

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

| Activity  | Rationale   |
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| Commissioning and contractual purposes<br>Planning<br>Quality and Performance | <p><b>Purpose</b> – Anonymous data is used by the Integrated Care Board (ICB) for planning, performance and commissioning purposes, as directed in the practices contract, to provide services as a public authority.</p> <p><b>Legal Basis</b> –</p> <ul style="list-style-type: none"> <li>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</li> <li>Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’</li> </ul> <p>Patients may opt out of having their personal confidential data used for Planning or research. Please contact your surgery to apply a Type 1 Opt out or logon to <a href="https://www.nhs.uk/your-nhs-data-matters/manage-your-choice/">https://www.nhs.uk/your-nhs-data-matters/manage-your-choice/</a> to apply a National Data Opt Out</p> <p><b>Processor</b> – Frimley ICB</p>  |
| Summary Care Record Including additional information                          | <p><b>Purpose</b> –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.</p> <p><b>Legal Basis</b> –</p> <ul style="list-style-type: none"> <li>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</li> <li>Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’</li> </ul> <p>Patients have the right to opt out of having their information shared with the SCR by completion of the form which can be downloaded <a href="#">here</a> 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.</p> <p><b>Processor</b> – NHS England</p> |
| Research  | <p><b>Purpose</b> – 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.</p>  |

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|                             | <p>Where personal confidential data is shared your consent will be required.</p> <p>Where you have opted out of having your identifiable information shared for this Planning or Research your information will not be shared.</p> <p><b>Legal Basis –</b></p> <ul style="list-style-type: none"> <li>Articles 6(1)(a) and 9(1)(a) – explicit consent; or</li> <li>Article 6(1)(c) (where we are <i>legally obligated</i> to share your personal data) for your standard personal data and Article 9(2)(j) (scientific research) for your health data.</li> </ul> <p>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.</p> <p>Sharing of aggregated non identifiable data is permitted.</p> <p><b>Processor – University of Oxford Research</b></p>        |
| Individual Funding Requests | <p><b>Purpose –</b> 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.</p> <p>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 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.</p> <p><b>Legal Basis –</b></p> <ul style="list-style-type: none"> <li>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</li> <li>Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'</li> </ul> <p><b>Data processor –</b> NHS South, Central &amp; West Commissioning Support Unit</p> |
| Safeguarding Adults         | <p><b>Purpose –</b> We will share personal confidential information with the safeguarding team where there is a need to assess and evaluate any safeguarding concerns and to protect the safety of individuals.</p> <p>Consent is not required to share information for this purpose.</p>  |

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|   | <p><b>Legal Basis</b> – Direct Care under UK GDPR:</p> <ul style="list-style-type: none"> <li>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</li> <li>Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine</li> </ul> <p><b>Data Processor</b> – Frimley ICB, RBWM, Bracknell Forest Council, Surrey Heath County Council &amp; Berkshire Healthcare Foundation Trust</p>  |
| Safeguarding Children                   | <p><b>Purpose</b> – We will share children’s personal information where there is a need to assess and evaluate any safeguarding concerns and to protect the safety of children.</p> <p><b>Legal Basis</b> –</p> <ul style="list-style-type: none"> <li>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</li> <li>Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’</li> </ul> <p>Consent may not be required to share this information.</p> <p><b>Data Processor</b> – Frimley ICB, RBWM, Bracknell Forest Council, Surrey Heath County Council &amp; Berkshire Healthcare Foundation Trust</p>  |
| Risk Stratification – Preventative Care | <p><b>Purpose</b> - ‘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.</p> <p>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> |

