

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

Activity	Rationale				
Child Health Information Services	Purpose – CHIS plays a critical role in immunisation scheduling and monitoring for new-born screening; sending invitation and result letters to parents/carers and recording and monitoring NHS public health childhood immunisation programmes.				
	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.				
	Processor – SCW, Apollo Medical Software Solutions, System C				
Commissioning and contractual purposes Invoice Validation Planning Quality and Performance	Purpose – Anonymous data is used by the CCG for planning, performance and commissioning purposes, as directed in the practices contract, to provide services as a public authority. Legal Basis – UK GDPR 6 1(b) Contractual obligation as set out in the Health and Social Care Act for Quality and Safety 2015				
Summany Caro Bosord	Processor – Frimley 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 				
	Full details of the Summary Care Record supplementary privacy notice can be found here				
	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 and NHS Digital				
	Processor – NHS England and NHS Digital				
Research	Purpose – We may share anonymous patient information with research companies for the purpose of exploring new ways of providing healthcare and treatment for patients with certain conditions. This data will not be used for any other purpose.				
	Where personal confidential data is shared your consent will need to be sought.				
	Where you have opted out of having your identifiable informatio shared for this Planning or Research your information will not b shared.				
	Legal Basis – consent is not required to share anonymous data that does not identify a patient.				
	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				
	Processor – N/A currently not taking park in any research				
Individual Funding Requests	Purpose – We may need to process your personal information where we are required to fund specific treatment for you for a particular condition that is not already covered in our standard NHS contract.				
	The clinical professional who first identifies that you may need the treatment will explain to you the information that is needed to be collected and processed in order to assess your needs and commission your care; they will gain your explicit consent to share this. You have the right to withdraw your consent at any time but this may affect the decision to provide individual funding.				
	Legal Basis – Under UK GDPR Article 6 1(a) consent is required Article 9 2 (h) health data				
	Data processor – SCWCSU				
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.				
	• 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(3)(b) (resease of forth a purpose of property in a research				
	 Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine 				

Data Processor – Surrey County Council, Waverley Borough Council Safeguarding Children **Purpose** – We will share children's personal information where there is a need to assess and evaluate any safeguarding concerns. **Legal Basis** - in some case consent will be required otherwise Article 6(1)(e) '...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...'; Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine **Data Processor** – Surrey County Council, Waverley Borough Council Risk Stratification -Purpose - 'Risk stratification for case finding' is a process for Preventative Care 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** UK GDPR Art. 6(1) (e) and Art.9 (2) (h). The use of identifiable data by CCGs and GPs for risk stratification has been approved by the Secretary of State, through the Confidentiality Advisory Group of the Health Research Authority (approval reference (CAG 7-04)(a)/2013)) and this approval has been extended to the end of September 2022 NHS England Risk Stratification which gives us a statutory legal basis under Section 251 of the NHS Act 2006 to process data for risk stratification purposes which sets aside the duty of confidentiality. We are committed to conducting risk stratification effectively, in ways that are consistent with the laws that protect your confidentiality. **Processors** – Connected Care

Public Health **Purpose** – Personal identifiable and anonymous data is shared. Screening programmes The NHS provides national screening programmes so that certain (identifiable) diseases can be detected at an early stage. These currently apply to Notifiable disease bowel cancer, breast cancer, aortic aneurysms and diabetic retinal information (identifiable) screening service. The law allows us to share your contact information with Public Health England so that you can be invited to the relevant Smoking cessation (anonymous) screening programme. Sexual health More information be found at: can (anonymous) https://www.gov.uk/topic/population-screeningprogrammes [Or insert relevant link] or speak to the practice 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 **Data Processors** – Public Health England Direct Care **Purpose** – Personal information is shared with other secondary care NHS Trusts trusts and providers in order to provide you with direct care services. Other Care Providers This could be hospitals or community providers for a range of services, including treatment, operations, physio, and community nursing, ambulance service. Legal Basis - The processing of personal data in the delivery of direct care and for providers' administrative purposes in this surgery and in support of direct care elsewhere is supported under the following Article 6 1 (e) direct care and 9 2 (h) to provide health or social care: In some cases patients may be required to consent to having their record opened by the third party provider before patients information is accessed. Where there is an overidding need to access the GP record in order to provide patients with life saving care, their consent will not be required. **Processors** – Frimley Park Hospital, Royal Surrey County Hospital Care Quality Commission **Purpose** – The CQC is the regulator for the English Health and Social Care services to ensure that safe care is provided. They will inspect and produce reports back to the GP practice on a regular basis. The Law allows the COC to access identifiable data. More detail on how they ensure compliance with data protection law (including UK GDPR) and their privacy statement is available on our website: https://www.cqc.org.uk/about-us/our-policies/privacystatement **Legal Basis** - Article 6(1)(c) "processing is necessary for compliance with a legal obligation to which the controller is subject." And Article

