

Privacy Notice

Campden Surgery

Your information, what you need to know

This privacy notice explains why we collect information about you, how that information will be used, how we keep it safe and confidential and what your rights are in relation to this.

Why we collect information about you

Health care professionals who provide you with care are required by law to maintain records about your health and any treatment or care you have received within any NHS organisation. These records help to provide you with the best possible healthcare and help us to protect your safety.

We collect and hold data for the purpose of providing healthcare services to our patients and running our organisation which includes monitoring the quality of care that we provide. In carrying out this role we will collect information about you which helps us respond to your queries or secure specialist services. We will keep your information in written form and/or in digital form. The records will include basic details about you, such as your name and address. They will also contain more sensitive information about your health and also information such as outcomes of needs assessments.

Our Commitment to Data Privacy and Confidentiality Issues

As a GP practice, all of our GPs, staff and associated practitioners are committed to protecting your privacy and will only process data in accordance with the Data Protection Legislation. This includes the General Data Protection Regulation (EU) 2016/679 (GDPR), the Data Protection Act (DPA) 2018, the Law Enforcement Directive (Directive (EU) 2016/680) (LED) and any applicable national Laws implementing them as amended from time to time. The legislation requires us to process personal data only if there is a legitimate basis for doing so and that any processing must be fair and lawful.

In addition, consideration will also be given to all applicable Law concerning privacy, confidentiality, the processing and sharing of personal data including the Human Rights Act 1998, the Health and Social Care Act 2012 as amended by the Health and Social Care (Safety and Quality) Act 2015, the common law duty of confidentiality and the Privacy and Electronic Communications (EC Directive) Regulations.

Details we collect about you

Records which this GP Practice will hold or share about you will include the following:

- Personal Data – means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- Special Categories of Personal Data – this term describes personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.
- Confidential Patient Information – this term describes information or data relating to their health and other matters disclosed to another (e.g. patient to clinician) in circumstances where it is reasonable to expect that the information will be held in confidence. Including both information

‘given in confidence’ and ‘that which is owed a duty of confidence’. As described in the Confidentiality: NHS code of Practice: Department of Health guidance on confidentiality 2003.

- Pseudonymised - The process of distinguishing individuals in a dataset by using a unique identifier which does not reveal their ‘real world’ identity.
- Anonymised – Data in a form that does not identify individuals and where identification through its combination with other data is not likely to take place
- Aggregated - Statistical data about several individuals that has been combined to show general trends or values without identifying individuals within the data.

How we use your information

Improvements in information technology are also making it possible for us to share data with other healthcare organisations for the purpose of providing you, your family and your community with better care. For example it is possible for healthcare professionals in other services to access your record with your permission when the practice is closed. Where your record is accessed without your permission it is necessary for them to have a legitimate basis in law. This is explained further in the Local Information Sharing at Appendix A.

Whenever you use a health or care service, such as attending Accident & Emergency or using Community Care services, important information about you is collected in a patient record for that service. Collecting this information helps to ensure you get the best possible care and treatment. The information collected about you when you use these services can also be used and provided to other organisations for purposes beyond your individual care, for instance to help with:

- improving the quality and standards of care provided
- research into the development of new treatments
- preventing illness and diseases
- monitoring safety
- planning services
- risk stratification
- population Health Management
- safeguarding of children or vulnerable adults
- statutory disclosures

This may only take place when there is a clear legal basis to use this information. All these uses help to provide better health and care for you, your family and future generations. Confidential patient information about your health and care is only used like this where allowed by law or with consent.

Most of the time, anonymised data is used for research and planning so that you cannot be identified in which case your confidential patient information isn’t needed.

A full list of details including the legal basis, any Data Processor involvement and the purposes for processing information can be found in Appendix A.

How long do we hold information for?

All records held by the Practice will be kept for the duration specified by national guidance from NHS Digital, [Health and Social Care Records Code of Practice](#). Once information that we hold has been identified for destruction it will be disposed of in the most appropriate way for the type of information it is. Personal

confidential and commercially confidential information will be disposed of by approved and secure confidential waste procedures. We keep a record of retention schedules within our information asset registers, in line with the Records Management Code of Practice for Health and Social Care 2016.

Individuals Rights under GDPR

Under GDPR 2016 the Law provides the following rights for individuals. The NHS uphold these rights in a number of ways.

