**Appendix A – The Practice will share patient information with these organisations where there is a legal basis to do so.**

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| **Activity** | **Rationale** |
| Commissioning and contractual purposes Invoice Validation  Planning  Quality and Performance | **Purpose –** Anonymous data is used by the Integrated Care Board (ICB) for planning, performance and commissioning purposes, as directed in the practices contract, to provide services as a public authority.  **Legal Basis** –   * Article 6(1)(e) ‘…necessary for the performance of a task carried out in the public interest or in the exercise of official authority…’; and * Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’   Patients may opt out of having their personal confidential data used for Planning or research. Please contact your surgery to apply a Type 1 Opt out or logon to <https://www.nhs.uk/your-nhs-data-matters/manage-your-choice/> to apply a National Data Opt Out  **Processor** – Frimley ICB |

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| Summary Care Record  Including additional information | **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** –   * Article 6(1)(e) ‘…necessary for the performance of a task carried out in the public interest or in the exercise of official authority…’; and * Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’   Patients have the right to opt out of having their information shared with the SCR by completion of the form which can be downloaded [here](https://digital.nhs.uk/services/summary-care-records-scr/scr-patient-consent-preference-form) and returned to the practice. Please note that by opting out of having your information shared with the Summary Care Record could result in a delay to care that may be required in an emergency.  **Processor –** NHS England |

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| Research | **Purpose –** We may share anonymous patient information with research companies for the purpose of exploring new ways of providing healthcare and treatment for patients with certain conditions. This data will not be used for any other purpose.  Where personal confidential data is shared your consent will be required.  Where you have opted out of having your identifiable information shared for this Planning or Research your information will not be shared.  **Legal Basis –**   * Articles 6(1)(a) and 9(1)(a) – explicit consent; or * Article 6(1)(c) (where we are *legally obligated* to share your personal data) for your standard personal data and Article 9(2)(j) (scientific research) for your health data.   Where identifiable data is required for research, patient consent will be needed, unless there is a legitimate reason under law to do so or there is support under the Health Service (Control of Patient Information Regulations) 2002 (‘section 251 support’) applying via the Confidentiality Advisory Group in England and Wales.  Sharing of aggregated non identifiable data is permitted.  **Processor –** |
| Individual Funding Requests | **Purpose –** We may need to process your personal information where we are required to fund specific treatment for you for a particular condition that is not already covered in our standard NHS contract.    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. You have the right to withdraw your consent at any time but this may affect the decision to provide individual funding.  **Legal Basis –** Under UK GDPR Article 6 1(a) consent is required   * Article 6(1)(e) ‘…necessary for the performance of a task carried out in the public interest or in the exercise of official authority…’; and * Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’   **Data processor** –South Central and West CSU via BerksEast.IFRrequests@nhs.net |
| Safeguarding Adults | **Purpose –** We will share personal confidential information with the safeguarding team where there is a need to assess and evaluate any safeguarding concerns and to protect the safety of individuals.  Consent is not required to share information for this purpose.  **Legal Basis** – Direct Care under UK GDPR:   * Article 6(1)(e) ‘…necessary for the performance of a task carried out in the public interest or in the exercise of official authority…’; and * Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine   **Data Processor** – Surrey Social Services Adult Support |
| Safeguarding Children | **Purpose –** We will share children’s personal information where there is a need to assess and evaluate any safeguarding concerns and to protect the safety of children.  **Legal Basis** –   * Article 6(1)(e) ‘…necessary for the performance of a task carried out in the public interest or in the exercise of official authority…’; and * Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’   **Data Processor** – Surrey Social Services Child Support team |
