



EDLESBOROUGH & PITSTONE SURGERY PRIVACY NOTICE

PROTECTING YOUR CONFIDENTIALITY / FAIR PROCESSING NOTICE (PRIVACY NOTICE)

YOUR PERSONAL 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 are 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 & CONFIDENTIALITY ISSUES

As a GP Practice, all 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) now known as the UK 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 the purpose of 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 or without your permission when the Practice is closed. Where your record is accessed without your permission it is necessary for them to have a legitimate basis in law. 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 by the service.
- Research into the development of new treatments and care pathways
- Preventing illness and diseases
- Monitoring safety
- Planning services
- Risk stratification
- Population Health Management

SAFEGUARDING OF CHILDREN OR VULNERABLE ADULTS

Sometimes we are duty bound by laws to disclose information to organisations such as the Care Quality Commission, the Driver and Vehicle Licensing Agency, the General Medical Council, Her Majesty's Revenue and Customs and Counter Fraud services. In these circumstances we will always try to inform you before we are required to disclose, and we only disclose the minimum information that the law requires us to do so

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 or with consent.

Pseudonymised or anonymised data is generally used for research and planning so that you cannot be identified.

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 [Records Management Code of Practice - NHSX](#). 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 2021.

INDIVIDUAL RIGHTS UNDER UK GDPR

Under UK GDPR 2016 the Law provides the following rights for individuals. The NHS upholds these rights in several 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'.

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

National Data Opt-Out (NDOO)

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.

The national data opt-out replaces the previous 'Type 2' opt-out, which required NHS Digital not to use a patient's confidential patient information for purposes beyond their individual care, for Planning or Research. 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 TO ACCESS TO YOUR INFORMATION (SUBJECT ACCESS REQUEST)

Under Data Protection Legislation everybody has the right of access to, or request a copy of, information we hold that can identify them, this includes medical records. There are some safeguards regarding what patients will have access to and they may find information has been redacted or removed for the following reasons:

- It may be deemed to risk causing harm to the patient or others.
- The information within the record may relate to third parties who are entitled to their confidentiality, or who have not given their permission for the information to be shared.

Patients do not need to give a reason to see their data. And requests can be made verbally or in writing. Although we may ask them to complete a form in order that we can ensure that they have the correct information required.

Where multiple copies of the same information are requested, the Surgery may charge a reasonable fee for the additional copies.

Patients will need to provide proof of identity to receive this information. We will not share information relating to you with other individuals without your explicit instruction or without sight of a legal document.

Patients may also request to have online access to their data, they may do this via an Administration [Total Triage request](#) or the [NHS APP](#).

COVID PASSPORT ACCESS

COVID Passports are no longer available.

CHANGE OF DETAILS

It is important that you tell the Surgery if any of your contact details such as your name or address have changed, or if any of your other contacts details are incorrect including third party emergency contact details. 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 will use this to send you text reminders about your appointments or other health related information. It is within our legal duty as a public authority to keep our patients updated with important information.

EMAIL ADDRESS

Where you have provided us with your email address, 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

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 using Administration [Total Triage request](#)

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 use our [complaints form](#) to ensure that it is processed in accordance with our Complaints Procedure. Alternatively, via the Information Commissioner (ICO) details listed below.

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.

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'll 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>



Document Control

This document was created by NHS South Central and West Commissioning Support Unit (SCW) and as such the Intellectual Property Rights of this document belong to SCW.

Document Name	Version	Status	Author
Privacy Notice Primary Care template	3.2	Published	NHS SCW Information Governance Services
Document objectives	This document supports Practice staff in compliance with Data Protection legislation, achieving best practice in the area of Information Governance and in meeting the requirements of the Data Security and Protection Toolkit		
Target audience	All staff		
Monitoring arrangements and indicators:	This document will be monitored by NHS SCW Information Governance Services to ensure any legislative changes that occur before the review date are incorporated.		
Review frequency	SCW reviews customer documents in line with our planned schedule		
Approved & ratified by Practice	Edlesborough Surgery	June-2024	

APPENDIX 1

The Practice may share patient information with these organisations where there is a legal basis to do so.