9(2) (h) as stated below

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' And Article 9(2)(h) as stated below

Data Processors - Optum, Cerner

Payments, Invoice validation

Purpose - Contract holding GPs in the UK receive payments from their respective governments on a tiered basis. Most of the income is derived from baseline capitation payments made according to the number of patients registered with the practice on quarterly payment days. These amounts paid per patient per quarter varies according to the age, sex and other demographic details for each patient. There are also graduated payments made according to the practice's achievement of certain agreed national quality targets known as the Quality and Outcomes Framework (QOF), for instance the proportion of diabetic patients who have had an annual review. Practices can also receive payments for participating in agreed national or local enhanced services, for instance opening early in the morning or late at night or at the weekends. Practices can also receive payments for certain national initiatives such as immunisation programs and practices may also receive incomes relating to a variety of non-patient related elements such as premises. Finally there are short term initiatives and projects that practices can take part in. Practices or GPs may also receive income for participating in the education of medical students, junior doctors and GPs themselves as well as research. In order to make patient based payments basic and relevant necessary data about you needs to be sent to the various payment services. The release of this data is required by English laws.

Legal Basis - Article 6(1)(c) "processing is necessary for compliance with a legal obligation to which the controller is subject." And Article 9(2)(h) 'as stated below

Data Processors – NHS England, 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 you as you change surgeries throughout your life.				
	Closed records will be archived by NHS England				
	Legal Basis - Article 6(1)(e); "necessary in the exercise of official authority vested in the controller' And Article 9(2)(h) as stated below				
	Processor – EMIS, and PCSE				
Medical reports Subject Access Requests	Purpose – Your medical record may be shared in order that soli acting on your behalf can conduct certain actions as instructed b				
	Insurance companies seeking a medical reports where you have applied for services offered by then can have a copy to your medical history for a specific purpose.				
	Legal Basis – Your explicit consent will be required before a GP can share your record for either of these purposes.				
	Processor –iGPR				
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 office authority vested in the controller' And Article 9(2)(h) Health data stated below				
	Processor – First Data Bank				
Medicines Management Team	Purpose — your medical record is shared with the medicines management team, in order that your medication can be kept up to date and any changes can be implemented.				
	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 Frimley ICB				
GP Federation Same Day service GP Extended Access Video consultations Minor injuries services MHICS	Purpose – Your medical record will be shared with the FICS (Farnham Integrated Care Services) and Salus 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				
MSK	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 – FICS and Salus				

PCN	Purpose – Your medical record will be shared with the Farnham PC in order that they can provide direct care services to the patie population.			
	Legal Basis - Article 6(1)(e); "necessary in the exercise of official authority vested in the controller' And Article 9(2)(h) Health data as stated below			
	Processor – Farnham Dene Medical Practice, Downing Street Medical Practice.			
Smoking cessation	Purpose – personal information is shared in order for the smoking cessation service to be provided.			
	Only those patients who wish to be party to this service will have their data shared			
	Legal Basis – consented			
	Processor – One you Surrey			
Social Prescribers	Purpose – Access to medical records is provided to social prescribers to undertake a full service to patients dependent on their social care needs.			
	Only those patients who wish to be party to this service will have their data shared			
	Legal Basis – Article 6(1)(e); "necessary in the exercise of official authority vested in the controller' And Article 9(2)(h) Health data as stated below			
	Processor – Farnham Primary Care Network			
Police	Purpose – Personal confidential information may be shared with the Police authority for certain purposes. The level of sharing and purpose for sharing may vary. Where there is a legal basis for this information to be shared no consent will be required.			
	The Police will require the correct documentation in order to make a request. This could be but not limited to, DS 2, Court order, s137, the prevention and detection of a crime.			
	In some cases consent may be required.			
	Legal Basis – UK GDPR – Article 6 1 (f) legitimate interest 6 1 (c) Legal Obligation. Article 9 2 (f) requests for legal reasons			
	Processor – Police Constabulary			
Coroner	Purpose – Personal information relating to a patient may be shared with the coroner upon request.			

