



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

Activity	Rationale
Commissioning and contractual purposes Planning Quality and Performance	<p>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.</p> <p>Legal Basis –</p> <ul style="list-style-type: none"> 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’ <p>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</p> <p>Processor – Sussex Health & Care (ICB)</p>
Summary Care Record Including additional information	<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 –</p> <ul style="list-style-type: none"> 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’ <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 to care that may be required in an emergency.</p> <p>Processor – NHS England</p>
Research	<p>Purpose – We may share anonymous patient information with research companies for the purpose of exploring new ways of</p>

	<p>providing healthcare and treatment for patients with certain conditions. This data will not be used for any other purpose.</p> <p>Where personal confidential data is shared your consent will be required.</p> <p>Where you have opted out of having your identifiable information shared for this Planning or Research your information will not be shared.</p> <p>Legal Basis –</p> <ul style="list-style-type: none"> Articles 6(1)(a) and 9(1)(h) – explicit consent; or Article 6(1)(c) (where we are <i>legally obligated</i> to share your personal data) for your standard personal data and Article 9(2)(j) (scientific research) for your health data. <p>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.</p> <p>Sharing of aggregated non identifiable data is permitted.</p> <p>Processor – Primary Care Research Network/Royal College of General Practitioners</p>
Individual Funding Requests	<p>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.</p> <p>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 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.</p> <p>Legal Basis –</p> <ul style="list-style-type: none"> 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' <p>Data processor – Sussex Health & Care (ICB)</p>
Safeguarding Adults	<p>Purpose – We will share personal confidential information with the safeguarding team where there is a need to assess and</p>

	<p>evaluate any safeguarding concerns and to protect the safety of individuals.</p> <p>Consent is not required to share information for this purpose.</p> <p>Legal Basis – Direct Care under UK GDPR:</p> <ul style="list-style-type: none"> 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 <p>Data Processor – Adult Social Services</p>
Safeguarding Children	<p>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.</p> <p>Legal Basis –</p> <ul style="list-style-type: none"> 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’ <p>Consent may not be required to share this information.</p> <p>Data Processor – Front Door For Families</p>
Risk Stratification – Preventative Care	<p>Purpose - ‘Risk stratification for case finding’ is a process for identifying and managing patients who have or may be at-risk of health conditions (such as diabetes) or who are most likely to need healthcare services (such as people with frailty). Risk stratification tools used in the NHS help determine a person’s risk of suffering a particular condition and enable us to focus on preventing ill health before it develops.</p> <p>Information about you is collected from a number of sources including NHS Trusts, 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.</p> <p>If you do not wish information about you to be included in any risk stratification programmes, please let us know. We can add a code to your records that will stop your information from being used for this purpose. Please be aware that this may limit the ability of healthcare professionals to identify if you have or are at risk of developing certain serious health conditions.</p>

	<p>Type of Data – Identifiable/Pseudonymised/Anonymised/Aggregate Data</p> <p>Legal Basis –</p> <ul style="list-style-type: none"> 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’ <p>Processors – Appointed data processor and for subsequent healthcare with the CCG/ PCO/ frailty service etc</p>
<p>Public Health Screening programmes (identifiable) Notifiable disease information (identifiable) Smoking cessation (anonymous) Sexual health (anonymous) Vaccination Programmes</p>	<p>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.</p> <p>More information can be found at: https://www.gov.uk/topic/population-screeningprogrammes [Or insert relevant link] or speak to the practice.</p> <p>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.</p> <p>Legal Basis –</p> <ul style="list-style-type: none"> 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’ <p>Data Processors – Public Health England https://www.gov.uk/government/organisations/public-health-england and equivalents in the devolved nations.</p>
<p>Direct Care NHS Trusts Community Providers Pharmacies Enhanced care providers Nursing Homes Other Care Providers</p>	<p>Purpose – Personal information is shared with other secondary care trusts and providers in order to provide you with individual direct care services. This could be hospitals or community providers for a range of services, including treatment, operations, physio, and community nursing, ambulance service.</p> <p>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:</p>

