



FAIR PROCESSING NOTICE (PRIVACY NOTICE)

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

Healthcare professionals who provide you with care are required by law to maintain records about your health and any treatment or care you have received. 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

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.

Data 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. 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

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.

Implementation of Secure Data Environments (SDEs) to ensure secure handling of pseudonymized data for research and planning.

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 as specified by national guidance from NHS Digital, [Records Management Code of Practice - NHS Transformation Directorate](#). 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.

Right To Opt-Out Of Data Sharing And Processing.

The updated opt-out mechanisms offer patients more clarity and control:

- **Type 1 Opt-Out:** Prevents sharing of confidential information outside the GP practice except for direct care or legal obligations.
- **National Data Opt-Out:** Updated for clarity, enabling patients to opt out of sharing data for research or planning.



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 find various information on what is meant by confidential patient information, how it is stored, who can and cannot use this information and how it is protected. you will be able to access the system to view, set or change your opt-out setting as well as find the contact number if you want to know any more or to set/change your opt-out by phone.

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.

Updates Related To Covid-19

Some opt-outs were temporarily suspended for public health purposes during the pandemic. Post-pandemic, normal opt-out policies apply.

Change of Details

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 may use this to send you text reminders about your appointments or other health screening information. Please let us know if you do not wish to receive text reminders on your mobile.

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: [Search the register | ICO](https://ico.org.uk/your-data-matters)



Data Protection Officer

- Should you have any data protection questions or concerns, please contact our Data Protection Officer Dan Lo Russo and the ICB IG Team will shortly take on responsibility for providing the Data Name: Daniel Lo Russo
- Email address: syheartlandsicb.informationgovernance@nhs.net
- Telephone: 07811 355 274
- Address: NHS Surrey Heartlands, Block C, 1st Floor, Dukes Court, Duke Street, Woking, Surrey, GU21 5BH

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 Complaint

If you have concerns or are unhappy about any of our services, please contact Business Manager, Mrs. Camilla Walker:

- Postal address: Guildowns Group Practice, The Oaks Surgery, Applegarth Avenue, Guildford, Surrey, GU2 8LZ
- Email: guildowns.practice@nhs.net
- Phone: 01483 409 309

For independent advice about data protection, privacy and data-sharing issues, you can contact the Information Commissioner:

- Address: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
- Phone: 0303 123 1113
- Website: [Information Commissioner's Office](https://www.informationcommissioner.gov.uk/)

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
NHS Surrey Heartlands ICB (Integrated Care Board)	Purpose – Anonymous data is used by the ICB for planning and performance as directed in the practices contract. Legal Basis – Contractual Processor – NHS Surrey Heartlands
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 Please be aware that if you choose to opt-out of SCR, NHS healthcare staff caring for you outside of this surgery may not be aware of your current medications, allergies you suffer from and any bad reactions to medicines you have had, in order to treat you safely in an emergency. Your records will stay as they are now with information being shared by letter, email or phone. If you wish to opt-out of having an SCR please return a completed opt-out form to the practice. Processor – NHS England and NHS Digital The Summary Care Record (SCR) is an electronic record which contains information about the medicines you take, allergies you suffer from, any reactions to medicines you have had, details of the management of long-term conditions, medications, immunisations, care plan information and significant medical history, past and present. It is held on a national database by NHS England. SCR may be shared with other healthcare professionals and organisations involved with your care. These professionals and organisations may also be able to update the record in order to ensure you are provided with the best possible care. You can opt out of having an SCR, or exclude certain information being shared via the SCR by filling in this form. Further information about the SCR can be found here.
Surrey Care Record	Our GP Practice is using the Surrey Care Record. Purpose - The Surrey Care Record is an Electronic Health Record (EHR) linking system that brings together patient/client's information across health and care systems in a secure manner, giving a