| Risk Stratification – Preventative Care | **Purpose -** ‘Risk stratification for case finding’ is a process for identifying and managing patients who have or may be at-risk of health conditions (such as diabetes) or who are most likely to need healthcare services (such as people with frailty). Risk stratification tools used in the NHS help determine a person’s risk of suffering a particular condition and enable us to focus on preventing ill health before it develops.  Information about you is collected from a number of sources including NHS Trusts, GP Federations and your GP Practice. A risk score is then arrived at through an analysis of your de-identified information.  This can help us identify and offer you additional services to improve your health.    If you do not wish information about you to be included in any risk stratification programmes, please let us know. We can add a code to your records that will stop your information from being used for this purpose. Please be aware that this may limit the ability of healthcare professionals to identify if you have or are at risk of developing certain serious health conditions.  Type of Data – Identifiable/Pseudonymised/Anonymised/Aggregate Data  **Legal Basis**   * Article 6(1)(e) ‘…necessary for the performance of a task carried out in the public interest or in the exercise of official authority…’; and   Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’  **Processors** – Frimley ICB |
| Public Health  Screening programmes (identifiable)  Notifiable disease information (identifiable)  Smoking cessation (anonymous)  Sexual health (anonymous)  Vaccination Programmes | Purpose – Personal identifiable and anonymous data is shared.  The NHS provides national screening programmes so that certain diseases can be detected at an early stage. These currently apply to bowel cancer, breast cancer, aortic aneurysms and diabetic retinal screening service to name a few. The law allows us to share your contact information, and certain aspects of information relating to the screening with Public Health England so that you can be appropriately invited to the relevant screening programme.  More information can be found at: https://www.gov.uk/topic/population-screeningprogrammes [Or insert relevant link] or speak to the practice.  Patients may not opt out of having their personal information shared for Public Health reasons.  Patients may opt out of being screened at the time of receiving an invitation.  **Legal Basis** –   * Article 6(1)(e) ‘…necessary for the performance of a task carried out in the public interest or in the exercise of official authority…’; and * Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’   Data Processors – Public Health Hampshire |
| Direct Care  NHS Trusts  Community Providers  Pharmacies  Enhanced care providers  Nursing Homes  Other Care Providers | **Purpose –** Personal information is shared with other secondary care trusts and providers in order to provide you with direct care services. This could be hospitals or community providers for a range of services, including treatment, operations, physio, and community nursing, ambulance service.  **Legal Basis -** The processing of personal data in the delivery of direct care and for providers’ administrative purposes in this surgery and in support of direct care elsewhere is supported under the following Article 6 1 (e) direct care and 9 2 (h) to provide health or social care: In some cases patients may be required to consent to having their record opened by the third party provider before patients information is accessed. Where there is an overriding need to access the GP record in order to provide patients with life saving care, their consent will not be required.  **Processors** – for example: Frimley Health NHS Trust, Royal Surrey County Hospital, North Hampshire NHS Trust locally |
| Care Quality Commission | **Purpose** – The CQC is the regulator for the English Health and Social Care services to ensure that safe care is provided. They will inspect and produce reports back to the GP practice on a regular basis. The Law allows the CQC to access identifiable data.  More detail on how they ensure compliance with data protection law (including UK GDPR) and their privacy statement is [available on our website](http://links.govdelivery.com:80/track?type=click&enid=ZWFzPTEmbXNpZD0mYXVpZD0mbWFpbGluZ2lkPTIwMTgxMjIxLjk5Mzg4MDcxJm1lc3NhZ2VpZD1NREItUFJELUJVTC0yMDE4MTIyMS45OTM4ODA3MSZkYXRhYmFzZWlkPTEwMDEmc2VyaWFsPTE3MzQ2MzQxJmVtYWlsaWQ9aWFpbi5yZWRtaWxsQG5ocy5uZXQmdXNlcmlkPWlhaW4ucmVkbWlsbEBuaHMubmV0JnRhcmdldGlkPSZmbD0mbXZpZD0mZXh0cmE9JiYm&&&107&&&https://www.cqc.org.uk/about-us/our-policies/privacy-statement)**:** <https://www.cqc.org.uk/about-us/our-policies/privacy-statement>  **Legal Basis** - Article 6(1)(c) “processing is necessary for compliance with a legal obligation to which the controller is subject.” And Article 9(2) (h) as stated below  **Processor**s – Care Quality Commission |
| Population Health Management | **Purpose –** Health and care services work together as ‘Integrated Care Systems’ (ICS) and are sharing data in order to:  • Understand the health and care needs of the care system’s  population, including health inequalities  • Provide support to where it will have the most impact  • Identify early actions to keep people well, not only focusing  on people in direct contact with services, but looking to join  up care across different partners.  (NB this links to the Risk Stratification activity identified above)  Type of Data – Identifiable/Pseudonymised/Anonymised/Aggregate Data. NB only organisations that provide your care will see your identifiable data.  **Legal Basis -** Article 6(1)(e); “necessary… in the exercise of official authority vested in the controller’ And Article 9(2)(h) as stated below  **Data Processors -** Optum, Cerner |
