Fair Processing Notice (Privacy Notice)

Your Personal Information – what you need to know

Your information, what you need to know

This privacy notice explains why we collect information about you, how that information will be used, how we keep it safe and confidential and what your rights are in relation to this.

Why we collect information about you

Health care professionals who provide you with care are required by law to maintain records about your health and any treatment or care you have received. These records help to provide you with the best possible healthcare and help us to protect your safety.

We collect and hold data for the purpose of providing healthcare services to our patients and running our organisation which includes monitoring the quality of care that we provide. In carrying out this role we will collect information about you which helps us respond to your queries or secure specialist services. We will keep your information in written form and/or in digital form.

Our Commitment to Data Privacy and Confidentiality Issues

As a GP practice, all of our GPs, staff and associated practitioners are committed to protecting your privacy and will only process data in accordance with the Data Protection Legislation. This includes the General Data Protection Regulation (EU) 2016/679 (GDPR) now known as the UK GDPR, the Data Protection Act (DPA) 2018, the Law Enforcement Directive (Directive (EU) 2016/680) (LED) and any applicable national Laws implementing them as amended from time to time. The legislation requires us to process personal data only if there is a legitimate basis for doing so and that any processing must be fair and lawful.

In addition, consideration will also be given to all applicable Law concerning privacy, confidentiality, the processing and sharing of personal data including the Human Rights Act 1998, the Health and Social Care Act 2012 as amended by the Health and Social Care (Safety and Quality) Act 2015, the common law duty of confidentiality and the Privacy and Electronic Communications (EC Directive) Regulations.

Data we collect about you

Records which this GP Practice will hold or share about you will include the following:

- Personal Data – means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- Special Categories of Personal Data – this term describes personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.
- Confidential Patient Information – this term describes information or data relating to their health and other matters disclosed to another (e.g. patient to clinician) in circumstances where it is reasonable to expect that the information will be held in confidence. Including both information 'given in confidence' and 'that which is owed a duty of confidence'. As

described in the Confidentiality: NHS code of Practice: Department of Health guidance on confidentiality 2003.

- Pseudonymised – The process of distinguishing individuals in a dataset by using a unique identifier which does not reveal their 'real world' identity.
- Anonymised – Data in a form that does not identify individuals and where identification through its combination with other data is not likely to take place
- Aggregated – Statistical data about several individuals that has been combined to show general trends or values without identifying individuals within the data.

How we use your information

Improvements in information technology are also making it possible for us to share data with other healthcare organisations for the purpose of providing you, your family and your community with better care. For example it is possible for healthcare professionals in other services to access your record with or without your permission when the practice is closed. Where your record is accessed without your permission it is necessary for them to have a legitimate basis in law. This is explained further in the Local Information Sharing at Appendix A.

Whenever you use a health or care service, such as attending Accident & Emergency or using Community Care services, important information about you is collected in a patient record for that service. Collecting this information helps to ensure you get the best possible care and treatment.

The information collected about you when you use these services can also be used and provided to other organisations for purposes beyond your individual care, for instance to help with:

- improving the quality and standards of care provided by the service
- research into the development of new treatments and care pathways
- preventing illness and diseases
- monitoring safety
- planning services
- risk stratification
- Population Health Management

Safeguarding of children or vulnerable adults

If we have significant concerns or hear about an individual child or vulnerable adult being at risk of harm, we may share relevant information with other organisations, such as local authorities and the Police, involved in ensuring their safety.

Statutory disclosures

Sometimes we are duty bound by laws to disclose information to organisations such as the Care Quality Commission, the Driver and Vehicle Licensing Agency, the General Medical Council, Her Majesty's Revenue and Customs and Counter Fraud services. In these circumstances we will always try to inform you before we are required to disclose and we only disclose the minimum information that the law requires us to do so

This may only take place when there is a clear legal basis to use this information. All these uses help to provide better health and care for you, your family and future generations. Confidential patient information about your health and care is only used like this where allowed by law or with consent.

Pseudonymised or anonymised data is generally used for research and planning so that you cannot be identified.

A full list of details including the legal basis, any Data Processor involvement and the purposes for processing information can be found in Appendix A.

How long do we hold information for?

All records held by the Practice will be kept for the duration specified by national guidance from NHS England, the Records Management Code of Practice for Health and Social Care. Once information that we hold has been identified for destruction it will be disposed of in the most appropriate way for the type of information it is. Personal confidential and commercially confidential information will be disposed of by approved and secure confidential waste procedures. We keep a record of retention schedules within our information asset registers, in line with the Records Management Code of Practice for Health and Social Care.

