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

Activity	Rationale
New patient registration	**Purpose** – The provision of healthcare or treatment and the management of health or social care systems and services. **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 – Healthtech-1 **Processor – Healthtech-1**
NHS South, Central and West Commisssioning Support Unit - Child Health Information Services (SCW CHIS)	**Purpose –** South, Central and West Child Health Information Services (SCW CHIS) is commissioned by NHS England to support the monitoring of care delivered to children. Personal data is collected from the child's GP record to enable health screening, physical examination and vaccination services to be monitored to ensure that every child has access to all relevant health interventions. For more information: Fair Processing Notice Child Health Information Services - NHS SCW Support and Transformation for Health and Care (scwcsu.nhs.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…'; 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 **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
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 information shared for this Planning or Research your information will not be 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. **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…'; and • 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…'; and • Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine **Data Processor** – Surrey County Council, Waverley Borough Council
Safeguarding Children Community Children's Service	**Purpose –** Provide community health services to 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…' **Data Processor –** HCRG Group
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** 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 Screening programmes (identifiable) Notifiable disease information (identifiable) Smoking cessation (anonymous) Sexual health (anonymous) Vaccine 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. The law allows us to share your contact information with Public Health England so that you can be invited to the relevant screening programme. More information can be found at: https://www.gov.uk/topic/population-screeningprogrammes [Or insert relevant link] or speak to the practice **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 NHS Trusts Other Care Providers	**Purpose –** Personal information is shared with other secondary care trusts and providers in order to provide you with direct care services. This could be hospitals or community providers for a range of services, including treatment, operations, physio, and community nursing, ambulance service. **Legal Basis -** The processing of personal data in the delivery of direct care and for providers' administrative purposes in this surgery and in support of direct care elsewhere is supported under the following Article 6 1 (e) direct care and 9 2 (h) to provide health or social care:

	In some cases patients may be required to consent to having their record opened by the third party provider before patients information is accessed. Where there is an 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 CQC to access identifiable data. More detail on how they ensure compliance with data protection law (including UK GDPR) and their privacy statement is available on our website**:** https://www.cqc.org.uk/about-us/our-policies/privacy-statement **Legal Basis** - Article 6(1)(c) "processing is necessary for compliance with a legal obligation to which the controller is subject." And Article 9(2) (h) as stated below **Processor**s – Care Quality Commission
Population Health Management	**Purpose –** Health and care services work together as 'Integrated Care Systems' (ICS) and are sharing data in order to: • Understand the health and care needs of the care system's population, including health inequalities • Provide support to where it will have the most impact • Identify early actions to keep people well, not only focusing on people in direct contact with services, but looking to join up care across different partners. (NB this links to the Risk Stratification activity identified above) Type of Data – Identifiable/Pseudonymised/Anonymised/Aggregate Data. NB only organisations that provide your care will see your identifiable data. **Legal Basis -** Article 6(1)(e); "necessary… in the exercise of official authority vested in the controller' And Article 9(2)(h) as stated below **Data Processors -** Optum, Cerner
Payments, 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 solicitors 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 –** Your explicit consent will be required before a GP can share your record for either of these purposes. **Processor –**iGPR
Medicines Optimisation	**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 Frimley ICB
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 MSK	**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 **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
Clinical Review Service	**Purpose:** Personal data is processed to provide a clinical review service for patients on behalf of the authorising NHS organisation. Services are designed to assist healthcare organisations implement systematic approaches to the health and wellbeing of patients with long term health conditions. **Legal Basis –** • 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' • 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 –** Interface Clinical Services Ltd. On behalf of AstraZeneca
Primary Care Network (PCN)	**Purpose –** Your medical record will be shared with the Farnham PCN in order that they can provide direct care services to the patient population. **Legal Basis** - Article 6(1)(e); "necessary… in the exercise of official authority vested in the controller' And Article 9(2)(h) Health data as stated below **Processor** – Farnham Park Health Group, Farnham Dene Medical Practice, Central Surgery,