	Legal Basis – UK GDPR Article 6 1 (c) Legal Obligation 9 2 (h) Health data				
	Processor – The Coroner				
Medical Examiner Officers RAS Triage Service - Frimley Health NHS Foundation Trust RDU01 – Specialty – Community	Purpose: Purpose: Medical records associated with deceased patients are outside scope of the UK GDPR. However, next of kin details are within the scope of the UK GDPR. We will share specified deceased patient records and next of kin details with the Medical Examiners within Frimley Health Foundation Trust.				
Healthcare.	Legal Basis:				
	Article 6(1)c "It is necessary under a legal obligation to which the controller is subject" Article 9(2)h "processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services"; and				
	Processor : Medical Examiners service - Frimley Health Foundation Trust.				
Private healthcare providers	Purpose – Personal information shared with private health caproviders in order to deliver direct care to patients at the patient request. Consent from the patient will be required to share data we private Providers. Legal Basis – Consented and under contract between the patient at the provider				
	Provider –Spire, Nuffield Health or others as agreed with the individual patient.				
Texting Service	Purpose – Personal identifiable information shared with the texting service in order that text messages including appointment reminders, campaign messages related to specific patients health needs and direct messages to patients				
	Legal Basis – UK GDPR Article 6 1 (b) Contract, Article 6 1 (e) Public task, Article 9 2 (h)				
	Provider - AccuRX, NHS App				
NHS Account Messaging Service	Purpose, We 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 <u>privacy notice for the NHS App</u> managed by NHS England Legal Basis – UK GDPR Article 6 1 (b) Contract, Article 6 1 (e) Public task, Article 9 2 (h)				
	task, Article 9.2 (II)				

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Remote consultation	Provider – NHS App Purpose – Personal information including images may be processed,			
Including – Video Consultation Clinical photography	stored and with the patients consent shared, in order to provide the patient with urgent medical advice during the COVID-19 pandemic.			
Cilifical priotography	Legal Basis – Article 6(1)(e); "necessary in the exercise of official authority vested in the controller' And Article 9(2)(h) Health data as stated below			
	Patients will be asked to provide consent if required to provide photographs of certain areas of concern. 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.			
	Processor – PATCHS, AccuRX			
MDT meetings	Purpose – For some long term conditions, such as diabetes, the practice participates in meetings with staff from other agencies involved in providing care, to help plan the best way to provide care to patients with these conditions.			
	During COVID 19 the practice may use secure video meeting platform to discuss patient needs.			
	Legal Basis – Article 6(1)(e); "necessary in the exercise of officia authority vested in the controller' And Article 9(2)(h) Health data as stated below			
General Practice	Processor – FICS, MS Teams Purpose – GP practices are required to provide data extraction of			
Extraction Service (GPES) 1. At risk patients data collection Version 3 2. CVDPREVENT Audit 3. Physical Health Checks for people with Severe	their patient's personal confidential information for various purposes to NHS Digital. 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:			
Mental Illness	1. At risk patients including severely clinically vulnerable			
	NHS England has directed NHS Digital to collect and analyse data in connection with Cardiovascular Disease Prevention Audit			
	3. GPES Physical Health Checks for people with Severe Mental Illness (PHSMI) data collection.			

	Legal Basis - All GP Practices in England are legally required to share data with NHS Digital for this purpose under section 259(1)(a) and (5) of the 2012 Act Further detailed legal basis can be found in each link. Any objections to this data collection should be made directly to NHS Digital. enquiries@nhsdigital.nhs.uk	
	Processor – NHS Digital or NHS X	
Medication/Prescribing	Purpose: Prescriptions containing personal identifiable and health data will be shared with chemists/pharmacies, in order to provide patients with essential medication or treatment as their health needs dictate. This process is achieved either by face to face contact with the patient or electronically. Where patients have specified a nominated pharmacy they may wish their repeat or acute prescriptions to be ordered and sent directly to the pharmacy making a more efficient process. Arrangements can also be made with the pharmacy to deliver medication Legal Basis: Article 6(1)(e); "necessary in the exercise of official authority vested in the controller' And Article 9(2)(h) Health data as stated below	
	Patients will be required to nominate a preferred pharmacy.	
Professional Training	Processor – Pharmacy of choice Purpose – We are a GP training surgery. On occasion you may be asked if you are happy to be seen by one of our GP registrars. 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.	
	 Legal Basis – 6 1 (a) consent, patients will be asked if they wish to take part in training sessions. 9 2 (a) - explicit consent will be required when making recordings of consultations 	
	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, HEE, iConnect, Fourteen Fish	