Individuals Rights under UK GDPR

Under UK GDPR 2016 the Law provides the following rights for individuals. The NHS upholds these rights in a number of ways.

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure (not an absolute right) only applies in certain circumstances
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling.

Your right to opt out of data sharing and processing

The NHS Constitution states 'You have a right to request that your personal and confidential information is not used beyond your own care and treatment and to have your objections considered'.

Type 1 Opt Out

This is an objection that prevents an individual's personal confidential information from being shared outside of their general practice except when it is being used for the purposes of their individual direct care, or in particular circumstances required by law, such as a public health screening, or an emergency like an outbreak of a pandemic disease. If patients wish to apply a Type 1 Opt Out to their record they should make their wishes know to the practice manager.

National data opt-out (NDOO)

The national data opt-out was introduced on 25 May 2018, enabling patients to opt-out from the use of their data for research or planning purposes, in line with the recommendations of the National Data Guardian in her Review of Data Security, Consent and Opt-Outs.

The national data opt-out replaces the previous 'type 2' opt-out, which required NHS Digital not to use a patient's confidential patient information for purposes beyond their individual care, for Planning or Research. Any patient that had a type 2 opt-out recorded on or before 11 October 2018 has had it automatically converted to a national data opt-out. Those aged 13 or over were sent a letter giving them more information and a leaflet explaining the national data opt-out. For more information go to National data opt out programme

To find out more or to register your choice to opt out, please visit www.nhs.uk/your-nhs-data-matters.

On this web page you will:

- See what is meant by confidential patient information
- Find examples of when confidential patient information is used for individual care and examples of when it is used for purposes beyond individual care
- Find out more about the benefits of sharing data
- Understand more about who uses the data
- Find out how your data is protected
- Be able to access the system to view, set or change your opt-out setting
- Find the contact telephone number if you want to know any more or to set/change your opt-out by phone
- See the situations where the opt-out will not apply

Right of Access to your information (Subject Access Request)

Under Data Protection Legislation everybody has the right of access to, or request a copy of, information we hold that can identify them, this includes medical records. There are some safeguards regarding what patients will have access to and they may find information has been redacted or removed for the following reasons;

- It may be deemed to risk causing harm to the patient or others
- The information within the record may relate to third parties who are entitled to their confidentiality, or who have not given their permission for the information to be shared.

Patients do not need to give a reason to see their data. And requests can be made verbally or in writing. Although we may ask them to complete a form in order that we can ensure that they have the correct information required.

Where multiple copies of the same information is requested the surgery may charge a reasonable fee for the additional copies.

Patients will need to provide proof of identity to receive this information. We will not share information relating to you with other individuals without your explicit instruction or without sight of a legal document.

Patients may also request to have online access to their data, they may do this via the NHS APP, or via the practices system. If you would like to access your GP record online visit www.southbournesurgery.com

Further information about the service can be found at the privacy notices for the NHS App managed by NHS England.

Change of Details

It is important that you tell the surgery if any of your contact details such as your name or address have changed, or if any of your other contacts details are incorrect including third party emergency contact details. It is important that we are made aware of any changes **immediately** in order that no information is shared in error.

Mobile telephone number

If you provide us with your mobile phone number, we will use this to send you text reminders about your appointments or other health related information. It is within our legal duty as a public authority to keep our patients updated with important information.

We also use the NHS Account Messaging Service provided by NHS England to send you messages relating to your health and care. You need to be an NHS App user to receive these messages. Further information about the service can be found at the **privacy notice for the NHS App** managed by NHS England.

Email address

Where you have provided us with your email address, we will use this to send you information relating to your health and the services we provide. If you do not wish to receive communications by email please let us know.

Notification

Data Protection Legislation requires organisations to register a notification with the Information Commissioner to describe the purposes for which they process personal and sensitive information.

We are registered as a Data Controller and our registration can be viewed online in the public register at: https://ico.org.uk/ESDWebPages/Search

Any changes to this notice will be published on our website and in a prominent area at the Practice.

Data Protection Officer

Our Data Protection Officer is provided by NHS Surrey and Sussex ICB. Should you have any data protection questions or concerns, please contact our Data Protection Officer c/o the Practice Business Manager, Southbourne Surgery, 337 Main Road, Southbourne, Emsworth PO10 8JH.

What is the right to know?

The Freedom of Information Act 2000 (FOIA) gives people a general right of access to information held by or on behalf of public authorities, promoting a culture of openness and accountability across the public sector. You can request any non-personal information that the GP Practice holds, that does not fall under an exemption. You may not ask for information that is covered by the Data Protection Legislation under FOIA. However you can request this under a right of access request – see section above ‘Access to your information’.