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|   | <p><b>Type of Data –</b><br/>Identifiable/Pseudonymised/Anonymised/Aggregate Data</p> <p><b>Legal Basis –</b></p> <ul style="list-style-type: none"> <li>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</li> <li>Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’</li> </ul> <p><b>Processors –</b> Frimley ICB</p>  |
| <p>Public Health<br/>Screening programmes (identifiable)<br/>Notifiable disease information (identifiable)<br/>Smoking cessation (anonymous)<br/>Sexual health (anonymous)<br/>Vaccination Programmes</p> | <p><b>Purpose –</b> Personal identifiable and anonymous data is shared. The NHS provides national screening programmes so that certain diseases can be detected at an early stage. These currently apply to bowel cancer, breast cancer, aortic aneurysms and diabetic retinal screening service to name a few. The law allows us to share your contact information, and certain aspects of information relating to the screening with Public Health England so that you can be appropriately invited to the relevant screening programme.</p> <p>More information can be found at:<br/><a href="https://www.gov.uk/topic/population-screeningprogrammes">https://www.gov.uk/topic/population-screeningprogrammes</a> [Or insert relevant link] or speak to the practice.</p> <p>Patients may not opt out of having their personal information shared for Public Health reasons.<br/>Patients may opt out of being screened at the time of receiving an invitation.</p> <p><b>Legal Basis –</b></p> <ul style="list-style-type: none"> <li>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</li> <li>Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’</li> </ul> <p><b>Data Processors –</b> RBWM &amp; Bracknell Forest Council</p> |
| <p>Direct Care<br/>NHS Trusts<br/>Community Providers<br/>Pharmacies<br/>Enhanced care providers<br/>Nursing Homes<br/>Other Care Providers</p>   | <p><b>Purpose –</b> Personal information is shared with other secondary care trusts and providers in order to provide you with individual direct care services. This could be hospitals or community providers for a range of services, including treatment, operations, physio, and community nursing, ambulance service.</p> <p><b>Legal Basis -</b> 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> <ul style="list-style-type: none"> <li>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</li> </ul>   |

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|                              | <ul style="list-style-type: none"> <li>Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine</li> </ul> <p><b>Processors</b> – Frimley Health NHS Foundation Trust &amp; Berkshire Healthcare NHS Foundation Trust</p>   |
| Care Quality Commission      | <p><b>Purpose</b> – 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 UK GDPR) and their privacy statement is <u>available on our website</u>: <a href="https://www.cqc.org.uk/about-us/our-policies/privacy-statement">https://www.cqc.org.uk/about-us/our-policies/privacy-statement</a></p> <p><b>Legal Basis</b> –</p> <ul style="list-style-type: none"> <li>Article 6(1)(e) '...processing is necessary for compliance with a legal obligation'; and</li> <li>Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine</li> </ul> <p><b>Processors</b> – Care Quality Commission</p>  |
| Population Health Management | <p><b>Purpose</b> – Health and care services work together as 'Integrated Care Systems' (ICS) and are sharing data in order to:</p> <ul style="list-style-type: none"> <li>Understand the health and care needs of the care system's population, including health inequalities</li> <li>Provide support to where it will have the most impact</li> <li>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.</li> </ul> <p><b>Type of Data</b> –<br/>Identifiable/Pseudonymised/Anonymised/Aggregate Data. NB only organisations that provide your care will see your identifiable data.</p> <p><b>Legal Basis</b> –</p> <ul style="list-style-type: none"> <li>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</li> <li>Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine</li> </ul> <p><b>Data Processors</b> - Optum, Cerner</p> |
| Payments                     | <p><b>Purpose</b> - 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</p>   |

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|  | <p>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.</p> <p><b>Legal Basis –</b></p> <ul style="list-style-type: none"> <li>Article 6(1)(c) 'processing is necessary for compliance with a legal obligation to which the controller is subject'; and</li> <li>Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'.</li> </ul> <p><b>Data Processors – NHS England, Frimley ICB, Public Health</b></p> |
| Patient Record data base                   | <p><b>Purpose –</b> 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</p> <p><b>Legal Basis –</b></p> <ul style="list-style-type: none"> <li>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</li> <li>Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'.</li> </ul> <p><b>Processor – EMIS &amp; PCSE</b></p>  |
| Medical reports<br>Subject Access Requests | <p><b>Purpose –</b> Your medical record may be shared in order that:</p> <p>Solicitors/persons acting on your behalf can conduct certain actions as instructed by you.</p> <p>Insurance companies seeking a medical reports where you have applied for services offered by then can have a copy to your medical history for a specific purpose.</p>   |

