

Appendix A

Who we share your information with and why

Activity	Rationale
Integrated Care Board ICB	<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 – Hampshire and Isle of Wight ICB</p> <p>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.</p>
Individual Funding Requests – The ICB	<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 gain your explicit consent to share this.</p> <p>Data processor – We ask NHS Hampshire and Isle of Wight ICB, to do this on our behalf.</p> <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 – Direct Care</p>
Summary Care Records	<p>Full details of the Summary Care Record supplementary privacy notice can be found here</p> <p>Patients have the right to opt out of having their information shared with the SCR by completion of the form which can be downloaded here and returned to the practice. Please note that by opting out of having your information shared with the Summary Care Record could result in a delay care that may be required in an emergency.</p>

CHIE

Processor – NHS England and NHS Digital via GP connect

Purpose – To provide Healthcare Professionals with complete, accurate and up to date information. This information comes from a variety of sources including GP practices, community providers, acute hospitals and social care providers. CHIE is used by GP out of hours, acute hospital doctors, ambulance service, GPs and others on caring for patients – you may opt out of having your information shared on this system.

Legal Basis – This service is for your direct care and in an emergency.

Data Processor – NHS SCW.

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.

CHIA

Legal basis – You can opt out of this service

Data processor – NHS SCW

Legal Basis : NHS Digital

General Practice
Extraction Service (GPES)

Patients who have expressed an opt out preference via Type 1 objections with their GP surgery not to have their data extracted for anything other than their direct care will not be party to this data extraction.

Processor : NHS Digital

Other GP practices

Purpose - We will enable other GPs and staff in other GP practices to have access to your medical record to allow you to receive acute medical care

within that service.

Legal Basis – this service is for your direct care and is fully consented, permission to share your medical record will be gained prior to an appointment being made in the service and again once you are in the consultation.

Data processor – Your registered surgery will continue to be responsible for your full medical record.

Community Nursing -

Complex Care Team

Diabetes Team

Home Visiting Service

Leg Ulcer Service

Heart Failure Service

Multi-Disciplinary Team

District Nurses

Midwives

Purpose - We will enable the Community Nursing Team to have access to your medical record to allow you to receive care from the community nurses for the services listed.

Legal Basis – these services are for your direct care and is fully consented, permission to share your medical record will be gained prior to an appointment being made in the service

Data processor – Your registered surgery will continue to be responsible for your full medical record

Purpose – to provide monitoring and advice in line with the national directive for prescribing. Anonymous data is collected by the CCG.

Pharmacists from the ICB

Legal Basis – direct care.

Data Processor – NHS Hampshire and Isle of Wight ICB

Purpose – We share information with health and social care authorities for safeguarding issues.

MASH – Multi Agency

Safeguarding Board -

Safeguarding Children

Safeguarding Adults

Legal Basis - Because of public Interest issues, e.g. to protect the safety and welfare of Safeguarding we will rely on a statutory basis rather than consent to share information for this use.

Data Processor – Multi Agency Safeguarding Authorities.

Purpose – Risk stratification is a process for identifying and managing patients who are at high risk of emergency hospital admission.

Risk Stratification

Edenbridge Apex tool

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 Risk stratification data tools are increasingly

being used in the NHS to help determine a person's risk, preventing an unplanned or (re)admission and identifying a need for preventive intervention.

Legal Basis - Risk stratification has been approved by the Secretary of State, through the Confidentiality Advisory Group of the Health Research Authority

NHS England encourages GPs to use risk stratification tools as part of their local strategies for supporting patients with long-term conditions and to help and prevent avoidable hospital admissions and to promote quality improvement in GP practices.

Data Processors – NHS South, Central and West Commissioning Support Unit (CSU) to assist us with providing Risk Stratification tools.

Data Processing activities for Risk Stratification – The GP practice instructs its GP IT system supplier to provide primary care data identifiable by your NHS Number.

Opting Out - If you do not wish information about you to be included in our risk stratification programme, please contact the GP Practice. They can add a code to your records that will stop your information from being used for this purpose. Further information about risk stratification is available from: <https://www.england.nhs.uk/ourwork/tsd/jg/risk-stratification/>

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.

Quality monitoring,
concerns and serious
incidents

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 as Hampshire and Isle of Wight ICB 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, **Purpose** – We share aggregated, anonymous, patient data about services

contract monitoring and evaluation we have provided.