		summary of your information which is held within a number of local records. For more information visit Your information - Surrey Heartlands ICS You have the right to object to information being shared for your own care. Please speak to the practice if you wish to object. You also have the right to have any mistakes or errors corrected. You can also view the Surrey Care Record web page at www.surreyheartlands.uk/surreycarerecord. Legal Basis – Direct Care Processor – Surrey Care Record
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 – consent is required to share confidential patient information for research, unless there is have support under the Health Service (Control of Patient Information Regulations) 2002 ('section 251 support') applying via the Confidentiality Advisory Group in England and Wales Processor – Research Ready, RCGP, NHS implementation of Secure Data Environments (to ensure secure handling of pseudonymized data for research and planning)
Individual Requests	Funding	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 Data processor – Surrey Heartlands ICB
Safeguarding Adults		Purpose – We will share personal confidential information with the safeguarding team where there is a need to assess and evaluate any safeguarding concerns. Legal Basis - Because of public Interest issues, e.g. to protect the safety and welfare of vulnerable adults, we will rely on a statutory basis rather than consent to process information for this use. Data Processor – Surrey MASH
Safeguarding Children		Purpose – We will share children's personal information where there is a need to assess and evaluate any safeguarding concerns. Legal Basis - Because of public Interest issues, e.g. to protect the safety and welfare of Safeguarding we will rely on a statutory basis rather than consent to share information for this use. Data Processor – Surrey MASH



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 and aggregate data Legal Basis GDPR Art. 6(1) (e) and Art.9 (2) (h). The use of identifiable data by ICBs and GPs for risk stratification has been approved by the Secretary of State, through the Confidentiality Advisory Group of the Health Research Authority (approval reference (CAG 7-04)(a)/2013)) and this approval has been extended to the end of September 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 – RCGP Research and Surveillance Centre Ardens, CQRS
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: Population screening programmes - GOV.UK 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) as stated below Data Processors – Surrey and Sussex Health Promotion Team



NHS Trusts	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 the following Article 6 and 9 conditions as stated below: Processors – Surrey Heartlands ICB
GP Integrated Mental Health Service	Purpose - The Community Mental Health Transformation Programme (CMHTP) and the Surrey Heartlands GP Integrated Mental Health Service (GPimhs) are designed to deliver support closer to communities by providing services focussed on Primary Care Network (PCN) populations, building on community assets and involving voluntary sector, housing & social care partners. The model will improve access to NICE-recommended interventions where required with increased and easy access in and out of highly specialised psychological therapies for people with Serious Mental Illness. The patient groups within the scope of the joint processing and sharing arrangements are: 1. Service users in primary care with unmet needs: a. Not meeting secondary care Community and Mental Health Recovery Services (CMHRS) and Improving Access to Psychological Therapies (IAPT) criteria, or where patients are not appropriate for IAPT b. Difficulty accessing the right services c. Utilise services in potentially chaotic patterns; physical health concerns, medication dependence, substance misuse, co-morbid physical long-term conditions contributing to poor mental health d. 'Held' by GPs as frequent attenders, absorbing excessive non-medical short-term prop-up interventions; 2. People in secondary care mental health services that can alternatively receive recovery focused services in primary care: a. Seamless step-up and step-down as required b. With potential shared care arrangements for medication. These typically comprise stable psychotic and mood disorders, and emotionally unstable personality disorder; and 3. Physical health of SMI patients in primary care: a. Supporting primary care to improve their delivery of physical health checks and facilitating bridging to evidence based interventions for people on the SMI registers. The approach will remove unhelpful thresholds and barriers through the deployment of a trusted assessor model. Care can be stepped up and stepped down flexibly without the need for time-consuming referrals and multiple assessments processes. Practices working together as Primary Care Networks (PCNs) have employed administrative staff (the "GPimhs Administrators") through their respective GP federations to work within the practices as part of the CMHTP GPimhs. GPimhs operates under Surrey and Borders Partnership NHS Foundation Trust's (SABP) CQC registration. Legal Basis - Unless a patient has objected to processing or joint processing and sharing and the sharing organisation has accepted