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure (not an absolute right) only applies in certain circumstances
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling.

Your right to opt out of data sharing and processing

The NHS Constitution states 'You have a right to request that your personal and confidential information is not used beyond your own care and treatment and to have your objections considered'. For further information please visit: [The NHS Constitution](#)

Type 1 Opt Out

This is an objection that prevents an individual's personal confidential information from being shared outside of their general practice except when it is being used for the purposes of direct care, or in particular circumstances required by law, such as a public health emergency like an outbreak of a pandemic disease. If you wish to apply a Type 1 Opt Out to their record they should make their wishes known to the practice manager.

National data opt-out

The national data opt-out was introduced on 25 May 2018, enabling patients to opt-out from the use of their data for research or planning purposes, in line with the recommendations of the National Data Guardian in her Review of Data Security, Consent and Opt-Outs.

By 2020 all health and care organisations are required to apply national data opt-outs where confidential patient information is used for research and planning purposes. NHS Digital has been applying national data opt-outs since 25 May 2018. Public Health England has been applying national data opt-outs since September 2018.

The national data opt-out replaces the previous 'type 2' opt-out, which required NHS Digital not to share a patient's confidential patient information for purposes beyond their individual care. Any patient that had a type 2 opt-out recorded on or before 11 October 2018 has had it automatically converted to a national data opt-out. Those aged 13 or over were sent a letter giving them more information and a leaflet explaining the national data opt-out. For more information go to [National data opt out programme](#)

To find out more or to register your choice to opt out, please visit www.nhs.uk/your-nhs-data-matters.

On this web page you will:

- See what is meant by confidential patient information
- Find examples of when confidential patient information is used for individual care and examples of when it is used for purposes beyond individual care
- Find out more about the benefits of sharing data
- Understand more about who uses the data
- Find out how your data is protected

- Be able to access the system to view, set or change your opt-out setting
- Find the contact telephone number if you want to know any more or to set/change your opt-out by phone
- See the situations where the opt-out will not apply

Right of Access to your information (Subject Access Request)

Under Data Protection Legislation everybody has the right have access to, or request a copy of, information we hold that can identify you, this includes your medical record, there are some safeguards regarding what you will have access and you may find information has been redacted or removed for the following reasons;

- Does not cause harm to the patient
- That legal confidentiality obligations for the non-disclosure of third-party information are adhered to

You do not need to give a reason to see your data. And requests can be made verbally or in writing. Although we may ask you to complete a form in order that we can ensure that you have the correct information you require.

Where multiple copies of the same information is requested the surgery may charge a reasonable fee for the extra copies.

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

Patients may also request to have online access to their data, they may do this via the [NHS APP](#), or via the practices system. If you would like to access your GP record online click here www.chippingcampdensurgery.co.uk

Patients have a right to make a data protection complaint directly to the practice, details are included in the complaints leaflet, available on our website or from the surgery reception.

COVID Passport access

Patients may access their Covid passport via the [link](#), the practice cannot provide this document as it is not held in the practice record. If you have any issues gaining access to your Covid Passport or letter you should call: 119

Change of Detail

It is important that you tell the surgery if any of your contact details such as your name or address have changed especially if any of your other contacts details are incorrect. It is important that we are made aware of any changes **immediately** in order that no information is shared in error.

Mobile telephone number

If you provide us with your mobile phone number, we will use this to send you text reminders about your appointments or other health related information. It is within our legal duty as a public authority to keep our patients updated with important information.

Email address

Where you have provided us with your email address, with your consent we will use this to send you information relating to your health and the services we provide. If you do not wish to receive communications by email please let us know.

Notification

Data Protection Legislation requires organisations to register a notification with the Information Commissioner to describe the purposes for which they process personal and sensitive information.

We are registered as a Data Controller and our registration can be viewed online in the public register at: [http://ico.org.uk/what we cover/register of data controllers](http://ico.org.uk/what_we_cover/register_of_data_controllers)

Any changes to this notice will be published on our website and in a prominent area at the Practice.

Data Protection Officer

Should you have any data protection questions or concerns, please contact our Data Protection Officer via the surgery at: correspondence.campdensurgery@nhs.net

What is the right to know?

