

Bartlett Group Practice

Appendix A – The Practice will 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	<p>Purpose – Anonymous data is used by the ICB for planning, performance and commissioning purposes, as directed in the practices contract, to provide services as a public authority.</p> <p>Legal Basis – UK GDPR 6 1(b) Contractual obligation as set out in the Health and Social Care Act for Quality and Safety 2015</p> <p>Processor – Frimley ICB.</p>
Summary Care Record Including additional information	<p>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.</p> <p>Legal Basis – Direct Care under UK GDPR :</p> <ul style="list-style-type: none"> • 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 <p>The relevant COPI notice states that its purpose: “...is to require organisations to process confidential patient information for the purposes set out in Regulation 3(1) of COPI to support the Secretary of State’s response to Covid-19 (Covid-19 Purpose). “Processing” for these purposes is defined in Regulation 3(2) and includes dissemination of confidential patient information to persons and organisations permitted to process confidential patient information under Regulation 3(3) of COPI.”</p> <p>Full details of the Summary Care Record supplementary privacy notice can be found here</p> <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 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.</p> <p>Processor – NHS England and NHS Digital.</p>

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<p>Connected Care and Thames Valley and Surrey, NHS Buckinghamshire, Oxfordshire and Berkshire West LHCR</p>	<p>Purpose: The purpose of the Connected Care Interoperability solution is to enable information about an individual’s medical condition and social care packages and requirements to be shared electronically across subscribing health and social care organisations in order to ensure that the care provided is safe and consistent with patients’ existing risks, diagnoses, conditions, problems, medication and other treatment. These records are known locally as Connected Care. The purpose of the Thames Valley and Surrey Care Record Interoperability solution (also known as the Local Health and Care Record (LHCR)) is to enable information about an individual’s medical condition and social care packages and requirements to be shared electronically across subscribing health and social care organisations across the Thames Valley and across Surrey for direct care purposes in order to ensure that the care provided is safe and consistent with patients’ existing risks, diagnoses, conditions, problems, medication and other treatment.</p> <p>Legal basis: Unless a patient has objected to processing or joint processing and sharing and the sharing organisation has accepted the patient’s objection the legal basis for viewing the shared records is also provided by General Data Protection Regulation:</p> <ol style="list-style-type: none"> 1. Article 6(1)e “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller”; and 2. Article 9(2)h “processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services, on the basis of Union or Member state laws.”. <p>Processor: SoftCat – Graphnet – System C – Microsoft.</p>
<p>EMIS Enterprise Search & Reports</p>	<p>Purpose: The EMIS Enterprise Search & Reports product can be used to support both GP Practices and the ICB/ICS in their service review and development. It will enable SCW to extract real time coded anonymised data from the practice and share with the ICB/ICS, to allow them to support the delivery of key NHS objectives around:</p> <ul style="list-style-type: none"> • Service redesign • Measuring performance and outcomes • Reducing health inequalities • Achieving efficiency savings • improving patient safety

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	<p>The information is being collected to facilitate efficient use of monitoring locally commissioned Primary Care Services as well as enhanced service monitoring. Aid future planning, ensure consistency of searches and ultimately improve patient care</p> <p>Legal Basis: this activity is being provided under :</p> <p>Condition for processing under the GDPR - Article 6 6(1) E - public interest or under official authority vested in the Controller</p> <p>Condition for processing Under the GDRP - Article 9 9(2) H - Preventative or occupational medicine, medical diagnosis or treatment, or management of Health and Social Care</p> <p>Processor: EMIS & South Central & West CSU.</p>
Research	<p>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.</p> <p>Where personal confidential data is shared your consent will need to be sought.</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>Legal Basis – consent is not required to share anonymous data that does not identify a patient.</p> <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>Processor – Healthy.io.</p>
Individual Funding Requests	<p>Purpose – We may need to process your personal information where we are required to fund specific treatment for you for a particular condition that is not already covered in our 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 in order to assess your needs and commission your care; they will gain your explicit consent to share this. You have the right to withdraw your consent at any time but this may affect the decision to provide individual funding.</p> <p>Legal Basis – Under UK GDPR Article 6 1(a) consent is required</p>