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|  | <p><b>Legal Basis –</b></p> <ul style="list-style-type: none"> <li>Article 6(1)(a) – consent for personal data; and</li> <li>Article 9(2)(a) – explicit consent for special-category data.</li> </ul> <p><b>Processor –</b> iGPR, Solicitors and Insurance organisations</p>   |
| Medicines Management Team<br>Medicines Optimisation  | <p><b>Purpose –</b> your medical record is shared with the medicines management team pharmacists, in order that your medication can be kept up to date and any necessary changes to medication can be implemented.</p> <p><b>Legal Basis –</b></p> <ul style="list-style-type: none"> <li>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</li> <li>Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’</li> </ul> <p><b>Processor –</b> Berkshire Primary Care, Frimley ICB &amp; FDB</p>   |
| GP Federation<br><br>Services they provide:<br>GP Extended Access<br>Video consultations<br>Vaccination Programmes<br>Telephony<br>Online Consultation Triage<br>Document Workflow<br>Patient Recall | <p><b>Purpose –</b> Your medical record will be shared with the Berkshire Primary Care 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. The Federation will be acting on behalf of the GP practice.</p> <p><b>Legal Basis –</b></p> <ul style="list-style-type: none"> <li>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</li> <li>Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’</li> </ul> <p><b>Processor –</b> Berkshire Primary Care</p> |
| Primary Care Network (PCN)   | <p><b>Purpose –</b> Your medical record will be shared with the Ascot Primary Care Network in order that they can provide direct care services to the patient population.</p> <p><b>Legal Basis –</b></p> <ul style="list-style-type: none"> <li>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</li> <li>Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’</li> </ul> <p><b>Processor –</b> Kings Corner Surgery, Ascot Medical Centre, Green Meadows Surgery &amp; Magnolia House Surgery</p>   |
| Smoking cessation  | <p><b>Purpose –</b> personal information is shared in order for the smoking cessation service to be provided.</p> <p>Only those patients who wish to be party to this service will have their data shared</p>  |

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|  | <p><b>Legal Basis –</b></p> <ul style="list-style-type: none"> <li>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</li> <li>Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’</li> </ul> <p><b>Processor – Smoke Free Life Berkshire</b></p>  |
| Social Prescribers   | <p><b>Purpose</b> – Access to medical records is provided to social prescribers to undertake a full service to patients dependent on their health social care needs.</p> <p>Only those patients who wish to be party to this service will have their data shared</p> <p><b>Legal Basis –</b></p> <ul style="list-style-type: none"> <li>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</li> <li>Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’</li> </ul> <p><b>Processor – RBWM &amp; Ascot Primary Care Networks</b></p>  |
| Police   | <p><b>Purpose</b> – Personal confidential information may be shared with the Police authority for certain purposes. The level of sharing and purpose for sharing may vary. Where there is a legal basis for this information to be shared consent will not always be required.</p> <p>The Police will require the correct documentation in order to make a request. This could be but not limited to, DS 2, Court order, s137, the prevention and detection of a crime. Or where the information is necessary to protect a person or community.</p> <p><b>Legal Basis – UK GDPR</b></p> <ul style="list-style-type: none"> <li>Article 6(1)(c) – to comply with a legal obligation; and</li> <li>Article 9(2)(j) – ‘for reasons of substantial public interest’</li> </ul> <p><b>Processor – Police Constabulary</b></p> |
| Coroner  | <p><b>Purpose</b> – Personal health records or information relating to a deceased patient may be shared with the coroner.</p> <p><b>Legal Basis – UK GDPR:</b></p> <ul style="list-style-type: none"> <li>Article 6(1)(c) – to comply with a legal obligation; and</li> <li>Article 9(2)(h) – ‘necessary for the purposes of preventative or occupational medicine’.</li> </ul> <p><b>Processor – The Coroner</b></p>  |
| Medical Examiner Officers RAS<br>Triage Service - Frimley Health<br>NHS Foundation Trust RDU01 | <p><b>Purpose:</b> 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</p>  |