	<ul style="list-style-type: none"> 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 <p>Processors – Brighton Sussex and University Hospitals, SPFT and SCFT, Brighton and Hove Federation</p>
Care Quality Commission	<p>Purpose – The CQC is the regulator for the English Health and Social Care services to ensure that safe care is provided. They will inspect and produce reports back to the GP practice on a regular basis. The Law allows the CQC to access identifiable data.</p> <p>More detail on how they ensure compliance with data protection law (including UK GDPR) and their privacy statement is <u>available on our website</u>: https://www.cqc.org.uk/about-us/our-policies/privacy-statement</p> <p>Legal Basis –</p> <ul style="list-style-type: none"> 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 <p>Processors – Care Quality Commission</p>
Payments	<p>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</p>

	<p>the various payment services. The release of this data is required by English laws.</p> <p>Legal Basis –</p> <ul style="list-style-type: none"> 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 <p>Data Processors – NHS England, ICB, Public Health</p>
Patient Record data base	<p>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</p> <p>Legal Basis –</p> <ul style="list-style-type: none"> 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’ <p>Processor – TPP/ PCSE</p>
Medical reports Subject Access Requests	<p>Purpose – Your medical record may be shared in order that:</p> <p>Solicitors/persons acting on your behalf can conduct certain actions as instructed by you.</p> <p>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.</p> <p>Legal Basis –</p> <ul style="list-style-type: none"> 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’ <p>Processor – Solicitors and insurance organisations</p>
Medicines Management Team Medicines Optimisation	<p>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.</p> <p>Legal Basis –</p>

	<ul style="list-style-type: none"> 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' <p>Processor – Appointed data processors within the Medicines Management Team Brighton Hove ICB</p>
GP Federation GP Extended Access Video consultations	<p>Purpose – Your medical record will be shared with the Brighton and Hove Federation 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. The Federation will be acting on behalf of the GP practice.</p> <p>Legal Basis –</p> <ul style="list-style-type: none"> 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' <p>Processor – Brighton and Hove Federation</p>
Primary Care Network (PCN)	<p>Purpose – Your medical record will be shared with the East and Central Brighton PCN in order that they can provide direct care services to the patient population.</p> <p>Legal Basis –</p> <ul style="list-style-type: none"> 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' <p>Processor -</p> <ul style="list-style-type: none"> Arch Healthcare. Ardingly Court Surgery. Broadway Surgery. Park Crescent Health Centre. Pavilion Surgery. Regency Surgery. Wellsbourne Healthcare CIC.
Social Prescribers	<p>Purpose – Access to medical records is provided to social prescribers to undertake a full service to patients dependent on their health social care needs.</p> <p>Only those patients who wish to be party to this service will have their data shared</p> <p>Legal Basis –</p>

	<ul style="list-style-type: none"> 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’ <p>Processor - East and Central Brighton PCN</p>
Police	<p>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 consent will not always be required.</p> <p>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. Or where the information is necessary to protect a person or community.</p> <p>Legal Basis – UK GDPR</p> <ul style="list-style-type: none"> Article 6(1)(c) – to comply with a legal obligation; and Article 9(2)(j) – ‘for reasons of substantial public interest’ <p>Processor – Police Constabulary</p>
Coroner	<p>Purpose – Personal health records or information relating to a deceased patient may be shared with the coroner.</p> <p>Legal Basis – UK GDPR Article 6(1)(c) - to comply with a legal obligation and article 9(2)(h) health data</p> <p>Processor – The Coroner</p>
Medical Examiner Service(Change to community Medical Examiners name) – [INSERT TRUST]	<p>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 Brighton and Hove.</p> <p>Legal Basis:</p> <p>Article 6(1)(c) – necessary under a legal obligation to which the controller is subject”; and</p> <p>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”</p> <p>Processor: Medical Examiners service – HM Coroner for Brighton and Hove</p>