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	<p>Article 9 2 (h) health data</p> <p>Data processor –Frimley ICB.</p>
Safeguarding Adults	<p>Purpose – We will share personal confidential information with the safeguarding team where there is a need to assess and evaluate any safeguarding concerns.</p> <p>Legal Basis – in some case consent will be required otherwise</p> <ul style="list-style-type: none"> • 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 <p>Data Processor – Surrey Safeguarding Adults Board (SSAB).</p>
Safeguarding Children	<p>Purpose – We will share children’s personal information where there is a need to assess and evaluate any safeguarding concerns.</p> <p>Legal Basis - in some case consent will be required otherwise</p> <ul style="list-style-type: none"> • 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 <p>Data Processor – Surrey Safeguarding Children Partnership.</p>
Risk Stratification – Preventative Care	<p>Purpose - ‘Risk stratification for case finding’ is a process for identifying and managing patients who have or may be at-risk of health conditions (such as diabetes) or who are most likely to need healthcare services (such as people with frailty). Risk stratification tools used in the NHS help determine a person’s risk of suffering a particular condition and enable us to focus on preventing ill health before it develops.</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> <p>Type of Data – Identifiable/Pseudonymised/Anonymised/Aggregate Data</p> <p>Legal Basis</p>

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	<p>UK GDPR Art. 6(1) (e) and Art.9 (2) (h). 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.</p> <p>Processors – Graphnet Connected Care.</p>
<p>Public Health Screening programmes (identifiable) Notifiable disease information (identifiable) Smoking cessation (anonymous) Sexual health (anonymous)</p>	<p>Purpose – Personal identifiable and anonymous data is shared. The NHS provides national screening programmes so that certain diseases can be detected at an early stage. These currently apply to bowel cancer, breast cancer, aortic aneurysms and diabetic retinal screening service. The law allows us to share your contact information with Public Health England so that you can be invited to the relevant screening programme.</p> <p>More information can be found at: https://www.gov.uk/topic/population-screeningprogrammes [Or insert relevant link] or speak to the practice</p> <p>Legal Basis - Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller” And Article 9(2)(h) Health data as stated below</p> <p>Data Processors - Surrey County Council.</p>
<p>Direct Care NHS Trusts Other Care Providers</p>	<p>Purpose – Personal information is shared with other secondary care trusts and providers in order to provide you with direct care services. This could be hospitals or community providers for a range of services, including treatment, operations, physio, and community nursing, ambulance service.</p> <p>Legal Basis - The processing of personal data in the delivery of direct care and for providers’ administrative purposes in this surgery and in support of direct care elsewhere is supported under the following 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 in order to provide patients with life saving care, their consent will not be required.</p> <p>Processors – NHS Frimley Health Foundation Trust/ Royal Surrey NHS Foundation Trust.</p>
<p>Care Quality Commission</p>	<p>Purpose – The CQC is the regulator for the English Health and Social Care services to ensure that safe care is provided. They will inspect and produce reports back to the GP practice on a regular basis. The Law allows the CQC to access identifiable data.</p>