Right to Complain

If you have concerns or are unhappy about any of our services, please contact the Practice Manager. Or via the ICO details listed below.

For independent advice about data protection, privacy and data-sharing issues, you can contact:

The Information Commissioner
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Phone: 0303 123 1113 Website: https://ico.org.uk/global/contact-us

The NHS Constitution

The NHS Constitution establishes the principles and values of the NHS in England. It sets out the rights patients, the public and staff are entitled to. These rights cover how patients access health services, the quality of care you’ll receive, the treatments and programs available to you, confidentiality, information and your right to complain if things go wrong.

The NHS Constitution for England - GOV.UK (www.gov.uk)

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	**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** – NHS Surrey and Sussex ICB
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** – 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 Patients have the right to opt out of having their information shared with the SCR by completion of the form which can be downloaded here and returned to the practice. Please note that by opting out of having your information shared with the Summary Care Record could result in a delay to care that may be required in an emergency. **Processor –** NHS England
Research	**Purpose –** We may share anonymous or pseudonymised 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(2)(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 –** NIHR Research Delivery Network, National Institute for Health and Care Research (NIHR)
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

Activity	Rationale
	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** – NHS Surrey and Sussex ICB
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** – NHS Surrey and Sussex ICB, West Sussex Adults Safeguarding Team
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 Consent may not be required to share this information. **Data Processor** – NHS Surrey and Sussex ICB, Multi-Agency Safeguarding Hub
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

Activity	Rationale
	• Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine' **Processors** – NHS Surrey and Sussex 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 NHS England so that you can be appropriately invited to the relevant screening programme. More information can be found at: https://www.nhs.uk/tests-and-treatments/nhs-screening/ 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** – West Sussex County Council Public Health Department
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 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. **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) '…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 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 lifesaving care, their consent will not be required. **Processors** – • **Community Nursing Team** – The nurses and other health professionals who work in the community and visit patients at their home. • **Onecall & Echo** – The team who coordinate Urgent Care and End of Life Care in the community. • **St Wilfrid's Hospice** – The team who provide tailored end of life care in the Community and at their Chichester Hospice. • **GP Hub** – local clinics providing additional GP Appointments. • **Bognor Minor Injuries Unit** – The Emergency Nurse Practitioners who treat minor injuries in the Bognor War Memorial Hospital Unit. • **Local Pharmacy** – where the patient has asked for prescriptions etc. to be sent. • **Nursing and Care Homes** – where the patient is a resident • University Hospitals Sussex • Sussex Partnership Foundation Trust (SPFT)
Care Quality	**Purpose** – The CQC is the regulator for the English Health and Social Care services to

Activity	Rationale
Commission	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 their website: 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." • Article 9(2) (h) as stated below **Processors** – 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' • Article 9(2)(h) as stated below **Data Processors -** NHS Surrey and Sussex ICB, Sussex Integrated Database, Optum
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) 'necessary for the purposes of preventative or occupational medicine'. **Data Processors** – NHS England, NHS Surrey and Sussex ICB, 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

Activity	Rationale
	you as you change surgeries throughout your life. Closed records will be archived by NHS England **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** – TPP and PCSE
Medical reports Subject Access Requests	**Purpose –** Your medical record may be shared in order that: Solicitors/persons acting on your behalf can conduct certain actions as instructed by you. Insurance companies seeking a medical report where you have applied for services offered by then can have a copy to your medical history for a specific purpose. **Legal Basis –** • Article 6(1)(a) – consent for personal data; and • Article 9(2)(a) – explicit consent for special-category data. **Processor –** iGPR, eMR, Solicitors, Insurance organisations
Medicines Management Team Medicines Optimisation	**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** – NHS Surrey and Sussex ICB
Medicines Optimisation OptimiseRX AnalyseRX Oberoi	**Purpose** – Your anonymous aggregated information will be shared in order to optimise medication. This will enable your GP to provide a more efficient medication regime for your personal care. Some of the anonymous information may be used nationally to drive wider understanding of the medication is used. **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** - NHS Surrey and Sussex ICB
Enhanced Access Evening and Saturday appointments	**Purpose –** Your medical record will be shared with Chichester Alliance of Medical Practices Ltd (ChAMP Ltd), which provides Enhanced Access appointments in the evenings and on Saturdays on behalf of the practice, in order that they can provide direct care to you. **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** – Chichester Alliance of Medical Practices Ltd (ChAMP Ltd)
Primary Care Network	**Purpose –** Your medical record will be shared with the Chichester Alliance of Medical 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' • Article 9(2)(h) Health data as stated below **Processor** – Chichester Alliance of Medical Practices (Langley House, Selsey,

