to text you with a message which is recorded in your medical record. 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 Accurx Scribe etc)during consultations. This software transcribes the conversation in real time onto your record 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.
k) **Herbert Protocol –** For direct care. Patients with Dementia or memory problems can sometimes go missing or 'wander'. In order to reduce their risk of harm, the practice (with your / patient consent) will keep a record containing an up to date photograph and various information that may lead to the patient being found more timely. The information will be shared with the local police and emergency services if and when a patient is reported missing.

l) **MedLink –** Patient recall and monitoring software used for the purposes of ensuring patients are kept up to date with all tests and monitoring to comply with medicines safety and for their well being and ongoing health requirements.

m) **MDT meetings –** for direct care, if appropriate, the GP will dial in remotely to a Multi Team meeting with other healthcare professionals (including district nurses, occupational therapists, social workers) in order to discuss how as a team they can help with both your health and social care needs.

n) **Primary Care Networks** – for Direct Care, information shared with shared staff. Currently the **Social Prescriber and Clinical Pharmacist.**

o) **AccuScribe AI** – Third Party software for transcription of patient consultations or GP dictation. Consent will be required if being used during a consultation.

p) **Numed** – Patient check in machine, when you have successfully checked in, the information is logged into your medical record held in EMIS.

q) **General Practice Extraction Service -** 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.

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.

Further information is available at: https://digital.nhs.uk/services/general-practice-extraction-service

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.

Legal Basis : 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 by 0300 303 5678

Processor : NHS Digital

r) General Practice Data for Planning & Research (GPDPR)

Purpose: Patients personal confidential data will be extracted and shared with NHS Digital in order to support vital health and care planning and research. Further information can be found here

Patients may opt out of having their information shared for Planning or Research by applying a National Data Opt Out or a Type 1 Opt Out. Details of how to Opt Out can be found on our Privacy Notice. For the National Data Opt Out patients are required to register their preference below. https://www.nhs.uk/your-nhs-data-matters/

For Type 1 Opt Out they can complete the form and return it to their registered practice for action by the 23rd June 2021. https://nhs-prod.global.ssl.fastly.net/binaries/content/assets/website-assets/data-and-information/data-collections/general-practice-data-for-planning-and-research/type-1-opt-out-form.docx

Legal Basis : The legal basis for this activity can be found at this link : General Practice Data for Planning and Research: NHS Digital Transparency Notice - NHS Digital

Processor: NHS Digital

s) ACR project for patients with diabetes (and/or other conditions)

The data is being processed for the purpose of delivery of a programme, sponsored by NHS Digital, to monitor urine for indications of chronic kidney disease (CKD) which is recommended to be undertaken annually for patients at risk of chronic kidney disease e.g., patients living with diabetes. The programme enables patients to test their kidney function from home. 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 patients at risk of kidney disease and help us agree any early interventions that can be put in place for the benefit of your care. Healthy.io will only use your data for the purposes of delivering their service to you. If you do not wish to receive a home test kit from Healthy.io we will continue to manage your care within the Practice. Healthy.io are required to hold data we send them in line with retention periods outlined in the Records Management code of Practice for Health and Social Care. Further information about this is available at: https://bit.ly/3xpSq5q.

9. ANONYMISED INFORMATION

Sometimes we may provide information about you in an anonymised form. If we do so, then none of the information we provide to any other party will identify you as an individual and cannot be traced back to you.

10. YOUR RIGHTS AS A PATIENT

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

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

We have one month to reply to you and give you the information that you require. 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.

You can register to use the NHS App – this will also give you access to some of your personal data.

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.

11. THIRD PARTIES MENTIONED ON YOUR MEDICAL RECORD

Sometimes we record information about third parties mentioned by you to us during any consultation. We are under an obligation to make sure we also protect that third party's rights as an individual and to ensure that references to them which may breach their rights to confidentiality, are removed before we send any information to any other party including yourself. Third parties can include: spouses, partners, and other family members.

12. HOW WE USE THE INFORMATION ABOUT YOU

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

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.

13. LEGAL JUSTIFICATION FOR COLLECTING AND USING YOUR INFORMATION

The Law says we need a **legal basis** to handle your personal and healthcare information.

CONTRACT: We have a contract with NHS England to deliver healthcare services to you. This contract provides that we are under a legal obligation to ensure that we deliver medical and healthcare services to the public.

CONSENT: Sometimes we also rely on the fact that you give us consent to use your personal and healthcare information so that we can take care of your healthcare needs.

Please note that you have the right to withdraw consent at any time if you no longer wish to receive services from us.

NECESSARY CARE: Providing you with the appropriate healthcare, where necessary. The Law refers to this as 'protecting your vital interests' where you may be in a position not to be able to consent.

LAW: Sometimes the Law obliges us to provide your information to an organisation (see above).

14. SPECIAL CATEGORIES

The Law states that personal information about your health falls into a special category of information because it is very sensitive. Reasons that may entitle us to use and process your information may be as follows:

PUBLIC INTEREST: Where we may need to handle your personal information when it is considered to be in the public interest. For example, when there is an outbreak of a specific disease and we need to

contact you for treatment, or we need to pass your information to relevant organisations to ensure you receive advice and/or treatment;

CONSENT: When you have given us consent;

VITAL INTEREST: If you are incapable of giving consent, and we have to use your information to protect your vital interests (e.g. if you have had an accident and you need emergency treatment);

DEFENDING A CLAIM: If we need your information to defend a legal claim against us by you, or by another party;

PROVIDING YOU WITH MEDICAL CARE: Where we need your information to provide you with medical and healthcare services

15. HOW LONG WE KEEP YOUR PERSONAL INFORMATION

We carefully consider any personal information that we store about you, and we will not keep your information for longer than is necessary for the purposes as set out in this Privacy Notice.

16. COMPLAINTS

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

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

17. OUR WEBSITE

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

18. 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:

http://www.denmeaddoctorssurgery.co.uk/disclaimer.htm#cookies

19. 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.

There is role based access to all systems holding patient identifiable data. Smartcards control the level of access for each staff member.

Anonymised data or Pseudonymised patient identifiers are used for any information shared with the ICB for audit purposes. All data stored on removal drives is encrypted.

20. TEXT MESSAGING AND CONTACTING YOU VIA EMAIL

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

We may contact you using SMS texting to your mobile phone or via email in the event that we need to notify you about appointments and other services that we provide to you involving your direct care, therefore you must ensure that we have your up to date details. This is to ensure we are sure we are actually contacting you and not another person.

21. WHERE TO FIND OUR PRIVACY NOTICE

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

22. CHANGES TO OUR PRIVACY NOTICE

We regularly review and update our Privacy Notice. This Privacy Notice was last updated on 15.04.2026