Activity	Rationale
Commissioning and contractual purposes. Invoice Validation Planning Quality and Performance	Purpose – 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. Legal Basis – UK GDPR 6 1(b) Contractual obligation as set out in the Health and Social Care Act for Quality and Safety 2015 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 https://www.nhs.uk/your-nhs-data-matters/manage-your-choice/ to apply a National Data Opt Out Processor – BOB ICB
Summary Care Record Including additional information	Purpose –The NHS in England uses a national electronic record called the Summary Care Record (SCR) to support patient care. It contains key information from your GP record. Your SCR provides authorised healthcare staff with faster, secure access to essential information about you in an emergency or when you need unplanned care, where such information would otherwise be unavailable. Legal Basis – Direct Care under UK GDPR: - Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine Patients have the right to opt out of having their information shared with the SCR by completion of the form which can be downloaded here and returned to the Practice. Please note that by opting out of having your information shared with the Summary Care Record could result in a delay to care that may be required in an emergency. Processor – NHS England & NHS Digital
Research	Purpose – We may share anonymous patient information with research companies for the purpose of exploring new ways of providing healthcare and treatment for patients with certain conditions. This data will not be used for any other purpose. Where personal confidential data is shared your consent will need to be required. Where you have opted out of having your identifiable information shared for this Planning or Research your information will not be shared. Legal Basis – Where sharing of personal identifiable data is required the legal basis of Article 6 1 (a) and 9 2 (h) Consent will be required. 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

	Sharing of aggregated non identifiable data is permitted. Processor – Thames Valley Research Institute
Individual Funding Requests	Purpose – We may need to process your personal information where we are required to fund specific treatment for you for a particular condition that s not already covered in our standard NHS contract. The clinical professional who first identifies that you may need the treatment will explain to you the information that is needed to be collected and processed to assess your needs and commission your care; they will gain your explicit consent to share this. You have the right to withdraw your consent at any time, but this may affect the decision to provide individual funding. Legal Basis – Under UK GDPR Article 6 1(a) consent is required 6 1 (e) Public Task Article 9 2 (h) health data Data processor – BOB ICB
Safeguarding Adults	Purpose – We will share personal confidential information with the safeguarding team where there is a need to assess and evaluate any safeguarding concerns and to protect the safety of individuals. Consent may not be required to share information for this purpose. Legal Basis – in some case consent will be required otherwise - Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine Data Processor – BOB Safeguarding Team
Safeguarding Children	Purpose – 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. Legal Basis - - Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine Consent may not be required to share this information. Data Processor – BOB Safeguarding Team
Risk Stratification – Preventative Care	Purpose - ‘Risk stratification for case finding’ is a process for identifying and managing patients who have or may be at-risk of health conditions (such as diabetes) or who are most likely to need healthcare services (such as people with frailty). Risk stratification tools used in the NHS help determine a person’s risk of suffering a particular condition and enable us to focus on preventing ill health before it develops. Information about you is collected from several sources including NHS Trusts, GP Federations and your GP Practice. A risk score is then arrived

