

Woosehill Medical Centre

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 contractual purposes Invoice Validation Planning Quality and Performance	<p>Purpose – Anonymous data is used by the CCG for planning, performance and commissioning purposes, as directed in the practices contract, to provide services as a public authority.</p> <p>Legal Basis – UK GDPR 6 1(b) Contractual obligation as set out in the Health and Social Care Act for Quality and Safety 2015</p> <p>Processor – Berkshire, Oxford & Buckinghamshire ICB</p>
Summary Care Record Including additional information	<p>Purpose – The NHS in England uses a national electronic record called the Summary Care Record (SCR) to support patient care. It contains key information from your GP record. Your SCR provides authorised healthcare staff with faster, secure access to essential information about you in an emergency or when you need unplanned care, where such information would otherwise be unavailable.</p> <p>Legal Basis – Direct Care under UK GDPR :</p> <ul style="list-style-type: none">• Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and• Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine <p>The relevant COPI notice states that its purpose: “...is to require organisations to process confidential patient information for the purposes set out in Regulation 3(1) of COPI to support the Secretary of State’s response to Covid-19 (Covid-19 Purpose). “Processing” for these purposes is defined in Regulation 3(2) and includes dissemination of confidential patient information to persons and organisations permitted to process confidential patient information under Regulation 3(3) of COPI.”</p> <p>Full details of the Summary Care Record supplementary privacy notice can be found here</p> <p>Patients have the right to opt out of having their information shared with the SCR by completion of the form which can be downloaded here and returned to the practice. Please note that by opting out of having your information shared with the Summary Care Record could result in a delay to care that may be required in an emergency.</p> <p>Processor – NHS England and NHS Digital</p>



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Research	<p>Purpose – We may share anonymous patient information with research companies for the purpose of exploring new ways of providing healthcare and treatment for patients with certain conditions. This data will not be used for any other purpose.</p> <p>Where personal confidential data is shared your consent will need to be sought.</p> <p>Where you have opted out of having your identifiable information shared for this Planning or Research your information will not be shared.</p> <p>Legal Basis – consent is not required to share anonymous data that does not identify a patient.</p> <p>Where identifiable data is required for research, patient consent will be needed, unless there is a legitimate reason under law to do so or there is support under the Health Service (Control of Patient Information Regulations) 2002 ('section 251 support') applying via the Confidentiality Advisory Group in England and Wales</p> <p>Processor – NHS Digital</p>
Individual Funding Requests	<p>Purpose – We may need to process your personal information where we are required to fund specific treatment for you for a particular condition that is not already covered in our standard NHS contract.</p> <p>The clinical professional who first identifies that you may need the treatment will explain to you the information that is needed to be collected and processed in order to assess your needs and commission your care; they will gain your explicit consent to share this. You have the right to withdraw your consent at any time but this may affect the decision to provide individual funding.</p> <p>Legal Basis – Under UK GDPR Article 6 1(a) consent is required Article 9 2 (h) health data</p> <p>Data processor – Berkshire, Oxford & Buckinghamshire ICB</p>
Safeguarding Adults	<p>Purpose – We will share personal confidential information with the safeguarding team where there is a need to assess and evaluate any safeguarding concerns.</p> <p>Legal Basis – in some case consent will be required otherwise</p> <ul style="list-style-type: none">• Article 6(1)(e) '...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...'; and• Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine' <p>Data Processor – Wokingham Borough Council Adult Social Care</p>



