

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 be 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), 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 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 your permission when the practice is closed. 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
- research into the development of new treatments
- preventing illness and diseases
- monitoring safety
- planning services

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.

Most of the time, anonymised data is used for research and planning so that you cannot be identified in which case, your confidential patient information is not needed.

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 Digital, [Health and Social Care Records Code of Practice](#). 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 2016.

Individuals Rights under GDPR

Under GDPR 2016, the Law provides the following rights for individuals. The NHS uphold 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'. For further information, please visit: [The NHS Constitution](#)

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 direct care, or in particular circumstances required by law, such as a public health emergency like an outbreak of a pandemic disease. If you wish to apply a Type 1 Opt Out to their record, they should make their wishes known to the practice manager.

National data opt-out

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.

By 2020, all health and care organisations are required to apply national data opt-outs where confidential patient information is used for research and planning purposes. NHS Digital has been applying national data opt-outs since 25 May 2018. Public Health England has been applying national data opt-outs since September 2018.

The national data opt-out replaces the previous 'type 2' opt-out, which required NHS Digital not to share a patient's confidential patient information for purposes beyond their individual care. 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 have access to, or request a copy of, information we hold that can identify you, this includes your medical record, there are some safeguards regarding what you will have access and you may find information has been redacted or removed for the following reasons;

- Does not cause harm to the patient
- That legal confidentiality obligations for the non-disclosure of third-party information are adhered to

You do not need to give a reason to see your data. In addition, requests can be made verbally or in writing. Although we may ask, you to complete a form in order that we can ensure that you have the correct information you require.

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

You will need to provide proof of identity to receive this information.

If you would like to access your GP record online, please contact the surgery to request an online username and password.

Change of Detail

It is important that you tell the surgery if any of your contact details such as your name or address have changed especially if any of your other contacts details are incorrect. 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 may use this to send you text reminders about your appointments or other health screening information. Please let us know if you do not wish to receive text reminders on your mobile.

Email address

Where you have provided us with your email address, with your consent 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: [http://ico.org.uk/what we cover/register of data controllers](http://ico.org.uk/what_we_cover/register_of_data_controllers)

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

Data Protection Officer

Should you have any data protection questions or concerns, please contact our Data Protection Officer via the surgery. Our Data Protection Officer is Nicky Shearwood (Practice Manager).

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, Nicky Shearwood (Practice Manager).

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 Care Record Guarantee

The NHS Care Record Guarantee for England sets out the rules that govern how patient information is used in the NHS, what control the patient can have over this, the rights individuals have to request copies of their data and how data is protected under Data Protection Legislation.

<http://systems.digital.nhs.uk/infogov/links/nhscrg.pdf>

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 will receive, the treatments and programs available to you, confidentiality, information and your right to complain if things go wrong.

<https://www.gov.uk/government/publications/the-nhs-constitution-for-england>

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

| Activity | Rationale |
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| CCG | <p>Purpose – Anonymous data is used by the CCG for planning and performance as directed in the practices contract.</p> <p>Legal Basis – Contractual</p> <p>Processor – Crawley and Horsham and Mid Sussex Clinical Commissioning Group (CCG’s)</p> |
| Summary Care Record | <p>Purpose: In order for the practice to have access to a shared record, the Integrated Care Service has commissioned a number of systems including GP connect, which is managed by NHS 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.</p> |

