

## Privacy Notice – Data Processors (EMIS Web, DOCMAN, etc)

This Practice uses **EMIS Web** as its clinical system. All aspects of your direct primary care management are recorded on this system (this includes: consultations, medication, Investigation results, referrals, preventive interventions, immunisations, procedures, attendances and contacts elsewhere and clinical correspondence from secondary care).

Your electronic medical records are accessible to all the clerical and clinical team members at our practices in order to facilitate all aspects of your direct medical care. They are also partially accessible to other primary care providers directly involved in your care (for example, out of hours general practitioner service, community district nurses and specialist nurses)

Your electronic records are stored by EMIS Health, which it hosts on our behalf by third party cloud-based data centre, which is owned and operated by Amazon Web Services (AWS).

**Docman 10** provides practice with software and cloud-based storage for electronic documents regarding our patients. This includes letters that we receive, scan and upload to the patient record, as well as letters that we receive in an electronic format. Docman stores the letters in their Servers and practice workflow and access the correspondence as required.

**Silicon Practice (Footfall)** – Our website is hosted by Silicon Practice acting as data processor. All of the website data is stored in encrypted databases hosted on UK based servers. Prescriptions, appointment or online forms systems transfer data over the secure HTTPS protocol.

**Surgery Connect by X-On Cloud Telephony System** – Practice uses Surgery Connect as its telephony provider for the purpose of providing medical care to patients. Surgery Connect allows the practice to record inbound and outbound calls for training and monitoring purposes. We lawfully do not require your consent; however you do have the right to terminate the call if you do not wish for the call to be recorded. All calls are processed by Surgery Connect and EMIS (our clinical records management system) to match the call with your patient record. Recordings are stored in a secure NHS approved cloud platform on X-On's servers in the United Kingdom.

Personal data - When a call is recorded we collect:

- a digital recording of the telephone conversation
- the telephone number of both parties (internal and external)
- Personal data revealed during a telephone call will be digitally recorded for example name and contact details to deliver appropriate services.

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• Occasionally 'special category' personal information may be recorded where a customer voluntarily discloses health, religious, ethnicity or criminal information to support their request for advice and/or services.

People who have access to your information will only normally have access to that which they need to fulfil their roles.

**Pinnacle PharmaOutcomes** is a secure, web-based clinical and service management data collection and communication platform that allows patient-facing entry of service information and personal sensitive data.

**GP Connect** is a platform which allows different systems to communicate so that authorised staff in different care setting (e.g 111, London Ambulance Service, Greenwich Health Federation Hubs, PCN Enhanced Access Hubs, and Community Care Providers like District Nurses) can view a patients GP record. Your consent to this sharing of data for the purpose of direct care with those outside the practice is assumed and allowed by Law.

**Sunquest ICE** system links with our practice clinical system directly for requesting and receiving investigations (pathology, radiology, microbiology and histology) The system allows practice to see investigations held by the hospital, including ones practice have not requested.

**Optimise Rx** is a system which is fully integrated with your GP Practice patient medical record. It supports the delivery of quality, safe and evidence-based prescribing at the point of care. OptimiseRx uses existing information saved in your patient medical record to determine if a message should pop-up on the screen to offer advice to the prescriber in relation to the medicine, they are prescribing for you.

We use a processor, **iGPR Technologies Limited** ("iGPR"), to assist us with responding to report requests relating to your patient data, such as subject access requests (SAR) that you submit to us (or that someone acting on your behalf submits to us) and report requests that insurers submit to us under the Access to Medical Records Act 1988 in relation to a life insurance policy that you hold or that you are applying for. iGPR manages the reporting process for us by reviewing and responding to requests in accordance with our instructions and all applicable laws, including UK data protection laws. iGPR supports GPs in their compliance with the data protection legislation by ensuring that patient data to be shared with requesting third parties such as solicitors and insurers, is effectively protected and encrypted in transit and at rest. GPs can produce reports for third parties faster by using iGPR to automatically redact information from the report in line with DPA requirements. All transmissions are audited, logged and verified to have been securely