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Safeguarding Children	<p>Purpose – We will share children's personal information where there is a need to assess and evaluate any safeguarding concerns.</p> <p>Legal Basis - in some cases consent will be required otherwise</p> <ul style="list-style-type: none">• Article 6(1)(e) '...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...'; and• Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine' <p>Data Processor – Wokingham Borough Council Children's Social Care</p>
Risk Stratification – Preventative Care	<p>Purpose - 'Risk stratification for case finding' is a process for identifying and managing patients who have or may be at-risk of health conditions (such as diabetes) or who are most likely to need healthcare services (such as people with frailty). Risk stratification tools used in the NHS help determine a person's risk of suffering a particular condition and enable us to focus on preventing ill health before it develops.</p> <p>Information about you is collected from a number of sources including NHS Trusts, GP Federations and your GP Practice. A risk score is then arrived at through an analysis of your de-identified information. This can help us identify and offer you additional services to improve your health.</p> <p>If you do not wish information about you to be included in any risk stratification programmes, please let us know. We can add a code to your records that will stop your information from being used for this purpose. Please be aware that this may limit the ability of healthcare professionals to identify if you have or are at risk of developing certain serious health conditions.</p> <p>Type of Data – Identifiable/Pseudonymised/Anonymised/Aggregate Data</p> <p>Legal Basis</p> <p>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.</p> <p>Processors – Berkshire Diabetic Eye Screening (In House Intelligence) National Diabetes Prevention - NHS Digital</p>



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ACG / PNG Group Score (Johns Hopkins Adjusted Clinical Groups)	<p>Purpose – You may notice a “test result” referring to an <i>ACG or PNG Group Score</i> within your NHS App or online medical record.</p> <p>The Johns Hopkins Adjusted Clinical Groups (ACG) and Patient Needs Groups (PNG) system is a nationally recognised NHS tool used to help health and care organisations understand patients’ overall health and care needs.</p> <p>It uses existing information in your GP record – such as diagnosed conditions, medications, test results and care episodes – to categorise patients according to the complexity and intensity of their health needs rather than single conditions.</p> <p>This helps the Practice and the NHS to:</p> <ul style="list-style-type: none">• Plan and deliver more personalised, proactive care;• Identify patients who may benefit from additional support; and• Improve how services are designed and delivered across the population. <p>The information is not used for any financial, insurance or non-clinical purpose and does not affect your access to care or treatment.</p> <p>Your score will only be updated if your overall health has significantly improved or deteriorated (for example, a new long-term condition, or improved control of an existing one).</p> <p>Legal Basis – Direct Care and the management of health and social care systems:</p> <ul style="list-style-type: none">• 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, medical diagnosis, the provision of health or social care or treatment, or the management of health or social care systems and services...’. <p>Processor – Frimley Integrated Care Board (ICB) via Connected Care (Graphnet)</p> <p>For more information on Connected Care, visit Connected Care</p>
Public Health Screening programmes (identifiable) Notifiable disease information (identifiable) Smoking cessation (anonymous) Sexual health (anonymous)	<p>Purpose – Personal identifiable and anonymous data is shared. The NHS provides national screening programmes so that certain diseases can be detected at an early stage. These currently apply to bowel cancer, breast cancer, aortic aneurysms and diabetic retinal screening service. The law allows us to share your contact information with Public Health England so that you can be invited to the relevant screening programme.</p> <p>More information can be found at: https://www.gov.uk/government/collections/population-screening-programmes-document-collection</p> <p>Legal Basis - Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below</p>



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	<p>Data Processors – Wokingham Borough Council – Berkshire West ICB Public Health.</p>
Vaccination Programmes	<p>Patients may not opt out of having their personal information shared for Public Health reasons.</p> <p>Patients may opt out of being screened at the time of receiving an invitation.</p> <p>Legal Basis –</p> <ul style="list-style-type: none"> Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ <p>Data Processors – UK Health Security Agency and Office for Health Improvement and Disparities</p>
Direct Care NHS Trusts Community Providers Pharmacies Enhanced care providers Nursing Homes Other Care Providers	<p>Purpose – Personal information is shared with other secondary care trusts and providers in order to provide you with direct care services. This could be hospitals or community providers for a range of services, including treatment, operations, physio, and community nursing, ambulance service.</p> <p>Legal Basis - The processing of personal data in the delivery of direct care and for providers' administrative purposes in this surgery and in support of direct care elsewhere is supported under the following Article 6 1 (e) direct care and 9 2 (h) to provide health or social care: In some cases patients may be required to consent to having their record opened by the third party provider before patients information is accessed. Where there is an overriding need to access the GP record in order to provide patients with life saving care, their consent will not be required.</p> <p>Processors – Royal Berkshire NHS Foundation Trust Frimley Health NHS Foundation Trust Westcall Out of Hours Graphnet Connected Care Reading Urgent Care, Bwell MSK Physiotherapy</p>
EMIS Writeback	<p>Purpose:</p> <p>Our GP practice uses a system functionality called EMIS writeback. It allows other authorised NHS organisations involved in your direct care to add relevant clinical information directly into your GP record.</p> <p>Legal Basis:</p> <ul style="list-style-type: none"> Article 6(1)e – Task carried out in the public interest. Article 9(2)h – Provision of Health or Social Care. <p>GP practice remains the data controller for your GP record.</p>
Care Quality Commission	<p>Purpose – The CQC is the regulator for the English Health and Social Care services to ensure that safe care is provided. They will inspect and produce reports back to the GP practice on a regular basis. The Law allows the CQC to access identifiable data.</p>