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| <p>– Specialty – Community Healthcare</p>  | <p>specified deceased patient records and next of kin details with the Medical Examiners within Frimley Health Foundation Trust</p> <p><b>Legal Basis:</b></p> <p>Article 6(1)(c) – necessary under a legal obligation to which the controller is subject”; and</p> <p>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”</p> <p><b>Processor:</b> Medical Examiners service – Frimley Health Foundation Trust</p>     |
| <p>Private Healthcare Providers</p>  | <p><b>Purpose</b> – 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.</p> <p><b>Legal Basis</b> – Articles 6(1)(a) and 9(2)(a) consent by the patient given under contract to the provider.</p> <p><b>Provider</b> – As requested by Patient</p>  |
| <p>Messaging Service</p>   | <p><b>Purpose</b> – Personal identifiable information shared with the messaging service in order that messages including; appointment reminders; results; campaign messages related to specific patients health needs; and direct messages to patients, can be transferred to the patient in a safe way.</p> <p><b>Legal Basis</b> –</p> <ul style="list-style-type: none"> <li>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</li> <li>Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’</li> </ul> <p><b>Provider</b> - AccuRx</p> |
| <p>Remote consultation Including – Video Consultation<br/>Clinical photography</p> | <p><b>Purpose</b> – Personal information including images may be processed, stored and with the patients consent shared, in order to provide the patient with urgent medical advice.</p> <p><b>Legal Basis</b> –</p> <ul style="list-style-type: none"> <li>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</li> <li>Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’</li> </ul>   |

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|  | <p>Patients may be videoed or asked to provide photographs with consent. There are restrictions on what the practice can accept photographs of. No photographs of the full face, no intimate areas, no pictures of patients who cannot consent to the process. No identifiable pictures of children.</p> <p><b>Processor – AccuRx</b></p>   |
| MDT meetings   | <p><b>Purpose</b> – For some long-term conditions, the practice participates in meetings with staff from other agencies involved in providing care, to help plan the best way to provide care to patients with these conditions. Personal data will be shared with other agencies in order that mutual care packages can be decided.</p> <p><b>Legal Basis –</b></p> <ul style="list-style-type: none"> <li>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</li> <li>Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’</li> </ul> <p><b>Processor – MDT Team (Frimley ICB)</b></p>   |
| <p>General Practice Extraction Service (GPES)</p> <ol style="list-style-type: none"> <li>At risk patients data collection Version 3</li> <li>CVDPREVENT Audit</li> <li>Physical Health Checks for people with Severe Mental Illness</li> <li>National Obesity Audit</li> </ol> | <p><b>Purpose</b> – 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:</p> <ol style="list-style-type: none"> <li><a href="#">At risk patients including severely clinically vulnerable</a></li> <li><a href="#">NHS England has directed NHS England to collect and analyse data in connection with Cardiovascular Disease Prevention Audit</a></li> <li><a href="#">GPES Physical Health Checks for people with Severe Mental Illness (PHSMI) data collection.</a></li> <li><a href="#">National Obesity Audit - NHS Digital</a></li> </ol> <p><b>Legal Basis</b> - 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</p> <p>Further detailed legal basis can be found in each link.</p> |

