



Appendix A - Privacy Notice
Greensand Surgery

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 Integrated Care Board (ICB) 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>Patients may opt out of having their personal confidential data used for Planning or research. Please contact your surgery to apply a Type 1 Opt out or logon to https://www.nhs.uk/your-nhs-datamatters/manage-your-choice/ to apply a National Data Opt Out</p> <p>Processor – BLMK ICB</p>

<p>Summary Care Record</p> <p>Including additional information</p>	<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>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>

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 required.</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 – Where sharing of personal identifiable data is required the legal basis of Article 6 1 (a) and 9 2 (h) Consent will be required.</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>Sharing of aggregated non identifiable data is permitted.</p> <p>Processor – Available on Request</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 6 1 (e) Public Task Article 9 2 (h) health data</p> <p>Data processor –BLMK 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 and to protect the safety of individuals.</p> <p>Consent may not be required to share information for this purpose.</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 – BLMK Safeguarding Adults Team</p>
Safeguarding Children	<p>Purpose – We will share children’s personal information where there is a need to assess and evaluate any safeguarding concerns and to protect the safety of children.</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>Consent may not be required to share this information.</p> <p>Data Processor – BLMK Children’s Services</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) Public task and Art.9 (2) (h) Health data. The use of identifiable data by ICBs and GPs for risk stratification has been approved by the Secretary of State, through the Confidentiality Advisory Group of the Health Research Authority (approval reference (CAG 7-04)(a)/2013)) and this approval has been extended to the end of September 2022 NHS England Risk Stratification which gives us a</p>
	<p>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 – Available upon request</p>

<p>Public Health Screening programmes (identifiable) Notifiable disease information (identifiable) Smoking cessation (anonymous) Sexual health (anonymous) Vaccination Programmes</p>	<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 to name a few. The law allows us to share your contact information, and certain aspects of information relating to the screening with Public Health England so that you can be appropriately invited to the relevant screening programme.</p> <p>More information can be found at: https://www.gov.uk/topic/population-screeningprogrammes [Or insert relevant link] or speak to the practice</p> <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: Sharing personal data for this purpose is governed by the COPI Reg 2. Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller” 6 1 (f) Legitimate interests And Article 9(2)(h) Health data as stated below 9 2 (i) Public health</p> <p>Data Processors – Public Health BLMK Council</p>
<p>Direct Care NHS Trusts Community Providers Pharmacies Enhanced care providers Nursing Homes Other Care Providers</p>	<p>Purpose – Personal information is shared with other secondary care trusts and providers in order to provide you with individual direct care services. This could be hospitals or community providers for a range of services, including treatment, operations, physio, and community nursing, ambulance service.</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:</p> <p>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 – BLMK Hospitals Trusts</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> <p>More detail on how they ensure compliance with data protection law (including UK GDPR) and their privacy statement is <u>available on our website</u>: https://www.cqc.org.uk/about-us/our-policies/privacystatement</p> <p>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</p> <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 - Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) as stated below</p> <p>Data Processors - 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 such as premises. Finally there are short term initiatives and projects that practices can take part in. Practices or GPs may also</p>

	<p>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 - 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</p> <p>Data Processors – NHS England, ICB, Public Health</p>
Patient Record data base	<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>A warning marker may be applied to your record if necessary for staff protection in accordance with practice policy. This will be reviewed on a regular basis and removed if no longer required.</p> <p>Closed records will be archived by NHS England</p> <p>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</p> <p>Processor – TPP System One, and PCSE</p>
Medical reports Subject Access Requests	<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 reports where you have applied for services offered by then can have a copy to your medical history for a specific purpose.</p> <p>Legal Basis – under GDPR Article 6 1 (a) and 9 2 (a) explicit consent will be required before a GP can share your record for either for these purposes.</p> <p>Processor – Solicitors, Insurance organisations</p>

