Wexham Surgery
Slough
Berkshire
SL2 5JP

Document Name Privacy Notice		Document Objective		This document supports Practice staff in compliance with Data Protection legislation, achieving best practice in the area of Information Governance and in meeting the requirements of the Data Security and Protection Toolkit	
Version:	**Review date:**	**Date of Issue:**	**Edited by:**	**Approved & ratified by:**	**Comments:**
V2.0	April 2019	4/4/2019			
V2.1	August 2021		W. Chambers	Dr V. Sharma	COPI Update
V3	March 2022	1.3.2022	W. Chambers	Dr V. Sharma	Covid Pass Link Annexe A updates
	March 2023				Nil Changes
	January 2024	30.1.2024	W. Chambers	Dr V. Sharma	Updated ICB. Gov Covid Pass Review Date Set Jan 2025
	February 2024	28.2.2024	W. Chambers	Dr V. Sharma	Updated e-consult (smartbox)
	December 2024	18.12.2024	W. Chambers	Dr V. Sharma	Updated Smoking Cessation SMS Patient Surveys. Medical Examiner. Removal Covid 19 NHS Data Processing
	August 2025	11.08.2025	W Chambers	Dr V. Sharma	Covid – OpenSafely
	April 2026	1.4.2026	W. Chambers	Namita Sharma	Update –Thames Valley ICB Update – TVS Thames Valley Care Records
	July 2026	6.7.2026	W.Chambers	Namita Sharma	Update - LTC Self Care Apps and Clinical Trials Recruitment

Fair Processing Notice (Privacy Notice)

Your Personal Information – what you need to know

Your information, what you need to know

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

Why we collect information about you

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

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

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

How long do we hold information for?

All records held by the Practice will be kept for the duration specified by national guidance from NHS Digital, Health and Social Care Records Code of Practice. Once information that we hold has been identified for destruction it will be disposed of in the most appropriate way for the type of information it is. Personal confidential and commercially confidential information will be disposed of by approved and secure confidential waste procedures. We keep a record of retention schedules within our information asset registers, in line with the Records Management Code of Practice for Health and Social Care 2016.

Individuals Rights under GDPR

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

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

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Your right to opt out of data sharing and processing

The NHS Constitution states 'You have a right to request that your personal and confidential information is not used beyond your own care and treatment and to have your objections considered'. For further information please visit: The NHS Constitution for England - GOV.UK (www.gov.uk)

Type 1 Opt Out

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

National data opt-out

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

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

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

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

On this web page you will:

- See what is meant by confidential patient information
- Find examples of when confidential patient information is used for individual care and examples of when it is used for purposes beyond individual care
- Find out more about the benefits of sharing data
- Understand more about who uses the data
- Find out how your data is protected
- Be able to access the system to view, set or change your opt-out setting
- Find the contact telephone number if you want to know any more or to set/change your opt-out by phone
- See the situations where the opt-out will not apply

Right of Access to your information (Subject Access Request)

Under Data Protection Legislation everybody has the right have access to, or request a copy of, information we hold that can identify you, this includes your medical record, there are some

safeguards regarding what you will have access and you may find information has been redacted or removed for the following reasons;

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

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

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

You will need to provide proof of identity to receive this information.

If you would like to access your GP record online click here https://drveenasharma.co.uk/

NHS Covid Pass – Now Closed

There are no longer any domestic requirements to demonstrate your vaccination status. Further information is available here: NHS COVID Pass - GOV.UK (www.gov.uk)

Change of Detail

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

Mobile telephone number

If you provide us with your mobile phone number, we 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: http://ico.org.uk/what_we_cover/register_of_data_controllers

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

Data Protection Officer

Should you have any data protection questions or concerns, please contact our Data Protection Officer via the surgery at: 240wexham.roadsurgery@nhs.net

What is the right to know?