	at through an analysis of your de-identified information. This can help us identify and offer you additional services to improve your health. If you do not wish information about you to be included in any risk stratification programmes, please let us know. We can add a code to your records that will stop your information from being used for this purpose. Please be aware that this may limit the ability of healthcare professionals to identify if you have or are at risk of developing certain serious health conditions. Type of Data - Identifiable/Pseudonymised/Anonymised/Aggregate Data Legal Basis UK GDPR Art. 6(1) (e) Public task and Art.9 (2) (h) Health data. The use of identifiable data by ICBs and GPs for risk stratification has been approved by the Secretary of State, through the Confidentiality Advisory Group of the Health Research Authority (approval reference (CAG 7-04)(a)/2013)) and this approval has been extended to the end of September 2022 NHS England Risk Stratification which gives us a statutory legal basis under Section 251 of the NHS Act 2006 to process data for risk stratification purposes which sets aside the duty of confidentiality. We are committed to conducting risk stratification effectively, in ways that are consistent with the laws that protect your confidentiality. Processor – BOB ICB
Public Health Screening programmes (identifiable) Notifiable disease information (identifiable) Smoking cessation (anonymous) Sexual health (anonymous) Vaccination Programmes including the Child Health Immunisation Service (CHIS)	Purpose – Personal identifiable and anonymous data is shared. The NHS provides national screening programmes so that certain diseases can be detected at an early stage. These currently apply to bowel cancer, breast cancer, aortic aneurysms, and diabetic retinal screening service 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. More information can be found at: https://www.gov.uk/topic/population-screeningprogrammes or speak to the Practice. Patients may not opt out of having their personal information shared for Public Health reasons. Patients may opt out of being screened at the time of receiving an invitation. CHIS works with maternity units, General Practices, health visitors, school nurses and local authorities to monitor and improve uptake of national childhood screening and immunisation programmes. We notify health visitors of all new births and of children who have moved into their area and ensure all babies have received their newborn screening. CHIS also ensures that children aged between 0-5 years receive appointments at the correct age for NHS routine childhood immunisations and we monitor that school-age children have had the immunisations they are due. Legal Basis: Sharing personal data for this purpose is governed by the COPI Reg 2. Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller” 6 1 (f) Legitimate interests

	And Article 9(2)(h) Health data as stated below 9 2 (i) Public health Data Processors – Buckinghamshire Council & NHS South Central Commissioning Support Unit, CHIS portal: NHS England, SCW, & Microsoft (UK)
Direct Care NHS Trusts Community Providers Pharmacies Enhanced care providers Nursing Homes Other Care Providers	Purpose – Personal information is shared with other secondary care trusts and providers 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. Legal Basis - The processing of personal data in the delivery of direct care and for providers' administrative purposes in this surgery and in support of direct care elsewhere is supported under the following Article 6 1 (e) direct care and 9 2 (h) to provide health or social care: In some cases, patients may be required to consent to having their record opened by the third-party provider before patients information is accessed. Where there is an overriding need to access the GP record to provide patients with lifesaving care, their consent will not be required. Processors – Buckinghamshire Healthcare Trust
Care Quality Commission	Purpose – The CQC is the regulator for the English Health and Social Care services to ensure that safe care is provided. They will inspect and produce reports back to the GP Practice on a regular basis. The Law allows the CQC to access identifiable data. More detail on how they ensure compliance with data protection law (including UK GDPR) and their privacy statement is <u>available on our website: https://www.cqc.org.uk/about-us/our-policies/privacy-statement</u> Legal Basis - Article 6(1)(c) "processing is necessary for compliance with a legal obligation to which the controller is subject." And Article 9(2) (h) as stated below Processors – Care Quality Commission (CQC)
Population Health Management	Purpose – Health and care services work together as 'Integrated Care Systems' (ICS) and are sharing data to: • Understand the health and care needs of the care system's population, including health inequalities • Provide support to where it will have the most impact • Identify early actions to keep people well, not only focusing on people in direct contact with services but looking to join up care across different partners. (NB this links to the Risk Stratification activity identified above) Type of Data – Identifiable/Pseudonymised/Anonymised/Aggregate Data. NB only organisations that provide your care will see your identifiable data. Legal Basis - Article 6(1)(e); "necessary... in the exercise of official authority vested in the controller' And Article 9(2)(h) as stated below Data Processors - Apex
Payments, Invoice validation	Purpose - Contract holding GPs in the UK receive payments from their respective governments on a tiered basis. Most of the income is derived