Non-commissioned, private healthcare providers (e.g. BUPA, Virgin Care, etc.)	<p>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.</p> <p>Legal Basis – Articles 6(1)(a) and 9(2)(a) Consented and under contract between the patient and the provider</p> <p>Provider – BUPA, AXA health, Beneden Health</p>
Messaging Service	<p>Purpose – Personal identifiable information shared with the messaging service in order that messages including; appointment reminders; results; campaign messages related to specific patients health needs; and direct messages to patients, can be transferred to the patient in a safe way.</p> <p>Legal Basis –</p> <ul style="list-style-type: none"> 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' <p>Provider - AccuRX - Mjog</p>
Remote consultation Including – Video Consultation Clinical photography	<p>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.</p> <p>Legal Basis –</p> <ul style="list-style-type: none"> 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' <p>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 pictures of children.</p> <p>Processor – e-Consult, AccuRX</p>
MDT meetings	<p>Purpose – For some long term conditions, 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. Personal data will be shared with other agencies in order that mutual care packages can be decided.</p> <p>Legal Basis –</p>

	<ul style="list-style-type: none"> 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’ <p>Processor – SCFT, SPFT, Social Care</p>
<p>General Practice Extraction Service (GPES)</p> <ol style="list-style-type: none"> At risk patients data collection Version 3 CVDPREVENT Audit Physical Health Checks for people with Severe Mental Illness 	<p>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:</p> <ol style="list-style-type: none"> At risk patients including severely clinically vulnerable NHS England has directed NHS England to collect and analyse data in connection with Cardiovascular Disease Prevention Audit GPES Physical Health Checks for people with Severe Mental Illness (PHSMI) data collection. <p>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 the The Health and Social Care Act 2012</p> <p>Further detailed legal basis can be found in each link.</p> <p>Any objections to this data collection should be made directly to NHS England. enquiries@nhsdigital.nhs.uk</p> <p>Processor – NHS England</p>
Medication/Prescribing	<p>Purpose: Prescriptions containing personal identifiable and health data will be shared with organisations who provide medicines management including chemists/pharmacies, in order to provide patients with essential medication regime management, medicines and or treatment as their health needs dictate. This process is achieved either by face to face contact with the patient or electronically. Pharmacists may be employed to review medication, Patients may be referred to pharmacists to assist with diagnosis and care for minor treatment, patients may 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</p>

	<p>can also be made with the pharmacy to deliver care and medication</p> <p>Legal Basis –</p> <ul style="list-style-type: none"> 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’ <p>Processor – Pharmacy of choice</p>
Professional Training	<p>Purpose – We are a training surgery. Our clinical team are required to be exposed to on the job, clinical experience, as well as continual professional development. On occasion you may be asked if you are happy to be seen by one of our GP registrars, pharmacists or other clinical team to assist with their training as a clinical professional. You may also be asked if you would be happy to have a consultation recorded for training purposes. These recordings will be shared and discussed with training GPs at the surgery, and also with moderators at the RCGP and HEE.</p> <p>Legal Basis –</p> <ul style="list-style-type: none"> 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’ <p>Recordings remain the control of the GP practice and they will delete all recordings from the secure site once they are no longer required.</p> <p>Processor – RCGP, HEE, iConnect, Fourteen Fish</p>
Telephony	<p>Purpose – The practice use an internet based telephony system that records telephone calls, for their own purpose and to assist with patient consultations. 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.</p> <p>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.</p> <ul style="list-style-type: none"> 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’ <p>Provider – Horizon</p>