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

Right to Complain

If you have concerns or are unhappy about any of our services, please contact Namita Sharma Partner

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

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

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

The NHS Care Record Guarantee

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

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

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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	**Purpose –** Anonymous data is used by the Thames Valley ICB for planning, performance and commissioning purposes, as directed in the practices contract, to provide services as a public authority. **Legal Basis** – • Article 6(1)(e) '…necessary for the performance of a task carried out in the public interest or in the exercise of official authority…'; and • Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine' Patients may 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-nhsdata-matters/manage-your-choice/ to apply a National Data Opt Out **Processor** – NHS Thames Valley Integrated Care Board (ICB)
Summary Care Record Including additional information	**Purpose –**The NHS in England uses a national electronic record called the Summary Care Record (SCR) to support patient care. It contains key information from your GP record. Your SCR provides authorised healthcare staff with faster, secure access to essential information about you in an emergency or when you need unplanned care, where such information would otherwise be unavailable. **Legal Basis** – Direct Care under UK GDPR: • Article 6(1)(e) '…necessary for the performance of a task carried out in the public interest or in the exercise of official authority…'; and • Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine The relevant COPI notice states that its purpose: "…is to require organisations to process confidential patient information for the purposes set out in Regulation 3(1) of COPI to support the Secretary of State's response to Covid-19 (Covid-19 Purpose). "Processing" for these purposes is defined in Regulation 3(2) and includes dissemination of confidential patient information to persons and organisations permitted to process confidential patient information under Regulation 3(3) of COPI."

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	Full details of the Summary Care Record supplementary privacy notice can be found here Patients have the right to opt out of having their information shared with the SCR by completion of the form which can be downloaded here and returned to the practice. Please note that by opting out of having your information shared with the Summary Care Record could result in a delay to care that may be required in an emergency. **Processor –** NHS England and NHS Digital
Research	**Purpose –** We may share anonymous patient information with research companies for the purpose of exploring new ways of providing healthcare and treatment for patients with certain conditions. This data will not be used for any other purpose. Where personal confidential data is shared your consent will need to be sought. Where you have opted out of having your identifiable information shared for this Planning or Research your information will not be shared. **Legal Basis –** • Articles 6(1)(a) and 9(1)(a) – explicit consent; or • Article 6(1)(c) (where we are legally obligated to share your personal data) for your standard personal data and Article 9(2)(j) (scientific research) for your health data. 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 **Processor –** NIHR Clinical Research Network: Thames Valley and South Midlands
Individual Funding Requests	**Purpose –** We may need to process your personal information where we are required to fund specific treatment for you for a particular condition that is not already covered in our standard NHS contract. The clinical professional who first identifies that you may need the treatment will explain to you the information that is needed to be collected and processed 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. **Legal Basis –** Article 6(1)(e) '…necessary for the performance of a task carried out in the public interest or in the exercise of official authority…'; and • Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine' **Data processor** – South Central and West Commissioning Support Unit
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 –** in some case consent will be required otherwise • Article 6(1)(e) '…necessary for the performance of a task carried out in the public interest or in the exercise of official authority…'; and • Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine **Data Processor** – Thames Valley ICB
Safeguarding Children	**Purpose –** We will share children's personal information where there is a need to assess and evaluate any safeguarding concerns. **Legal Basis -** in some case consent will be required otherwise • Article 6(1)(e) '…necessary for the performance of a task carried out in the public interest or in the exercise of official authority…'; and • Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine **Data Processor** – NHS England and NHS Digital via GP connect
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, Primary Care Networks and your GP Practice. A risk score is then arrived at through an analysis of your

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	de-identified information. This can help us identify and offer you additional services to improve your health. If you do not wish information about you to be included in any risk stratification programmes, please let us know. We can add a code to your records that will stop your information from being used for this purpose. Please be aware that this may limit the ability of healthcare professionals to identify if you have or are at risk of developing certain serious health conditions. Type of Data – Identifiable/Pseudonymised/Anonymised/Aggregate Data **Legal Basis** – • Article 6(1)(e) '…necessary for the performance of a task carried out in the public interest or in the exercise of official authority…'; and • Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine' **Processors** – East Berkshire Clinical Commissioning Group and SOUTH CENTRAL AND WEST CSU (SCW)
Public Health Screening programmes (identifiable) Notifiable disease information (identifiable) Smoking cessation (anonymous) Sexual health (anonymous)	**Purpose –** Personal identifiable and anonymous data is shared. The NHS provides national screening programmes so that certain diseases can be detected at an early stage. These currently apply to bowel cancer, breast cancer, aortic aneurysms and diabetic retinal screening service. The law allows us to share your contact information with Public Health England so that you can be invited to the relevant screening programme. More information can be found at: https://www.gov.uk/topic/population-screeningprogrammes [Or insert relevant link] or speak to the practice **Legal Basis –** **• Article 6(1)(e) '…necessary for the performance of a task carried out in the public interest or in the exercise of official authority…'; and** **• Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'** **Data Processors** – Thames Valley PHE
Direct Care NHS Trusts Other Care Providers	**Purpose –** Personal information is shared with other secondary care trusts and providers in order to provide you with direct care services. This could be hospitals or community providers for a range of services, including treatment, operations, physio, and community nursing, ambulance service.