Smoking cessation	**Purpose –** personal information is shared in order for the smoking cessation service to be provided. Only those patients who wish to be party to this service will have their data shared **Legal Basis –** consented **Processor –** 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 Healthcare**.**	**Purpose**: Purpose: Medical records associated with deceased patients are outside scope of the UK GDPR. However, next of kin details are within the scope of the UK GDPR. We will share specified deceased patient records and next of kin details with the Medical Examiners within Frimley Health Foundation Trust. **Legal Basis**:

	Article 6(1)c "It is necessary under a legal obligation to which the controller is subject" Article 9(2)h "processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services"; and **Processor**: Medical Examiners service - Frimley Health Foundation Trust.
Private healthcare providers	**Purpose –** Personal information shared with private health care providers in order to deliver direct care to patients at the patient's request. Consent from the patient will be required to share data with Private Providers. **Legal Basis –** Consented and under contract between the patient and the provider **Provider** –Spire, Nuffield Health or others as agreed with the individual patient.
Texting / Messaging 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 can be transferred in a safe way **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 privacy notice for the NHS App managed by NHS England **Legal Basis –** UK GDPR Article 6 1 (b) Contract, Article 6 1 (e) Public task, Article 9 2 (h) **Provider – NHS App**
Translation Services	**Purpose –** Provide interpretation and translation services to clinicians/patients. **Legal basis –** • Article 6(1)(a) – consent for personal data • Article 6 1 (f) legitimate interest **Provider** – DALS/Frimley ICB

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 during the COVID-19 pandemic. **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 –** Rapid Health AccuRX
Rapid Health	**Purpose** - This online consultation software supports the Practice by reducing administrative workload, improving appointment efficiency and prioritising patient needs based on symptom severity allowing staff to focus on urgent cases while enhancing overall patient flow. **NHS Login** If you access Rapid Health using your NHS login details, the identity verification services are managed by NHS England. NHS England is the controller for any personal information you provided to NHS England to get an NHS login account and verify your identity and uses that personal information solely for that single purpose. For this personal information, our role is a "data processor" only and we must act under the instructions provided by NHS England (as the "data controller") when verifying your identity. For more information on NHS login, see the NHS login privacy notice and NHS login terms and conditions. Your Privacy on NHS login and Terms and conditions You can access Rapid Health on the NHS App using your NHS login details. If you sign in using NHS login, Rapid Health will ask your permission to share your NHS login information with their service. This allows them to fill in some personal details for you, such as your name, date of birth and contact details. Rapid Health will not use your NHS login information for any other purposes. You can only share your NHS login information if you have proved your identity to NHS login. You can choose not to share your NHS login information with Rapid Health, but you will need to enter your information yourself whilst using the service. **Legal Basis** – • Article 6(1)(e); 'necessary… in the exercise of official authority vested in the controller' • Article 9 (2)(h) 'necessary for the purposes of preventative or occupational medicine' **Processor** – Rapid Health

Patient direct access to Records	**Purpose –** The National Accelerated Citizen Access Programme allows patients access their GP records through the NHS App and other patient facing applications. It provides patient data directly to the patient unless individual circumstances render access inappropriate. This is part of GP contractual requirements since 2014 for coded data and 2019/20 for full future information entered onto the GP system. **Legal Basis –** • Article 6(1)(e) Necessary for the performance of a task carried out in the public interest • UK GDPR Article 9(2)(h) Necessary for provision of health and/or social care, including preventative or occupational medicine **Provider** – NHS App, Patient Access and other patient facing applications
MDT meetings	**Purpose** – For some long-term conditions, such as diabetes, the practice participates in meetings with staff from other agencies involved in providing care, to help plan the best way to provide care to patients with these conditions. During COVID 19 the practice may use secure video meeting platform to discuss patient needs. **Legal Basis –** Article 6(1)(e); "necessary… in the exercise of official authority vested in the controller' And Article 9(2)(h) Health data as stated below **Processor –** FICS, 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 Audit 5. General Practice Diabetic Retinopathy Screening (GP2DRS)	**Purpose –** GP practices are required to provide data extraction of 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: 1. At risk patients including severely clinically vulnerable 2. 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. **Processor** – Pharmacy of choice
Professional Training	**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
Local Shared Care Record (CHIE)	**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 care 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… in the exercise of official authority vested in the controller" • Article 9(2)g "processing is necessary for reasons of substantial public interest" • Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine **Processor -** Thames Valley & Surrey (TVS) Care Records, South Central West Commissioning Support Unit (SCW)
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)**
Anticoagulation Monitoring	**Purpose:** Personal Confidential data is shared with LumiraDX in order to provide an anticoagulation clinic to patients who are on anticoagulation medication. This will only affect patients who are within this criteria. **Legal Basis**: The legal basis for this activity under UK GDPR is Article 6(1)(e); "necessary… in the exercise of official authority vested in the controller' And Article 9(2)(h) Health data as stated below **Processor** : INRStar, LumiraDX
Berkshire and Surrey Pathology Service (BSPS)	**Purpose –** Clinisys ICE/Universal ICE (UICE) system are order communications systems which are used to place orders and view results for various departments, most commonly Pathology and Radiology. There are also wider uses of ICR beyond ordering tests and viewing results, such as the completion of Clinical Letters and Clinical Forms. **Legal Basis**:

	• Article 6(1)(e); "necessary… in the exercise of official authority vested in the controller", Article 9(2)g "processing is necessary for reasons of substantial public interest" • Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine **Processor** - Clinisys
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 National Obesity Audit	**Purpose –** GP practices are required to provide data extraction of their patients personal confidential information for various purposes to NHS England. The objective of this data collection is on an ongoing basis to identify patients registered at General Practices who fit within a certain criteria, in order to monitor and either provide direct care, or prevent serious harm to those patients. Below is a list of the purposes for the data extraction, by using the link you can find out the detail behind each data extraction and how your information will be used to inform this essential work: 1. At risk patients including severely clinically vulnerable 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
Xyla Elective Care (XEC)	**Purpose**: Personal confidential data will be shared for the purpose of providing a Dermatology Virtual Triage service. Data will be shared to enable Xyla Elective Care (XEC) specialists to be able to support them in patient management by providing advice and referring patients as their condition dictates. **Legal Basis**: Under UK GDPR the legal basis for this activity is for direct care: 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"; 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." On the basis of union or member state law or pursuant to contract with a health professional and subject to conditions and safeguards. **Joint Controller:** Xyla Elective Care (XEC), Frimley Health NHS Foundation Trust **Processor:** Cinapsis
Remote Care & Monitoring	**Purpose:** To capture and process patient data to assist health and social care professionals to make better decisions regarding the planning, delivery, monitoring and review of care to individual service users. **Legal Basis:** • Article 6(1)(e); "necessary… in the exercise of official authority vested in the controller" • Article 9(2)g "processing is necessary for reasons of substantial public interest" • Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine • Article 9(2)i "processing is necessary for reasons of public interest in the area of public health" **Processor:** Docobo and Graphnet
Population Management Analytics Tool	**Purpose:** Ardens have been commissioned to process personal data for the purpose of providing aggregated, anonymised population health management analytics to the practice. This allows the practice to upload data from their clinical system to support service management and identify individual patients based upon pre-specified reports for the purposes of National and Local Contract management and locally commissioned services where there is a legitimate relationship to do so. **Legal basis:** Under UK GDPR the legal basis for this activity is for direct care: • Article 6 1 (f) legitimate interest **Processor:** Ardens Manager
Early Onset Type 2 Diabetes (EOT2D)	**Purpose**: The practice will discuss with patients meeting the criteria if they wish to be involved in the program. Patient data will then be shared with Oviva who will contact patients to gain consent to continue and deliver direct care to those patients.

