PARK ROAD
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	**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** – Frimley 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 and 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 –** None at present, to be populated if research commenced
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 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. **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** – NHS Frimley 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** – Surrey Safeguarding Board
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** – Surrey Safeguarding Board
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** 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. **Processors** – NHS England and Department of Health
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: https://www.gov.uk/topic/population-screeningprogrammes [Or insert relevant link] 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. **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** – Public Health Surrey (Surrey County Council)
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, 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 in order to provide patients with life saving care, their consent will not be required. **Processors** – Frimley Health NHS Foundation 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 available on our website: https://www.cqc.org.uk/about-us/our-policies/privacy-statement **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 **Processor**s – Care Quality Commission
Population Health Management	**Purpose –** 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. (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 -** Frimley ICS
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. 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) 'as stated below **Data Processors** – NHS England, ICB, Public Health
Patient Record data base	**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 **Processor** – EMIS, DOCMAN 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 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 for these purposes. **Processor –** Solicitors, Insurance organisations, iGPR (Niche Health)

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** – NHS Frimley ICB
GP Federation GP Extended Access	**Purpose –** Your medical record will be shared with Surrey Heath Community Providers Limited 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** – Surrey Heath Community Providers Limited
Primary Care Network (PCN)	**Purpose –** Your medical record will be shared with the Surrey Heath PCN 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** – Park Road Group Practice, Bartlett Group, Camberley Health Centre, Park House Surgery, Lightwater Surgery, Station Road and Upper Gordon Road Surgery.
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 –** Surrey 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… in the exercise of official authority vested in the controller' And Article 9(2)(h) Health data as stated below **Processor – Surrey Heath PCN**
First Contact Physio	**Purpose** – Access to medical records is provided to physio providers in order for physio services 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… in the exercise of official authority vested in the controller' And Article 9(2)(h) Health data as stated below **Processor – Surrey Heath PCN**
Mental Health Provider	**Purpose** – Access to medical records is provided in order for mental health services 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… in the exercise of official authority vested in the controller' And Article 9(2)(h) Health data as stated below **Processor – Surrey Heath PCN**
DXS	**Purpose –** Your medical record will be shared in order that a referral can be made to other providers **Legal basis –** Your consent will be required to share your record for this purpose. **Processor** - DXS
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 –6 1 (c) Legal Obligation. Article 6 1 (f) legitimate interest

	Article 9 2 (f) requests for legal reasons **Processor –** Police Constabulary
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 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 –** Article 6 1 (a) and 9 2 (h) Consented and under contract between the patient and the provider **Provider** – Any named private provider
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, Mjog, Iplato, E-consult, 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… in the exercise of official authority vested in the controller' And Article 9(2)(h) Health data as stated below Patients may be videod 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 –** e-Consult, AccuRX, LIVI
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 –** MS Teams
COVID-19 Research and Planning	**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. COPI Reg 3 has been extended and you can find further information here: Coronavirus (COVID-19): notice under Regulation 3(4) of the Health Service (Control of Patient Information) Regulations 2002 - GOV.UK (www.gov.uk) NHS England » OpenSAFELY – the Coronavirus (COVID-19) Research Platform **Legal Basis** – In order to share personal confidential data with other agencies for research or planning. Either the Article 6 1 (a) and 9 2 (a) Explicit consent will be required. or The Processor would need to meet Section 251 CAG approval. Or It would need to be approved under direct care to patients Article 6 1 (e) Public Task and 9 2 (h) Health data **Provider** – COVID vaccination Hubs, BIOBANK, Oxford University,
General Practice Extraction Service (GPES) 1. At risk patients data collection Version 3 2. Covid-19 Planning and Research data 3. CVDPREVENT Audit 4. Physical Health Checks for people	**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: 1. At risk patients including severely clinically vulnerable