	from baseline capitation payments made according to the number of patients registered with the Practice on quarterly payment days. These amounts paid per patient per quarter varies according to the age, sex, and other demographic details for each patient. There are also graduated payments made according to the Practice's achievement of certain agreed national quality targets known as the Quality and Outcomes Framework (QOF), for instance the proportion of diabetic patients who have had an annual review. Practices can also receive payments for participating in agreed national or local enhanced services, for instance opening early in the morning or late at night or at the weekends. Practices can also receive payments for certain national initiatives such as immunisation programs and practices may also receive incomes relating to a variety of non-patient related elements such as premises. Finally, there are short term initiatives and projects that Practices can take part in. Practices or GPs may also receive income for participating in the education of medical students, junior doctors, and GPs themselves as well as research. To make patient-based payments basic and relevant necessary data about you needs to be sent to the various payment services. The release of this data is required by English laws. Legal Basis - Article 6(1)(c) "processing is necessary for compliance with a legal obligation to which the controller is subject." And Article 9(2)(h) 'as stated below Data Processors – NHS England, ICB, Public Health
Patient Record Database	Purpose – Your medical record will be processed in order that a data base can be maintained, this is managed in a secure way and there are robust processes in place to ensure your medical record is kept accurate, and up to date. Your record will follow you as you change surgeries throughout your life. Closed records will be archived by NHS England Legal Basis - Article 6(1)(e); "necessary... in the exercise of official authority vested in the controller' And Article 9(2)(h) as stated below Processors – EMIS and PCSE
Medical Reports Subject Access Requests	Purpose – Your medical record may be shared in order that: Solicitors/persons acting on your behalf can conduct certain actions as instructed by you. Insurance companies seeking medical reports where you have applied for services offered by then can have a copy to your medical history for a specific purpose. Legal Basis – under GDPR Article 6 1 (a) and 9 2 (a) explicit consent will be required before a GP can share your record for either of these purposes. Processor – Solicitors, Insurance organisations
Medicines Management Team Medicines Optimisation	Purpose – 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. Legal Basis - Article 6(1)(e); "necessary... in the exercise of official authority vested in the controller' And Article 9(2)(h) Health data as stated below

	Processor – BOB ICB / North Buckinghamshire PCN
GP Federation Add services they provide GP Extended Access Video consultations Minor injuries services	Purpose – Your medical record will be shared with the North Bucks PCN with your consent 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. Legal Basis - Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below Processor – North Buckinghamshire PCN / FedBucks
Primary Care Network (PCN)	Purpose – Your medical record will be shared with North Buckinghamshire PCN Healthcare Professionals (HCPs) in order that they can provide direct care services to the patient population. Legal Basis - Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below Processor – PCN Practices
Smoking cessation	Purpose – personal information is shared in order for the smoking cessation service to be provided. Only those patients who wish to be party to this service will have their data shared Legal Basis – Article 6 1 (a) and 9 2 (h) consent Processor – Live Well Stay Well, Be Healthy Bucks (Buckinghamshire Council & NHS)
Social Prescribers	Purpose – Access to medical records is provided to social prescribers to undertake a full service to patients dependent on their health social care needs. Only those patients who wish to be party to this service will have their data shared. Legal Basis – Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below Processor – North Bucks PCN
JOY Social Prescribing Software (JOY APP)	Purpose – Access to medical records is provided to the JOY application for the purpose of making referral(s) to services available within the JOY directory of services. Only those patients who wish to be party to this service will have their data shared. Legal Basis – Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below Processor – North Bucks PCN & JOY application, servers and cloud storage https://www.thejoyapp.com/privacy

Police	Purpose – Personal confidential information may be shared with the Police authority for certain purposes. The level of sharing and purpose for sharing may vary. Where there is a legal basis for this information to be shared consent will not always be required. The Police will require the correct documentation 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. Legal Basis – UK GDPR –6 1 (c) Legal Obligation. Article 6 1 (f) legitimate interest Article 9 2 (f) requests for legal reasons Processor – Police
Coroner / Medical Examiner	Purpose – Personal health records or information relating to a deceased patient may be shared with the coroner or medical examiner upon request. Legal Basis – UK GDPR Article 6 1 (c) Legal Obligation 9 2 (h) Health data Processor – The Coroner, Medical Examiner
Private Healthcare Providers	Purpose – Personal information shared with private health care providers to deliver direct care to patients at the patient's request. Consent from the patient will be required to share data with Private Providers. Legal Basis – Article 6 1 (a) and 9 2 (h) Consented and under contract between the patient and the provider Provider – Patient Preference, BUPA, Virgin, etc.
Messaging Service	Purpose – 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. Legal Basis – UK GDPR Article 6 1 (b) Contract, Article 6 1 (e) Public task, Article 9 2 (h) Health data Provider - accurx
Remote consultation Including – Video Consultation Clinical photography	Purpose – Personal information including images may be processed, stored and with the patients consent shared, in order to provide the patient with urgent medical advice. Legal Basis – Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below Patients 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 pictures of children. Processor – accurx, Microsoft Teams, Zoom
Remote Triage including Imagery & messaging services	Purpose – Personal information including images may be processed, stored and with the patients consent shared, to provide the patient with triage (medical, administration, other) advice & follow up services.