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	<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>: https://www.cqc.org.uk/about-us/our-policies/privacy-statement</p> <p>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</p> <p>Processors – Care Quality Commission.</p>
<p>Population Health Management</p>	<p>Purpose – 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"> • 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. <p>(NB this links to the Risk Stratification activity identified above)</p> <p>Type of Data – Identifiable/Pseudonymised/Anonymised/Aggregate Data. NB only organisations that provide your care will see your identifiable data.</p> <p>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</p> <p>Data Processors - No processors currently active.</p>
<p>Payments, Invoice validation</p>	<p>Purpose - Contract holding GPs in the UK receive payments from their respective governments on a tiered basis. Most of the income is derived from baseline capitation payments made according to the number of patients registered with the practice on quarterly payment days. These amounts paid per patient per quarter varies according to the age, sex and other demographic details for each patient. There are also graduated payments made according to the practice’s achievement of certain agreed national quality targets known as the Quality and Outcomes Framework (QOF), for instance the proportion of diabetic patients who have had an annual review. Practices can also receive payments for participating in agreed national or local enhanced services, for instance opening early in the morning or late at night or at the weekends. Practices can also receive payments for certain national initiatives such as immunisation programs and practices may also receive incomes relating to a variety of non-patient related elements such as premises. Finally there are short term initiatives and projects that practices can take part in. Practices or GPs may also receive income for participating in the education of medical students, junior doctors and GPs themselves as well as research. In order to make patient based payments basic and relevant necessary data about you needs to be sent to the various payment services. The release of this data is required by English laws.</p>

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	<p>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</p> <p>Data Processors – NHS England, ICB, Public Health.</p>
Patient Record data base	<p>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</p> <p>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</p> <p>Processor – EMIS, PCSE, Docman.</p>
Medical reports Subject Access Requests	<p>Purpose – Your medical record may be shared in order that solicitors 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> <p>Legal Basis – Your explicit consent will be required before a GP can share your record for either of these purposes.</p> <p>Processor – iGPR.</p>
Medicines Optimisation OptimiserX	<p>Purpose – Your anonymous aggregated information will be shared in order to optimise medication. This will enable your GP to provide a more efficient medication regime for your personal care. Some of the anonymous information may be used nationally to drive wider understanding of the medication is used.</p> <p>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</p> <p>Processor – FDB(First Databank).</p>
Interface Clinical Services Ltd	<p>Purpose: Personal confidential data will be shared for the purpose of the practice fulfilling their legal and contractual requirements to report QOF Enhancement and Coding services.</p> <p>Legal Basis:</p> <p>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”</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>


 Joining the dots across health and care

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	<p>Processor:</p> <ul style="list-style-type: none"> • Interface Clinical Services Ltd • CFH Docmail Ltd
<p>Medicines Management Team</p>	<p>Purpose – your medical record is shared with the medicines management team, in order that your medication can be kept up to date and any changes can be implemented.</p> <p>Legal Basis - Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below</p> <p>Processor – Frimley ICB.</p>
<p>GP Federation Services they provide: GP Enhanced Access Covid Vaccination Centre Mental health Services Social Prescribing Clinical Pharmacist Nursing Associate Cancer navigation</p>	<p>Purpose – Your medical record will be shared with the Surrey Heath Community Providers 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 enhanced access clinics, Offsite/onsite clinics</p> <p>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</p> <p>Processor – Surrey Heath Community Providers.</p>
<p>NHS TYPE 2 Diabetes Remission Programme</p>	<p>Purpose: The NHS Type 2 Diabetes Remission Programme</p> <p>Legal Basis:</p> <ol style="list-style-type: none"> 1. Article 6(1)e “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller”; 2. Article 9(2)h “processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services”; <p>Processor: Oviva UK Ltd</p>
<p>PCN</p>	<p>Purpose – Your medical record will be shared with the Practices in our PCN as listed below for shared appointment services booked externally in order that they can provide direct care services to the patient population.</p> <p>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 and direct consent.</p>