<p>Learning Disability Mortality Programme LeDer</p>	<p>Purpose: The Learning Disability Mortality Review (LeDeR) programme was commissioned by NHS England to investigate the death of patients with learning difficulties and Autism to assist with processes to improve the standard and quality of care for people living with a learning disability and Autism. Records of deceased patients who meet with this criteria will be shared with NHS England.</p> <p>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.</p> <p>Processor : ICB, NHS England</p>
<p>Shared Care Record</p>	<p>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 England, 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.</p> <p>Where data is used for secondary uses no personal identifiable data will be used.</p> <p>Where personal confidential data is used for Research explicit consent will be required.</p> <p>Legal Basis –</p> <ul style="list-style-type: none"> 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’ <p>Processor: NHS England</p>
<p>Local shared care record</p>	<p>Purpose: Health and Social care services are developing shared systems to share data efficiently and quickly. It is important for anyone treating you to be able to access your shared record so that they have all the information they need to care for you. This will be during your routine appointments and in urgent situations such as going to A&E, calling 111 or going to an Out of hours appointment. It is also quicker for staff to access a shared record than to try to contact other staff by phone or email.</p> <p>Only authorised staff can access the systems and the information they see is carefully checked so that it relates to their job. Systems do not share all your data, just data which services have agreed is necessary to include.</p>

	<p>Legal Basis –</p> <ul style="list-style-type: none"> 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’ <p>Processor: Brighton Sussex and University Hospitals, Brighton and Hove Federation, SPFT and SCFT</p>
Anticoagulation Monitoring	<p>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.</p> <p>Legal Basis –</p> <ul style="list-style-type: none"> 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’ <p>Processor : LumiraDX</p>
Apex	<p>Purpose: The practice agrees to provide access to non patient identifiable aggregate data through the Federated view within APEX relating to practice operations and Extended Access, this shared data will include:</p> <ul style="list-style-type: none"> Appointment activity data: Number of appointments offered, unused slots, DNAs, booked on same day, home visit and telephone appointments Patient data: Number of patients seen, age and sex breakdown of patients seen and long term conditions of those patients Clinical data: to include any coded data against the care record in aggregated form <p>Legal Basis – Direct Care as reflected in UK GDPR</p> <ul style="list-style-type: none"> 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. 9.2 (h) processing special category data for Health and Social Care Purposes <p>Processor : Apex</p>
Targeted Lung Health Check (TLHC) Screening Programme - Pilot	<p>Purpose: To identify patients and invite them to take part in a Targeted Lung Health Check (TLHC) Screening. The purpose of this screening is to identify and treat lung conditions to improve outcomes.</p> <p>Legal Basis:</p>

	<p>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”;</p> <p>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”;</p> <p>Processor: InHealth</p>
Heidi Health	<p>Purpose: The practice intends to use ‘Heidi’ to process and transcribe clinical conversations, either between a clinician and patients or of a clinician dictating their clinical findings/management plan during, before or following patient consultations. The technology looks to capture relevant details such as different speakers, medical terminology and symptomatology.</p> <p>Legal Basis –</p> <p>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”</p> <p>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”</p> <p>Processor: Heidi Health</p>
Tortus	<p>Purpose: The practice intends to use TORTUS AI to process and transcribe clinical conversations, either between clinicians and patients or as part of a dictating process to record their findings/management plan during, before or following patient conversations.</p> <p>Legal Basis –</p> <p>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”</p> <p>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”</p>

