Fernlea Drive, Woosehill, Wokingham, RG41 3DR

Appendix A – The Practice will share patient information with these organisations where there is a legal basis to do so.

Activity	Rationale
Commissioning and	Purpose – Anonymous data is used by the CCG for planning,
contractual purposes	performance and commissioning purposes, as directed in the practices
Invoice Validation	contract, to provide services as a public authority.
Planning	portionally to promote some portions,
Quality and Performance	Legal Basis – UK GDPR 6 1(b) Contractual obligation as set out in the
	Health and Social Care Act for Quality and Safety 2015
	, , , , , , , , , , , , , , , , , , ,
	Processor – Berkshire, Oxford & Buckinghamshire ICB
Summary Care Record	Purpose –The NHS in England uses a national electronic record
,	called the Summary Care Record (SCR) to support patient care. It
Including additional	
information	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.
	unavanable.
	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
	The relevant COPI notice states that its purpose: "is to require
	organisations to process confidential patient information for the
	purposes set out in Regulation 3(1) of COPI to support the Secretary
	of State's response to Covid-19 (Covid-19 Purpose). "Processing" for
	, , , , , , , , , , , , , , , , , , , ,
	these purposes is defined in Regulation 3(2) and includes
	dissemination of confidential patient information to persons and
	organisations permitted to process confidential patient information
	under Regulation 3(3) of COPI."
	Full details of the Summary Care Record supplementary privacy
	notice can be found here
	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



Fernied Drive, Wooseniii, Wokinghairi, NG41 3DN	
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
	sought.
	Sought.
	Where you have ented out of having your identifiable information
	Where you have opted out of having your identifiable information
	shared for this Planning or Research your information will not be
	shared.
	Legal Basis – consent is not required to share anonymous data that does
	not identify a patient.
	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
	Confidentiality Advisory Group in England and Wales
	Processor NUIC Digital
Late the design by the second	Processor – NHS Digital
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.
	accionation provides mannagements.
	Legal Basis – Under UK GDPR Article 6 1(a) consent is required
	Article 9 2 (h) health data
	Article 5.2 (II) Health data
	Data processor - Rerkshire Oxford & Buckinghamshire ICB
Safaguarding Adults	Data processor – Berkshire, Oxford & Buckinghamshire ICB Purpose – We will share personal confidential information with the
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.
	safeguarding concerns.
	safeguarding concerns. Legal Basis – in some case consent will be required otherwise
	safeguarding concerns. Legal Basis – in some case consent will be required otherwise • Article 6(1)(e) 'necessary for the performance of a task carried
	safeguarding concerns. Legal Basis – in some case consent will be required otherwise
	safeguarding concerns. Legal Basis – in some case consent will be required otherwise • Article 6(1)(e) 'necessary for the performance of a task carried
	 safeguarding concerns. 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
	 safeguarding concerns. 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
	 safeguarding concerns. 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
	 safeguarding concerns. 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
	 safeguarding concerns. 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



Fernlea Drive, Woosehill, Wokingham, RG41 3DR

Safeguarding Children

Purpose – We will share children's personal information where there is a need to assess and evaluate any safeguarding concerns.

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 – Wokingham Borough Council Children's Social Care

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) and Art.9 (2) (h). The use of identifiable data by CCGs 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 – Berkshire Diabetic Eye Screening (In House Intelligence) National Diabetes Prevention - NHS Digital









	Powers - Developed in the state of the state
Public Health	Purpose – Personal identifiable and anonymous data is shared.
Screening programmes	The NHS provides national screening programmes so that certain
(identifiable)	diseases can be detected at an early stage. These currently apply to
Notifiable disease information	bowel cancer, breast cancer, aortic aneurysms and diabetic retinal
(identifiable)	screening service. The law allows us to share your contact information
Smoking cessation	with Public Health England so that you can be invited to the relevant
(anonymous)	screening programme.
Sexual health (anonymous)	More information can be found at:
	https://www.gov.uk/topic/population-screeningprogrammes [Or insert
	relevant link] or speak to the 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
	Data Processors – Wokingham Borough Council – Berkshire West ICB
	Public Health.
Vaccination Programmes	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 –
	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 Processors – UK Health Security Agency and Office for Health
	Improvement and Disparities
Direct Care	Purpose – Personal information is shared with other secondary care
NHS Trusts	trusts and providers in order to provide you with direct care services.
Community Providers	This could be hospitals or community providers for a range of services,
Pharmacies	including treatment, operations, physio, and community nursing,
Enhanced care	ambulance service.
providers	
Nursing Homes	Legal Basis - The processing of personal data in the delivery of direct
Other Care Providers	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 overidding need to access the GP record in
	order to provide patients with life saving care, their consent will not be
	required.
	Processors – Royal Berkshire NHS Foundation Trust
	Frimley Health NHS Foundation Trust
	Westcall Out of Hours
	Graphnet Connected Care
I .	•
	Reading Urgent Care, Bwell MSK Physiotherapy