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|                        | <p>Any objections to this data collection should be made directly to NHS England. <a href="mailto:enquiries@nhsdigital.nhs.uk">enquiries@nhsdigital.nhs.uk</a></p> <p><b>Processor</b> – NHS England</p>   |
| Medication/Prescribing | <p><b>Purpose:</b> Prescriptions containing personal identifiable and health data will be shared with organisations who provide medicines management including chemists/pharmacies, in order to provide patients with essential medication regime management, medicines and or treatment as their health needs dictate. This process is achieved either by face to face contact with the patient or electronically. Pharmacists may be employed to review medication, Patients may be referred to pharmacists to assist with diagnosis and care for minor treatment, patients may have specified a nominated pharmacy they may wish their repeat or acute prescriptions to be ordered and sent directly to the pharmacy making a more efficient process. Arrangements can also be made with the pharmacy to deliver care and medication</p> <p><b>Legal Basis</b> –</p> <ul style="list-style-type: none"> <li>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</li> <li>Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’</li> </ul> <p><b>Processor</b> – Pharmacy of choice</p>                                   |
| Professional Training  | <p><b>Purpose</b> – We are a training surgery. Our clinical team are required to be exposed to on the job, clinical experience, as well as continual professional development. On occasion you may be asked if you are happy to be seen by one of our GP registrars, pharmacists or other clinical team to assist with their training as a clinical professional. You may also be asked if you would be happy to have a consultation recorded for training purposes. These recordings will be shared and discussed with training GPs at the surgery, and also with moderators at the RCGP and HEE.</p> <p><b>Legal Basis</b> –</p> <ul style="list-style-type: none"> <li>6 1 (a) consent, patients will be asked if they wish to take part in training sessions</li> <li>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</li> <li>Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’</li> </ul> <p>Recordings remain the control of the GP practice and they will delete all recordings from the secure site once they are no longer required.</p> <p><b>Processor</b> – RCGP, HEE / NHS Digital, Fourteen Fish</p> |

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| Telephony  | <p><b>Purpose</b> – The practice use an internet based telephony system that records telephone calls, for their own purpose and to assist with patient consultations. The telephone system has been commissioned to assist with the high volume and management of calls into the surgery, which in turn will enable a better service to patients.</p> <p><b>Legal Basis</b> – 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.</p> <ul style="list-style-type: none"> <li>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</li> <li>Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’</li> </ul> <p><b>Provider</b> – Surgery Connect – X-ON &amp; Tailor Made Technologies</p>  |
| Learning Disability Mortality Programme<br>LeDer | <p><b>Purpose:</b> The Learning Disability Mortality Review (LeDeR) programme was commissioned by NHS England to investigate the death of patients with learning difficulties and Autism to assist with processes to improve the standard and quality of care for people living with a learning disability and Autism. Records of deceased patients who meet with this criteria will be shared with NHS England.</p> <p><b>Legal Basis:</b> 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.</p> <p><b>Processor</b> : Frimley ICB &amp; NHS England</p>  |
| Shared Care Record                               | <p><b>Purpose:</b> In order for the practice to have access to a shared record, the Integrated Care Service has commissioned a number of systems including <a href="#">GP connect</a>, which is managed by NHS England, to enable a shared care record, which will assist in patient information to be used for a number of care related services. These may include Population Health Management, Direct Care, and analytics to assist with planning services for the use of the local health population.</p> <p>Where data is used for secondary uses no personal identifiable data will be used.</p> <p>Where personal confidential data is used for Research explicit consent will be required.</p> <p><b>Legal Basis</b> –</p> <ul style="list-style-type: none"> <li>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</li> <li>Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’</li> </ul> |

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|  | <b>Processor:</b> NHS England   |
| Local shared care record   | <p><b>Purpose:</b> 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&amp;E, calling 111 or going to an Out of hours appointment. It is also quicker for staff to access a shared record than to try to contact other staff by phone or email.</p> <p>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.</p> <p><b>Legal Basis –</b></p> <ul style="list-style-type: none"> <li>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</li> <li>Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’</li> </ul> <p><b>Processor:</b> Frimley ICB &amp; NHS England</p> |
| Anticoagulation Monitoring   | <p><b>Purpose:</b> Personal Confidential data is shared with INR Star in order to provide an anticoagulation clinic to patients who are on anticoagulation medication. This will only affect patients who are within this criteria.</p> <p><b>Legal Basis –</b></p> <ul style="list-style-type: none"> <li>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</li> <li>Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’</li> </ul> <p><b>Processor :</b> Neqas &amp; INR Star</p>  |
| Oviva Type 2 Diabetes Path to Remission Programme (T2DR) and Frimley GP Practices (Frimley GP) | <p><b>Purpose:</b> The NHS Type 2 Diabetes Path to Remission 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 nutritionally complete total diet replacement products, for 12 weeks, followed by a period of food reintroduction and subsequent weight maintenance support, with a total duration of 12 months.</p> <p>The programme is delivered by Oviva, for any eligible patients referred by GPs in the eligible areas. The contract for the provision of the programme is held between NHSE and Oviva, with data flowing between Oviva and GP surgeries directly and between Oviva and the commissioners for reporting. Data is also provided</p>  |