	the patient's objection(s) the legal basis for sharing and viewing the shared records includes provisions of Section 251B of the Health and Social Care Act 2012 (as amended by the Health and Social Care (Safety and Quality) Act 2015): 2. The sharing organisation must ensure that the information is disclosed to: (a) persons working for the sharing organisation (b) any other relevant health or adult social care commissioner or provider with whom the sharing organisation communicates about the individual; and 3. So far as the sharing organisation considers that the disclosure is: (a) likely to facilitate the provision to the individual of health services or adult social care in England (b) in the individual's best interests. Unless a patient has objected to processing or joint processing and sharing and the sharing organisation has accepted the patient's objection the legal basis for viewing the shared records is also provided by General Data Protection Regulation: 1. Article 6(1)e "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"; and 2. Article 9(2)h "processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services, on the basis of Union or Member state laws." 3. The 'official authority' and the 'member state laws' establish the legal bases that organisations rely upon for the need to share and jointly process data to deliver care. Where access to confidential data is legitimate, the common law duties of confidentiality are satisfied because consent to view a patient's record is implied where the patient concerned agrees to be referred to a service or where the patient concerned refers themselves or presents to a service. In general patients are made aware of data sharing either via 'fair processing notices', specific discussion with care staff or in most cases by both methods. For GPimhs, the individual patients and clients concerned are provided with a GPimhs-specific information leaflet which includes key processing and privacy notice content Processors - GP Federation (Procure), GP clinical system supplier (EMIS), NHS Digital (for NHSmail), Voluntary Sector and Social Enterprise providers
Care Commission	Quality Purpose – The CQC is the regulator for 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 their website: https://www.cqc.org.uk/about-us/our-policies/privacy-statement



	Legal Basis - Article 6(1) (c) “processing is necessary for compliance with a legal obligation to which the controller is subject.” And Article 9(2) (h) as stated below Processor – Care Quality Commission
Patient Record data base	Purpose – Your medical record will be shared, in order that a data base can be maintained and managed in a secure way Legal Basis - Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) as stated below Processor – EMIS
Third party processors	In order to deliver the best possible service, the practice will use carefully selected third party service providers. When we use a third party service provider to process data on our behalf, we will always have an appropriate agreement in place to ensure that they keep the data secure, that they do not use or share the information other than in accordance with our instructions and that they operate securely. Examples of functions that may be carried out by third parties include companies that provide; • IT services and support, including our clinical systems • Systems which manage patient facing services (e.g. our website) • Data hosting service providers • Systems which facilitate appointment bookings, electronic prescription services • Document management service
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 Processor - iGPR
AccurRX	Purpose: for the purposes of Direct Care as specified within this Arrangement, including for the purpose of medical diagnosis, treatment and social care and there is a legitimate relationship between the Patient and the Care Provider i.e., the patient must be receiving Direct Care from a registered health or social care professional, or other health or social care worker who is working under the authority of a registered health or social care professional; • in the context of the particular Product(s) selected by the Parties; and • for the purposes of the Direct Care use case as agreed with NHS England during the onboarding process; Legal Basis: The legal basis for this activity under UK GDPR is Article 6(1) (e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2) (h) Health data as stated below. Processor: AccuRx Ltd.
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... in the exercise of official authority vested in the controller’ And Article 9(2)(h) as stated below Processor –PRIMIS
GP Federation GP Extended Access RSCH Community services Phyllis Tuckwell RSCH EMIS Portal		Purpose – Your medical record will be shared with the Procure 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. Procure Health GP Federation are providing the local vaccination service to our patients. As a result of this there may be a requirement for your information to be shared with them if you are eligible for the vaccine. This information will be shared to support your direct care. Those working at the local vaccination service will only normally have access to the information which they need to fulfil their roles. 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 – Procure
PCN – Guilford and Waverley Primary Care Networks.		Purpose – Your medical record will be shared with the Guilford and Waverley PCNs 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 – Guildford and Waverley Practices
Smoking cessation and Weight loss Service		Purpose – personal information is shared in order for the smoking cessation service and the Weight loss Service to be provided. Legal Basis – consented Processor – oneyousurrey
Payment, validation	Invoice	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 (QOF), for instance the proportion of diabetic patients who have had an annual review. Practices can also receive payments for participating in agreed national or local enhanced services, for instance opening early in the morning or late at night or at the weekends. Practices can also receive payments for certain national initiatives such as immunisation programs and practices may also receive incomes relating to a variety of non-patient related elements such as premises. Finally there are short term initiatives and projects that practices can take part in. Practices or GPs may also receive income for participating in the education of medical students, junior doctors and GPs themselves as well as research. In order to make patient based payments basic and relevant necessary data about you needs to be sent to the various