| Payments, | **Purpose -** Contract holding GPs in the UK receive payments from their respective governments on a tiered basis. Most of the income is derived from baseline capitation payments made according to the number of patients registered with the practice on quarterly payment days. These amounts paid per patient per quarter varies according to the age, sex and other demographic details for each patient. There are also graduated payments made according to the practice’s achievement of certain agreed national quality targets known as the Quality and Outcomes Framework (QOF), for instance the proportion of diabetic patients who have had an annual review. Practices can also receive payments for participating in agreed national or local enhanced services, for instance opening early in the morning or late at night or at the weekends. Practices can also receive payments for certain national initiatives such as immunisation programs and practices may also receive incomes relating to a variety of non-patient related elements such as premises. Finally there are short term initiatives and projects that practices can take part in. Practices or GPs may also receive income for participating in the education of medical students, junior doctors and GPs themselves as well as research. In order to make patient based payments basic and relevant necessary data about you needs to be sent to the various payment services. The release of this data is required by English laws.  **Legal Basis** - Article 6(1)(c) “processing is necessary for compliance with a legal obligation to which the controller is subject.” And Article 9(2)(h) ‘as stated below  **Data Processors** – NHS England, ICBs, Public Health |
| Patient Record data base | **Purpose –** Your medical record will be processed in order that a data base can be maintained, this is managed in a secure way and there are robust processes in place to ensure your medical record is kept accurate, and up to date. Your record will follow you as you change surgeries throughout your life.  Closed records will be archived by NHS England  **Legal Basis -** Article 6(1)(e); “necessary… in the exercise of official authority vested in the controller’ And Article 9(2)(h) as stated below  **Processor** – EMIS and PCSE |
| Medical reports  Subject Access Requests | **Purpose –** Your medical record may be shared in order that solicitors acting on your behalf can conduct certain actions as instructed by you.  Insurance companies seeking a medical reports where you have applied for services offered by then can have a copy to your medical history for a specific purpose.   * **Legal Basis –** Your explicit consent will be required before a GP can share your record for either of these purposes. Article 6(1)(a) – consent for personal data; and * Article 9(2)(a) – explicit consent for special-category data.   **Processor –** iGPR, Solicitors and Insurance organisations. |
| Medicines Management team  Medicines Optimisation  OptimiseRX  AnalyseRX  Oberoi | **Purpose** – your medical record is shared with the medicines management team pharmacists, in order that your medication can be kept up to date and any necessary changes to medication can be implemented.  **Legal Basis** –   * Article 6(1)(e) ‘…necessary for the performance of a task carried out in the public interest or in the exercise of official authority…’; and * Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’   **Processor** - FDB |
| GP Federation : Salus Medical Services  GP Extended Access  Paramedic Visiting Service  Additional roles clinicians including MSK  Video consultations  Minor injuries services | **Purpose –** Your medical record will be shared with Salus Medical Services in order that they can provide direct care services to the patient population. This could be in the form of video consultations, Minor injuries clinics, GP extended access clinics  **Legal Basis** - Article 6(1)(e); “necessary… in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below  **Processor** – Salus Medical Services |
| PCN | **Purpose –** Your medical record can be shared with the Fleet PCN Practices in order that they can provide direct care services to the patient population.  **Legal Basis** - Article 6(1)(e); “necessary… in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below  **Processor** – Fleet Medical Centre, Branksomewood Surgery, Richmond Surgery, Crondall New Surgery |
| Smoking cessation | **Purpose –** personal information is shared in order for the smoking cessation service to be provided.  Only those patients who wish to be party to this service will have their data shared  **Legal Basis –** consented  **Processor –** Smokefree Hampshire |
| Social Prescribers | **Purpose** – Access to medical records is provided to social prescribers to undertake a full service to patients dependent on their social care needs.  Only those patients who wish to be party to this service will have their data shared  **Legal Basis** – Article 6(1)(e); “necessary… in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below  **Processor –** Frimley Social Prescribing Service |