	Legal Basis – UK GDPR Article 6 1 (b) Contract, Article 6 1 (e) Public task, Article 9 2 (h) Health data Patients may be asked to provide photographs with consent. There are restrictions on what the Practice can accept - the following photographs should NOT be submitted (1) full face, (2) intimate parts of the body, (3) patients who are unable to consent to the process, & (4) images of children. Processor - accurx
Multidisciplinary Team (MDT) meetings	Purpose – 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. Legal Basis – Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below Processor – MDT / Adult Community Healthcare Team (AHT) Teams
Research and Planning (OpenSAFELY)	NHS England has been directed by the government to establish and operate the OpenSAFELY COVID-19 Service and the OpenSAFELY Data Analytics Service. These services provide a secure environment that supports research, clinical audit, service evaluation and health surveillance for COVID-19 and other purposes. Each GP practice remains the controller of its own GP patient data but is required to let approved users run queries on pseudonymised patient data. This means identifiers are removed and replaced with a pseudonym. Only approved users are allowed to run these queries, and they will not be able to access information that directly or indirectly identifies individuals. Patients who do not wish for their data to be used as part of this process can register type 1 opt out with their GP (https://www.nhs.uk/using-the-nhs/about-the-nhs/opt-out-of-sharing-your-health-records/) For additional information see: https://www.opensafely.org/ Legal Basis & Record of Processing Activities (ROPA) - the creation and maintenance of a pseudonymised GP dataset (only coded patient data), held within Optum, made available to NHS England–approved studies via the OpenSAFELY platform - the GP data remains under practice control and is retained for the duration of the Data Processing Notice (DPN), with only study-specific cohorts and results transferring to NHS England control - the DPN establishes a legal obligation (UK GDPR Article 6(1)(c)) on practices, with purposes and safeguards set out in the DPN
General Practice Extraction Service (GPES) - At risk patients’ data collection Version 3 - Covid-19 Planning and Research data - CVDPREVENT Audit	Purpose – GP Practices are required to provide data extraction of their patients’ personal confidential information for various purposes to NHS Digital. The objective of this data collection is on an ongoing basis to identify patients registered at General Practices who fit within certain criteria 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:

4. Physical Health Checks for people with Severe Mental Illness 5. National Obesity Audit	1. At risk patients including severely clinically vulnerable 2. NHS England has directed NHS Digital to collect and analyse data in connection with Cardiovascular Disease Prevention Audit 3. GPES Physical Health Checks for people with Severe Mental Illness (PHSMI) data collection 4. National Obesity Audit - NHS Digital Legal Basis - All GP Practices in England are legally required to share data with NHS Digital for this purpose under section 259(1)(a) and (5) of the 2012 Act Further detailed legal basis can be found in each link. Any objections to this data collection should be made directly to NHS Digital. enquiries@nhsdigital.nhs.uk Processor – NHS Digital, NHS X, NHS England
Medication/Prescribing	Purpose: Prescriptions containing personal identifiable and health data will be shared with organisations who provide medicines management including chemists/pharmacies, 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 Legal Basis: Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below Processor – Pharmacy of Patients Choice
Professional Training	Purpose – 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 with moderators at the RCGP and HEE. Legal Basis – 6 1 (a) consent, patients will be asked if they wish to take part in training sessions. 9 2 (a) - explicit consent will be required when making recordings of consultations Recordings remain the control of the GP Practice and they will delete all recordings from the secure site once they are no longer required. Processor – RCGP, HEE, iConnect, Blue Stream Academy, Buttercup, iLearn (TeamNet)