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	<p>Processor – Upper Gordon Road Surgery, Park House Surgery, Park Road Group practice, Camberley health Centre, Station Road Surgery, Lightwater Surgery, NHUC Emergency care.</p>
Smoking cessation	<p>Purpose – 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> <p>Legal Basis – consented</p> <p>Processor – One You Surrey.</p>
Social Prescribers	<p>Purpose – Access to medical records is provided to social prescribers to undertake a full service to patients dependent on their social care needs.</p> <p>The Surrey Heath Borough Council have commissioned the system Elemental to store and assist with the processing of personal confidential data of patients referred into the Social Prescriber service.</p> <p>While the purpose for processing remains the same, the transfer of data will change. The Elemental system commissioned by the Council will integrate with the EMIS medical recording system.</p> <ol style="list-style-type: none"> 1. GP’s, and those with access to Primary Care EMIS will be able to track individual Social Prescribing outcomes within the clinical record for those whom they have initiated a Social Prescribing referral. 2. Aggregate data will enable Primary Care Networks to report on the overall performance of Social Prescribing utilizing SNOMED coding 3. Anonymised aggregate data will enable reporting on Social Prescribing at a system-level, including identification of gaps in VCSE service provision <p>Only those patients who wish to be party to this service will have their data shared</p> <p>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</p> <p>Processor – Surrey Heath Community Providers/Surrey health Borough Council/Elemental</p>
Police	<p>Purpose – Personal confidential information may be shared with the Police authority for certain purposes. The level of sharing and purpose for sharing may vary. Where there is a legal basis for this information to be shared no consent will be required.</p>

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	<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.</p> <p>In some cases consent may be required.</p> <p>Legal Basis – UK GDPR – Article 6 1 (f) legitimate interest 6 1 (c) Legal Obligation. Article 9 2 (f) requests for legal reasons</p> <p>Processor – Police Constabulary.</p>
Coroner	<p>Purpose – Personal information relating to a patient may be shared with the coroner upon request.</p> <p>Legal Basis – UK GDPR Article 6 1 (c) Legal Obligation 9 2 (h) Health data</p> <p>Processor – The Coroner.</p>
Medical Examiner Officers RAS Triage Service - Frimley Health NHS Foundation Trust RDU01 – Specialty – Community Healthcare.	<p>Purpose: Medical records associated with deceased patients are outside scope of the UK GDPR. However, next of kin details are within the scope of the UK GDPR. We will share specified deceased patient records and next of kin details with the Medical Examiners within Frimley Health Foundation Trust.</p> <p>Legal Basis: Article 6(1)c “It is necessary under a legal obligation to which the controller is subject” Article 9(2)h “processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services”; and</p> <p>Processor: Medical Examiners service - Frimley Health Foundation Trust.</p>
Private healthcare providers	<p>Purpose – Personal information shared with private health care providers in order to deliver direct care to patients at the patient’s request. Consent from the patient will be required to share data with Private Providers.</p> <p>Legal Basis – Consented and under contract between the patient and the provider</p> <p>Provider – Any GP referred services.</p>
Texting Service	<p>Purpose – Personal identifiable information shared with the texting service in order that text messages including appointment reminders, campaign messages related to specific patients health needs and direct messages to patients</p> <p>We use the NHS Account Messaging Service provided by NHS England to send you messages relating to your health and care. You need to be an NHS App user to receive these messages. Further information</p>

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	<p>about the service can be found at the privacy notice for the NHS App managed by NHS England."</p> <p>Legal Basis – UK GDPR Article 6 1 (b) Contract, Article 6 1 (e) Public task, Article 9 2 (h)</p> <p>Provider - AccuRX</p>
<p>Healthy.io - ACR project for patients with diabetes (and/or other conditions)</p>	<p>Purpose: The data is being processed for the purpose of delivery of a programme, sponsored by NHS Digital, to monitor urine for indications of chronic kidney disease (CKD) which is recommended to be undertaken annually for patients at risk of chronic kidney disease e.g., patients living with diabetes. The programme enables patients to test their kidney function from home. We will share your contact details with Healthy.io to enable them to contact you and send you a test kit. This will help identify patients at risk of kidney disease and help us agree any early interventions that can be put in place for the benefit of your care. Healthy.io will only use your data for the purposes of delivering their service to you. If you do not wish to receive a home test kit from Healthy.io we will continue to manage your care within the Practice. Healthy.io are required to hold data we send them in line with retention periods outlined in the Records Management code of Practice for Health and Social Care. Further information about this is available at: https://lp.healthy.io/minuteiful_info/.</p>
<p>Dermatology Virtual Triage and NEHF Community Provision</p>	<p>Using the Cinapsis software platform, GPs will raise referrals to Xyla Elective Care (XEC). GPs will use the Cinapsis mobile app to securely take images and can continue to then raise a case via the mobile/web app or can raise a case using the Cinapsis desktop application which will be integrated with EMIS. The case will then be available to XEC on the Cinapsis platform. XEC will then be able to triage cases, arrange medical photography if required, and will respond to the GP with an outcome. If the patient needs to be seen in a clinic, Cinapsis will appropriately pass the case to the Frimley booking team via an eRS integration. The Frimley booking team will then proceed to book the patient into the appropriate clinic.</p> <p>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</p> <p>Provider – Cinapsis & Xyla Elective Care (XEC).</p>
<p>Digital Forms via Text message</p>	<p>Purpose: Personal confidential information will be shared in order to collect and collate information from patients concerning the control and management of Chronic diseases, medical conditions and other information as required by the GP practice to monitor patient’s health and promote wellbeing.</p> <p>Legal Basis : under UK GDPR Article 6 1 (e) Public Task and Article 9 2 (h) Health information</p>