	<p>Processor: Tortus</p>
Numed Healthcare	<p>Purpose: To enable the performance of services under the agreement, particularly self-check-in functionality for appointments. To facilitate service provision, improve efficiency, and ensure secure access to healthcare facilities for patients and staff.</p> <p>Legal Basis –</p> <p>Article 6(1)(b) “Processing is necessary for the performance of a contract to which the data subject is party (i.e. the provision of services to patients)”</p> <p>Article 9(2)(h) “Processing is necessary for the purposes of preventive or occupational medicine and the provision of health or social care”</p> <p>Processor: Numed Holdings Ltd (T/A Numed Healthcare)</p>
Accurx Scribe	<p>Purpose: Accurx Scribe is a digital tool used to transcribe and summarise clinical consultations in real-time using AI technology. The purpose of using Accurx Scribe is to reduce administrative burden on clinicians by enabling them to focus on patient interaction rather than documentation. The tool generates clinical notes, summaries, or letters from spoken consultations. These outputs are reviewed by the clinician before being saved to the patient’s electronic health record. The service supports improved accuracy, clinical safety, and continuity of care.</p> <p>Legal Basis –</p> <p>Article 6(1)(b) “Processing is necessary for the performance of a contract to which the data subject is party (i.e. the provision of services to patients)”</p> <p>Article 9(2)(h) “Processing is necessary for the purposes of preventive or occupational medicine and the provision of health or social care”</p> <p>Processor: Accurx</p>
Spark Primary Care	<p>Purpose: Spark Primary Care processes patient paperwork on our behalf. The purpose is to convert letters and documentation into the patient’s medical record and to be workflowed to members of the practice team when action is required on said document. The data will always remain within the clinical system and any communication regarding</p>

	<p>specific patient data can be done securely through the clinical system.</p> <p>Sharing the data will be used to improve the efficiency of data within the clinical system it sits and the speed in which it is processed safely, reducing clinical risk and improving the quality of patient data within their medical records.</p> <p>Legal Basis –</p> <p>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”</p> <p>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”</p> <p>Processor: Spark Primary Care</p>
OpenSAFELY	<p>Purpose: The OpenSAFELY platform is used to support:</p> <ul style="list-style-type: none"> • Clinical audit • Service evaluation • Health surveillance • Research • Evaluation of NHS services • Health and social care policy, planning and commissioning <p>All purposes are public interest-based and help NHS England and other approved bodies understand and improve health outcomes, capacity, and service design across England.</p> <p>Legal Basis –</p> <p>UK GDPR Article 6(1)(c) We are legally required to share this data under the NHS OpenSAFELY Data Analytics Service Pilot Directions 2025, issued under Section 259(1)(a) of the Health and Social Care Act 2012.</p> <p>UK GDPR Article 9(2)(g) Substantial Public Interest: This processing is necessary for reasons of substantial public interest under UK law. The Data Protection Act 2018, Schedule 1, Part 2, Paragraph 6 supports the statutory purpose.</p>

	<p>UK GDPR Article 9(2)(h) Health or Social Care: Processing is also necessary for the provision and management of health and care services.</p> <p>Common Law Duty of Confidentiality: The legal requirement to provide this data overrides the need for individual consent. It is mandated under the Health and Social Care Act 2012 as part of a Data Provision Notice (DPN).</p> <p>Processors:</p> <p>The Phoenix Partnership (TPP) Optum (formerly EMIS) Amazon Web Services (UK) (as sub-processor for cloud storage) Bennett Institute for Applied Data Science (University of Oxford) –software development and management of the platform</p>
Optimise COPD	<p>Purpose:</p> <p>The OPTIMISE COPD Patient Review Service is used to support:</p> <ul style="list-style-type: none"> • Clinical audit • Service evaluation • Identification of risk in COPD patients • Clinical optimisation and medication review • Improved management of long-term respiratory conditions • Enhancement of population health and practice-level care quality <p>The service helps the practice improve health outcomes for patients with COPD who are not under specialist care. The service is delivered by Screen Clinical Ltd and supported by GlaxoSmithKline (GSK) as a freely given healthcare donation. Screen Clinical pharmacists conduct structured reviews under the direction of the practice's clinicians.</p> <p>Legal Basis –</p> <p>UK GDPR Article 6(1)(e) – Public Task: Processing is necessary for the performance of a task carried out in the public interest: the provision and improvement of direct patient care within primary care settings.</p> <p>UK GDPR Article 9(2)(h) – Health or Social Care: Processing is necessary for the purposes of preventive or occupational medicine, the assessment of the working capacity of an employee, medical diagnosis, the provision of health or social care, or the management of health systems and services.</p> <p>Common Law Duty of Confidentiality: Access is for direct care purposes and is therefore permitted under CLDC without explicit patient consent. Screen Clinical staff operate as part of the practice's care team under a Data</p>