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	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) '…necessary for the performance of a task carried out in the public interest or in the exercise of official authority…'; and • Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine **Processors** – Thames Valley Health NHS Foundation Trust
Care Quality Commission	**Purpose** – The CQC is the regulator for the English Health and Social Care services to ensure that safe care is provided. They will inspect and produce reports back to the GP practice on a regular basis. The Law allows the CQC to access identifiable data. More detail on how they ensure compliance with data protection law (including UK GDPR) and their privacy statement is available on our website**:** https://www.cqc.org.uk/about-us/our-policies/privacy-statement **Legal Basis** - Legal Basis – • Article 6(1)(e) '…processing is necessary for compliance with a legal obligation'; and • Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine **Processor**s – Care Quality Commission
Population Health Management	**Purpose –** Health and care services work together as 'Integrated Care Systems' (ICS) and are sharing data in order to: • Understand the health and care needs of the care system's population, including health inequalities. • Provide support to where it will have the most impact • Identify early actions to keep people well, not only focusing on people in direct contact with services, but looking to join up care across different partners. (NB this links to the Risk Stratification activity identified above) **Type of Data** – Identifiable/Pseudonymised/Anonymised/Aggregate Data. NB

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	only organisations that provide your care will see your identifiable data. **Legal Basis –** • Article 6(1)(e) '…necessary for the performance of a task carried out in the public interest or in the exercise of official authority…'; and • Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine **Data Processors** - Optum, Interface
Payments, Invoice validation	**Purpose -** Contract holding GPs in the UK receive payments from their respective governments on a tiered basis. Most of the income is derived from baseline capitation payments made according to the number of patients registered with the practice on quarterly payment days. These 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 receive income for participating in the education of medical students, junior doctors and GPs themselves as well as research. In order to make patient based payments basic and relevant necessary data about you needs to be sent to the various payment services. The release of this data is required by English laws. **Legal Basis** – • Article 6(1)(c) 'processing is necessary for compliance with a legal obligation to which the controller is subject'; and • Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'. **Data Processors** – NHS England, THAMES VALLEY ICB, Public Health
Patient Record data base	**Purpose –** Your medical record will be processed in order that a data base can be maintained, this is managed in a secure way and there are robust processes in place to ensure your medical record

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	is kept accurate, and up to date. Your record will follow you as you change surgeries throughout your life. Closed records will be archived by NHS England **Legal Basis -** Article 6(1)(e); "necessary… in the exercise of official authority vested in the controller' And Article 9(2)(h) as stated below **Processor** – EMIS, Connected Care ,PCSE and Ardens
Medical reports Subject Access Requests	**Purpose –** Your medical record may be shared in order that solicitors acting on your behalf can conduct certain actions as instructed by you. Insurance companies seeking a medical report where you have applied for services offered by then can have a copy to your medical history for a specific purpose. **Legal Basis –** • Article 6(1)(c) 'processing is necessary for compliance with a legal obligation to which the controller is subject'; and • Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'. **Processor –** Solicitors and Insurance organisations
Medicines Management Team	**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. **Legal Basis** – • Article 6(1)(e) '…necessary for the performance of a task carried out in the public interest or in the exercise of official authority…'; and • Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine' **Processor** – Thames Valley ICB
Primary Care Network (PCN) Central Slough Network (CSN)	**Purpose –** Your medical record will be shared with the CSN in order that they can provide direct care services to the patient population. **Legal Basis** – • Article 6(1)(e) '…necessary for the performance of a task carried out in the public interest or in the exercise of official authority…'; and • Article 9(2)(h) 'necessary for the purposes of