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	<p>Provider: SYML Connect.</p>
<p>Remote consultation Including – Video Consultation Clinical photography</p>	<p>Purpose – Personal information including images may be processed, stored and with the patients consent shared, in order to provide the patient with urgent medical advice during the COVID-19 pandemic.</p> <p>Legal Basis – Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below</p> <p>Patients will be asked to provide consent if required to provide photographs of certain areas of concern. There are restrictions on what the practice can accept photographs of. No photographs of the full face, no intimate areas, no pictures of patients who cannot consent to the process. No pictures of children.</p> <p>Processor – e-Consult, AccuRX.</p>
<p>MDT meetings</p>	<p>Purpose – For some long term conditions, such as diabetes, the practice participates in meetings with staff from other agencies involved in providing care, to help plan the best way to provide care to patients with these conditions.</p> <p>During COVID 19 the practice may use secure video meeting platform to discuss patient needs.</p> <p>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</p> <p>Processor – MS Teams.</p>
<p>COVID-19 Research and Planning</p>	<p>Purpose – To understand the risks to public health, trends and prevent the spread of infections such as Covid-19 the government has enabled a number of initiatives which include research and planning during the Covid-19 pandemic which may include the collection of personal confidential data has been necessary. This is to assist with the diagnosis, testing, self-isolating, fitness to work, treatment medical, social interventions and recovery from Covid-19.</p> <p>Legal Basis - Notice under Regulation 3(4) of the Health Service (Control of Patient Information) Regulations 2002 (COPI), which were made under sections 60 (now section 251 of the NHS Act 2006) and 64 of the Health and Social Care Act 2001.</p> <p>Coronavirus (COVID-19): notice under regulation 3(4) of the Health Service (Control of Patient Information) Regulations 2002, which were made under sections 60 (now section 251 of the NHS Act 2006) and 64 of the Health and Social Care Act 2001 – Biobank - GOV.UK (www.gov.uk)</p> <p>Coronavirus (COVID-19): notification to organisations to share information - GOV.UK (www.gov.uk)</p>