Telephony	Purpose – The practice use an internet based telephony system that records telephone calls, patients will have the right to decline recordings of calls as is their individual right. The calls will be held on the external server for a duration of 3 years unless requested for them to be removed sooner. The telephone system has been commissioned to assist with the high volume and management of calls into the surgery, which in turn will enable a better service to patients.
	Legal Basis – While there is a robust contract in place with the processor, the surgery has undertaken this service to assist with the direct care of patients in a more efficient way. Article 6(1)(e); "necessary in the exercise of official authority vested in the controller' And Article 9(2)(h) Health data as stated below
	Provider – Surgery Connect
Learning Disability Mortality Programme LeDer	Purpose : The Learning Disability Mortality Review (LeDeR) programme was commissioned by NHS England to investigate the death of patients with learning difficulties to assist with processes to improve the standard and quality of care for people living with a learning disability.
	Legal Basis: It has approval from the Secretary of State under section 251 of the NHS Act 2006 to process patient identifiable information who fit within a certain criteria.
	Processor : ICB, NHS England
Technical Solution Pseudonymisation	Purpose: Personal confidential and special category data in the form of medical record, is extracted under contract for the purpose of pseudonymisation. This will allow no patient to be identified within the data set that is created. SCWCSU has been commissioned to provide a data processing service for the GPs, no other processing will be undertaken under this contract.
	Legal Basis: Under UK GDPR the legitimate purpose for this activity is under contract to provide assistance. Article 6(1)(e); "necessary in the exercise of official authority vested in the controller' And Article 9(2)(h) Health data as stated below
	Processor: SCW CSU
Shared Care Record	Purpose: In order for the practice to have access to a shared record, the Integrated Care Service has commissioned a number of systems including GP connect, which is managed by NHS Digital, to enable a shared care record, which will assist in patient information to be used for a number of care related services. These may include Population Health Management, Direct Care, and analytics to assist with planning services for the use of the local health population.

Where data is used for secondary uses no personal identifiable data will be used. Where personal confidential data is used for Research explicit consent will be required. **Legal Basis:** Article 6(1)(e); "necessary... in the exercise of official authority vested in the controller' And Article 9(2)(h) Health data as stated below Processor: Plexus, NHS Digital, ESHT, ICS member providers (connected Care) Purpose: Personal Confidential data is shared with LumiraDX in order Anticoagulation Monitoring to provide an anticoagulation clinic to patients who are on anticoagulation medication. This will only affect patients who are within this criteria. **Legal Basis**: The legal basis for this activity under UK GDPR is Article 6(1)(e); "necessary... in the exercise of official authority vested in the controller' And Article 9(2)(h) Health data as stated below **Processor**: INRStar, LumiraDX **General Practice** Purpose – GP practices are required to provide data extraction of Extraction Service (GPES) their patients personal confidential information for various purposes 1. At risk patients to NHS England. The objective of this data collection is on an ongoing data collection basis to identify patients registered at General Practices who fit Version 3 within a certain criteria, in order to monitor and either provide direct 2. CVDPREVENT care, or prevent serious harm to those patients. Below is a list of the Audit purposes for the data extraction, by using the link you can find out 3. Physical Health the detail behind each data extraction and how your information will Checks for people be used to inform this essential work: with Severe 1. At risk patients including severely clinically vulnerable Mental Illness National Obesity Audit 2. NHS England has directed NHS England to collect and analyse data in connection with Cardiovascular Disease Prevention **Audit** 3. GPES Physical Health Checks for people with Severe Mental Illness (PHSMI) data collection. 4. National Obesity Audit - NHS Digital **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 Further detailed legal basis can be found in each link.

Any objections to this data collection should be made directly to NHS England. enquiries@nhsdigital.nhs.uk
Processor – NHS England

We will keep our Privacy Notice under regular review. This notice was last reviewed on 14th November 2023.

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..."

Date	Author	Version	Page	Reason for Change
03.10.2022	SCW	3	All	Review for Website publication
25.08.2021	SCW	4.	All	Review for Website publication, minor
				changes made to links and addition of covid
				and online access.
06.01.2023	FPHG	4.1	All	Review Updated CCG to ICB
				Removal Covid
11.09.2023	FPHG	4.2	All	Reviewed and updated with NHS App and
				Medical Examiner
14.11.2023	SCW/AG	V4.8	All	Reviewed and updated with National
				Obesity Audit