| Police | **Purpose –** Personal confidential information may be shared with the Police authority for certain purposes. The level of sharing and purpose for sharing may vary. Where there is a legal basis for this information to be shared no consent will be required.  The Police will require the correct documentation in order to make a request. This could be but not limited to, DS 2, Court order, s137, the prevention and detection of a crime.  In some cases consent may be required.  **Legal Basis – UK** GDPR – Article 6 1 (f) legitimate interest 6 1 (c) Legal Obligation.  Article 9 2 (f) requests for legal reasons  **Processor –** Hampshire Police Constabulary or Surrey Police Constabulary |
| Coroner | **Purpose –** Personal information relating to a patient may be shared with the coronerupon request.  **Legal Basis –** UK GDPR Article 6 1 (c) Legal Obligation 9 2 (h) Health data  **Processor –** The Coroner – Hampshire or Surrey |
| Medical Examiner Service(Frimley Health) | **Purpose**: Purpose: Medical records associated with deceased patients are outside scope of the UK GDPR. However, next of kin details are within the scope of the UK GDPR. We will share specified deceased patient records and next of kin details with the Medical Examiners within Frimley Health.  **Legal Basis**:  Article 6(1)(c) – necessary under a legal obligation to which the controller is subject”; and  Article 9(2)(h)– “processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services”  **Processor**: Medical Examiners service – FHFT |
| Non-commissioned, private healthcare providers (e.g. BUPA, Virgin Care, etc.) | **Purpose –** Personal information shared with private health care providers in order to deliver direct care to patients at the patient’s request. Consent from the patient will be required to share data with Private Providers.  **Legal Basis –** Articles 6(1)(a) and 9(2)(a) consent by the patient given under contract to the provider.  **Provider** -for example BUPA, Spire, BMI depending on patients choice. |
| Messaging and Texting Services | **Purpose –** Personal identifiable information shared with the texting service in order that text messages including appointment reminders, campaign messages related to specific patients health needs and direct messages to patients   * **Legal Basis –** Article 6(1)(e) ‘…necessary for the performance of a task carried out in the public interest or in the exercise of official authority…’; and * Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’   **Provider -** AccuRX, Surgery Connect. |
| Remote consultation  Including – Video Consultation  Clinical photography | **Purpose** – Personal information including images may be processed, stored and with the patients consent shared, in order to provide the patient with urgent medical advice.  **Legal Basis –** Article 6(1)(e); “necessary… in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below  Patients may be videoed or asked to provide photographs with consent. There are restrictions on what the practice can accept photographs of. No photographs of the full face, no intimate areas, no pictures of patients who cannot consent to the process. No identifiable pictures of children.  **Processor –**AccuRX, Surgery Connect |
| MDT meetings | **Purpose** – For some long term conditions, such as diabetes, the practice participates in meetings with staff from other agencies involved in providing care, to help plan the best way to provide care to patients with these conditions.  During COVID 19 the practice may use secure video meeting platform to discuss patient needs.  **Legal Basis –** Article 6(1)(e); “necessary… in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below  **Processor –** MS Teams |
| COVID-19  Research and Planning | **Purpose** – To understand the risks to public health, trends and prevent the spread of infections such as Covid-19 the government has enabled a number of initiatives which include research and planning during the Covid-19 pandemic which may include the collection of personal confidential data has been necessary. This is to assist with the diagnosis, testing, self-isolating, fitness to work, treatment medical, social interventions and recovery from Covid-19.  **Legal Basis** - Notice under Regulation 3(4) of the Health Service (Control of Patient Information) Regulations 2002 (COPI), which were made under sections 60 (now section 251 of the NHS Act 2006) and 64 of the Health and Social Care Act 2001.  [Coronavirus (COVID-19): notice under regulation 3(4) of the Health Service (Control of Patient Information) Regulations 2002, which were made under sections 60 (now section 251 of the NHS Act 2006) and 64 of the Health and Social Care Act 2001 – Biobank - GOV.UK (www.gov.uk)](https://www.gov.uk/government/publications/coronavirus-covid-19-notification-of-data-controllers-to-share-information/coronavirus-covid-19-notice-under-regulation-34-of-the-health-service-control-of-patient-information-regulations-2002-biobank)  [Coronavirus (COVID-19): notification to organisations to share information - GOV.UK (www.gov.uk)](https://www.gov.uk/government/publications/coronavirus-covid-19-notification-of-data-controllers-to-share-information)  **Provider** – BioBank, NHS Digital, NHS England, other organisations included in the roll out of vaccinations, treatment and care of patients suffering with Covid-19 |