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	<p>Provider – BioBank, NHS Digital, NHS England, other organisations included in the roll out of vaccinations, treatment and care of patients suffering with Covid-19.</p>
<p>General Practice Extraction Service (GPES)</p> <ol style="list-style-type: none"> 1. At risk patients data collection Version 3 2. Covid-19 Planning and Research data 3. CVDPREVENT Audit 4. Physical Health Checks for people with Severe Mental Illness 	<p>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 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"> 1. At risk patients including severely clinically vulnerable 2. Covid-19 Planning and Research data, to control and prevent the risk of Covid-19 3. NHS England has directed NHS Digital to collect and analyse data in connection with Cardiovascular Disease Prevention Audit 4. GPES Physical Health Checks for people with Severe Mental Illness (PHSMI) data collection. <p>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</p> <p>Further detailed legal basis can be found in each link.</p> <p>Any objections to this data collection should be made directly to NHS Digital. enquiries@nhsdigital.nhs.uk</p> <p>Processor – NHS Digital or NHS X.</p>
<p>Medication/Prescribing</p>	<p>Purpose: Prescriptions containing personal identifiable and health data will be shared with chemists/pharmacies, in order to provide patients with essential medication or treatment as their health needs dictate. This process is achieved either by face to face contact with the patient or electronically, Where patients have specified a nominated pharmacy they may wish their repeat or acute prescriptions to be ordered and sent directly to the pharmacy making a more efficient process. Arrangements can also be made with the pharmacy to deliver medication</p> <p>Legal Basis : Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below</p> <p>Patients will be required to nominate a preferred pharmacy.</p>

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	<p>Processor – Pharmacy of choice.</p>
Professional Training	<p>Purpose – We are a GP training surgery. On occasion you may be asked if you are happy to be seen by one of our GP registrars. You may also be asked if you would be happy to have a consultation recorded for training purposes. These recordings will be shared and discussed with training GPs at the surgery, and also with moderators at the RCGP and HEE.</p> <p>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</p> <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>Processor – RCGP, HEE, iConnect, Fourteen Fish.</p>
Telephony	<p>Purpose – Purpose: Personal Confidential data will be shared and stored within an external system for the purpose of managing telephone calls. All incoming and outgoing calls will be recorded and may be used as part of a patients medical record. Patients may request a copy of their telephone recording if held via the SARs process.</p> <p>Legal Basis: under UK GDPR Article 6 1 (e) Public Task and Article 9 2 (h) Health Data</p> <p>Provider: X-ON Surgery Connect.</p>
Learning Disability Mortality Programme LeDer	<p>Purpose : The Learning Disability Mortality Review (LeDer) programme was commissioned by NHS England to investigate the death of patients with learning difficulties to assist with processes to improve the standard and quality of care for people living with a learning disability.</p> <p>Legal Basis: It has approval from the Secretary of State under section 251 of the NHS Act 2006 to process patient identifiable information who fit within a certain criteria.</p> <p>Processor : ICB, NHS England.</p>
Technical Solution Pseudonymisation	<p>Purpose: Personal confidential and special category data in the form of medical record, is extracted under contract for the purpose of pseudonymisation. This will allow no patient to be identified within the data set that is created. SCWCSU has been commissioned to provide a data processing service for the GPs, no other processing will be undertaken under this contract.</p>

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	<p>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</p> <p>Processor: SCW CSU.</p>
Shared Care Record	<p>Purpose: In order for the practice to have access to a shared record, the Integrated Care Service has commissioned a number of systems including GP connect, which is managed by NHS Digital, to enable a shared care record, which will assist in patient information to be used for a number of care related services. These may include Population Health Management, Direct Care, and analytics to assist with planning services for the use of the local health population.</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>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</p> <p>Processor: Frimley Health Foundation Trust & Virgin Care Community Services, Phyllis Tuckwell Hospice Care.</p>
Anticoagulation Monitoring	<p>Purpose: Personal Confidential data is shared with LumiraDX in order to provide an anticoagulation clinic to patients who are on anticoagulation medication. This will only affect patients who are within this criteria.</p> <p>Legal Basis: The legal basis for this activity under UK GDPR is Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below</p> <p>Processor : LumiraDX INRStar.</p>