	preventative or occupational medicine **Processor** – Central Slough Network (Herschel Medical Centre, Shreeji Medical Centre, Manor Park Medical Centre, Crosby house surgery, 240 Wexham Road Surgery)
Smoking cessation	**Purpose –** personal information is shared in order for the smoking cessation service to be provided. Only those patients who wish to be party to this service will have their data shared **Legal Basis** – • Article 6(1)(e) '…necessary for the performance of a task carried out in the public interest or in the exercise of official authority…'; and • Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine' **Processor –** Solutions for Health
Social Prescribers	**Purpose** – Access to medical records is provided to social prescribers to undertake a full service to patient's dependent on their social care needs. Only those patients who wish to be party to this service will have their data shared **Legal Basis** – • Article 6(1)(e) '…necessary for the performance of a task carried out in the public interest or in the exercise of official authority…'; and • Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine' **Processor –** Wellbeing team SLOUGH CVS/CSN PCN Prescriber
Police	**Purpose –** Personal confidential information may be shared with the Police authority for certain purposes. The level of sharing and purpose for sharing may vary. Where there is a legal basis for this information to be shared no consent will be required. The Police will require the correct documentation in order to make a request. This could be but not limited to, DS 2, Court order, s137, the prevention and detection of a crime. Or where the information is necessary to protect a person or community. **Legal Basis – UK GDPR** • Article 6(1)(c) – to comply with a legal obligation; and • Article 9(2)(j) – 'for reasons of substantial public interest

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	Processor – Police Constabulary
Coroner	**Purpose –** Personal information relating to a patient may be shared with the coroner upon request. **Legal Basis** – UK GDPR: • Article 6(1)(c) – to comply with a legal obligation; and • Article 9(2)(h) – 'necessary for the purposes of preventative or occupational medicine' **Processor –** The Coroner
Medical Examiner Service	**Purpose: Purpose:** Medical records associated with deceased patients are outside scope of the UK GDPR. However, next of kin details are within the scope of the UK GDPR. We will share specified deceased patient records and next of kin details with the Medical Examiners within Thames Valley Health Trust **Legal Basis:** Article 6(1)(c) – necessary under a legal obligation to which the controller is subject"; and Article 9(2)(h)– "processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services" **Processor:** Medical Examiners Thames Valley Health NHS Foundation Trust
Non-Commissioned Private healthcare providers	**Purpose –** Personal information shared with private health care providers to deliver direct care to patients at the patient's request. Consent from the patient will be required to share data with Private Providers. **Legal Basis –** Articles 6(1)(a) and 9(2)(a) consent by the patient given under contract to the provider. **Provider** – Private Hospitals and Health Care Providers
NHS App and other SMS/Text Messaging Services.	**Purpose –** Personal identifiable information shared with the texting service in order that text messages including appointment reminders, campaign messages related to specific patients health needs and direct messages in a secure way. We use the NHS Account Messaging Service provided by NHS England to send you messages relating to your health and care. You need to be an NHS App user to receive these messages.

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	Further information about the service can be found at the privacy notice for the NHS App managed by NHS England https://www.nhs.uk/nhs-app/nhs-app-legal-and-cookies/nhs-app-privacy-policy/privacy-policy/ We may also contact you via SMS using the Accurx messaging service which is commissioned for Practice use by SEL ICB. Accurx Privacy information for patients can be found on the following link Accurx https://www.accurx.com/security-for-patients **Legal Basis –** • Article 6(1)(e) '…necessary for the performance of a task carried out in the public interest or in the exercise of official authority…'; and • Article 9(2)(h) 'necessary for the purposes **Provider** - NHSAPP, AccuRX, Iplato, E-Consult
Remote consultation Including – Video Consultation Clinical photography	**Purpose** – Personal information including images may be processed, stored and with the patients consent shared, in order to provide the patient with urgent medical advice during the COVID-19 pandemic. **Legal Basis –** • Article 6(1)(e) '…necessary for the performance of a task carried out in the public interest or in the exercise of official authority…'; and • Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine' Patients will be asked to provide consent if required to provide photographs of certain areas of concern. 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. **Processor –** AccuRX
MDT meetings	**Purpose** – For certain long-term conditions, the practice collaborates with other care providers to plan the best care for patients. Personal data is shared with these agencies to coordinate effective care packages. **Legal Basis –** • Article 6(1)(e) '…necessary for the performance of a task carried out in the public interest or in the exercise of