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	<p>More detail on how they ensure compliance with data protection law (including GDPR) and their privacy statement is available on our website: https://www.cqc.org.uk/about-us/our-policies/privacy-statement</p> <p>Legal Basis –</p> <ul style="list-style-type: none">• 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.’ <p>Processors – Care Quality Commission</p>
Population Health Management	<p>Purpose – Health and care services work together as ‘Integrated Care Systems’ (ICS) and are sharing data in order to:</p> <ul style="list-style-type: none">• Understand the health and care needs of the care system’s population, including health inequalities• Provide support to where it will have the most impact• Identify early actions to keep people well, not only focusing on people in direct contact with services, but looking to join up care across different partners. <p>(NB this links to the Risk Stratification activity identified above)</p> <p>Type of Data – Identifiable/Pseudonymised/Anonymised/Aggregate Data. NB only organisations that provide your care will see your identifiable data.</p> <p>Legal Basis –</p> <ul style="list-style-type: none">• Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and• Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ <p>Data Processors - Berkshire, Oxford & Buckinghamshire ICB, Optum, Cerner</p>
Payments, Invoice validation	<p>Purpose - Contract holding GPs in the UK receive payments from their respective governments on a tiered basis. Most of the income is derived from baseline capitation payments made according to the number of patients registered with the practice on quarterly payment days. These amounts paid per patient per quarter varies according to the age, sex and other demographic details for each patient. There are also graduated payments made according to the practice’s achievement of certain agreed national quality targets known as the Quality and Outcomes Framework (QOF), for instance the proportion of diabetic patients who have had an annual review. Practices can also receive payments for participating in agreed national or local enhanced services, for instance opening early in the morning or late at night or at the weekends. Practices can also receive payments for certain national initiatives such as immunisation programs and practices may also receive incomes relating to a variety of non-patient related elements</p>



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	<p>such as premises. Finally there are short term initiatives and projects that practices can take part in. Practices or GPs may also receive income for participating in the education of medical students, junior doctors and GPs themselves as well as research. In order to make patient based payments basic and relevant necessary data about you needs to be sent to the various payment services. The release of this data is required by English laws.</p> <p>Legal Basis –</p> <ul style="list-style-type: none">• Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and• Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’
Patient Record data base	<p>Data Processors – NHS England, ICB, Public Health</p> <p>Purpose – Your medical record will be processed in order that a data base can be maintained, this is managed in a secure way and there are robust processes in place to ensure your medical record is kept accurate, and up to date. Your record will follow you as you change surgeries throughout your life.</p> <p>Closed records will be archived by NHS England</p> <p>Legal Basis –</p> <ul style="list-style-type: none">• Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and• Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’
Medical reports Subject Access Requests	<p>Processor – EMIS, Docman and PCSE</p> <p>Purpose – Your medical record may be shared in order that:</p> <p>Solicitors/persons acting on your behalf can conduct certain actions as instructed by you.</p> <p>Insurance companies seeking a medical report where you have applied for services offered by them can have a copy to your medical history for a specific purpose.</p> <p>Legal Basis –</p> <ul style="list-style-type: none">• Article 6(1)(a) – consent for personal data; and• Article 9(2)(a) – explicit consent for special-category data. <p>Processor – Solicitors and insurance organisations (iGDPR) Privacy Policy iGPR</p>
Medicines Optimisation	<p>Purpose – Your anonymous aggregated information will be shared in order to optimise medication. This will enable your GP to provide a more efficient medication regime for your personal care. Some of the</p>