Activity	Rationale
	Cathedral, Parklands, Lavant Road, Tangmere, Southbourne, Witterings)
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 –** • 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 –** West Sussex County Council
Social Prescribers	**Purpose** – Access to medical records is provided to social prescribers to undertake a full service to patients dependent on their health 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' • Article 9(2)(h) Health data as stated below **Processor –** Chichester Alliance of Medical Practices PCN
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 consent will not always 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. Or where the information is necessary to protect a person or community. **Legal Basis – UK** GDPR – • Article 6(1)(c) – to comply with a legal obligation; and • Article 9(2)(g) – 'for reasons of substantial public interest' **Processor –** Police Constabulary
Coroner	**Purpose –** Personal health records or information relating to a deceased patient may be shared with the coroner. **Legal Basis –** UK GDPR • Article 6 1 (c) Legal Obligation • 9 2 (h) Health data **Processor –** The Coroner
Medical Examiner Service – University Hospitals Sussex	**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 University Hospitals Sussex **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 – University Hospitals Sussex
Non-commissioned,,	**Purpose –** Personal information shared with private health care providers in order to

Activity	Rationale
Private healthcare providers	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** - Nuffield Health, Spire Healthcare Group plc, Circle Health Group, Optegra Eye Healthcare
Messaging Service	**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. **Legal Basis –** 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' **Provider -** Accurx (Patient Triage and SMS messaging)
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 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 be videod 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 (Patient Triage)
MDT meetings	**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. **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 –** MS Teams
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	**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 2. NHS England collects and analyses data in connection with the Cardiovascular Disease Prevention Audit 3. GPES Physical Health Checks for people with Severe Mental Illness (PHSMI) data

Activity	Rationale
Audit	collection. 4. National Obesity Audit - NHS England **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 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. england.contactus@nhs.net **Processor –** NHS England
Summarisation and coding of clinical notes Review and update records Coding of clinical correspondence Maintenance of preventative screen and vaccination data Administrative and clinical support	**Purpose:** To fulfil their role in supporting our organisation, GPS may access and process the following types of personal data. • **Medical records.** Details of your medical history, including past and current diagnoses, treatments, medications, allergies, immunisations, test results, and any relevant health conditions. • **Clinical correspondence.** Communications such as referral letters, discharge summaries, specialist reports, and other documentation related to your care. • **Demographic information.** Your name, date of birth, NHS number, address, contact details, next of kin, ethnicity, first language, sexual orientation, gender identity, and other relevant demographic data. • **Preventive health information.** Data related to preventive screenings, recall dates, and vaccination history to ensure proactive patient management. • **Lifestyle information.** Relevant details about your lifestyle that may impact your health, such as smoking status, alcohol use, and occupation. Why GPS needs access to your information. **GPS has been contracted to process your personal data for the following essential purposes.** • **Accurate summarisation and coding.** To ensure your medical records are accurately summarised and coded, reflecting comprehensive and up-to-date information. This supports effective clinical decision-making, improves care continuity, and ensures data consistency within your records. • **Review and update of records.** To review and clarify existing medical records, particularly where they are incomplete or unclear (e.g., handwritten notes). This includes verifying any missing or illegible data by cross-referencing other sources, ensuring the accuracy and completeness of your health information. • **Coding of clinical correspondence.** To accurately code all incoming and outgoing clinical correspondence, such as referral letters, specialist notes, and discharge summaries, ensuring that this information is correctly recorded in your medical records and accessible to healthcare providers involved in your care. • **Maintenance of preventive screening and vaccination data.** To maintain up-to-date records of preventive screening recall dates and vaccination history, which helps in proactive management and timely patient reminders. • **Administrative and clinical support.** To support the administrative and clinical functions of our practice, ensuring compliance with regulatory requirements such as the Quality and Outcomes Framework (QOF) and other NHS standards. **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…'; **Processor:** General Practice Solutions (GPS)
AI Notetaking during patient consultations	• Purpose: • **Improved Interaction:** Allows clinicians to focus solely on the patient during the consultation. • **Accurate Documentation:** Helps create precise, clear, and detailed medical