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| | <p>Where personal confidential data is used for Research explicit consent will be required.</p> <p>Legal Basis: Under UK GDPR 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</p> <p>Processor: Plexus, NHS Digital, ESHT, ICS member providers</p> |
| Research | <p>Purpose – We may share personal confidential or anonymous information with research companies. Where you have opted out of having your identifiable information shared for this purpose, your information will be removed.</p> <p>Legal Basis – consent is required to share confidential patient information for research, unless there is support under the Health Service (Control of Patient Information Regulations) 2002 (‘section 251 support’) applying via the Confidentiality Advisory Group in England and Wales</p> <p>Processor – (to be completed as and when required)</p> |
| Research – Service Level Agreement Sussex SID – Primary Care Landing Platform | <p>The processing that SCW has been requested to undertake will enable Sussex wide GP Practices to utilise existing extraction methods between SCW and EMIS web and TPP – SystmOne. SCW will extract data from participating Practices and then process the data through a common pseudonymisation tool (PseudoApp) developed by Beautiful Information Ltd. SCW will then provide (as instructed) the pseudonymised data extract to East Sussex Hospital Trust (ESHT) for further processing as part of the Sussex Integrated Dataset (SID).</p> <p>The purpose for which the data is processed within the SID is determined by the Controllers under the Sussex Information Sharing Protocol and not SCW as processor.</p> <p>The purpose is however described below:</p> <p>The Sussex Integrated Dataset (SID) is being established to improve the quality of health, well-being and care across Sussex Health and Care Partnership (SHCP). Data processing is for the purpose of Research and Planning (Secondary uses/Indirect Care).</p> <p>There is an increasing need to share and link data between partner organisations within Sussex to ensure that system-wide modelling, analysis and monitoring can be effectively carried out to support better understanding of the connections and interdependencies between health and social care services and the patient flows between them, with the aim of improving patient outcomes by enabling closer collaboration, risk sharing and joint commissioning.</p> <p>This will support:</p> |

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| | <ul style="list-style-type: none"> • an increased understanding of the existing use of health and social care services in Sussex, including the connections between different services; • a richer, system-wide view of the population’s need for future health and social care services, looking across traditional organisational boundaries which will provide new intelligence for a Sussex population health strategy; • the ability to understand variation through proactive benchmarking and comparison to improve clinical outcomes; • the ability to identify service improvements opportunities and financial efficiencies, for instance where patients use multiple services or where there is significant overlap between services; • public health intelligence work fulfilling statutory role of improving the health and wellbeing of people in Sussex, including Joint Strategic Needs Assessment, Health Needs Assessments, Health Equity Audits and Health Impact Assessments. <p>The legal basis for processing the data under the General Data Protection Regulation 2016 has been identified by SHCP as:</p> <p>Article 6 - Lawfulness of processing:</p> <p>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</p> <p>Article 9 - Processing of special categories of personal data</p> <p>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...’</p> <p>Data Processor – NHS South, Central & West Commissioning Support Unit (SCW) on behalf of NHS England</p> |
| Individual Funding Requests | <p>Purpose – We may need to process your personal information where we are required to fund specific treatment for you for a particular condition that is not already covered in our contracts.</p> <p>Legal Basis - 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</p> <p>Data processor – NEL CSU - IFR Team</p> |
| Safeguarding Adults | <p>Purpose – We will share personal confidential information with the safeguarding team where there is a need to assess and evaluate any safeguarding concerns.</p> |

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| | <p>Legal Basis - Because of public Interest issues, e.g. to protect the safety and welfare of vulnerable adults, we will rely on a statutory basis rather than consent to process information for this use.</p> <p>Data Processor – West Sussex County Council</p> |
| Safeguarding Children | <p>Purpose – We will share children’s personal information where there is a need to assess and evaluate any safeguarding concerns.</p> <p>Legal Basis - Because of public Interest issues, e.g. to protect the safety and welfare of Safeguarding we will rely on a statutory basis rather than consent to share information for this use.</p> <p>Data Processor – West Sussex County Council</p> |
| Risk Stratification – Preventative Care | <p>Purpose - ‘Risk stratification for case finding’ is a process for identifying and managing patients who have or may be at-risk of health conditions (such as diabetes) or who are most likely to need healthcare services (such as people with frailty). Risk stratification tools used in the NHS help determine a person’s risk of suffering a particular condition and enable us to focus on preventing ill health before it develops. Information about you is collected from a number of sources including NHS Trusts, GP Federations and your GP Practice. A risk score is then arrived at through an analysis of your de-identified information. This can help us identify and offer you additional services to improve your health.</p> <p>If you do not wish information about you to be included in any risk stratification programmes, please let us know. We can add a code to your records that will stop your information from being used for this purpose. Please be aware that this may limit the ability of healthcare professionals to identify if you have or are at risk of developing certain serious health conditions.</p> <p>Type of Data – Identifiable/Pseudonymised/Anonymised/Aggregate Data</p> <p>Legal Basis 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 2020 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.</p> <p>Processors – DOCOBO / ARTIMUS</p> |
| Public Health | <p>Purpose – Personal identifiable and anonymous data is shared.</p> |