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	<p>anonymous information may be used nationally to drive wider understanding of the medication is used.</p> <p>Legal Basis –</p> <ul style="list-style-type: none"> • Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and • Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ <p>Processor - Berkshire, Oxford & Buckinghamshire ICB</p>
Medicines Management Team	<p>Purpose – your medical record is shared with the medicines management team, in order that your medication can be kept up to date and any changes can be implemented.</p> <ul style="list-style-type: none"> • 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’ <p>Processor – Berkshire, Oxford & Buckinghamshire ICB</p>
GP Federation End of life & Palliative Care Point of Care across Berkshire Out of Hours	<p>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</p> <p>Legal Basis –</p> <ul style="list-style-type: none"> • Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and • Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ <p>Processor – Reading Urgent Care Bwell MSK Physiotherapy Service BOB Out of Hours</p>
Primary Care Network PCN	<p>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.</p> <p>Legal Basis –</p> <ul style="list-style-type: none"> • Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and • Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ <p>Processor –New Wokingham Road Surgery and Woosehill Medical Centre</p>



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Smoking cessation	<p>Purpose – personal information is shared in order for the smoking cessation service to be provided.</p> <p>Only those patients who wish to be party to this service will have their data shared</p> <p>Legal Basis –</p> <ul style="list-style-type: none"> • Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and • Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ <p>Processor – N/A</p>
Social Prescribers	<p>Purpose – Access to medical records is provided to social prescribers to undertake a full service to patients dependent on their social care needs.</p> <p>Only those patients who wish to be party to this service will have their data shared</p> <p>Legal Basis –</p> <ul style="list-style-type: none"> • Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and • Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ <p>Processor – Berkshire, Oxford & Buckinghamshire ICB</p>
Police	<p>Purpose – Personal confidential information may be shared with the Police authority for certain purposes. The level of sharing and purpose for sharing may vary. Where there is a legal basis for this information to be shared consent will not always be required.</p> <p>The Police will require the correct documentation in order to make a request. This could be but not limited to, DS 2, Court order, s137, the prevention and detection of a crime. Or where the information is necessary to protect a person or community.</p> <p>In some cases consent may be required.</p> <p>Legal Basis – UK GDPR</p> <ul style="list-style-type: none"> • Article 6(1)(c) – to comply with a legal obligation; and • Article 9(2)(j) – ‘for reasons of substantial public interest’ <p>Processor – Police Constabulary</p>
Coroner	<p>Purpose – Personal health records or information relating to a deceased patient may be shared with the coroner.</p> <p>Legal Basis – UK GDPR</p>

 Joining the dots across health and care

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	<ul style="list-style-type: none"> Article 6(1)(c) – to comply with a legal obligation; and Article 9(2)(h) – “necessary for the purposes of preventative or occupational medicine” <p>Processor – The Coroner</p>
Indemnity Organisations	<p>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.</p> <p>Legal Basis –</p> <ul style="list-style-type: none"> 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. <p>Processors –</p> <ul style="list-style-type: none"> Medical Defence Union (MDU) – Privacy policy
Medical Examiner Service	<p>Purpose: Medical records associated with deceased patients are outside scope of the UK GDPR. However, next of kin details are within the scope of the UK GDPR. We will share specified deceased patient records and next of kin details with the Medical Examiners within Berkshire, Oxford & Buckinghamshire ICB.</p> <p>Legal Basis –</p> <ul style="list-style-type: none"> 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” <p>Processor – Medical Examiners service – Berkshire, Oxford & Buckinghamshire ICB</p>
Non-commissioned, private healthcare providers (e.g. BUPA, Virgin Care, etc.)	<p>Purpose – Personal information shared with private health care providers in order to deliver direct care to patients at the patient’s request. Consent from the patient will be required to share data with Private Providers.</p> <p>Legal Basis – Articles 6(1)(a) and 9(2)(a) consent by the patient given under contract to the provider.</p> <p>Provider – N/A</p>
Messaging Service	<p>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</p>