	Patient will have the ability to withdraw consent to be part of the program at any time. **Legal Basis**: 1. Article 6(1)e "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"; 2. Article 9(2)h "processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services"; and **Processor**: Oviva UK Ltd
Type 2 Diabetes Remission Programme	**Purpose:** The NHS Type 2 Diabetes Remission Programme is a service for people with Type 2 diabetes. It is a one-year programme to support healthier lifestyle, weight loss and remission of Type 2 diabetes. The programme consists of 12 weeks of total diet replacement (with specific shakes and soups), followed by food reintroduction and support focussing on movement and maintaining a new healthy eating lifestyle. The programme is delivered by Oviva UK Ltd., for any eligible patients referred by GPs in eligible areas. The contract for the provision of the programme is held between NH England and Oviva UK Ltd. **Legal Basis:** • 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' • 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**: Oviva UK Ltd.
Heidi Health – AI Scribe Software	**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. **Legal Basis**:

	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" **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**: Heidi Health
Surrey and Borders Partnership Mental Health Practitioners access to Integrated Care Team EMIS system	**Purpose:** We are updating our data processing practices to enhance the integration of mental health and dementia care services within primary and community care settings. This update will support the provision of direct care services to patients by enabling Surrey and Borders Partnership (SABP) clinical staff working withing the Integrated Care Team to access and incorporate their clinical records into the Salus EMIS clinical system. **Legal Basis:** This update is in compliance with applicable data protection laws and regulations, including the Data Protection Act 2018 and UK GDPR. The legal basis for processing is Article 6(1)(e) and Article 9(2)(h) of the UK GDPR, which cover processing necessary for the performance of a task carried out in the public interest and for the provision of health or social care. **Processor:** Salus Medical Services will act as the data processor in this updated data flow. **Controller:** Salus Medical Services will retain controllership of all data entered by Salus employed staff. Surrey and Borders Partnership will have controllership of any data entered by their own employees. Entries made by Surrey and Borders staff will be identifiable by their consultation header entries which will contain the practitioners name followed by (SABP Mental Health Practitioner) or SABP Dementia Link Practitioner) **Audit:** Appropriate records access will be audited on a monthly basis, jointly, by Salus Medical Services Integrated Care Services Manager and by Surrey and Borders Integrated Care Service Manager **Data Flow:** The data flow will be as follows: Referral from Partner → Salus Medical Services → Surrey and Borders Partnership. Named Mental Health Practitioners and Dementia Link Practitioners employed by SABP will incorporate their clinical records and notes into the Salus EMIS clinical system, accessible via 'All Records' for mutual caseload patients. This change will enable primary care-based SABP practitioners to add records for isolated mental health interventions where a referral has taken place. This does not include any SABP practitioner working

	outside of the integrated care, or primary care setting. This will not include practitioners working in the Community Mental Health Team (CMHT) or Community Mental Health Recovery Services (CMHRS) or Community Mental Health Team Older Peoples Team (CMHTOP).
OpenSAFELY COVID-19 and Data Analytics Services	**Purpose:** "NHS England has been directed by the government to establish and operate the OpenSAFELY COVID-19 Service and the OpenSAFELY Data Analytics Service. These services provide a secure environment that supports research, clinical audit, service evaluation and health surveillance for COVID-19 and other purposes. Each GP practice remains the controller of its own GP patient data but is required to let approved users run queries on pseudonymised patient data. This means identifiers are removed and replaced with a pseudonym. Only approved users are allowed to run these queries, and they will not be able to access information that directly or indirectly identifies individuals. **Legal Basis** – UK GDPR – Article 6 basis: UK GDPR Article 6(1)(c) - processing is necessary for compliance with a legal obligation to which the controller is subject (the Directions). UK GDPR Article 9 basis: UK GDPR Article 9(2)(g) - processing is necessary for reasons of substantial public interest, on the basis of domestic law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject, by virtue of compliance with a direction supplemented by: Patients who do not wish for their data to be used as part of this process can register a type 1 opt out with their GP. Here you can find additional information about OpenSAFELY." **Processor:** NHS England / EMIS Web
Stoma/Catheter Prescribing Service	**Purpose**: To establish a new regional Appliance Prescribing Service managed by Bullen. The service will handle all prescribing and ongoing prescription management, ensuring that appliance orders match patient needs and reduce unnecessary waste. **Legal Basis:** Direct Care:

	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”; 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, on the basis of domestic law”. **Sharing Data Controllership**: Bullen acting as individual data controllers

We will keep our Privacy Notice under regular review. This notice was last reviewed on 7th April 2025

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...”