The Freedom of Information Act 2000 (FOIA) gives people a general right of access to information held by or on behalf of public authorities, promoting a culture of openness and accountability across the public sector. You can request any non-personal information that the GP Practice holds, that does not fall under an exemption. You may not ask for information that is covered by the Data Protection Legislation under FOIA. However you can request this under a right of access request – see section above ‘Access to your information’.

Right to Complain

Patients have a right to make a data protection complaint directly to the practice, details are included in the complaints leaflet, available on our website or from the surgery reception.

If you have concerns or are unhappy about any of our services, please contact the Practice Manager.

Alternatively, for independent advice about data protection, privacy and data-sharing issues, you can contact:

The Information Commissioner
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Phone: 0303 123 1113 Website: <https://ico.org.uk/global/contact-us>

The NHS Care Record Guarantee

The NHS Care Record Guarantee for England sets out the rules that govern how patient information is used in the NHS, what control the patient can have over this, the rights individuals have to request copies of their data and how data is protected under Data Protection Legislation.

The NHS Constitution

The NHS Constitution establishes the principles and values of the NHS in England. It sets out the rights patients, the public and staff are entitled to. These rights cover how patients access health services, the

quality of care you'll receive, the treatments and programs available to you, confidentiality, information and your right to complain if things go wrong.

<https://www.gov.uk/government/publications/the-nhs-constitution-for-england>

Appendix A – The Practice will share your 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 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. Processors/Recipients – Gloucestershire Integrated Care Board (ICB)
Local shared care record – JUYI – Joining Up Your Information	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. For more information see: Joining Up Your Information : One Gloucestershire 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 Gloucestershire ICB, Kainos, Orion
Summary Care Record	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. Full details are available at: Summary Care Record supplementary transparency notice - NHS Digital Processor/recipients – NHS England and NHS Digital
Research	Purpose – We may share personal confidential or anonymous information with research companies. Where you have opted out of having your identifiable information shared for this purpose your information will be removed. 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/recipients – National Institute for Health Research, Clinical Research Network, West of England
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 contracts. Legal Basis - 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. Under UK GDPR Article 6 1 (e) Public Task and Article 9 2 (h) health data apply Data processor/recipients – Gloucestershire ICB

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
Safeguarding Adults and Children	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 safety. Consent may not be required to share information for this purpose. Legal Basis – in some cases 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 Processors/Recipients – One Gloucestershire Safeguarding Team
Risk Stratification – Preventative Care	Purpose - ‘Risk stratification for case finding’ is a process for identifying and managing patients who have or may be at-risk of health conditions (such as diabetes) or who are most likely to need healthcare services (such as people with frailty). Risk stratification tools used in the NHS help determine a person’s risk of suffering a particular condition and enable us to focus on preventing ill health before it develops. Information about you is collected from 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 GDPR Art. 6(1) (e) and Art.9 (2) (h). The use of identifiable data by ICB's 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 2020 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/Recipients – South, West and Central Commissioning Support Unit, Gloucestershire ICB
Public Health Screening programmes (identifiable) Notifiable disease information (identifiable) Smoking cessation (anonymous) Sexual health (anonymous)	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. More information can be found at: https://www.gov.uk/topic/population-screeningprogrammes [Or insert relevant link] or speak to the practice Legal Basis - 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/recipients – South West Integrated Public Health Commissioning Team, NHS England and NHS Improvement – South West
Direct Care NHS Trusts Community Providers Pharmacies Enhanced care providers Nursing Homes	Purpose – Personal information is shared with other secondary care trusts 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. 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 Article 6 1 (e) direct care and 9 2 (h) to provide health or social care.