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	<p>safe way.</p> <p>Legal Basis –</p> <ul style="list-style-type: none">• Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and• Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ <p>Provider - AccuRX - NHSAPP, Footfall</p>
Online Consultation / Total Triage (Accurx Patient Triage, Self-Book and Patient Initiated Follow-Up (PIFU))	<p>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).</p> <p>Legal Basis –</p> <ul style="list-style-type: none">• Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and• Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ <p>Processor – Accurx Accurx Privacy Policy</p>
Remote consultation Including – Video Consultation Clinical photography	<p>Purpose – Personal information including images may be processed, stored and with the patients consent shared, in order to provide the patient with urgent medical advice.</p> <p>Legal Basis –</p> <ul style="list-style-type: none">• Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and• Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ <p>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.</p> <p>Processor – AccuRX Accurx Privacy Policy</p>



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MDT meetings	<p>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.</p> <p>Legal Basis –</p> <ul style="list-style-type: none"> • Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and • Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ <p>Processor – MS Teams</p>
General Practice Extraction Service (GPES) <ol style="list-style-type: none"> 1. At risk patients data collection Version 3 2. CVDPREVENT Audit 3. Physical Health Checks for people with Severe Mental Illness National Obesity Audit	<p>Purpose – GP practices are required to provide data extraction of their patients personal confidential information for various purposes to NHS Digital. The objective of this data collection is on an ongoing basis to identify patients registered at General Practices who fit within a certain criteria, in order to monitor and either provide direct care, or prevent serious harm to those patients. Below is a list of the purposes for the data extraction, by using the link you can find out the detail behind each data extraction and how your information will be used to inform this essential work:</p> <ol style="list-style-type: none"> 1. At risk patients including severely clinically vulnerable 2. 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 <p>Legal Basis - All GP Practices in England are legally required to share data with NHS Digital for this purpose under section 259(1)(a) and (5) of The Health and Social Care Act 2012</p> <p>Further detailed legal basis can be found in each link.</p> <p>Any objections to this data collection should be made directly to NHS Digital. enquiries@nhsdigital.nhs.uk</p> <p>Processor – NHS England</p>
Medication/Prescribing	<p>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</p>



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	<p>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.</p> <p>Legal Basis –</p> <ul style="list-style-type: none">• Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and• Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ <p>Processor – Pharmacy of choice</p>
4. Professional Training	<p>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.</p> <p>Legal Basis –</p> <ul style="list-style-type: none">• Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and• Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ <p>Recordings remain the control of the GP practice and they will delete all recordings from the secure site once they are no longer required.</p> <p>Processor – Blue stream Academy, RCGP, eLH. Clarity Teamnet</p>
Telephony	<p>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.</p> <p>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.</p> <ul style="list-style-type: none">• Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and• Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ <p>Provider – X-on (Surgery Connect)</p>