Medicines Management Team Medicines Optimisation	<p>Purpose – your medical record is shared with the medicines management team pharmacists, in order that your medication can be kept up to date and any necessary changes to medication can be implemented.</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> <p>Processor – BLMK ICB Medicines Optimisation</p>
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GP Federation	<p>Purpose – Your medical record will be shared with BLMK ICS/ICB/Federation in order that they can provide direct care services to the patient population. This could be in the form of video consultations, Minor injuries clinics, GP extended access clinics. The Federation will be acting on behalf of the GP practice.</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> <p>Processor – BLMK ICS/ICB/Federation</p>
Primary Care Network (PCN)	<p>Purpose – Your medical record will be shared within Hillton PCN in order that they can provide direct care services to the patient population.</p> <p>The objective of primary care networks (PCNs) is for group practices together to create more collaborative workforces which ease the pressure of GP’s, leaving them better able to focus on patient care.</p> <p>This practice is a member of Hillton PCN. Other members of the network are: Greensands Surgery, Ampthill Dr A Sulakshana and Partners</p> <p>Primary Care Networks form a key building block of the NHS long-term plan. Bringing general practices together to work at scale has been a policy priority for some years for a range of reasons, including improving the ability of practices to recruit and retain staff; to manage financial and estates pressures: to provide a wider range of services to patients and to more easily integrate with the wider health and care system.</p> <p>This means the practice may share your information with other practices within the PCN to provide you with your care and treatment.</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> <p>Processor – Hillton PCN</p>
Smoking cessation	<p>Purpose – personal information is shared 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 – Article 6 1 (a) and 9 2 (h) consent</p> <p>Processor – Choose You</p>
Social Prescribers	<p>Purpose – Access to medical records is provided to social prescribers to undertake a full service to patients dependent on their health 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 – 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> <p>Processor – Hillton PCN</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>Legal Basis – UK GDPR –6 1 (c) Legal Obligation. Article 6 1 (f) legitimate interest Article 9 2 (f) requests for legal reasons</p> <p>Processor – Police Constabulary</p>

Coroner Medical Examiner	<p>Purpose – Personal health records or information relating to a deceased patient may be shared with the coroner or medical examiner upon request.</p> <p>Legal Basis – UK GDPR Article 6 1 (c) Legal Obligation 9 2 (h) Health data</p> <p>Processor – The Coroner, Medical Examiner</p>
Private healthcare providers	<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 – Article 6 1 (a) and 9 2 (h) Consented and under contract between the patient and the provider</p> <p>Provider - LIVI</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 safe way.</p> <p>Legal Basis – UK GDPR Article 6 1 (b) Contract, Article 6 1 (e) Public task, Article 9 2 (h) Health data</p> <p>Provider - Accurx, TPP SystmOne</p>
Utilising self-booking links for patients to book appointments	<p>Purpose - Processing of data to send appointment booking links to patients – via the direct booking links or the Practice website.</p> <p>Legal Basis of Processing - Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’ Article 9(2)(h) ‘... the provision of health or social care or treatment of management of health or social care systems...’</p> <p>Provider – Accurx – Accubook</p> <p>For further information of Hero Health Privacy Policy please see this link: 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 – 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> <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,</p>
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 – 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> <p>Processor – Microsoft Teams</p>
COVID-19 Research and Planning	<p>Purpose – To understand the risks to public health, trends and prevent the spread of infections such as Covid-19 the government has enabled a number of initiatives which include research and planning during the Covid-19 pandemic which may include the collection of personal confidential data has been necessary. This is to assist with the diagnosis, testing, self-isolating, fitness to work, treatment medical, social interventions and recovery from Covid-19. COPI Reg 3 has been extended and you can find further information here: Coronavirus (COVID-19): notice under Regulation 3(4) of the Health Service (Control of Patient Information) Regulations 2002 - GOV.UK (www.gov.uk)</p> <p>NHS England » OpenSAFELY – the Coronavirus (COVID-19) Research Platform</p> <p>Legal Basis – In order to share personal confidential data with other agencies for research or planning. Either the Article 6 1 (a) and 9 2 (a) Explicit consent will be required. or The Processor would need to meet Section 251 CAG approval. Or It would need to be approved under direct care to patients Article 6 1 (e) Public Task and 9 2 (h) Health data</p> <p>Provider – COVID vaccination Hubs, BIOBANK, Oxford University,</p>

General Practice Extraction Service (GPES)	<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</p>
<ol style="list-style-type: none"> 1. At risk patients data collection Version 3 2. Covid-19 Planning and Research data 3. CVDPREVENT Audit 4. Physical Health Checks for people with Severe Mental Illness 	<p>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. Covid-19 Planning and Research data, to control and prevent the risk of Covid-19 3. NHS England has directed NHS Digital to collect and analyse data in connection with Cardiovascular Disease Prevention Audit 4. GPES Physical Health Checks for people with Severe Mental Illness (PHSMI) data collection. <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 2012 Act</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 Digital or NHS X</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 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 : 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> <p>Processor – Pharmacy of choice</p>
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</p>
	<p>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 – 6 1 (a) consent, patients will be asked if they wish to take part in training sessions. 9 2 (a) - explicit consent will be required when making recordings of consultations</p> <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 – RCGP, HEE, iConnect, Fourteen Fish</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>Recordings are retained for up to three years, and are used periodically for the purposes of seeking clarification where there is a dispute as to what was said and for staff training Access to these recordings is restricted to named senior staff.</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. 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> <p>Provider – X-on Surgery Connect, Xon Surgery Assist</p>
Learning Disability Mortality Programme LeDer	<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>
Technical Solution Pseudonymisation	<p>Purpose: Personal confidential and special category data in the form of medical record, is extracted under contract for the purpose of pseudonymisation. This will allow no patient to be identified within the data set that is created. SCWCSU has been commissioned to provide a data processing service for the GPs, no other processing will be undertaken under this contract.</p>
	<p>Legal Basis: Under UK GDPR the legitimate purpose for this activity is under contract to provide assistance. Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below</p> <p>Processor: SCW CSU or NHS M & L CSU, NHS Arden and GEM CSU</p>