Telephony	Purpose – The practice uses 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. We record ALL calls unless the surgery originator or patient requests that they are not recorded. Our phone system is set to automatically retain calls for 3 years. After this point, the recordings are automatically deleted. The 3-year retention period enables us to download and retain exact and unaltered copies of calls where required for medico-legal purposes. Legal Basis – While there is a robust contract in place with the processor, the surgery has undertaken this service to assist with the direct care of patients in a more efficient way. - Article 6(1)(e) ‘...necessary 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’ Provider – (X-ON) Surgery Connect
Learning Disability Mortality Programme LeDer	Purpose: The Learning Disability Mortality Review (LeDeR) programme was commissioned by NHS England to investigate the death of patients with learning difficulties 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 these criteria will be shared with NHS England. Legal Basis: It has approval from the Secretary of State under section 251 of the NHS Act 2006 to process patient identifiable information who fit within certain criteria. Processor - ICB, NHS England
Technical Solution Pseudonymisation	Purpose: Personal confidential and special category data in the form of medical record, is extracted under contract for the purpose of pseudonymisation. This will allow no patient to be identified within the data set that is created. SCWCSU has been commissioned to provide a data processing service for the GPs, no other processing will be undertaken under this contract. Legal Basis: Under UK GDPR the legitimate purpose for this activity is under contract to provide assistance. Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below Processor - SCW CSU
Shared Care Record	Purpose: For the Practice to have access to a shared record, the Integrated Care Service has commissioned a number of systems including GP connect, which is managed by NHS Digital, to enable a shared care record, which will assist in patient information to be used for a number of care related services. These may include Population Health Management, Direct Care, and analytics to assist with planning services for the use of the local health population. Where data is used for secondary uses no personal identifiable data will be used.

	Where personal confidential data is used for Research explicit consent will be required. Legal Basis: Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below Processor - NHS Digital
Local shared care record	Purpose: Health and Social care services are developing shared systems to share data efficiently and quickly. It is important for anyone treating you to be able to access your shared record so that they have all the information they need to care for you. This will be during your routine appointments and in urgent situations such as going to A&E, calling 111 or going to an Out of hours appointment. It is also quicker for staff to access a shared record than to try to contact other staff by phone or email. Only authorised staff can access the systems and the information they see is carefully checked so that it relates to their job. Systems do not share all your data, just data which services have agreed is necessary to include. Legal Basis: Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below Processor: BOB ICB / GP Connect
Cloud Based Records Storage	Purpose: Practice data including referral templates, staff payroll information, user guides, GMS contract information, staff appraisals, equipment asset lists, practice policies e.g. business continuity plans is stored on single central location within the SCW’s data centre as part of the Bucks Single Domain Migration project. Legal Basis: Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h). Processor: SCW
Friends & Family Test (FFT)	Purpose: The practice is required to engage with patients that are registered with us to obtain FFT feedback. The link for the survey will be sent to patients following appointments using accurx. The link for the survey is a Google Form. The survey responses will be processed using Microsoft Excel (or similar software) and shared with NHS England as per contractual requirement. In addition, a summary of the survey results are published on our Notice boards and Social Media. The information will be collected directly by the practice and used to analyse and improve the service provided to patients. It is anonymised data only, no identifiable information will be collected and made available. The patient is reminded that they should not record any identifiable information about themselves or any situations that could provide their identity to others. The information collected from the Survey will support the GP practices to improve current and existing services and create opportunities for new services to meet the needs of the patient population. Processor: Edlesborough Surgery, Google (Alphabet) (Forms), Microsoft (Excel)
Practice Local Data	Purpose: Practice data including referral templates, staff payroll information, user guides, GMS contract information, staff appraisals,