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<p>Learning Disability Mortality Programme LeDer</p>	<p>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.</p> <p>Legal Basis: It has approval from the Secretary of State under section 251 of the NHS Act 2006 to process patient identifiable information who fit within a certain criteria.</p> <p>Processor : ICB, NHS England</p>
<p>Shared Care Record</p>  <p>TVSCareRecordKeyFacts.pdf</p>	<p>Purpose: In order for the practice to have access to a shared record, the Integrated Care Service has commissioned a number of systems including GP connect which is managed by NHS Digital, to enable a shared care record, which will assist in patient information to be used for a number of care related services. These may include Population Health Management, Direct Care, and analytics to assist with planning services for the use of the local health population.</p> <p>Where data is used for secondary uses no personal identifiable data will be used.</p> <p>Where personal confidential data is used for Research explicit consent will be required.</p> <p>Legal Basis –</p> <ul style="list-style-type: none"> Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ <p>Processor: NHS England</p>
<p>Anticoagulation Monitoring</p>	<p>Purpose: Personal Confidential data is shared with LumiraDX in order to provide an anticoagulation clinic to patients who are on anticoagulation medication. This will only affect patients who are within this criteria.</p> <p>Legal Basis –</p> <ul style="list-style-type: none"> Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ <p>Processor : LumiraDX - Royal Berkshire NHS Foundation Trust</p>
<p>NHS South, Central and West Commissioning Support Unit –</p>	<p>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</p>

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<p>Child Health Information Services (CHIS)</p> <p> PDF</p> <p>Information Governance and Chi</p>	<p>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.</p> <p>For more information: Fair Processing Notice Child Health Information Services - NHS SCW Support and Transformation for Health and Care (scwcsu.nhs.uk)</p> <p>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...’</p> <p>Processor – SCW, Apollo Medical Software Solutions, System C</p>
<p>OpenSAFELY COVID-19 and Data Analytics Services</p>	<p>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.</p> <p>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.</p> <p>Only approved users are allowed to run these queries, and they will not be able to access information that directly or indirectly identifies individuals.</p> <p>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).</p> <p>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:</p> <ul style="list-style-type: none">• Data Protection Act 2018 basis• Data Protection Act 2018 (DPA 2018) Schedule 1, Part 2, paragraph 6: Statutory etc and government purposes. <p>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.</p> <p>Here you can find additional information about OpenSAFELY."</p>

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	<p>IG frequently asked questions (FAQs) - Information governance - NHS Transformation Directorate</p> <p>NHS OpenSAFELY Data Analytics Service pilot - Privacy notice - NHS England Digital</p> <p>Processor:</p> <ul style="list-style-type: none">• NHS England• EMIS
Dictation, Transcription and AI-Assisted Documentation	<p>Purpose:</p> <p>We use AI-backed Digital Dictation to support our clinicians and administrative staff in creating and processing clinical documentation. These systems enable secure digital dictation, automatic transcription, and (where applicable) AI-assisted 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.</p> <p>Legal Basis:</p> <ul style="list-style-type: none">• Article 6(1)(e) '...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...'; and• Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine' <p>Processor:</p> <ul style="list-style-type: none">• Lexacom Scribe• Heidi
Confidential Waste Disposal	<p>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.</p> <p>Legal Basis –</p> <ul style="list-style-type: none">• Article 6(1)(c) – processing is necessary for compliance with a legal obligation (UK GDPR); and• Article 9(2)(h) – processing is necessary for the purposes of health or social care and the management of health systems and services. <p>Processor – Shred-it</p> <p>Secure Data Protection Services Shred-it UK</p> <p>Secure Paper & Digital Records for GDPR Compliance Shred-it UK</p>



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Appliance Management Service	<p>Purpose – personal information is shared to facilitate the prescribing and supply management of urology, stoma and trans anal irrigation products.</p> <p>Legal Basis –</p> <ul style="list-style-type: none"> Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ <p>Processor – Bullen Healthcare Group</p>
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We will keep our Privacy Notice under regular review. This notice was last reviewed on 14-01-2026.

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 V8 _ Dec 2023	8	Published	NHS SCW Information 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	Woosehill Medical Centre	Date: 12-01-2026			
Date issued by practice	14-01-2026				
GP Review date:	01-10-2026				

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)

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16-09-2025	Woosehill	8	14-15	OpenSAFEY 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 AI-Assisted Documentation
			15-16	Confidential Waste Disposal
23-10-2025	Woosehill	8	3-4	Add new section: "ACG / PNG Group Score (Johns Hopkins Adjusted Clinical Groups)"
12-01-2026	Woosehill	8	5	Added EMIS Writeback wording
14-01-2026	Woosehill	8	17	Appliance Management Service