	payment services. The release of this data is required by English laws. Legal Basis - Article 6(1) (c) “processing is necessary for compliance with a legal obligation to which the controller is subject.” Data Processors – NHS England, UKHSA, Surrey Heartlands ICB
General Practice Transparency Notice for GPES CVDPREVENT Audit data collection	CVDPREVENT is a national primary care audit to support professionally led quality improvement in the diagnosis and management of six high-risk conditions that cause stroke, heart attack and dementia: atrial fibrillation (AF), high blood pressure, high cholesterol, diabetes, non-diabetic hyperglycaemia and chronic kidney disease. The audit data will support practices and Primary Care Networks (PCNs) to identify gaps, inequalities and opportunities for improvement in clinical care. It will provide the core data to assist General Practices and PCNs to meet the requirements of the PCN Directed Enhanced Service for CVD prevention, (scheduled for April 2021), as well as local improvement schemes. Fair processing information for patients for this data sharing is provided in this Transparency Notice: Cardiovascular Disease Prevention Audit (CVDPREVENT Audit) - NHS England Digital
NovaHS	Purpose: To provide an integrated administrative and clinical support system encompassing the clinical correspondence between health organisations and Guildowns Group Practice, on behalf of our patients. Documents are processed, coded, and saved to a patients’ records and flagged where appropriate to a clinician for action. Legal Basis - Article 9(2)(h) as described below Processor: Novahs : Nova HS Services
Physical Health Checks for people with severe mental illness: GDPR information	Please see below link to NHS Digital transparency notice: Physical Health Checks for People with Severe Mental Illness (PHSMI): GDPR information - NHS England Digital
LineIn & GPInTheCloud	Purpose: For the purposes of Direct Care as specified within this Arrangement, including for the purpose of medical diagnosis, treatment and social care and there is a legitimate relationship between the Patient and the Care Provider i.e., the patient must be receiving Direct Care from a registered health or social care professional, or other health or social care worker who is working under the authority of a registered health or social care professional; • in the context of the particular Product(s) selected by the Parties; and



	for the purposes of the Direct Care use case as agreed with NHS England during the onboarding process; Legal Basis: The legal basis for this activity under UK GDPR is Article 6(1) (e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2) (h) Health data as stated below. Processor: Lineln, Delt Shared Services & Integy Ltd
Livi	Purpose: For the purposes of Direct Care as specified within this Arrangement, including for the purpose of medical diagnosis, treatment and social care and there is a legitimate relationship between the Patient and the Care Provider i.e., the patient must be receiving Direct Care from a registered health or social care professional, or other health or social care worker who is working under the authority of a registered health or social care professional; - in the context of the particular Product(s) selected by the Parties; and - for the purposes of the Direct Care use case as agreed with NHS England during the onboarding process; Legal Basis: The legal basis for this activity under UK GDPR is Article 6(1) (e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2) (h) Health data as stated below. Processor: Livi
Surgery Connect & Surgery Assist	Purpose: for the purposes of Direct Care as specified within this Arrangement, including for the purpose of medical diagnosis, treatment and social care and there is a legitimate relationship between the Patient and the Care Provider i.e., the patient must be receiving Direct Care from a registered health or social care professional, or other health or social care worker who is working under the authority of a registered health or social care professional; - in the context of the particular Product(s) selected by the Parties; and - for the purposes of the Direct Care use case as agreed with NHS England during the onboarding process; Legal Basis: The legal basis for this activity under UK GDPR is Article 6(1) (e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2) (h) Health data as stated below. Processor: X-On Health
RSS Referral Support Service	Purpose - Personal identifiable data and special categories of personal data are processed to support direct healthcare - to allow the RSS to process patient referrals and manage the referral pathway to support GP Practices.