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| <p>Screening programmes (identifiable) Notifiable disease information (identifiable) Smoking cessation (anonymous) Sexual health (anonymous)</p> | <p>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.</p> <p>More information can be found at: https://www.gov.uk/topic/population-screeningprogrammes [Or insert relevant link] or speak to the practice</p> <p>Legal Basis</p> <p>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</p> <p>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...’</p> <p>Data Processors – PHE South East</p> |
| <p>Direct Care NHS Trusts Other Care Providers</p> | <p>Purpose – Personal information is shared with other secondary care trusts 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.</p> <p>Legal Basis - The processing of personal data in the delivery of direct care and for providers’ administrative purposes in this surgery and in support of direct care elsewhere is supported under the following</p> <p>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</p> <p>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...’</p> <p>Processors – NHS England</p> |
| <p>Care Quality Commission</p> | <p>Purpose – The CQC is the regulator for the English Health and Social Care services to ensure that safe care is provided. They will inspect and produce reports back to the GP practice on a regular basis. The Law allows the CQC to access identifiable data.</p> <p>More detail on how they ensure compliance with data protection law (including GDPR) and their privacy statement is <u>available on our website:</u> https://www.cqc.org.uk/about-us/our-policies/privacy-statement</p> |

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| | <p>Legal Basis</p> <p>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</p> <p>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...’</p> <p>Processors – Care Quality Commission</p> |
| <p>Payments, Invoice validation</p> | <p>Purpose - Contract holding GPs in the UK receive payments from their respective governments on a tiered basis. Most of the income is derived from baseline capitation payments made according to the number of patients registered with the practice on quarterly payment days. These amount 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 (QUOF), 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.</p> <p>Legal Basis</p> <p>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</p> <p>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...’</p> <p>Data Processors – NHS England, CCG, Public Health</p> |
| <p>Patient Record data base</p> | <p>Purpose – Your medical record will be shared, in order that a data base can be maintained and managed in a secure way</p> <p>Legal Basis</p> <p>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</p> |

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| | <p>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...’</p> <p>Processor – SystmOne (TPP)</p> |
| <p>Medical Reports Subject Access Requests (SARS)</p> | <p>Purpose – Your medical record may be shared in order that solicitors instructed on your behalf or insurance companies seeking a medical report can have a copy to your medical history for a specific purpose.</p> <p>Legal Basis – Your explicit consent will be required before a GP can share your record for this purpose.</p> <p>Processor - Patients and or their representatives – e.g. family members, solicitors, insurance companies</p> |
| <p>OptimiseRX</p> | <p>Purpose – Your anonymous information will be shared in order to optimise your medication within your record. This will enable your GP to provide a more efficient medication regime.</p> <p>Legal Basis</p> <p>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</p> <p>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...’</p> <p>Processor - FDB</p> |
| <p>Medicines Management Team</p> | <p>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.</p> <p>Legal Basis</p> <p>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</p> <p>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...’</p> <p>Processor – Crawley and Horsham and Mid Sussex Clinical Commissioning Group (CCG’s) Medication Management Team</p> |
| <p>Anti-Coagulation Data Base</p> | <p>Purpose - Personal confidential data is shared with the INR database in order to provide certain patients who meet the criteria with an anticoagulation service. Data is held on the data base and can be accessed by the practice.</p> |

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| | <p>Patients may exercise their rights of access by using the practices SARs process.</p> <p>Legal Basis</p> <p>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</p> <p>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...’</p> <p>Processor - LumiraDx</p> |
| <p>LIVI App – GP Extended Access / Video Consults</p> | <p>Purpose – Your medical record will be shared (with consent) with the LIVI App 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.</p> <p>Legal Basis</p> <p>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</p> <p>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...’</p> <p>Processor – LIVI</p> |
| <p>The Hub – Alliance for Better Care – GP Extended Access</p> | <p>Purpose – Your medical record will be shared with the Hub 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</p> <p>Legal Basis</p> <p>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</p> <p>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...’</p> <p>Processor – Alliance for better care (ABC)</p> |
| <p>Silicon Practice / Dashboard – Website Provider</p> | <p>Purpose – Your information which is filled in within the templates of the Southgate Medical Group website would be shared between your GP service and the Silicon Practice in order that they can provide direct care services to the patient population.</p> <p>Legal Basis</p> |