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	official authority…'; and • Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine **Processor –** Thames Valley Health ICB and Community Health and Social Care Organisations East Berkshire
General Practice Extraction Service (GPES) 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	**Purpose –** GP practices are required to provide data extraction of their patients personal confidential information for various purposes to NHS Digital. The objective of this data collection is on an ongoing basis to identify patients registered at General Practices who fit within a certain criteria, in order to monitor and either provide direct care, or prevent serious harm to those patients. Below is a list of the purposes for the data extraction, by using the link you can find out the detail behind each data extraction and how your information will be used to inform this essential work: 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. **Legal Basis -** All GP Practices in England are legally required to share data with NHS Digital for this purpose under section 259(1)(a) and (5) of the 2012 Act Further detailed legal basis can be found in each link. Any objections to this data collection should be made directly to NHS Digital. enquiries@nhsdigital.nhs.uk **Processor –** NHS Digital or NHS X
Medication/Prescribing	**Purpose:** Prescriptions containing personal identifiable and health data will be shared with chemists/pharmacies, in order to provide patients with essential medication or treatment as their health needs dictate. This process is achieved either by face to face contact with the patient or electronically. Where patients have specified a nominated pharmacy they may wish their repeat or

	acute prescriptions to be ordered and sent directly to the pharmacy making a more efficient process. Arrangements can also be made with the pharmacy to deliver medication Legal Basis – **• Article 6(1)(e) '…necessary for the performance of a task carried out in the public interest or in the exercise of official authority…'; and** **• Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'** Patients will be required to nominate a preferred pharmacy. **Processor** – Pharmacy of choice
Telephony Surgery Connect Advanced Health Telephony	**Purpose –** The practice use an internet based telephony system that records telephone calls, patients will have the right to decline recordings of calls as is their individual right. The calls will be held on the external server for a duration of 3 years unless requested for them to be removed sooner. The telephone system has been commissioned to assist with the high volume and management of calls into the surgery, which in turn will enable a better service to patients. **Legal Basis –** While there is a robust contract in place with the processor, the surgery has undertaken this service to assist with the direct care of patients in a more efficient way. • Article 6(1)(e) '…necessary for the performance of a task • carried out in the public interest or in the exercise of • official authority…'; and • • Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine' **Provider – X-on Health**
Learning Disability Mortality Programme LeDer	**Purpose :** The Learning Disability Mortality Review (LeDeR) programme was commissioned by NHS England to investigate the death of patients with learning difficulties to assist with processes to improve the standard and quality of care for people living with a learning disability. **Legal Basis:** It has approval from the Secretary of State under section 251 of the NHS Act 2006 to process patient identifiable information who meet specific criteria. **Processor : Thames Valley ICB, NHS England**
Technical Solution Pseudonymisation	**Purpose:** Personal confidential and special category data in the form of medical record, is extracted under contract for the

	purpose of pseudonymisation. This will allow no patient to be identified within the data set that is created. SCWCSU has been commissioned to provide a data processing service for the GPs, no other processing will be undertaken under this contract. **Legal Basis:** Under UK GDPR the legitimate purpose for this activity is under contract to provide assistance. Article 6(1)(e); "necessary… in the exercise of official authority vested in the controller' And Article 9(2)(h) Health data as stated below **Processor**: SCW CSU
Shared Care Record	**Purpose:** In order for the practice to have access to a shared record, the Integrated Care Service has commissioned a number of systems including GP Connect , which is managed by NHS England, 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. Appendix A – GP Privacy Notice V8 Direct Care, and analytics to assist with planning services for the use of the local health population. Where data is used for secondary uses no personal identifiable data will be used. Where personal confidential data is used for Research explicit consent will be required. **Legal Basis –** • Article 6(1)(e) '…necessary for the performance of a task carried out in the public interest or in the exercise of official authority…'; and • Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine' **Processor:** NHS England NHS Digital
Local shared care record Wexham Park Hospital	**Purpose:** Health and Social care services are developing shared systems to share data efficiently and quickly. It is important for anyone treating you to be able to access your shared record so that they have all the information they need to care for you. This will be during your routine appointments and in urgent situations such as going to A&E,

