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WHITE HORSE MEDICAL PRACTICE

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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 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 practice's contract, to provide services as a public authority. **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' 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** – Thames Valley 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** – • 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.

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	Please note that 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
Research	**Purpose –** We may share anonymous or pseudonymised 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 be required. Where you have opted out of having your information shared for this planning or research your information will not be shared. **Legal Basis –** • Articles 6(1)(a) and 9(1)(a) – explicit consent; or • Article 6(1)(c) (where we are *legally obligated* to share your personal data) for your standard personal data and Article 9(2)(j) (scientific research) for your health data. 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 –** RCGP RSC, Umed research network, Clinical Practice Research Datalink (CPRD)
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 is 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 – • 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** – Oxfordshire County Council, Oxford Health, Vale Adult Social Care Team
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 is not required to share information for this purpose. **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 **Data Processor** – Oxfordshire County Council, Oxford Health, Vale Adult Social Care 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. **Processor** – Oxfordshire County Council, Oxford Health, Vale Adult Social Care 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 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. 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** – • 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** – MedLink, Q-Risk
Public Health Screening programmes (identifiable) Notifiable disease information (identifiable) Smoking cessation (anonymous) Sexual health (anonymous) Vaccination Programmes	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: Population screening programmes - GOV.UK [Or insert relevant link] or speak to the practice. Patients **may not opt out** of having their personal information shared for Public Health reasons.

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	Patients may opt out of being screened at the time of receiving an invitation. **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** – Oxfordshire County Council, Oxford Health
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 in order to provide you with individual direct care services. This could be hospitals or community providers for a range of services, including treatment, operations, physiotherapy, 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) '…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** – Oxford health NHS foundation trust, Great Western hospital NHS foundation trust, Pharmcy4U, Ferendune Court care home, Coxwell Hall, Boots Pharmacy, Farringdon Pharmacy, Oxford Health District Nurses, Core prescribing
Care Quality Commission (CQC)	**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 available on our website**:** **Privacy statement - Care Quality Commission** **Legal Basis** – • Article 6(1)(c) '…processing is necessary for compliance with a legal obligation'; and

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	• Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine **Processor** – Care Quality Commission
Population Health Management	**Purpose –** Population health management aims to shift the focus from reactive care to proactive, preventative care. It is a critical function of our new integrated care systems and the foundation to building a healthier future together. Health and care services work together as 'Integrated Care Systems' (ICS) and are sharing data in order 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. **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 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 -** Optum, Cerner
Payments	**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 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. **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) 'necessary for the purposes of preventative or occupational medicine'. **Processor** – NHS England, ICB, Public Health
GP Clinical System	**Purpose –** NHS GP surgery clinical systems are digital platforms, that manage patient info, allowing online access via the NHS App for appointments, prescriptions, and viewing records (allergies, medicines, results). These systems ensure data sharing between clinicians through GP Connect, improving care, with all practices mandated to provide online access to new record entries. 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 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** – 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 a medical report where you have applied for services offered by them, can have a copy of your medical history for a specific purpose. **Legal Basis** – • Article 6(1)(a) – consent for personal data; and • Article 9(2)(a) – explicit consent for special-category data. **Processor –** Solicitors and insurance organisations iGPR
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 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** – Core prescribing solutions
Dictation and transcription software.	**Purpose**: To help create more accurate and detailed notes some clinicians may use transcription and dictation software. Some of these may also implement artificial intelligence to format these notes. All data that is sent to be processed is anonymised and cannot be used to identify any patients. **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: Hedi Health, TORTUS AI, Surgery intellect
Primary Care Network (PCN)	**Purpose –** Your medical record will be shared with the White Horse Medical Practice in order that they can provide direct care services to the patient population. **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** – White Horse Medical Practice
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)(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 –** Oxfordshire County Council
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 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 –** White Horse Medical Practice
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 in order to make a request. This could be but not limited to, DS 2, Court order, s137, the prevention and detection of a crime. Or where the information is necessary to protect a person or community. **Legal Basis –** 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 6(1)(f) 'necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity' • Article 9(2)(g) 'necessary for reasons of substantial public interest' • **Processor –** Police Constabulary
Coroner	**Purpose –** Personal health records or information relating to a deceased patient may be shared with the coroner**.** **Legal Basis –** UK GDPR: • Article 6(1)(c) – to comply with a legal obligation; and • Article 9(2)(h) – 'necessary for the purposes of preventative or occupational medicine'. **Processor –** The Coroner
Community Medical Examiners – Oxford health NHS foundation trust.	**Purpose**: 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 Oxford health NHS foundation trust. **Legal Basis**: Article 6(1)(c) – necessary under a legal obligation to which the controller is subject"; and 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"

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	Processor: Medical Examiners service – Oxford health NHS foundation trust.
Non-commissioned, private healthcare providers (e.g. BUPA, Virgin Care, etc.)	**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. **Legal Basis –** Articles 6(1)(a) and 9(2)(a) consent by the patient given under contract to the provider. **Provider** - Bupa and other private healthcare providers that have been requested by the patient.
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** – • 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 -** AccuRX - NHSAPP, MedLink, TITAN PMR, engage consult
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 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 may be videoed or asked to provide photographs with consent. There are restrictions on what the practice can accept photographs of. No photographs of the full face, no intimate areas, no pictures of patients who cannot consent to the process. No identifiable pictures of children.