Shared Care Record	<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>To support your care and improve the sharing of relevant information to our partner organisations (as above) when they are involved in looking after you, we will share information to other systems. You can opt out of this sharing of your records with our partners at any time if this sharing is based on your consent.</p> <p>We may also use external companies to process personal information, such as for archiving purposes.</p> <p>These companies are bound by contractual agreements to ensure information is kept confidential and secure. All employees and sub-contractors engaged by our practice are asked to sign a confidentiality agreement. If a sub-contractor acts as a data processor for Greensand Surgery an appropriate contract (art 24-28) will be established for the processing of your information.</p> <p>Sharing your information without consent We will normally ask you for your consent, but there are times when we may be required by law to share your information without your consent, for example:</p> <ul style="list-style-type: none"> • where there is a serious risk of harm or abuse to you or other people; • Safeguarding matters and investigations • where a serious crime, such as assault, is being investigated or where it could be prevented; • notification of new births; • where we encounter infectious diseases that may endanger the safety of others, such as meningitis or measles (but not HIV/AIDS); • where a formal court order has been issued; • where there is a legal requirement, for example if you had committed a Road Traffic Offence. <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: 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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	Processor: NHS Digital
Local shared care record BLMK ICB	<p>Purpose: Health and Social care services are developing shared systems to share data efficiently and quickly. It is important for anyone treating you to be able to access your shared record so that they have all the information they need to care for you. This will be during your routine appointments and in urgent situations such as going to A&E, calling 111 or going to an Out of hours appointment. It is also quicker for staff to access a shared record than to try to contact other staff by phone or email.</p> <p>Only authorised staff can access the systems and the information they see is carefully checked so that it relates to their job. Systems do not share all your data, just data which services have agreed is necessary to include.</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> <p>Processor: BLMK ICB</p>
Anticoagulation Monitoring	<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: The legal basis for this activity under UK GDPR is</p>
	<p>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> <p>Processor : INRStar</p>
Weight and Wellbeing programme	<p>Purpose – personal information is shared in order for the Weight and Wellbeing lifestyle intervention programme to be provided. Only those patients who wish to be party to this service will have their data shared.</p> <p>Legal Basis – Article 6 1 (a) and 9 2 (h) consent</p> <p>Processor – Xpert Health Training & Education Ltd, CX Services Ltd</p>

<p>Accurx Patient Triage – Online Consultation Platform</p>	<p>Purpose: Online consultation allows the patients to contact the Practice without having to wait on the phone or take time to come into the practice in person especially if a patient is not sure whether they need a face-to-face consultation. Online consultations enable patients to use a secure online system to ask questions, report symptoms and the practice can then respond by signposting patients to the right person e.g. a doctor or to appropriate service or support.</p> <p>Legal Basis:</p> <p>Article 6 1 (b) Contract where the data subject is party</p> <p>Article 6 (1) (e) of the GDPR, which permits us to process your personal information that is necessary to provide a service which is in the public interest</p> <p>Article 9(2) (h) of the GDPR which permits us to process your health information which is necessary for the provision of health treatment.</p> <p>Processor: Accurx Limited Accurx Privacy Policy</p>
<p>Heidi A.I. – Transcribing conversations to the electronic health record EHR.</p>	<p>Heidi A.I.</p> <p>As part of the Digital First National programme of work, GP Practices are required to record accurate data about patient interaction, especially within consultations. To assist with this administrative task, the practice is using a new technology known as Heidi AI.</p> <p>The primary purposes include improving clinical documentation, aiding healthcare professionals in notetaking, and generating consult summaries. Heidi technology enables clinicians to focus on patients during the consultation, contributing to improved patient care. It also acts as a valuable tool for medical practitioners, saving them hours of administrative time per week.</p> <p>Heidi works by transcribing speech into text from a healthcare encounter such as conversations between clinicians and patients or by clinicians dictating their clinical findings, impression and/or management plans before, during and after the healthcare encounter. The clinician can also add additional contextual notes about the healthcare encounter.</p> <p>This system is designed to alleviate the administrative burden on healthcare professionals, allowing them to focus more on patient care rather than paperwork. The Heidi Scribe will leverage natural language processing (NLP), speech recognition technology, and</p>