	calling 111 or going to an Out of hours appointment. It is also quicker for staff to access a shared record than to try to contact other staff by phone or email. Only authorised staff can access the systems and the information they see is carefully checked so that it relates to their job. Systems do not share all your data, just data which services have agreed is necessary to include. **Legal Basis** – • Article 6(1)(e) '…necessary for the performance of a task carried out in the public interest or in the exercise of official authority…'; and • Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine' Processor: NHS Digital, EPIC
CHIS – Child Health Information Services	Purpose: SCW CHIS is commissioned by NHS England to support the monitoring of the care delivered to children across regions in the UK. This notice sets out the types of personal data that we collect about children and will explain how and why their personal data is used. Health screening, physical examination and vaccination services are monitored to ensure that every child has access to all relevant health interventions. In support of this SCW CHIS maintains a record of all children resident in the areas we look after. We maintain a record of all children aged 0-19 years old and their mothers/related parties, and mothers-to-be. The data set includes personal data and special category data relating to: Demographics, NHS number, Ethnicity, Newborn Bloodspot and Newborn Hearing, Newborn and Infant Physical Examinations, Vaccination and Immunisations status, Looked After Children status. We record demographics and HepB status for mothers and mothers-to-be. We receive data from GPs, maternity departments, independent midwives, health visitor providers, screening laboratories, school-age vaccination providers, school nurses and local authorities, and other CHIS providers. **Legal Basis:** Healthcare data The Secretary of State delegates several public health functions to NHS England. The public health functions agreement enables NHS

	England to commission certain public health services which will drive improvements in population health, including CHIS. SCW is commissioned by NHS England to provide the CHIS as part of their public health duties. GDPR legal basis: 6 (1) (e) Public task Local Authority data SCW may provide local authorities with information necessary to support their legal obligations. Under S 436A Education Act 1996 each local authority has a legal obligation to: Be aware of children residing in its area Investigate cases of children missing from education and ensure children not receiving statutory provision are receiving an adequate education Planning and development of services for children and young people Local authorities will provide data to SCW CHIS for the planning of appropriate services enabling the health and wellbeing of children and families, e.g. school immunisation programme. GDPR legal basis: 6 (1) (e) Public task **Processor:** NHS South, Central and West Commissioning Support Unit (SCW CSU)
Anticoagulation Monitoring	**Purpose:** Personal Confidential data is shared with LumiraDX in order to provide an anticoagulation clinic to patients who are on anticoagulation medication. This will only affect patients who are within this criteria. **Legal Basis**: The legal basis for this activity under UK GDPR is Article 6(1)(e); "necessary… in the exercise of official authority vested in the controller' And Article 9(2)(h) Health data as stated below **Processor** : LumiraDX INRStar
TLHC – Targeted Lung Health Check Programme	**Purpose:** To identify and invite the eligible cohort to receive a telephone triage appointment; if high-risk for lung cancer to invite for a physical nurse-led lung health consultation, followed by a CT scan if appropriate. **Legal Basis:** Legal Basis

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	For GDPR purposes NHS England's lawful basis for processing is Article 6(1)(e) – '…exercise of official authority…'; For the processing of special categories (health) data the basis is 9(2)(h) – '…health or social care…', and 9(2)(j) '…statistical purposes…'. **Processor:** NHS England
Smoking Cessation SMS Patient Surveys	**Purpose:** This joint processing and sharing DPIA schedule outlines the use of the System Insights analytics platform and the Syml Connect platform to support the delivery of SMS-based patient communications and surveys to inform our patient population of the smoking cessation resources that are available across the Thames Valley ICS region, working alongside local authority partners. **Legal Basis:** 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 processing the records for the purposes set out above is also provided by the UK General Data Protection Regulation ("GDPR"): 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"; 2. Article 9(2)g "processing is necessary for reasons of substantial public interest"; 3. 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"; and 4. Article 9(2)i "processing is necessary for reasons of public interest in the area of public health" 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:** Graphnet – System C – Microsoft – Syml Connect