	equipment asset lists, practice policies e.g. business continuity plans is stored on single central location within the SCW's data centre as part of the Bucks Single Domain Migration project. Legal Basis: Article 6(1)(e); "necessary... in the exercise of official authority vested in the controller" And Article 9(2)(h). Processor: SCW
EDATT ("Florence") Chat Bot – data, messaging	Purpose – Personal information, if provided by the patient, is stored & used for advice & follow up services. Legal Basis – UK GDPR Article 6 1 (b) Contract, Article 6 1 (e) Public task, Article 9 2 (h) Health data Processor – Hanley Consulting (EDATT BOT), Zoho Corporation (Cloud Storage) https://help.x-onweb.com/en/articles/83518-privacy-policy (Hanley Consulting was acquired by X-ON OCT24)
Interpretation/Translation Services	Purpose – The practice uses an internet-based translation/interpretation service which may be one-to-one, via an APP/service, Telephone or Video. These services may be recorded / retained Legal Basis – While there is a robust contract in place with the processor, the surgery has undertaken this service to assist with the direct care of patients in a more efficient way. - Article 6(1)(e) '...necessary 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' Provider – DALs https://dals.co.uk/privacy-policy/
Clinician Note Taking / Patient Communication / Referrals processing	Purpose: The practice, for some practitioners uses an Artificial Intelligence (AI) software scribing solution to summarise the patient consultation notes. Patients will be asked to consent before the solution is used for a consultation Legal Basis – While there is a robust contract in place with the processor, the surgery has undertaken this service to assist with the direct care of patients in a more efficient way. - Article 6(1)(e) '...necessary 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' Provider: accurx https://www accurx.com/scribe their GDPR & patient Safety policy https://www accurx.com/data-processing-agreement
Clinician Note Taking	Purpose: The practice, for some practitioners uses an Artificial Intelligence (AI) software scribing solution to summarise the patient consultation notes. Patients will be asked to consent before the solution is used for a consultation Legal Basis – While there is a robust contract in place with the processor, the surgery has undertaken this service to assist with the direct care of patients in a more efficient way. Article 6(1)(e) '...necessary 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' Provider: www.heidihealth.com their GDPR & patient Safety policies https://www.heidihealth.com/uk/compliance/gdpr & https://www.heidihealth.com/uk/safety
Diabetic Eye Screening Service SpectraPM - the software used by InHealth to provide Diabetic Eye Screening	Purpose – Access to medical records is provided to the SpectraPM application for the purpose of making referral(s) to the Diabetic Eye Screening service (Oxfordshire & Buckinghamshire). https://www.inhealthgroup.com/diabetic-eye-screening/ Only those patients who wish to be party to this service will have their data shared. Legal Basis – Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller” And Article 9(2)(h) Health data as stated below Processor – SpectraPM (InHealth Group) https://www.inhealthgroup.com/privacy-policy/
OpenSAFELY Data Analytics Services	Purpose: "NHS England has been directed by the government to establish and operate the OpenSAFELY COVID-19 Service and the OpenSAFELY Data Analytics Service. These services provide a secure environment that supports research, clinical audit, service evaluation and health surveillance for COVID-19 and other purposes. Each GP practice remains the controller of its own GP patient data but is required to let approved users run queries on pseudonymised patient data. This means identifiers are removed and replaced with a pseudonym. Only approved users are allowed to run these queries, and they will not be able to access information that directly or indirectly identifies individuals. Legal Basis – UK GDPR – Article 6 basis: UK GDPR Article 6(1)(c) - processing is necessary for compliance with a legal obligation to which the controller is subject (the Directions). UK GDPR Article 9 basis: UK GDPR Article 9(2)(g) - processing is necessary for reasons of substantial public interest, on the basis of domestic law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject, by virtue of compliance with a direction supplemented by: Data Protection Act 2018 basis Data Protection Act 2018 (DPA 2018) Schedule 1, Part 2, paragraph 6: Statutory etc and government purposes. Patients who do not wish their data to be used as part of this process can register a Type 1 OPT OUT (https://www.nhs.uk/using-the-nhs/about-the-nhs/opt-out-of-sharing-your-health-records/) via the NHS APP, with their GP (however, this may impact other analytical tools that are reliant upon patients Opting-In e.g. Segmentation / Patient Needs Group (PNG)) Here you can find additional information about OpenSAFELY (Secure analytics platform for NHS electronic health records) (https://www.opensafely.org/).