Fernlea Drive, Woosehill, Wokingham, RG41 3DR

	ea Drive, Wooseniii, Wokingnam, RG41 3DK
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 available on our
	website: https://www.cqc.org.uk/about-us/our-policies/privacy-
	statement
	<u>statement</u>
	Logal Pacie
	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.'
	Processors – Care Quality Commission
Population Health	Purpose – Health and care services work together as 'Integrated Care
Management	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)
	To a set Data and the stiffette /Data data as it and /A a set of /
	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'
	·
	Data Processors - Berkshire, Oxford & Buckinghamshire ICB, Optum,
	Cerner
Payments, Invoice validation	Purpose - Contract holding GPs in the UK receive payments from their
- syments, invoice variation	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

Fernlea Drive, Woosehill, Wokingham, RG41 3DR

Term	ea Drive, Wooseniii, Wokingnam, RG41 3DR
	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)(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'
Patient Record data base	Data Processors – NHS England, ICB, Public Health 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 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, 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 report where you have applied for services offered by then can have a copy to 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 (iGDPR) Privacy Policy iGPR

Fernlea Drive, Woosehill, Wokingham, RG41 3DR

	Ed Drive, Wooseliii, Wokingilaiii, RG41 5DK
Medicines Optimisation	Purpose – Your anonymous aggregated information will be shared in order to optimise medication. This will enable your GP to provide a more efficient medication regime for your personal care. Some of the anonymous information may be used nationally to drive wider understanding of the medication is used. 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 - Berkshire, Oxford & Buckinghamshire ICB
Medicines Management Team	Purpose – your medical record is shared with the medicines management team, in order that your medication can be kept up to date and any changes can be implemented.
	 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 – Berkshire, Oxford & Buckinghamshire ICB
GP Federation End of life & Palliative Care Point of Care across Berkshire Out of Hours	Purpose – Your medical record will be shared with the Reading Urgent Care Care Alliance, Bwell MSK Physiotherapy Service, and BOB Out of Hours 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
	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 – Reading Urgent Care Bwell MSK Physiotherapy Service BOB Out of Hours
Primary Care Network PCN	Purpose – Your medical record will be shared with New Wokingham Road Surgery 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'

	-erified Drive, Woosefilli, Wokingflaffi, KG41 3DK
	Processor –New Wokingham Road Surgery and Woosehill Medical Centre
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 – N/A
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 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 – Berkshire, Oxford & Buckinghamshire 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. 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. In some cases consent may be required.
	 Legal Basis – UK GDPR Article 6(1)(c) – to comply with a legal obligation; and Article 9(2)(j) – 'for reasons of substantial public interest'
	Processor – Police Constabulary



Fernlea Drive, Woosehill, Wokingham, RG41 3DR

	Tea Drive, Wooseilli, Wokingilalli, KG41 3DK
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
Indemnity Organisations	Purpose – We may occasionally share limited identifiable patient
	information with medical defence or indemnity organisations — such as the Medical Defence Union (MDU) when they are supporting one of our
	clinicians during patient complaints or litigation. Where possible,
	information will be redacted before being shared. This may be done via
	secure email or discussed verbally by phone.
	Legal Basis –
	Article 6(1)(c) – to comply with a legal obligation; and
	 Article 9(2)(f) – processing is necessary for the establishment, exercise or defence of legal claims.
	Processors –
	Medical Defence Union (MDU) – Privacy policy
Medical Examiner Service	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 Berkshire, Oxford
	& Buckinghamshire ICB.
	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"
	Processor – Medical Examiners service – Berkshire, Oxford &
	Buckinghamshire ICB
Non-commissioned, private	Purpose – Personal information shared with private health care
healthcare providers (e.g.	providers in order to deliver direct care to patients at the patient's
BUPA, Virgin Care, etc.)	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 – N/A