Other Care Providers	Processors/Recipients – Gloucestershire Hospitals NHS Foundation Trust; Gloucestershire Health & Care NHS Foundation Trust; South Western Ambulance Service 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 GDPR) and their privacy statement is <u>available on our website</u>: 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/recipientss – Care Quality Commission
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 amount 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 (QUOF), 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 Processors/recipients – 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. A warning marker may be applied to your record if necessary for staff protection in accordance with practice policy. This will be reviewed on a regular basis and removed if no longer required. 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 – TPP, PCSE
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 changes can be implemented. ICBs operate pharmacist and prescribing advice services to support local GP practices with prescribing queries, which may require identifiable information to be shared. These pharmacists work with your usual GP to provide advice on medicines and prescribing queries, and review prescribing of medicines to ensure that it is appropriate for your needs, safe and cost-effective. Legal Basis - Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Processors/Recipients – Gloucestershire ICB and Gloucestershire Hospitals NHS Foundation Trust
PCN – Primary Care Network	Purpose – Your medical record will be shared with the North Cotswold 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) as stated below Processor/recipients – Stow surgery, Mann Cottage Surgery, Whitehouse Surgery, Cotswold Medical Practice
Smoking cessation	Purpose – personal information is shared in order for the smoking cessation service to be provided. Legal Basis – consented Processors/recipients - South West Integrated Public Health Commissioning Team, NHS England and NHS Improvement – South West

Social Prescribers	Purpose – Access to medical records is provided to social prescribers to undertake a full service to patients dependent on their 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 Processors/Recipients – Gloucestershire Rural Community Council
Voluntary services	Purpose – Only patients who wish to be party to this service will have relevant 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 Recipients/Processors - Campden Voluntary Help Group and Chipping Campden Support Hub, Campden Home Nursing, North Cotswold Foodbank
Mental Health provider	Purpose – For the provision of mental health services Legal Basis – Direct Care Processor/recipients – 2gether NHS Foundation Trust
Clinical Audit (including Primary Care Data Extraction Process (PCDES))	Purpose – Information will be used by the CCG for clinical audit to monitor the quality of the service provided to patients with long terms conditions. When required, information will be held centrally and used for statistical purposes (e.g. the National Diabetes Audit). When this happens, strict measures are taken to ensure that individual patients cannot be identified from the data. Legal Basis – 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/recipients – Gloucestershire ICB; Sollis
Department for Work and Pensions	Purpose – Our practice is legally required to provide limited data to the Department for Work and Pensions for the management of the social care system and fraud prevention. Legal Basis – Article 9(2)(b) ‘necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection..’ Processor/recipients – Department for Work & Pensions