| General Practice Extraction Service (GPES)   1. At risk patients data collection Version 3 2. CVDPREVENT Audit 3. Physical Health Checks for people with Severe Mental Illness 4. National Obesity Audit | **Purpose –** GP practices are required to provide data extraction of their patients personal confidential information for various purposes to NHS England. The objective of this data collection is on an ongoing basis to identify patients registered at General Practices who fit within a certain criteria, in order to monitor and either provide direct care, or prevent serious harm to those patients. Below is a list of the purposes for the data extraction, by using the link you can find out the detail behind each data extraction and how your information will be used to inform this essential work:   1. [At risk patients including severely clinically vulnerable](https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdigital.nhs.uk%2Fabout-nhs-digital%2Fcorporate-information-and-documents%2Fdirections-and-data-provision-notices%2Fdata-provision-notices-dpns%2Fcovid-19-at-risk-patients-data-provision-notice&data=05%7C01%7Cvhawkins1%40nhs.net%7C9cb2f9bbb9b944d24d5808dbe108856b%7C37c354b285b047f5b22207b48d774ee3%7C0%7C0%7C638351199605378945%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=lXR5ek58UqFQRRegqfk25x0umIJ7ftvV0grSYqu9UWc%3D&reserved=0) 2. [NHS England has directed NHS England to collect and analyse data in connection with Cardiovascular Disease Prevention Audit](https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdigital.nhs.uk%2Fabout-nhs-digital%2Fcorporate-information-and-documents%2Fdirections-and-data-provision-notices%2Fdata-provision-notices-dpns%2Fcardiovascular-disease-prevention-audit&data=05%7C01%7Cvhawkins1%40nhs.net%7C9cb2f9bbb9b944d24d5808dbe108856b%7C37c354b285b047f5b22207b48d774ee3%7C0%7C0%7C638351199605378945%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=8dfFavVuK8qSMLLJqfmJtCC2Angv9xhXxXKOLTcnQJQ%3D&reserved=0) 3. [GPES Physical Health Checks for people with Severe Mental Illness (PHSMI) data collection](https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdigital.nhs.uk%2Fabout-nhs-digital%2Fcorporate-information-and-documents%2Fdirections-and-data-provision-notices%2Fdata-provision-notices-dpns%2Fphysical-health-checks-severe-mental-illness%3F_cldee%3Dcm9iZXJ0LmhhY2tpbmdAbmhzLm5ldA%253d%253d%26recipientid%3Dlead-1b4643b1db2feb11bf6f000d3a86b8d5-6b1a1b731c7d46d2b60ec64c42de1be7%26esid%3Db5b9d61e-ab29-eb11-a813-000d3a87467d&data=05%7C01%7Cvhawkins1%40nhs.net%7C9cb2f9bbb9b944d24d5808dbe108856b%7C37c354b285b047f5b22207b48d774ee3%7C0%7C0%7C638351199605378945%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=Lh1KR8rz11IyEmQ2LwjCX1ZRvkIHPuBOka32w2%2BJT88%3D&reserved=0). 4. [National Obesity Audit - NHS Digital](https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdigital.nhs.uk%2Fabout-nhs-digital%2Fcorporate-information-and-documents%2Fdirections-and-data-provision-notices%2Fdata-provision-notices-dpns%2Fnational-obesity-audit%3F_cldee%3DMTwqTidD6GQfIUy1RoyIAa-PVa1wntrwim2UURsv-ZqlFQ8QJr4WWoWSwm9kKfGQJQGlt3tFOclBv0ElImRPLA%26recipientid%3Dlead-06d96b2b497eee1181790022481b54df-b15fddd95abc4713a5585bcb5b5d5581%26esid%3D43a10bae-8b0e-ee11-8f6e-002248c87a5b&data=05%7C01%7Cvhawkins1%40nhs.net%7C9cb2f9bbb9b944d24d5808dbe108856b%7C37c354b285b047f5b22207b48d774ee3%7C0%7C0%7C638351199605378945%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=MzjqlJBqES8Qj8pPV5cSK%2BTXIb8lOWkRb4jOxTiwjmE%3D&reserved=0)   **Legal Basis -** All GP Practices in England are legally required to share data with NHS England for this purpose under section 259(1)(a) and (5) of theThe Health and Social Care Act 2012  Further detailed legal basis can be found in each link.  Any objections to this data collection should be made directly to NHS England.  [enquiries@nhsdigital.nhs.uk](mailto:enquiries@nhsdigital.nhs.uk)  **Processor –** NHS England |
| Medication/Prescribing | **Purpose:** Prescriptions containing personal identifiable and health data will be shared with chemists/pharmacies, in order to provide patients with essential medication or treatment as their health needs dictate. This process is achieved either by face to face contact with the patient or electronically.Where patients have specified a nominated pharmacy they may wish their repeat or acute prescriptions to be ordered and sent directly to the pharmacy making a more efficient process. Arrangements can also be made with the pharmacy to deliver medication  **Legal Basis :** Article 6(1)(e); “necessary… in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below  Patients will be required to nominate a preferred pharmacy.  **Processor** – Pharmacy of choice |
| Telephony | **Purpose –** The practice use an internet based telephony system that records telephone calls, patients will have the right to decline recordings of calls as is their individual right. The calls will be held on the external server for a duration of 3 years unless requested for them to be removed sooner. The telephone system has been commissioned to assist with the high volume and management of calls into the surgery, which in turn will enable a better service to patients.  **Legal Basis –** While there is a robust contract in place with the processor, the surgery has undertaken this service to assist with the direct care of patients in a more efficient way.   * Article 6(1)(e); “necessary… in the exercise of official authority vested in the controller’ * Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’   **Provider –** Surgery Connect – Storacall t/a X-ON |