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transmitted and received.	
1) <b>Controller</b> contact details	Manor Brook Medical Centre 117 Brook Lane, Blackheath, London SE3 0EN
2) <b>Data Protection Officer</b> contact details	Mr David Birkenshaw GP Data Protection Officer <a href="mailto:gpdpo@selondonics.nhs.uk">gpdpo@selondonics.nhs.uk</a>
3) <b>Purpose</b> of the processing	<p>To record all relevant information about our patients (the data subjects) within their GP electronic record.</p> <p>To enable practice to digitise all correspondence, and receive digital information, about patients.</p> <p>To enable a safe two way communication between patient and practice.</p> <p>To allow health care professionals to enter demographic and clinical information about patients received the COVID-19 and Flu Vaccinations.</p> <p>To enable the other healthcare workers to provide the most appropriate advice, investigations, treatments, therapies and/or care.</p> <p>To enable healthcare professionals working for practice to access hospital's Sunquest ICE database, and in so providing practice with relevant information about investigations held on hospital record.</p> <p>To enable quality, safe and evidence-based prescribing at the point of care.</p> <p>To assist us with responding to report requests relating to your patient data, such as subject access requests (SAR) and Access to Medical Records Act 1988 (AMRA)</p>
4) <b>Lawfulness Conditions</b>	<p>This is a Direct Care purpose. Special category of data (health)</p> <p>Lawful bases:</p> <p>Article 6(1)(e) – Official Authority</p> <p>Article 9(2)(h) – Provision of health</p>
5) <b>Recipient or categories of recipients</b> of the shared data	<p>EMIS Health Ltd acts as the data processor for this, hosting the patient records database at their secure servers in Leeds.</p> <p>Docman Ltd acting as a data processor. Personal data submitted via the website or online forms systems is received by Healthcare Professionals and Admin staff at practice providing direct medical care.</p>

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Surgery Connect (data processor) telephone recording data is accessible by Practice as the Data Controller. Information may be accessed remotely by the supplier (Surgery Connect) for support purposes.

Pinnacle is acting as Data Processor, who subsequently provide this information to NHS England and Public Health England.

GP connect data will be shared with health and care professionals and support staff who contribute to your care (111, London Ambulance Service, Greenwich Health Federation Hubs, PCN Enhanced Access Hubs and Community Service Providers like District Nurses). GP Connect also provides the ability of your medical records being transferred to your new registered practice electronically without the delay. This enables continuity of your care by different providers.

Sunquest ICE is acting as a data processor. Healthcare Professionals and administrative staff from practice are able to access ICE database directly through the patient's EMIS Web GP record.

OptimiseRx is provided by First Databank UK Limited and acting as a data processor. Personal data does not leave the GP practice clinical system. Only the prescriber at your GP practice will see this information. The Medicines Optimisation Team at SEL ICB will have access to anonymised and aggregated data.

Redcentric manages the iGPR infrastructure within the secure, private NHS HSCN environment at one of its UK based datacentres, ensuring all data is safe, secure, encrypted and is transmitted and received using the highest encryption and security protocols. Redcentric submits an annual Data Security and Protection Toolkit to NHS Digital.

iGPR enables third parties to securely request and receive patient medical reports electronically. The data is fully encrypted to ES256 standard in transit and at rest and flows through a secure Health and Social Care Network (HSCN) accredited data centre.

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<b>6) Rights to object</b>	You have the right to object to some or all the information being processed under Article 21. Please contact the Data Controller or the practice. You should be aware that this is a right to raise an objection, that is not the same as having an absolute right to have your wishes granted in every circumstance.
<b>7) Right to access and correct</b>	You have the right to access any identifiable data that is being shared and have any inaccuracies corrected.
<b>8) Retention period</b>	The data will be retained for the period as specified in the national records retention schedule.
<b>9) Right to Complain.</b>	You have the right to complain to the Information Commissioner's Office, you can use this link <a href="https://ico.org.uk/make-a-complaint/data-protection-complaints/">https://ico.org.uk/make-a-complaint/data-protection-complaints/</a> or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)  There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)