Improving Diabetes Care	Purpose – Information that does not identify individual patients is used to enable focussed discussions to take place at practice-led local diabetes review meetings between health care professionals. This enables the professionals to improve the management and support of these patients. Legal Basis – Anonymised information Processor/recipients – Gloucestershire ICB (ICS Health and Well Being)
National Fraud Initiative - Cabinet Office	Purpose – The use of data by the Cabinet Office for data matching is carried out with statutory authority. It does not require the consent of the individuals concerned under Data Protection legislation. Data matching by the Cabinet Office is subject to a Code of Practice. For further information see: https://www.gov.uk/government/publications/code-of-data-matching-practice-for-national-fraud-initiative Legal Basis – Part 6 of the Local Audit and Accountability Act 2014 Processor/recipients – Cabinet Office and Local fraud team
National Registries	Purpose – National Registries (such as the Learning Disabilities Register) have statutory permission under Section 251 of the NHS Act 2006, to collect and hold service user identifiable information without the need to seek informed consent from each individual service user. Legal Basis – Section 251 of the NHS Act 2006 Processor/recipients – individual service providers
Supporting Medicines Management	Purpose – ICB's/PCN's operate pharmacist and prescribing advice services to support local GP practices with prescribing queries, which may require identifiable information to be shared. These pharmacists work with your usual GP to provide advice on medicines and prescribing queries, and review prescribing of medicines to ensure that it is appropriate for your needs, safe and cost-effective. Where specialist prescribing support is required, the ICB medicines optimisation team may order medications on behalf of your GP Practice to support your care. Legal Basis – Direct Care Processor/recipients – Apollo/Eclipse/Pincer
Supporting Locally Commissioned Services	Purpose – ICB's support GP practices by auditing anonymised data to monitor locally commissioned services, measure prevalence and support data quality. The data does not include identifiable information and is used to support patient care and ensure providers are correctly paid for the services they provide. Legal Basis – Anonymised Data Processor/recipients – Glos ICB
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. Legal Basis – GDPR –6 1 (c) Legal Obligation. Article 6 1 (f) legitimate interest 9(2) (c) Vital Interests; 9(2) (f) Legal claims or judicial acts; 9(2) (g) Reasons of substantial public interest (with a basis in law) Processors/Recipients – Police
Coroners	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. Coroners and Justice Act 2009 Processors/Recipients – Coroner, Medical Examiners
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 Processors/Recipients – for example, Concierge Medical, Nuffield Health
Professional Training	Purpose – We are a training surgery for medical students. 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 Medical students, pharmacists or other clinical team to assist with their training as a clinical professional. 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 Processors/Recipients – Bristol and Warwick University medical students
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 Processors/Recipients: SCW CSU
General Practice Data for Planning and Research (GDPR)	Purpose: Patients personal confidential data will be extracted and shared with NHS Digital in order to support vital health and care planning and research. Further information can be found here Patients may opt out of having their information shared for Planning or Research by applying a National Data Opt Out or a Type 1 Opt Out (see above). Legal Basis : The legal basis for this activity can be found at this link : General Practice Data for Planning and Research: NHS Digital Transparency Notice - NHS Digital Processor/recipients: NHS Digital
GP Connect	Purpose: We use a facility called GP Connect to support your direct care. 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. 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 Processors/Recipients - Authorised Clinicians such as GPs, NHS 111 Clinicians, Care Home Nurses (if you are in a Care Home), Secondary Care Trusts, Social Care Clinicians are able to access the GP records of the patients they are treating.
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 direct 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) Processors/Recipients - ICB, Optum
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 Processors/Recipients : LumiraDX INRStar
Medication/Prescribing	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 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 Patients will be required to nominate a preferred pharmacy. Processors/Recipients – Pharmacy of choice
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 Processors/Recipients – AccuRX
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 Processors/Recipients - AccuRX
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. Processors/Recipients – Solicitors, Insurance organisations
iGPR	Purpose – Your medical record will be shared in order that a report can be provided to agencies such as insurance companies or solicitors Legal Basis – Your consent will be required to share your record for this purpose Processors/Recipients – iGPR
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 Processors/Recipients – Direct Care providers
Coronavirus (COVID-19) Research Platform	OpenSAFELY is a secure, open-source software platform for analysis of electronic health data. The system provides access to de-identified (pseudonymised) personal data to support approved projects. The purposes for processing are to identify medical conditions and medications that affect the risk or impact of Covid-19 infection on individuals. Your personal data is collected from various sources including Primary care (GP) records processed by TPP. Legal Basis : COVID-19 Public Health Directions 2020 and DPN

	See: NHS England » OpenSAFELY – the Coronavirus (COVID-19) Research Platform for more information and details or recipients.
OpenSAFELY	Our practice is required by law to provide pseudonymised patient data to NHS England’s OpenSAFELY Data Analytics Service. This is a secure environment, hosted by our clinical system supplier (TPP SystmOne), where data is used for research, planning and evaluation to improve NHS care. • The data is pseudonymised (identifiers such as name, date of birth, address are removed or replaced with codes). • Data never leaves the secure environment provided by the system supplier. Only aggregate results are shared with approved researchers. • The service is run under a formal Data Provision Notice (DPN) issued by NHS England, which GP practices are legally required to comply with. • Our practice remains the data controller for the information we hold. • Your Type 1 Opt-Out choice (preventing your confidential information being used for planning or research) will still be respected, except for a small number of specific public health projects where national regulations apply. You can read more about OpenSAFELY at: https://opensafely.org/ Information on NHS England’s legal basis for this data use is available at: NHS Digital Data Provision Notices. If you have any questions, please contact the practice Data Protection Officer.
General Practice Extraction Service (GPES) 1.	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. Th link below provides details of the data extractions and how your information will be used to inform this essential work: Data Provision Notices (DPNs) - NHS Digital Legal Basis - All GP Practices in England are legally required to share data with NHS Digital for this purpose under section 259(1)(a) and (5) of the 2012 Act Further detailed legal basis can be found in each link. Any objections to this data collection should be made directly to NHS Digital. enquiries@nhsdigital.nhs.uk Processors/Recipients – NHS Digital or NHS X
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. Processors/Recipients : ICB, NHS England
Telephony	Purpose – The practice uses an internet based telephony system that automatically records all incoming telephone calls, for their own purpose, for staff training and to assist with disputed conversations. 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. Legal Basis –There is a robust contract in place with the Processor, and 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 Processors/Recipients – X-on

Reviews of and Changes to our Privacy Notice

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