Activity	Rationale
	notes for the patient record. • **Time Efficiency:** Streamlines administrative tasks, giving clinicians more time to spend with their patients. **Patient consent for Heidi AI** Your privacy and comfort are our top priorities. Heidi Health AI Scribe only processes information discussed during your appointment and operates within strict privacy and data protection regulations. Before using Heidi Health AI Scribe, your clinician will explain its role and seek your verbal consent. You have the right to decline its use at any time. **Data Security:** Heidi Health AI Scribe complies with UK data protection laws, including UK-GDPR, ensuring that your information is handled securely and confidentially. **Data Protection Officer:** The Heidi Health Data Protection Impact Assessment has been reviewed on behalf of your GP Practice. **Your Control:** If you prefer not to have Heidi Health AI Scribe involved, please let your clinician know. This will not affect the quality of care you receive. **Retention:** Transcriptions will not be stored outside the medical record for more than 1 day maximum. **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…' **Processor:** Heidi Health AI Scribe
AI Receptionist (EMMA AI)	**Purpose** Improved patient access – reduce the waiting time on the telephone Time Efficiency – allows patient services to focus on other necessary tasks. QuantumLoop's EMMA is an automated call-handling service for GP surgeries. It captures patient demographic and request details (administrative or clinical), converts speech to text, validates patient identity against NHS PDS, and submits the request into triage systems (e.g. Accurx, SystmOne). EMMA reduces staff burden, ensures calls are answered promptly, and helps practices meet NHS England targets for call response. It processes patient and clinician data for the purposes of triage and direct patient care Call recordings are kept for 30 days and then securely deleted. Call logs and transcripts are kept for up to 8 years in line with NHS records guidance, unless the practice asks for earlier deletion. Data is hosted on Microsoft Azure in the UK. **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…' **Processor:** QuantumLoop Technologies Ltd
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. 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 can also be made with the pharmacy to deliver care and medication **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** – Pharmacy of choice

Activity	Rationale
Professional Training	**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 GP trainers at the surgery and, where needed for training and assessment, through the RCGP training portfolio (FourteenFish). **Legal Basis –** • 6 1 (a) consent, patients will be asked if they wish to take part in training sessions. • 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' Recordings remain the control of the GP practice and they will delete all recordings from the secure site once they are no longer required. **Processor** – RCGP, NHS England, FourteenFish, Clarity
Telephony	**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. Telephone calls to and from the practice may be recorded. Our phone system is set to automatically retain calls for 30 days. After this point, the recordings are automatically deleted. The 30-day retention period enables us to download and retain exact and unaltered copies of calls where required for medico-legal purposes. **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 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 –** Surgery Connect – X-ON
Typewriting Service	**Purpose –** The practice use an internet based typewriting service to assist with patient referrals and letters. The service has been commissioned to assist with the high volume and management of referrals and other medical letters, which in turn will enable a better, more timely, 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) Health data as stated below **Provider –** Lexacom
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 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. **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.

Activity	Rationale
	Processor : NHS England, NHS Surrey and Sussex ICB
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' • Article 9(2)(h) Health data as stated below **Processor**: SCW CSU
Prospective online access	**Purpose**: To allow patients to access their GP medical record online via the NHS App. The view all documents and entries made into their record by the GP, including information sent to the GP Practice where exemptions do not apply. Where a patient has requested third party access (family/friends) to their medical records, it is the patient's responsibility to ensure removal of this access if no longer required. Proxy access to the patient's record will be limited unless the patient has requested full access. **Legal Basis**: **UK GDPR**: • Article 6(1)(e) Necessary for the performance of a task carried out in the public interest • Article 9(2)(h) Necessary for provision of health and/or social care, including preventative or occupational medicine **Common Law Duty of Confidentiality (CLDC)**: • The CLDC is satisfied as the data subjects are accessing their own data following sign up for a relevant app or platform and selecting the option to view their GP record. **Processor**: NHS England, TPP
Off Site Storage of medical records	**Purpose:** The practice has contracted off-site storage providers for the secure storage of Lloyd George (paper) medical records, and for their movement to and from storage. The providers have met the NHS standards for this service. The practice can assure patients that their medical records will remain in the control of the practice and robust mechanisms are in place to protect the security of patients' personal confidential data. **Legal Basis:** The movement and storage of patient records will be undertaken by contractual obligation between the practice and the companies undertaking the work. Under UK GDPR: • Article 6(1)(b) contractual obligation • Article 6(1)(e) public task • Article 9(2)(h) health data **Processors:** Iron Mountain UK PLC; Niche Oasis; CAS; Hugh Symons
Shared Care Record	**Purpose:** In order for the practice to have access to a shared record, the Integrated Care System 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. 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:**

Activity	Rationale
	• 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: NHS England**
Local shared care record (Our Care Connected)	**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. 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. **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: Plexus, NHS England, ESHT, University Hospitals Sussex (UHSx), ICS member providers**

Reviews of and Changes to our Privacy Notice

We will keep our Privacy Notice under regular review. This notice was last reviewed on 31 October 2026.

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..."