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Nursing Home	<p>The purpose of accessing and using the personal health and social care data is for direct care.</p> <p>Examples are:</p> <ul style="list-style-type: none"> · ordering medication online · viewing test results · viewing discharge information · secure communication between health professionals to receive advice and guidance at the point of care · enabling care information access by the right person at the right time · assessing ongoing needs for care whether acute (from a GP) or secondary care <p>Legal Basis:</p> <ul style="list-style-type: none"> • Article 6 1E which allows the processing of personal data when necessary to perform a duty of care. • Article 9 Paragraph 2H: To lawfully process special category data, it is necessary to identify both a lawful basis under Article 6 of the GDPR and separate condition for processing under Article 9. This covers the provision of health or social care or treatment. <p>Provider: Holly Lodge Nursing Home , Cedar Lodge - Forest Care, Marula Lodge.</p>
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Speech and Language Therapy service	<p>Purpose: Personal confidential data will be shared with the Speech and Language Therapy service in order to provide a full and accurate service to patients who require this service. No other patients data will be shared during this service. Patients will have agreed to be referred into the service and understand that their record will be accessed by the service provider.</p> <p>Legal Basis: this activity is being provided under the auspice of Direct Care. Under GDPR the Article 6 1 (e) Public Task And Article 9 (h) Health Data will apply</p> <p>Processor: Central Surrey Health Ltd.</p>
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Referrals	<p>Purpose – Your medical record will be shared in order that a referral can be made to other providers</p> <p>Legal Basis – Your consent will be required to share your record for this purpose</p> <p>Processor – DXS.</p>
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Technical Solutions for Analytics	<p>Purpose – Your personal information will be shared in order that a referral can be made to other providers</p>
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	<p>Legal Basis Provision of technical services to ensure working capacity of medical equipment</p> <p>Processor – Trusted Technology Partnership (formally Healthcare Computing)/ SCWCSU.</p>
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Digitisation of Paper Medical Records

The NHS Long Term plan published in 2019 requires the digitisation of all primary care paper medical records, commonly known as ‘Lloyd George’ records or ‘A4 medical records’

Having paper based medical records restricts the use of technology to provide ‘joined up’ services and therefore the current paper records will be transferred to a digital format and then destroyed.

This will involve the current patient paper medical records being scanned and then entered directly into a patient’s electronic medical record. This work will be completed by a third-party supplier, **Iron Mountain UK plc**, whose security standards have been reviewed by Frimley Clinical Commissioning Group.

We are required by Data Protection law to provide you with the following information about how we handle your information.

Data Controller contact details	Bartlett Group Practice 1 Beech Road Frimley Green Surrey GU16 6QQ
Data Protection Officer contact details	Lucy Hunt IG Consultant and DPO SCWCSU GP-IGEnquiries.scwcsu@nhs.net
Purpose of the processing	Transferring the current paper medical records into patients’ electronic medical records.
Lawful basis for processing	<p>The following provisions of the General Data Protection Regulation permit us to digitise existing paper medical records:</p> <p>Article 6(1)(e) – ‘processing is necessary...in the exercise of official authority vested in the controller...’</p> <p>Article 9(2)(h) – ‘processing is necessary for the purpose of preventative...medicine...the provision of health or social care or treatment or the management of health or social care systems and services...’</p>
Recipient or categories of recipients of the processed data	The paper patient records will be shared with Iron Mountain UK plc , who will scan and digitise the current paper medical records before destroying them.
Right to access and correct	You have the right to access your medical record and have any errors or mistakes corrected. Please speak to a member of staff


 Joining the dots across health and care

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	or look at our 'subject access request' policy on the practice website – Bartlett Group Practice
Retention period	GP medical records will be kept in line with the law and national guidance. Information on how long records can be kept can be found at: https://www.nhs.uk/information-governance/guidance/records-management-code/records-management-code-of-practice-2021/ or speak to the practice . The paper medical records will be destroyed 60 days after they are transferred to an electronic format.

The practice holds medical records to provide medical treatment and advice and patients have a relationship with a GP in order for them to be provide health and care service to you. We therefore do not require your consent to transfer these papers records to an electronic format.

If you have any questions about this project, please contact Wendy Foster, Operations Manager- wendy.foster3@nhs.net

Details of Supplier:

Iron Mountain UK Plc
Ground Floor,
4 More London Riverside,
London
SE1 2AU
United Kingdom.

We will keep our Privacy Notice under regular review. This notice was last reviewed on 3rd March 2022

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...'