	<p>machine learning algorithms to understand and interpret complex medical dialogue, identify key health information, and categorise data into the appropriate sections of an Electronic Health Record (EHR).</p> <p>Your consent will be sought for consultations that are transcribed using the Heidi AI tool. Heidi also uses aggregated de-identified information from these consults to improve its models and outputs, ultimately improving both patient care and clinician experience.</p> <p>All Data that identifies you stays within the practice and its servers which are UK based, no identifiable data is used by the Heidi tool for machine learning.</p> <p>Heidi AI will not make decisions about your care, it only transcribes verbal interactions with the practice, with your consent.</p> <p>More information about the model can be found on the Heidi website here: -</p> <p>https://www.heidihealth.com/uk</p> <p>Privacy Policy UK Heidi Health</p>
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Lawful basis for processing:

The processing of personal data in the delivery of direct care and for providers' administrative purposes in this surgery and in support of direct care elsewhere is supported under the following Article 6 and 9 conditions of the UK GDPR:

- Article 6(1)(e) '...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...'; and
- Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services...'

How long will we store your information?	<p>We are required under UK law to keep your information and data for the full retention periods as specified by the NHS Records management code of practice for health and social care and national archives requirements. More information on records retention can be found online at (https://digital.nhs.uk/article/1202/Records-Management-Code-of-Practice-for-Health-and-SocialCare-2016).</p>
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<p>How can you access, amend move the personal data that you have given to us?</p>	<p>Even if we already hold your personal data, you still have various rights in relation to it. To get in touch about these, please contact us. We will seek to deal with your request without undue delay, and in any event in accordance with the requirements of any applicable laws. Please note that we may keep a record of your communications to help us resolve any issues which you raise.</p> <p>Right to object: If we are using your data and you do not agree, you have the right to object. We will respond to your request within one month (although we may be allowed to extend this period in certain cases). This is NOT an absolute right sometimes we will need to process your data even if you object.</p>
<p>Right to withdraw consent</p>	<p>Where we have obtained your consent to process your personal data for certain activities (for example for a research project, or consent to send you information about us or matters you may be interested in), you may withdraw your consent at any time.</p> <p>Right to erasure: In certain situations (for example, where we have processed your data unlawfully), you have the right to request us to "erase" your personal data. We will respond to your request within one month (although we may be allowed to extend this period in certain cases) and will only disagree with you if certain limited conditions apply. If we do agree to your request, we will delete your data but will need to keep a note of your name/ other basic details on our register of individuals who would prefer not to be contacted. This enables us to avoid contacting you in the future where your data are collected in unconnected circumstances. If you would prefer us not to do this, you are free to say so.</p>
<p>Right of data portability</p>	<p>If you wish, you have the right to transfer your data from us to another data controller. We will help with this with a GP to GP data transfer and transfer of your hard copy notes.</p>
<p>Service Evaluation</p>	<p>The PCN carries out service evaluations in order to improve the quality and accessibility of primary care services. This may be carried out in a number of ways including telephone surveys, online surveys and interviews.</p> <p>The legal basis for contacting you to take part –</p> <p>Article 6, 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;"</p> <p>Article 9, (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</p>