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| | <p>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</p> <p>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...’</p> <p>Processor – Silicon Practice</p> |
| E-Consult | <p>Purpose – Online consultations provide opportunities for patients to engage with the NHS remotely, in some cases through automated clinical algorithms that reduce the need for contact with clinicians, thus reducing burden on clinical staff and enabling patients to seek real-time clinical support.</p> <p>NHSX and NHS England have been promoting the use of online consultation solutions across the health service, particularly in primary care settings. Efforts to widen uptake of virtual alternatives to face to face appointments have been accelerated considering Covid-19.</p> <p>eConsult is one such solution that has already been commissioned independently in a number of GPs across the country, although there are inconsistencies in the contracts, agreements and data protection impact assessments in place between the supplier and different NHS customers. To ensure provision of a consistent approach across the NHS, NHS England will undertake a national DPIA and establish a comprehensive contractual solution with the supplier on behalf of and in conjunction with GPs.</p> <p>It is important to note that these arrangements have been made to facilitate rollout of the eConsult solution at pace, while ensuring the provision of robust information governance controls. These will be reviewed in six months’ time and do not constitute a change in precedent as to the provision of IT systems on behalf of the NHS.</p> <p>Legal Basis</p> <p>Article 9 - Processing of special categories of personal data</p> <p>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...’</p> <p>Processor – Primary care providers determine the purpose of the processing</p> |
| PCN | <p>Purpose – Your medical record will be shared with the Crawley Care Collaborative PCN in order that they can provide direct care services to the patient population.</p> |

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| | <p>Legal Basis</p> <p>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</p> <p>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...’</p> <p>Processor – Leacroft Medical Practice, Langley Corner Surgery and Bridge Medical Centre</p> |
| Social Prescribers | <p>Purpose – Access to medical records is provided to social prescribers to undertake a full service to patients dependent on their social care needs.</p> <p>Legal Basis – Consented</p> <p>Processor – Crawley Volunteer Service (CVS)</p> |
| Police | <p>Purpose – Medical reports may be requested by the police for criminals</p> <p>Legal Basis – Consented or Article 10 GDPR</p> <p>Processor – Police Constabulary</p> |
| Coroners | <p>Purpose – Personal information may be shared with the coroner</p> <p>Legal Basis – Legal Obligation</p> <p>Processor – The Coroner (West Sussex & Surrey Coroner Services)</p> |
| Private healthcare providers | <p>Purpose – Personal information shared with private health care providers in order to deliver direct care to patients at the patients request</p> <p>Legal Basis – Consented and under contract between the patient and the provider</p> <p>Provider – BUPA, Nuffield Health and any other health insurer</p> |
| Texting Service | <p>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</p> <p>Legal Basis – Consent from patients and direct care</p> <p>Provider - Sussex HIS, AccuRx and Mjog</p> |
| Remote consultation Including – Video Consultation Clinical photography | <p>Purpose – Personal information including images may be processed, stored and with the patients consent shared, in order to provide the patient with urgent medical advice during the COVID-19 pandemic.</p> <p>Legal Basis – Direct Care and Consent</p> |