Fernlea Drive, Woosehill, Wokingham, RG41 3DR

Fernlea Drive, Woosehill, Wokingham, RG41 3DR	
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'
	Provider - AccuRX - NHSAPP, Footfall
Online Consultation / Total Triage (Accurx Patient Triage, Self-Book and Patient Initiated Follow-Up (PIFU))	Purpose – The practice provides an online consultation service (known as Total Triage) using Accurx. This allows patients to securely submit clinical or administrative requests online at a time convenient to them, including via the NHS App. Patients may attach photos or documents to support their request. Submitted information is reviewed by practice staff and triaged appropriately to provide safe, effective care. Patients may also be offered links to book their own appointments (Self-Book) or contact the practice directly as part of an agreed follow-up pathway (PIFU).
	 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 Accurx Privacy Policy
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 pictures of children.

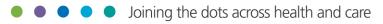
Fernlea Drive, Woosehill, Wokingham, RG41 3DR

	ea Drive, Wooseilii, Wokingilalii, KG41 3DK
	Processor – AccuRX Accurx Privacy Policy
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'
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 National Obesity Audit	Purpose – GP practices are required to provide data extraction of their patients personal confidential information for various purposes to NHS Digital. The objective of this data collection is on an ongoing basis to identify patients registered at General Practices who fit within 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:
	At risk patients including severely clinically vulnerable
	NHS England has directed NHS Digital to collect and analyse data in connection with Cardiovascular Disease Prevention Audit
	3. GPES Physical Health Checks for people with Severe Mental Illness (PHSMI) data collection.
	4. National Obesity Audit - NHS Digital
	Legal Basis - All GP Practices in England are legally required to share data with NHS Digital for this purpose under section 259(1)(a) and (5) of The 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 Digital. enquiries@nhsdigital.nhs.uk
	Processor – NHS England
Medication/Prescribing	Purpose: Prescriptions containing personal identifiable and health data will be shared with organisations who provide medicines management includingchemists/pharmacies, in order to provide patients with

Fernlea Drive, Woosehill, Wokingham, RG41 3DR

Ferni	ea Drive, Woosehill, Wokingham, RG41 3DR
	essential medicationregime 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
4. 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.
	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.
	Processor – Blue stream Academy, RCGP, eLH. Clarity Teamnet
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.
	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

	ilea Drive, Wooseilii, Wokingilaili, KG41 5DK
	 Article 9(2)(h) 'necessary for the purposes of preventative or
	occupational medicine'
	Provider – X-on (Surgery Connect)
Learning Disability Mortality	Purpose: The Learning Disability Mortality Review (LeDeR)
Programme	
_	programme was commissioned by NHS England to investigate the
LeDer	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.
	patients who meet with this effect will be shared with this England.
	Local Basis, It has a supposed from the Constant of Chate and demonstring
	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
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
PDF	•
TVSCareRecordKeyF	including GP connect which is managed by NHS Digital, to enable a
acts.pdf	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 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'
	Dracecor NHC England
A stress takes and the	Processor: NHS England
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 –
	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'
	230apational medicine



Fernlea Drive, Woosehill, Wokingham, RG41 3DR

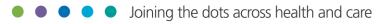
Processor: LumiraDX - Royal Berkshire NHS Foundation Trust NHS South, Central and West **Purpose** – South, Central and West Child Health Information Services Commissioning Support Unit – (SCW CHIS) is commissioned by NHS England to support the monitoring Child Health Information of care delivered to children. Personal data is collected from the child's Services (CHIS) 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. Information For more information: Fair Processing Notice Child Health Information Governance and Chi 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 OpenSAFELY COVID-19 and Purpose: "NHS England has been directed by the government to establish and operate the OpenSAFELY COVID-19 Service and the **Data Analytics Services** OpenSAFELY Data Analytics Service. These services provide a secure environment that supports research, clinical audit, service evaluation and health surveillance for COVID-19 and other purposes. Each GP practice remains the controller of its own GP patient data but is required to let approved users run queries on pseudonymised patient data. This means identifiers are removed and replaced with a pseudonym. Only approved users are allowed to run these queries, and they will not be able to access information that directly or indirectly identifies individuals. Legal Basis -**UK GDPR – Article 6 basis:** UK GDPR Article 6(1)(c) - processing is necessary for compliance with a legal obligation to which the controller is subject (the Directions). **UK GDPR Article 9 basis:** UK GDPR Article 9(2)(g) - processing is necessary for reasons of substantial public interest, on the basis of domestic law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject, by virtue of compliance with a direction supplemented by: Data Protection Act 2018 basis