	Processor: NHS England OPTUM: EMIS (Patient Management System)
Healthtech-1 Automated (New) Patient Registration	Purpose: To deliver GP practice services that are required by law. We've instructed the Data Processor to process your data to enable the online registration process to be completed. As a Controller, we need to collect this information to safely register You as a patient and receive electronic copies of your GP notes from your previous practice. Legal Basis – Providing services for: - the provision of health care or treatment - the management of health care systems or services or social care systems or services The lawful basis lies within Article 6 of the UK GDPR: 6(1)(e) Public task: the processing is necessary for You to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law. The lawful basis of processing special category data lies within Article 9 of the UK GDPR: 9(2)(h) ‘...medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems...’ Additionally in Data Protection Act 2018 (Schedule 10, 8. Medical Purposes (1,b)): Medical purposes: 8(1)The processing is necessary for medical purposes and is undertaken by— (a) a health professional, or (b) a person who in the circumstances owes a duty of confidentiality which is equivalent to that which would arise if that person were a health professional. In this paragraph, “medical purposes” includes the purposes of preventative medicine, medical diagnosis, medical research, the provision of care and treatment and the management of healthcare services. https://docs.healthtech1.uk/privacy-policy https://docs.healthtech1.uk/general-privacy-policy Processor: Healthtech-1

Appliance Management Service	Purpose – personal information is shared to facilitate the prescribing and supply management of urology, stoma and trans anal irrigation products. Legal Basis – - Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ Processor – Bullen Healthcare Group
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Lawful basis for processing

The processing of personal data in the delivery of direct care and for providers' administrative purposes in this surgery and in support of direct care elsewhere is supported under the following Article 6 and 9 conditions of the UK GDPR:

- Article 6(1)(e) '...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...'; and
- Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services...'

Revision V17 2025-12

V17	GH	2025-12	Appliance Management Service change 19-Jan-2026 (Bullen Healthcare Group)
V16	GH	2025-11	OpenSAFELY revised information from NHS England How to activate the OpenSAFELY analytics platform - NHS England Digital
V15	GH	2025-09	Child Health Information Service / Child Health Immunisation Service (CHIS) update
V14	GH	2025-09	Healthtech-1 New Patient Registration automation
V13	GH	2025-08	Cleaned up OpenSAFELY entry to ensure that the URLs are accessible
V12	GH	2025-08	OpenSAFELY COVID-19 and Data Analytics Services
V11	GH	2025-05	accurx Scribe The AI medical scribe for all clinicians
V10	GH	2025-03	SpectraPM – the software used by InHealth to provide Diabetic Eye Screening
V9	GH	2025-03	HEIDI The AI medical scribe for all clinicians (trial usage for SOME clinicians)
V8	GH	2025-02	DALS Translation/Interpretation Services
V7	GH	2024-11	JOY Social Prescribing Application (JOY APP)
V6	GH	2024-09	EDATT ("Florence") Privacy Notice, Include Total Triage references
V5	GH	2024-06	Google Forms for FFT, Single Domain Privacy Notice
V4	GH	2024-03	AccuRX Triage
V3	GH	2024-03	Telephony (X-ON)
V2	GH	2024-01	Single Domain Migration Project (Cloud Storage)
V1	GH	2023-11	Original

CLOUD Document – Ensure that you are working to the latest version

NOTEs for Edlesborough Surgery Staff

1. BOOKMARK the documents' location (in your internet browser e.g. Chrome, Edge, etc.)
2. ALWAYS use the bookmarked version (it is the latest version)
3. HARDCOPY versions of this document must be considered as **UNCONTROLLED**
4. A portable document format (.pdf) version (created from the master Word document) should be published on the Surgery website as & when it changes

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