	<p>To process the survey information, we collect from you we will only do so with your consent.</p> <p>Article 6(1)(a) - Consent of the data subject (you)</p> <p>Article 9(2)(a) – Explicit consent of the data subject. (you)'</p>
Access to your personal information	<p>Data Subject Access Requests (DSAR): You have a right under the Data Protection legislation to request access to view or to obtain copies of what information the surgery holds about you and to have it amended should it be inaccurate. To request this, you need to do the following:</p> <ul style="list-style-type: none"> • Your request should be made to the Practice. (For information from a hospital or other Trust/ NHS organisation you should write direct to them. • There is no charge to have a copy of the information held about you • We are required to provide you with information within one month • You will need to give adequate information (for example full name, address, date of birth, NHS number and details of your request) so that your identity can be verified, and your records located information we hold about you at any time. <p>What should you do if your personal information changes?</p> <p>You should tell us so that we can update our records please contact the Practice Manager as soon as any of your details change, this is especially important for changes of address or contact details (such as your mobile phone number), the practice will from time to time ask you to confirm that the information we currently hold is accurate and up-to-date.</p>
Online Access	<p>You may ask us if you wish to have online access to your medical record. However, there will be certain protocols that we have to follow to give you online access, including written consent and the production of documents that prove your identity.</p> <p>Please note that when we give you online access, the responsibility is yours to make sure that you keep your information safe and secure if you do not wish any third party to gain access.</p>
Third parties mentioned on your medical record	<p>Sometimes we record information about third parties mentioned by you to us during any consultation or contained in letters we receive from other organisations. We are under an obligation to make sure we also protect that third party's rights as an individual and to ensure that references to them which may breach their rights to confidentiality, are removed before we send any information to any other party including yourself.</p> <p>The NHS wants to give people better ways to see their personal health information online. We know that people want to be able to access their health records. It can help you see test results faster. It also lets you read and review notes from your appointments in your own time.</p>

	<p>From 01/11/2022 we're now letting you see all the information within your health record automatically.</p> <p>If you are over 16 and have an online account, such as through the NHS App, NHS website, or another online primary care service, you will now be able to see all future notes and health records from your doctor (GP). Some people can already access this feature, this won't change for you. This means that you will be able to see notes from your appointments, as well as test results and any letters that are saved on your records. This only applies to records from your doctor (GP), not from hospitals or other specialists. You will only be able to see information from 31/10/23]. For most people, access will be automatic, and you won't need to do anything.</p> <p>Your doctor (GP) may talk to you to discuss test results before you are able to see some of your information on the app. Your doctor (GP) may also talk to you before your full records access is given to make sure that having access is of benefit to you. There might be some sensitive information on your record, so you should talk to your doctor if you have any concerns.</p> <p>These changes only apply to people with online accounts. If you do not want an online account, you can still access your health records by requesting this information through reception. The changes also only apply to personal information about you. If you are a carer and would like to see information about someone you care for, speak to reception staff.</p> <p>The NHS App, website and other online services are all very secure, so no one is able to access your information except you. You'll need to make sure you protect your login details. Don't share your password with anyone as they will then have access to your personal information. If you do not want to see your health record, or if you would like more information about these changes, please speak to your GP or reception staff.</p>
Our website	<p>The only website this Privacy Notice applies to is the Surgery's website. If you use a link to any other website from the Surgery's website then you will need to read their respective Privacy Notice. We take no responsibility (legal or otherwise) for the content of other websites. The Surgery's website uses cookies. For more information on which cookies we use and how we use them, please see our Cookies Policy.</p>
CCTV recording	<p>CCTV is installed on our practice premises covering the external area of the building. Images are held to improve the personal security of patients and staff whilst on the premises, and for the prevention and detection of crime. The images are recorded onto an integral hard drive of the equipment and are overwritten on a rolling basis. Viewing of these digital images is password protected and controlled by the Practice Manager.</p>

Objections / Complaints	<p>Should you have any concerns about how your information is managed at the GP, please contact the GP Practice Manager. If you are still unhappy following a review by the GP practice, you have a right to lodge a complaint with a supervisory authority: You have a right to complain to the UK supervisory Authority as below.</p> <p>Information Commissioner: Wycliffe house Water Lane Wilmslow Cheshire SK9 5AF Tel: 01625 545745 https://ico.org.uk/</p> <p>If you are happy for your data to be used for the purposes described in this privacy notice, then you do not need to do anything. If you have any concerns about how your data is shared, then please contact the Practice Data Protection Officer. If you would like to know more about your rights in respect of the personal data we hold about you, please contact the Data Protection Officer as below.</p>
Data Protection Officer	<p>The Practice Data Protection Officer is Paul Couldrey of PCIG Consulting Limited. Any queries regarding Data Protection issues should be addressed to him at: -</p> <p>Email: Couldrey@me.com</p> <p>Postal: PCIG Consulting Limited 7 Westacre Drive Quarry Bank Dudley West Midlands DY5 2EE</p>

Data Protection Officer:

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Email: Couldrey@me.com

Postal: PCIG Consulting Limited
7 Westacre Drive

Quarry Bank
Dudley
West Midlands
DY5 2EE

Changes:

It is important to point out that we may amend this Privacy Notice from time to time. If you are dissatisfied with any aspect of our Privacy Notice, please contact the Practice Data Protection Officer. We keep our Privacy Notice under regular review. This notice was last reviewed on 24th March 2025.