	Legal Basis: Article 6(1)e - “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller” Article 9(2)h - “processing is necessary for the purposes of preventive or occupational medicine, 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”. Processors: NHS Surrey Heartlands Integrated Care Board (SH ICB)
CHIS (Child Health Information Services) Apollo (SCW) – Changing name to Magentus Data Management Services Ltd	Purpose: The processing of personal data for the delivery of individual care and for the administration of Child Health Information Services Legal: to support that care is lawful under the following provisions of the UK GDPR: - Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services...’ They provide the CHIS under contract to NHS England, which is responsible for the provision of the overall CHIS as part of the Public Health Section 7a Agreement – service specification 28. We are required to report on immunisation status and 6-8 week baby checks. It is important to maintain immunisation reporting for the protection of all children. They require this information for the effective management of a complete child health record in CHIS and for reporting to NHS England on local immunisation uptake. Processor: Apollo Medical Software solutions (Magentus Data Management Services Ltd)
InTouchnow	Purpose: An AI platform deploying custom AI voice agents to answer calls and triage patients, in order to deliver zero waiting times, improve access assisting GP practices provide a quicker and more focused solution. Legal Basis: The legal basis for this activity under UK GDPR is Article 6(1) (e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2) (h) Health data as stated below. Processor: Intouchnow Services Ltd.
Heidi Health AI Scribe	Purpose: Heidi AI Scribe helps clinicians document patient consultations by transcribing verbal interactions and categorizing information into the Electronic Health Record (HER) Legal Basis: Heidi Health AI Scribe's legal basis for processing patient data is primarily consent under Article 6(1)(a) of the GDPR, and also necessary for the provision of health or social care under Article 9(2)(h) of the GDPR. This means you will be asked for your consent before any transcribing is done, and the data is used to support clinicians in maintaining accurate and timely medical



	records. Heidi also adheres to UK GDPR compliance and NHS data security standards. Processors: Heidi Health AI Scribe - a data processor under a contractual agreement with the practice.
Diabetes Eye screening	Purpose: A diagnostic healthcare solution to screening the community diabetes patients to ensure eye health. Legal bases: 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: Inhealth group
OpenSAFELY	Purpose: The purpose of these Directions (the Purpose) is to enable NHS England to establish a secure data analytics service using the OpenSAFELY technology, for users approved by or on behalf of NHS England (Department of Health and Social Care) to run queries on pseudonymised GP and NHS England patient data held by GP IT system suppliers within the GP system suppliers’ secure environments for the purposes set out in the requirements specification Legal Bases: These Directions are given in exercise of the powers conferred by sections 254(1), 260 (1)(2)(d), and 304(9), (10) and (12) of the Health and Social Care Act 2012 (the 2012 Act), sections 13ZC and 272(7) and (8) of the National Health Service Act 2006 (the 2006 Act) and regulation 32 of the National Institute for Health and Care Excellence (Constitution and Functions) and NHS England (Information Functions) Regulations 2013 (the Regulations). The service enabled by these Directions is operated by NHS England in the exercise of its powers under sections 1, 2 and Chapter A1 of the 2006 Act and section 270 of the 2012 Act. These Directions are to be known as the NHS OpenSAFELY Data Analytics Service Pilot Directions 2025 and come into force on the date after the day on which they are signed. These Directions cease to have effect on 31 March 2027 or such other date, if any, as the Secretary of State notifies to NHS England by a further direction. Processor: The Phoenix Partnership (Leeds) Ltd (TPP) and EMIS Group PLC The Bennett Institute, University of Oxford, and the EHR research group, London School of Hygiene and Tropical Medicine (LSHTM), under contract with NHS England, provide platform development functions and conduct analyses of the data held on the service NHS OpenSAFELY Data Analytics Service pilot - Privacy notice - NHS England Digital



HCRG	Purpose: To provide direct healthcare and related services; to support administration and to meet legal / statutory duties in health and social care. Legal Bases: Under UK GDPR & DPA 2018: Article 6(1)(e) – “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller” Article 9(2)(h) – “processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services, on the basis of Union or Member state laws” The GDPR legal bases are further supported by the purposes set out in the Data Protection Act 2018, Schedule 1, Part 2, paragraph 6 “Statutory etc and government purposes” and sub-paragraph 2(a) “the exercise of a function conferred on a person by an enactment or rule of law”. The “official authority” and the “member state laws” establish the legal bases that organisations rely upon for the need to share and jointly process data to deliver care. Processor: EMIS with HCRG
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Reviews of and Changes to our Privacy Notice

We will keep our Privacy Notice under regular review, at least annually.

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...’

Right to Object

Under Article 21 of the UK GDPR, you have the right to object to the processing of some or all of your personal data. To raise an objection, please contact the Practice or our Data Protection Officer. Please note that this is a right to request that processing be restricted or stopped — it does not guarantee that your objection will be upheld in all cases, particularly where there are overriding legal or clinical reasons for continuing to process the data.