Legal Basis - Our legal basis for collecting and processing information for this purpose is statutory. We set our reporting requirements as part of our contracts with NHS service providers and do not ask them to give us identifiable data about you.

If patient level data was required for clarity and extensive evaluation of a service, consent will be gained for the surgery to share this information.

Data Processor – Various organisations, CCG, third party organisations commissioned by the NHS to perform actuarial services, NHS England

eConsult – 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.

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.

Care Quality Commission

CQC relies on its legal powers to access information rather than consent, therefore may use its powers to access records even in cases where objections have been raised.

CQC Privacy Notice is [available on the CQC website](#)

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.

Surveys and asking for your feedback

Legal Basis – you are under no obligation to take part and where you do, we consider your participation as consent to hold and use the responses you give us.

Data Processor – Survey Monkey, we love surveys

Purpose - To support research oriented proposals and activities in our commissioning system

Clinical Practice Research collects de-identified patient data from a network of GP practices across the UK.

Research

Primary care data are linked to a range of other health related data to provide a longitudinal, representative UK population health dataset. You can opt out of your information being used for research purposes at any

time

<https://www.nctu.ac.uk/our-research/randomised-trials/current-studies/attack.aspx>

Legal Basis - Your consent will be obtained by the organisation holding your records before identifiable information about you is disclosed for any research. If this is not possible then the organisation wishing to use your information will need to seek formal approval from The Independent Group Advising on the Release of Data (IGARD) [Digital NHS UK - IGARD](#)

We may write to you offering you the opportunity to take part in research, for which your consent will be sought.

Purpose - To support disease monitoring and health prevention for specific patients

Screening

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

West Sussex County Council

Legal Basis - Your consent is sought either implicitly or explicitly. You are invited to be screened either by the practice or the screening provider directly. You can choose to consent or dissent at any point in the screening.

Other organisations who provide support services 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.

Confidential – Restore Data shred provide confidential waste destruction services

Oasis/restore for the storage and transfer of patient notes

NHS England use City Sprint to transfer medical records

Continence and Stoma Service – for direct care in providing continence/stoma products and monitoring.

NHS Trusts / Foundation Trusts

Primary Care Network
Social Care Services
NHS England (NHSE) and NHS Digital (NHSD)
Multi Agency Safeguarding Hub (MASH)
Education Services
Fire and Rescue Services
Police & Judicial Services
Other 'data processors' which you will be informed of

Medication pharmacy

Purpose : Prescriptions containing personal identifiable and health data will be shared with chemists/pharmacies, in order to provide patients with essential medication or treatment as their health needs dictate. This process is achieved either by face to face contact with the patient or electronically. Where patients have specified a nominated pharmacy they may wish their repeat or acute prescriptions to be ordered and sent directly to the pharmacy making a more efficient process. Arrangements can also be made with the pharmacy to deliver medication

Legal Basis : Article 6(1)(e); "necessary... in the exercise of official authority vested in the controller"

Patients will be required to nominate a preferred pharmacy.

Processor – Pharmacy of choice

GP connect remote booking

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

Extended Access

Purpose: Providing extended access services to our patients means you can access medical services outside of our normal working hours. In order to provide you with this service, we have formal arrangements in place

with the Clinical Commissioning Group and with other practices whereby certain key “**hub**” practices offer this service on our behalf for you as a patient to access outside of our opening hours. This means, those key “**hub**” practices will have to have access to your medical record to be able to offer you the service. Please note to ensure that those practices comply with the law and to protect the use of your information, we have very robust data sharing agreements and other clear arrangements in place to ensure your data is always protected and used for those purposes only.

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

- WaterlooVille Hub extended access
- Shpca Clinical Services Community Hub
- Ipcas Hub

The process: The objective of primary care networks (PCNs) is for group practices together to create more collaborative workforces which ease the pressure of GP’s, leaving them better able to focus on patient care.

Primary Care Network

Bringing general practices together to work at scale has been a policy priority for some years for a range of reasons, including improving the ability of practices to recruit and retain staff; to manage financial and estates pressures; to provide a wider range of services to patients and to more easily integrate with the wider health and care system. . This means the practice may share your information with other practices within the PCN to provide you with your care and treatment.