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|                                     | <p>to Frimley ICB (only in aggregate form) to enable monitoring of referrals and ensure the overall success of the programme.</p> <p>This programme is available for all Frimley residents who meet the eligibility criteria for the programme.</p> <p>This Data Sharing Agreement (DSA) is to clearly stipulate the data sharing practices between Frimley GPs and Oviva.</p> <p><b>Legal Basis:</b></p> <ul style="list-style-type: none"> <li>Article 6(1)(e) 'the performance of a task in the public interest ' (in respect of general personal data) and provision of health care, (in other words, patient information is provided in order for Oviva to provide NHS services and have official authority to process personal data in the delivery of these services through our commissioning contracts),</li> <li>Article 9(2)(h), (in respect of special categories of personal data). Oviva will provide all referrals with a summary of its Privacy Notice when booking the patient into their first appointment and will send them the Privacy Notice in their booking letter/email, and patients can see this notice at any time on Oviva's website. Patients have the ability to request their data to be deleted at any point in line with NHS records management code of practice 2021 and other applicable data UK data protection legislation.</li> </ul> <p><b>Processor:</b> Oviva UK Ltd &amp; Frimley ICB</p> |
| Early Onset Type 2 Diabetes (EOT2D) | <p><b>Purpose:</b> 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.</p> <p>Patient will have the ability to withdraw consent to be part of the program at any time.</p> <p><b>Legal Basis:</b></p> <ul style="list-style-type: none"> <li>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";</li> <li>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</li> </ul> <p><b>Processor:</b> Oviva UK Ltd</p>  |
| Xyla Elective Care (XEC)            | <p><b>Purpose:</b> Personal confidential data will be shared for the purpose of providing a Dermatology Virtual Triage service. Data</p>   |

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|   | <p>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.</p> <p><b>Legal Basis:</b> Under UK GDPR the legal basis for this activity is for direct care:<br/> Article 6(1)e<br/> “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”;<br/> Article 9(2)h<br/> “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.</p> <p><b>Joint Controller:</b> Xyla Elective Care (XEC), Frimley Health NHS Foundation Trust<br/> <b>Processor:</b> Cinapsis</p>  |
| Regional Health and Social Care – TVS Care Records Remote Care & Monitoring | <p><b>Purpose:</b> The purpose for this joint processing and sharing arrangement is to allow data held in the TVS Care Records to be accessed through and processed by the TVS1 Care Records for Remote Care and Monitoring solution<sup>2</sup> for presentation to and use by service users (patients and residents) themselves. This joint processing and sharing arrangement also includes the recording, processing and use of confidential data provided directly into the system by local remote care and monitoring professionals, as well as by the service user by means of the Luscii App.</p> <p>The purpose of capturing and processing this data is to assist health and social care professionals to make better decisions regarding the planning, delivery, monitoring and review of care to individual service users. Eligible service users include:</p> <ol style="list-style-type: none"> <li>1. Patients referred by general practice for step-up care;</li> <li>2. Patients referred by acute and community care providers for step-down care; and</li> <li>3. Patients identified using the TVS System Insights/Population Health analytics platform who are expected to benefit from the remote care and monitoring capabilities offered by the TVS Care Records Remote Care and Monitoring service.</li> </ol> <p><b>Legal Basis:</b></p> <ul style="list-style-type: none"> <li>• 1. Article 6(1)e “processing is necessary for the performance of a task carried out in the public interest</li> </ul> |