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OpenSAFELY COVID-19 and Data Analytics Services	**Purpose:** "NHS England has been directed by the government to establish and operate the OpenSAFELY COVID-19 Service and the OpenSAFELY Data Analytics Service. These services provide a secure environment that supports research, clinical audit, service evaluation and health surveillance for COVID-19 and other purposes. Each GP practice remains the controller of its own GP patient data but is required to let approved users run queries on pseudonymised patient data. This means identifiers are removed and replaced with a pseudonym. Only approved users are allowed to run these queries, and they will not be able to access information that directly or indirectly identifies individuals. **Legal Basis** – UK GDPR – Article 6 basis: UK GDPR Article 6(1)(c) - processing is necessary for compliance with a legal obligation to which the controller is subject (the Directions). UK GDPR Article 9 basis: UK GDPR Article 9(2)(g) - processing is necessary for reasons of substantial public interest, on the basis of domestic law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject, by virtue of compliance with a direction supplemented by: Patients who do not wish for their data to be used as part of this process can register a type 1 opt out with their GP. Here you can find additional information about OpenSAFELY." **Processor:** NHS England The Phoenix Partnership (TPP) EMIS
Thames Valley and Surrey Care Records	Purpose of the TVS Care Records processing The overriding objective of the shared record processing is to ensure that the right care is

	provided safely and in as timely a manner as possible. The more specific purposes for the processing with the shared care records includes: 1. Directly supporting the provision of safe and timely care; 2. Managing the health and care of groups of individuals; 3. Managing the health and care of the population as a whole; 4. Managing the health and care system (the ICS) as a whole; 5. Commissioning local health and care services; 6. Research; and 7. National returns. **Legal basis for the processing** Health and Care legislation Unless an individual has objected to processing or joint processing and sharing and the sharing organisation has accepted the individual'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. The statutory basis for processing the shared records includes the provisions of: 1. Section 254 of the Health and Social Care Act 2012; 2. Sections 17 and 47 of the Children Act 1989; 3. Sections 10 and 11 of the Children Act 2004; 4. The Children and Families Act 2014; and 5. Section 96 of the Health and Care Act (2022).
TVS Care Records Self Care and Monitoring -LTC Self Care Apps and Clinical Trials Recruitment	**Summary of the Processing and Sharing Requirement Purpose** The purpose for this joint processing and sharing arrangement is to allow the identification of and support for patients who could benefit from the deployment of Self care and Monitoring applications and content. Conditions and areas of clinical need supported by the Self care and Monitoring1 applications2 and content include: 1. Asthma – which is supported by the myAsthma solution; 2. COPD – which is

	supported by the myCOPD solution; 3. Diabetes – which is supported by the myDiabetes solution; and 4. Heart and cardio vascular – which is supported by the myHeart solution. Eligible service users3 include: 1. Patients referred by general practice for step-up care; 2. Patients referred by acute and community care providers for step-down care; and 3. Patients identified using the TVS System Insights/Population Health analytics platform who are expected to benefit from the remote care and monitoring capabilities offered by the TVS Care Records Remote Care and Monitoring service. **The legal basis for processing** the shared records includes the provisions of: 1. Section 254 of the Health and Social Care Act 2012; 2. Sections 17 and 47 of the Children Act 1989; 3. Sections 10 and 11 of the Children Act 2004; 4. The Children and Families Act 2014; and 5. Section 96 of the Health and Care Act (2022). GDPR 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 processing the records for the purposes set out above is also provided by the UK General Data Protection Regulation ("GDPR"): 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"; 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 domestic law"; and 3. Article 9(2)j 8 "processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes". 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 "domestic law" establish the legal bases that organisations rely upon for the need to share and jointly process data to deliver care. **Processor (s)** Graphnet – Microsoft – my mhealth – Amazon Web Services – GP system suppliers