| Learning Disability Mortality Programme  LeDer | **Purpose :** The Learning Disability Mortality Review (LeDeR) programme was commissioned by NHS England to investigate the death of patients with learning difficulties to assist with processes to improve the standard and quality of care for people living with a learning disability.  **Legal Basis:**  It has approval from the Secretary of State under section 251 of the NHS Act 2006 to process patient identifiable information who fit within a certain criteria.  **Processor :** ICB, NHS England |
| Technical Solution  Pseudonymisation | **Purpose:** Personal confidential and special category data in the form of medical record, is extracted under contract for the purpose of pseudonymisation. This will allow no patient to be identified within the data set that is created. SCWCSU has been commissioned to provide a data processing service for the GPs, no other processing will be undertaken under this contract.  **Legal Basis:** Under UK GDPR the legitimate purpose for this activity is under contract to provide assistance.  Article 6(1)(e); “necessary… in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below  **Processor**: SCW CSU |
| Shared Care Record | **Purpose:** In order for the practice to have access to a shared record, the Integrated Care Service has commissioned a number of systems including GP connect, which is managed by NHS Digital, to enable a shared care record, which will assist in patient information to be used for a number of care related services. These may include Population Health Management, Direct Care, and analytics to assist with planning services for the use of the local health population.  Where data is used for secondary uses no personal identifiable data will be used.  Where personal confidential data is used for Research explicit consent will be required.  **Legal Basis:** Article 6(1)(e); “necessary… in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below  **Processor:** Plexus, NHS Englandl, ESHT, ICS member providers |
| Anticoagulation Monitoring | **Purpose:** Personal Confidential data is shared with LumiraDX in order to provide an anticoagulation clinic to patients who are on anticoagulation medication. This will only affect patients who are within this criteria.  **Legal Basis**: The legal basis for this activity under UK GDPR is  Article 6(1)(e); “necessary… in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below  **Processor** : LumiraDX INRStar |
| Medefer | **Purpose**: Early diagnosis of prostate cancer  **Legal Basis**:  1. Article 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”;  2. Article 9(2)h  social care or treatment or the management of health or social care systems and services”; and  **Processor**: Medefer  “processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or |
| Oviva | **Purpose**: The NHS Type 2 Diabetes Remission Programme  **Legal Basis**:  1. Article 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”;  2. Article 9(2)h  “processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services”; and  **Processor**: Oviva UK Ltd |
| Medical Examiner Officers RAS Triage Service - Frimley Health NHS Foundation Trust RDU01 – Specialty – Community Healthcare. | **Purpose**: Purpose: Medical records associated with deceased patients are outside scope of the UK GDPR. However, next of kin details are within the scope of the UK GDPR. We will share specified deceased patient records and next of kin details with the Medical Examiners within Frimley Health Foundation Trust.  **Legal Basis**:  Article 6(1)c  “It is necessary under a legal obligation to which the controller is subject”  Article 9(2)h  “processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services”; and  **Processor**: Medical Examiners service - Frimley Health Foundation Trust |

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

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| DPO Advice provided by: | Name | Lucy Hunt |
| Job Title | DPO and GP IG Senior IG Consultant |
| Organisation | SCW |
| DPO advice accepted or overruled: | Name | Victoria Hawkins |
| Job Title  Senior Partner/Caldicott Guardian/ SIRO | Practice Manager SIRO |
| Organisation | Crondall New Surgery |
| Comments: none |  | |
| This activity will be kept under review by: | Name | Victoria Hawkins |
| Job Title | Practice Manager SIRO |
| Organisation | Crondall New Surgery |

Next review due 31/08/2024.

**Lawful basis for processing:**

The processing of personal data in the delivery of direct care and for providers’ administrative purposes in this surgery and in support of direct care elsewhere is supported under the following Article 6 and 9 conditions of the UK GDPR:

* Article 6(1)(e) ‘…necessary for the performance of a task carried out in the public interest or in the exercise of official authority…’; and
* Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services...”