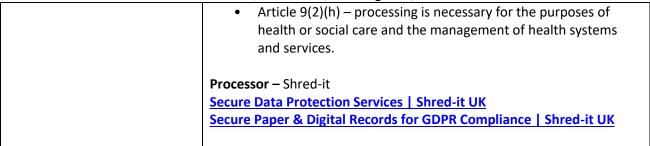
Fernlea Drive, Woosehill, Wokingham, RG41 3DR Data Protection Act 2018 (DPA 2018) Schedule 1, Part 2, paragraph 6: Statutory etc and government purposes. Patients who do not wish their data to be used as part of this process can register a type 1 opt out with their GP. Here you can find additional information about OpenSAFELY." IG frequently asked questions (FAQs) - Information governance - NHS **Transformation Directorate** NHS OpenSAFELY Data Analytics Service pilot - Privacy notice - NHS **England Digital** Processor: NHS England **EMIS** • Dictation, Transcription and AI-**Purpose:** Assisted Documentation We use Lexacom Digital Dictation, including Lexacom Echo and Lexacom Scribe, to support our clinicians and administrative staff with creating and processing clinical documentation. These systems enable secure digital dictation, automatic transcription, and (where applicable) Alassisted text generation to improve efficiency and accuracy in our record keeping. All recordings, transcriptions and generated documents are processed securely within the UK and in accordance with UK data protection laws. Only authorised staff have access to this information, and all data is handled securely, used solely for providing care, and retained in line with the NHS Records Management Code of Practice. No patient data is used to train or improve the AI system. **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: Lexacom Confidential Waste Disposal Purpose – We use Shred-it Confidential Waste Service to securely dispose of confidential paper records and other documents containing personal identifiable information. All confidential waste is collected in locked consoles and securely shredded and destroyed in line with NHS information governance requirements and the Records Management Code of Practice.

Legal Basis -

 Article 6(1)(c) – processing is necessary for compliance with a legal obligation (UK GDPR); and



Fernlea Drive, Woosehill, Wokingham, RG41 3DR



We will keep our Privacy Notice under regular review. This notice was last reviewed on 17-09-2025.

Fernlea Drive, Woosehill, Wokingham, RG41 3DR

Document Control

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

Document Name	Version	Status	Author	
Appendix A – GP Privacy Notice	8	Published	NHS SCW Information	
V8_Dec 2023			Governance Services	
Document objectives:	This document supports Practice staff in compliance with Data Protection legislation, achieving best practice in the area of Information Governance and in meeting the requirements of the Data Security and Protection Toolkit			
Target audience:	All staff			
Monitoring arrangements and indicators:	This document will be monitored by NHS SCW Information Governance Services to ensure any legislative changes that occur before the review date are incorporated.			
Review frequency	SCW reviews customer documents in line with our planned schedule			
SCW Planned Review date	01 October 2025			
Approved & ratified by practice	Woosehil	l Medical Centre	Date: 16-09-2025	
Date issued by practice	16-09-2025			
GP Review date:	16-09-2025			

Change record

Date	Author	Version	Page	Reason for Change
Dec 2023	SCW	8	All	Review for Website publication
16-09-2025	Woosehill	8	13	NHS South, Central and West
				Commissioning Support Unit – Child Health
				Information Services (CHIS)
16-09-2025	Woosehill	8	14-15	OpenSAFELY COVID-19 and Data Analytics
				Services
17-09-2025	Woosehill	8	10	Online Consultation / Total Triage (Accurx
				Patient Triage, Self-Book and Patient
				Initiated Follow-Up (PIFU))
			15	Dictation, Transcription and Al-Assisted
				Documentation
			15-16	Confidential Waste Disposal