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|   | <p>or in the exercise of official authority vested in the controller”;</p> <ul style="list-style-type: none"> <li>• 2. Article 9(2)g “processing is necessary for reasons of substantial public interest”;</li> <li>• 3. 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”; and</li> <li>• 4. Article 9(2)i “processing is necessary for reasons of public interest in the area of public health”</li> </ul> <p><b>Joint Controller:</b> Frimley Health NHS Foundation Trust<br/> <b>Processor:</b> Graphnet – Luscii – AWS – Microsoft</p>   |
| Interpretation & Translation Services                     | <p><b>Purpose:</b> Interpretation and Translation Services for the direct care purpose of the patient during the consultation - Provision of the required interpretation/translation service as per the terms and conditions documentation. To include operations such as collection, recording, organisation, structuring, storage, adaptation, or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of data.</p> <p><b>Legal Basis:</b><br/>         Lawful Conditions of processing are contained within GDPR Article 6.1e and Article 9.2h</p> <p><b>Processor:</b> DALs</p>   |
| NHSMail and Office 365 (N365 Applications and Sharepoint) | <p><b>Purpose:</b><br/>         NHSMail and Office 365 help NHS staff work more securely and efficiently which directly benefits our patients:</p> <ul style="list-style-type: none"> <li>• <b>Security:</b> Emails are encrypted keeping your sensitive information safe.</li> <li>• <b>Collaboration:</b> Staff can easily work together saving time and improving care.</li> <li>• <b>Reliability:</b> The system is supported 24/7 to avoid service disruptions.</li> <li>• <b>National Reach:</b> Staff can easily connect across different NHS organisations.</li> <li>• <b>Safety:</b> Advanced protection against viruses and spam keeps information secure.</li> <li>• <b>Flexibility:</b> Staff can communicate without disruption even if organisations change.</li> </ul> <p>These tools support the NHS's goal of improving digital care and collaboration.</p> <p><b>Legal Basis:</b></p> |



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|   | <ul style="list-style-type: none"> <li>- Article 6 (1)e - It is necessary for the performance of a task carried out in the public interest or under official authority vested in the controller.</li> <li>- 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</li> </ul> <p><b>Processor:</b> Accenture<br/><b>Sub-processor:</b> Microsoft</p>  |
| Adult Vaccination: Shingles and Pneumococcal National Immunisation Programmes | <p><b>Purpose:</b> To ensure patients are up to date with their adult immunisations – To support direct patient care</p> <p><b>Legal Basis:</b> Article 6(1)e and Article 9(2)h – Direct Care</p> <p><b>Processor:</b> CHASE Search and Selection Limited</p>   |
| ECG & Spirometry Software   | <p><b>Purpose:</b> To provide integration software facilitating the exchange of data between the patient record system and a range of diagnostic medical devices supplied by Numed Healthcare – To support direct patient care</p> <p><b>Legal Basis:</b> Article 6(1)e and Article 9(2)h – Direct Care</p> <p><b>Processor:</b> Numed Healthcare<br/><b>Sub-Processor:</b> SwitchStance Limited</p>  |
| OpenSAFELY COVID-19 and Data Analytics Services                               | <p><b>Purpose:</b><br/>"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.</p> <p>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.</p> <p>Only approved users are allowed to run these queries, and they will not be able to access information that directly or indirectly identifies individuals.</p> <p><b>Legal Basis –</b><br/><b>UK GDPR – Article 6 basis:</b><br/>UK GDPR Article 6(1)(c) - processing is necessary for compliance with a legal obligation to which the controller is subject (the Directions).<br/><b>UK GDPR Article 9 basis:</b><br/>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</p> |

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|                                    | <p>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:</p> <p>Patients who do not wish for their data to be used as part of this process can register a <a href="#">type 1 opt out</a> with their GP. Here you can find <a href="#">additional information about OpenSAFELY</a>."</p> <p><b>Processor:</b> NHS England</p> <p><b>Sub-Processor:</b> EMIS</p>  |
| Stoma/Catheter Prescribing Service | <p><b>Purpose:</b><br/>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.</p> <p><b>Legal Basis:</b><br/>Direct Care:<br/>Article 6(1)e<br/>"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<br/><br/>Article 9(2)h<br/>"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".</p> <p><b>Sharing Data Controllership:</b><br/>Bullen acting as individual data controllers</p> |

We keep our Privacy Notice under regular review. This notice was last reviewed in July 2025.

Updated: 05.11.2025