	<p>Processing Agreement and are bound by professional and contractual confidentiality requirements.</p> <p>Processors:</p> <ul style="list-style-type: none"> • Screen Clinical Ltd – primary data processor providing COPD clinical review services • CFH Docmail Ltd – sub-processor used only if patient mailings are required (with prior practice permission) • GlaxoSmithKline (GSK) – receives only anonymous, aggregated or limited PV-related data where required • TPP SystmOne – clinical system provider facilitating secure data access within the practice <p>No identifiable patient data is transferred outside the practice. All patient-identifiable information accessed by Screen Clinical is retained only for the duration of the service and is deleted within 10 days of completion.</p>
iGPR	<p>Purpose:</p> <p>The iGPR (Classic Service) is used by the practice to support:</p> <ul style="list-style-type: none"> • Processing of Subject Access Requests (SARs) under UK GDPR • Responding to third-party requests for information (e.g. insurance, DWP, solicitors) • Clinical record redaction and review, ensuring data shared complies with legislation • Ensuring patients can review any reports before third-party disclosure via the “Copy to Patient” function • Reducing administrative burden through automated extraction and redaction support • Supporting legal compliance, record-keeping, and safe patient engagement regarding information access <p>Legal Basis –</p> <p>UK GDPR Article 6(1)(c) – Legal Obligation Processing is necessary to comply with a legal obligation under Article 15 UK GDPR (Right of Access), and related rights exercised by patients and third-party requesters.</p> <p>UK GDPR Article 9(2)(h) – Health or Social Care Processing is necessary for the provision of health or social care, including safe handling of medical records for the purposes of access, review, or disclosure.</p> <p>Common Law Duty of Confidentiality Implied consent is used when data subjects request access or authorise a third party. The practice ensures patients are informed that iGPR is used for this purpose via the privacy notice.</p>

	<p>Processors:</p> <p>iGPR Technologies Ltd – Primary data processor for handling request workflows and document redaction</p>
<p>GPES Data for Consented Research</p>	<p>Purpose:</p> <p>The General Practice Extraction Service (GPES) Data for Consented Research is used to:</p> <ul style="list-style-type: none"> • Collect pseudonymised patient data from GP practices in England • Support approved health and care research studies with valid legal and ethical approval • Improve population health outcomes, policy, and research design • Enable trusted research environments to conduct robust and secure analysis using linked health data <p>This process supports national research priorities and patient care improvement through access to high-quality data from GP records, where the patient has explicitly consented to participate in the research.</p> <p>Data is extracted by NHS England via the GPES system from GP clinical systems (e.g. EMIS, TPP), processed by NHS Digital/NHS England, and provided to accredited research organisations that meet strict IG and legal standards. No data is extracted or shared for patients who have not consented.</p> <p>Legal Basis –</p> <p>UK GDPR Article 6(1)(a) – Consent: Processing is based on the explicit consent of the data subject for their identifiable or pseudonymised data to be used for specific research purposes.</p> <p>UK GDPR Article 9(2)(a) – Explicit Consent for Special Category Data: As this involves health data (special category), processing is based on the individual's explicit consent to participate in the research project.</p> <p>Common Law Duty of Confidentiality: Consent meets the common law requirement. Patients are provided with clear information on the research purpose and how their data will be used.</p>



	<p>Processors:</p> <p>NHS England (via GPES) – Extracts and processes data on behalf of the research programme</p> <p>EMIS / TPP / Cegedim / Vision – GP system providers enabling secure data extraction</p> <p>Approved Research Bodies – Only those with specific ethical approval, accreditation, and data-sharing agreements</p> <p>Secure Data Environments (SDEs) – Used to hold and analyse pseudonymised research data securely</p>
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We keep our Privacy Notice under regular review. This notice was last reviewed in February 2026.