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| | <p>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.</p> <p>Processor – e-Consul and AccuRX</p> |
| MDT meetings | <p>Purpose – Personal information will be discussed with other providers of care, in order to provide a secure video meeting platform to discuss patients’ needs during the COVID-19 pandemic.</p> <p>Legal Basis – Direct Care</p> <p>Processor – MS Teams</p> |
| COVID-19 Research and Planning | <p>Purpose – For the collection of Personal confidential data regarding the diagnosis, testing, self-isolating, fitness to work, treatment medical and social interventions and recovery from Covid-19. To enable research and planning during the Covid-19 pandemic.</p> <p>Legal Basis - Notice under Regulation 3(4) of the Health Service (Control of Patient Information) Regulations 2002 (COPI), which were made under sections 60 (now section 251 of the NHS Act 2006) and 64 of the Health and Social Care Act 2001. Data will only be extracted for those patients who have consented to the process.</p> <p>Provider - BioBank</p> |
| General Practice Extraction Service (GPES) At risk patients data collection Version 3 | <p>Purpose - The objective of this collection is on an ongoing basis to identify patients registered at General Practices who may be:</p> <ul style="list-style-type: none"> • clinically extremely vulnerable if they contract COVID-19 • at moderate or high risk of complications from flu or COVID-19 <p>This General Practice Extraction Service (GPES) data will be extracted weekly and be used to assist in producing a weekly update of the Shielded Patient List (SPL).</p> <p>The data, as specified by the DPN, supports the COVID-19 Public Health Directions 2020 from the Secretary of State for Health and Social Care. Organisations that are in scope of the notice are legally required to comply.</p> <p>More information regarding this data collection can be found here: COVID-19 at risk patients Data Provision Notices</p> <p>Legal Basis - Sections 259(1)(a), 259(5) and 259(8) of the Health and Social Care Act 2012.</p> <p>Where a patient’s record contains a defined long-term medical condition, which poses a COVID-19 risk and/or a condition/code which identifies a patient as being of moderate or high risk of complications</p> |

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| | <p>from flu/COVID-19, data will be extracted until the expiry of the COVID 19. This will be reviewed regularly.</p> <p>Processor – NHS Digital</p> |
| <p>General Practice Extraction Service (GPES) Covid-19 Planning and Research data</p> | <p>Purpose – Personal confidential and Special Category data will be extracted at source from GP systems for the use of planning and research for the Covid-19 pandemic emergency period. Requests for data will be required from NHS Digital via their secure NHSX SPOC Covid-19 request process.</p> <p>Legal Basis:</p> <p>NHS Digital has been directed by the Secretary of State under section 254 of the 2012 Act under the COVID-19 Direction to establish and operate a system for the collection and analysis of the information specified for this service: GPES Data for Pandemic Planning and Research (COVID-19). A copy of the COVID-19 Direction is published here: https://digital.nhs.uk/about-nhs-digital/corporate-information-and-documents/directions-and-data-provision-notice/secretary-of-state-directions/covid-19-public-health-directions-2020</p> <p>Patients who have expressed an opt out preference via Type 1 objections with their GP surgery, not to have their data extracted for anything other than their direct care will not be party to this data extraction.</p> <p>Processor : NHS Digital</p> |
| <p>General Data Extraction Service (GPES) CVDPREVENT Audit</p> | <p>Purpose – NHS England has directed NHS Digital to collect and analyse data in connection with Cardiovascular Disease Prevention Audit (referred hereafter to as “CVDPREVENT Audit”).</p> <p>The NHS Long Term Plan identifies cardiovascular disease (CVD) as a clinical priority and the single biggest condition where lives can be saved by the NHS over the next 10 years. CVD causes a quarter of all deaths in the UK.</p> <p>This General Practice Extraction Service (GPES) data will be extracted as an initial full-year extract of data and thereafter as an extract on a quarterly basis. The first extract is scheduled to take place in the second half of 2020-21 financial year and will cover the previous financial year of 2019-20.</p> <p>Legal Basis:</p> <p>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</p> <p>More information on this data extraction can be found here</p> <p>Processor: NHS Digital</p> |

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| Medication/Prescribing | <p>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</p> <p>Legal Basis</p> <p>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</p> <p>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...’</p> <p>Patients will be required to nominate a preferred pharmacy.</p> <p>Processor – Pharmacy of choice</p> |
| Technical Solution Pseudonymisation | <p>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.</p> <p>Legal Basis: Under UKGDPR 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</p> <p>Processor: SCW CSU</p> |

Reviews and Changes to our Privacy Notice

We will keep our Privacy Notice under regular review. This notice was last reviewed in March 2021.

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 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...’