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	Processor – Engage Consult
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 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 –** Vale Adult Social Care Team & ICB - Urgent and Emergency Care for Oxfordshire, local District nurse team
General Practice Extraction Service (GPES) 1. At risk patients' data collection Version 3 2. CVDPREVENT Audit 3. Physical Health Checks for people with Severe Mental Illness 4. National Obesity Audit	**Purpose –** GP practices are required to provide data extraction of their patients' personal confidential information for various purposes to NHS England. The objective of this data collection is on an ongoing basis to identify patients registered at General Practices who fit within a certain criteria, in order to monitor and either provide direct care, or prevent serious harm to those patients. Below is a list of the purposes for the data extraction; by using the link you can find out the detail behind each data extraction and how your information will be used to inform this essential work: 1. At risk patients including severely clinically vulnerable 2. NHS England has directed NHS England 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 England for this purpose under section 259(1)(a) and (5) of the The Health and Social Care Act 2012 Further detailed legal basis can be found in each link.

	Any objections to this data collection should be made directly to NHS England. enquiries@nhsdigital.nhs.uk **Processor –** NHS England
OpenSAFELY COVID-19 and 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: Patients who do not wish for their data to be used as part of this process can register a type 1 opt out with their GP. Here you can find additional information about OpenSAFELY." **Processor:** NHS England, EMIS
Medication/Prescribing	**Purpose:** Prescriptions containing personal identifiable and health data will be shared with organisations who provide

	medicines management including chemists/pharmacies, in order to provide patients with essential medication regime management, medicines and or treatment as their health needs dictate. This process is achieved either by face-to-face contact with the patient or electronically. Pharmacists may be employed to review medication**,** Patients may be referred to pharmacists to assist with diagnosis and care for minor treatment, patients may have specified a nominated pharmacy they may wish their repeat or acute prescriptions to be ordered and sent directly to the pharmacy making a more efficient process. Arrangements can also be made with the pharmacy to deliver care and medication **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** – Pharmacy of choice, TITAN PMR
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 also 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 • 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' Recordings remain the control of the GP practice and they will delete all recordings from the secure site once they are no longer required.

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	Processor – RCGP, HEE, iConnect, Fourteen Fish
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 incoming and outgoing calls. Our phone system is set to automatically retain calls for 1 year. After this point, the recordings are automatically deleted. The 1 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 –** Surgery Connect – X-ON
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 this 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 a certain criteria. **Processor: ICB, NHS England**
GP Connect	**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 England. GP Connect - NHS England Digital GP Connect makes patient information available to all appropriate clinicians when and where they need it, to support

	direct patients care, leading to improvements in both care and outcomes. GP Connect is not used for any purpose other than direct care. GP Connect provides a method of secure information transfer and reduces the need to use less secure or less efficient methods of transferring information, such as email or telephone. GP Connect transparency notice - NHS England Digital **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:** NHS England
Shared Care Record	**Purpose:** The shared care record will assist in patient information being 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 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:** NHS England
Local shared care record (Thames Valley 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 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:** Thames Valley ICB
Online access	**Purpose**: To allow patients to access their GP medical record online via the NHS App. The view all documents and entries made into their record by the GP, including information sent to the GP Practice where exemptions do not apply. Where a patient has requested third party access (family/friends) to their medical records, it is the patient's responsibility to ensure removal of this access if no longer required. Proxy access to the patient's record will be limited unless the patient has requested full access. **Legal Basis**: **UK GDPR**: • Article 6(1)(e) Necessary for the performance of a task carried out in the public interest • Article 9(2)(h) Necessary for provision of health and/or social care, including preventative or occupational medicine **Common Law Duty of Confidentiality (CLDC)**: • The CLDC is satisfied as the data subjects are accessing their own data following sign up for a relevant app or platform and selecting the option to view their GP record. **Processor**: NHS Digital, Optum
Electronic reporting solution – Managed Service	**Purpose**: The iGPR Electronic Reporting Solution provides GP Practices a solution to manage Subject Access Requests (SARs) under UK GDPR *and other requests for information* that are received from patients and third parties. The solution integrates directly with the practice clinical system. iGPR acts as a data

	Processor and securely reviews, prepares and supplies copies of medical records or reports when we as your GP practice are either legally required or when you have given your consent. **Legal Basis**: Under GDPR the surgery has used its legal basis of Article 6 1(c) it is necessary under a legal obligation to which the controller is subject Article 6 1 (e) Public Task - it is necessary for the performance of a task carried out in the public interest or under official authority vested in the controller Article 9 2 (a) health data - the data subject has given explicit consent **Processor**: iGPR Technologies Ltd
NHSMail and Office 365 (N365 Applications and SharePoint)	**Purpose:** NHSmail and Office 365 help NHS staff work more securely and efficiently which directly benefits our patients: · Security: Emails are encrypted keeping your sensitive information safe. · Collaboration: Staff can easily work together saving time and improving care. · Reliability: The system is supported 24/7 to avoid service disruptions. • **National Reach:** Staff can easily connect across different NHS organisations. • **Safety:** Advanced protection against viruses and spam keeps information secure. • **Flexibility:** Staff can communicate without disruption even if organisations change. These tools support the NHS's goal of improving digital care and collaboration. **Legal Basis:** **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"; **Article 9(2)h -** "processing is necessary for the purposes of preventive or occupational medicine"; **Processor:** Accenture **Sub-processor:** Microsoft
Child Health Information Services (CHIS)	**Purpose –** South Central and West Child Health Information Services (SCW CHIS) is commissioned by NHS England to support the monitoring of care delivered to children. Personal data is collected from the child's GP record to enable health screening, physical examination and

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	vaccination services to be monitored to ensure that every child has access to all relevant health interventions. For more information: Fair Processing Notice Child Health Information Services - NHS SCW Support and Transformation for Health and Care (scwcsu.nhs.uk) **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. **Processor** – SCW, Apollo Medical Software Solutions, SystemC

We keep our Privacy Notice under regular review. This notice was last reviewed in June 2026.