with Severe Mental Illness	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. **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 or NHS X
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… in the exercise of official authority vested in the controller' And Article 9(2)(h) Health data as stated below **Processor** – Pharmacy of 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 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. **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, Fourteen Fish
Telephony	**Purpose –** The practice use an internet-based telephony system that records telephone calls, for their own purpose and to assist with patient consultations. The telephone system has been commissioned to assist with the high volume and management of calls into the surgery, which in turn will enable a better service to patients. Video Consultation Functionality Our telephony system includes the ability to carry out video consultations. This functionality is available to support patient care where appropriate, but it will be used infrequently and only when there is a clear need to do so. Video consultations are conducted securely and are not recorded. No audio-visual recordings are stored, shared, or retained by the practice. All video consultations are handled in accordance with our existing privacy, confidentiality, and data protection obligations, and we ensure that any personal data discussed during a consultation is treated with the same level of care as all other clinical information. **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… in the exercise of official authority vested in the controller' And Article 9(2)(h) Health data as stated below **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**
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:** 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. 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:** NHS Digital
Anticoagulation Monitoring	**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. **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 **Processor** : LumiraDX INRStar
Surveys and asking for your feedback	Sometimes we may offer you the opportunity to take part in a survey that the practice is running. We will not generally ask you to give us any personal confidential information as part of any survey. **Legal basis –** you are under no obligation to take part and where you do, we consider your participation as consent to hold and use the responses you give us. **Data Processor –** Survey Monkey
Speech and Language Therapy service	**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. **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 **Processor:** Central Surrey Health Ltd
Healthy.io - ACR project for patients with diabetes (and/or other conditions)	**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/minuteful_info/
Teledermatology Advice & Guidance System	**Purpose:** Clinicians wishing to seek advice on patient management, will initiate the Cinapsis communication process by the input of the patient NHS number into the software or directly from the electronic patient record. In turn, this queries the NHS Spine Service or the electronic patient record system and returns patient demographic details. A presenting complaint and, if necessary, additional information such as documents or images can be added, which creates a 'Case' within the software. The clinician can then seek advice from a colleague electronically either synchronously, over the telephone or video, or asynchronously through messaging. All data processed via the System are encrypted during transmission and whilst at rest on computer servers, located at an NHS HSCN accredited data hosting centre. The data hosting centre is managed by Hicom Technology Ltd.; these arrangements are covered under contract with the Supplier. Hicom, under data protection legislation is regarded as a Sub-processor of personal data. Two additional specialist companies provide applications to the Supplier; these are used to manage voice and video communications. The Supplier has in place contracts with Twilio Ireland Ltd., and Aculab PLC, which under data protection legislation are regarded as Sub-processors of personal data. **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** – Monmedical Limited (Trading as Cinapsis) Sub-Processors - Hicom Technology Ltd, Twilio Ireland Ltd and Aculab PLC
Xyla Elective Care (XEC)	**Purpose**: Personal confidential data will be shared for the purpose of providing a Dermatology Virtual Triage service. Data will be shared to enable Xyla Elective Care (XEC) specialists to be able to support

	them in patient management by providing advice and referring patients as their condition dictates. **Legal Basis**: Under UK GDPR the legal basis for this activity is for direct care: 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, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services." On the basis of union or member state law or pursuant to contract with a health professional and subject to conditions and safeguards. **Joint Controller:** Xyla Elective Care (XEC), Frimley Health NHS Foundation Trust **Processor:** Cinapsis
NHS South, Central and West Commissioning Support Unit – 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 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 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..." Processor – SCW, Apollo Medical Software Solutions, System C
Rapid Health	**Purpose:** This software will support the Practice by reducing administrative workload, improving appointment efficiency and

	prioritising patient needs based on symptom severity. Allowing staff to focus on urgent cases while enhancing overall patient flow**.** **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:** Rapid Health

Malnutrition / Hydration Project	**Purpose** • Enable people to stay well, safe and independent at home for longer, the project supports healthier nutritional and hydration patterns and behaviours. • Provide the right care in the right place at the right time the project supports proactive intervention, before people become increasingly dependent on health and care services; therefore 'at the right time • Addressing health inequalities and support the priorities of Health & Wellbeing boards The high-level objectives of the service are: • To provide people with knowledge and understanding to enable them to make simple sustainable changes to calorie and fluid intake. • To improve wellbeing and reduce the demand on health and social care services including Urgent & Emergency Care **Legal Basis –** 1.GDPR 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"; **Data Processor** – Surrey Heath Community Providers Limited. EMIS Web will be used to generate searches in order to identify relevant patients GP Practices will remain Data Controllers for Clinical records held on EMIS.

Stoma/Catheter Prescribing Service	**Purpose**: To establish a new regional Appliance Prescribing Service managed by Bullen. The service will handle all prescribing and ongoing prescription management, ensuring that appliance orders match patient needs and reduce unnecessary waste. **Legal Basis:** Direct Care: 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 Article 9(2)h "processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services, on the basis of domestic law". **Sharing Data Controllership**: Bullen acting as individual data controllers
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 The Phoenix Partnership(TPP) EMIS
Request for information processing	**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. **Legal Basis**: Under GDPR the surgery has used its legal basis of Article 6 1(a) consent; Article 6 1 (b) contract where the data party is subject Article 6 1 (e) Public Task Article 9 2 (a) Explicit consent Article 9 2 (h) health data **Processor**: iGPR Technologies Ltd

We keep our Privacy Notice under regular review. This notice was last reviewed on 16th March 2026.

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..."