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

| Activity | Rationale |
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| **Commissioning and contractual purposes Planning Quality and Performance** | **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.<br><br>**Legal Basis** –<br>• 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<br>• Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'<br><br>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-data-matters/manage-your-choice/ to apply a National Data Opt Out<br><br>**Processor** – East Sussex 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.<br><br>**Legal Basis** –<br>• 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<br>• Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'<br><br>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 https://digital.nhs.uk/services/summary-care-records-scr/scr-patient-consent-preference-form 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.<br>**Processor –** NHS England |
| **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.<br><br>Where personal confidential data is shared your consent will be required.<br><br>Where you have opted out of having your identifiable information shared for this Planning or Research your information will not be shared. |

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| | **Legal Basis –**<br><br>• Articles 6(1)(a) and 9(1)(a) – explicit consent; or<br>• 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.<br><br>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.<br><br>Sharing of aggregated non identifiable data is permitted.<br><br>**Processor –** Research Organisations will be listed here as projects arise |
| **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.<br><br>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.<br><br>**Legal Basis** –<br>• 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<br>• Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'<br><br>**Data processor** –East Sussex ICB |
| **Safeguarding Adults** | **Purpose –** We will share personal confidential information with the safeguarding team where there is a need to assess and evaluate any safeguarding concerns and to protect the safety of individuals.<br><br>Consent is not required to share information for this purpose.<br><br>**Legal Basis** – Direct Care under UK GDPR:<br>• 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<br>• Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine<br><br>**Data Processor** – East Sussex County Council Adults Safeguarding Team |
| **Safeguarding Children** | **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. |

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| | **Legal Basis** –<br>• 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<br>• Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'<br><br>Consent may not be required to share this information.<br><br>**Data Processor** – East Sussex County Council Children Safeguarding Team |
| **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.<br><br>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.<br><br>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.<br><br>**Type of Data –** Identifiable/Pseudonymised/Anonymised/Aggregate Data<br><br>**Legal Basis** –<br>• 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<br>• Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'<br><br>**Processors** – NHS Digital, Ardens |
| **Public Health Screening programmes (identifiable) Notifiable disease information (identifiable) Smoking cessation (anonymous) Sexual health (anonymous)** | Purpose – Personal identifiable and anonymous data is shared.<br>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.<br>More information can be found at: https://www.gov.uk/topic/population-screeningprogrammes or speak to the practice. |

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| **Vaccination Programmes** | Patients may not opt out of having their personal information shared for Public Health reasons.<br>Patients may opt out of being screened at the time of receiving an invitation.<br><br>**Legal Basis** –<br>• 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<br>• Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'<br><br>Data Processors – East Sussex County Council Public Health |
| **Direct Care**<br>**NHS Trusts**<br>**Community Providers**<br>**Pharmacies**<br>**Enhanced care providers**<br>**Nursing Homes**<br>**Other Care Providers (Hastings Primary Care Hub, IC24)** | **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.<br><br>**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:<br><br>• 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<br>• Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine<br><br>**Processors** – East Sussex Hospitals Trust (Conquest Hospital and Eastbourne District General Hospital, SCFT, SPFT), Sussex Partnership 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.<br><br>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<br><br>**Legal Basis** –<br>• Article 6(1)(e) '…processing is necessary for compliance with a legal obligation'; and<br>• Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine<br><br>**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:<br>• Understand the health and care needs of the care system's population, including health inequalities<br>• Provide support to where it will have the most impact |

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| | • 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.<br><br>**Type of Data –** Identifiable/Pseudonymised/Anonymised/Aggregate Data. NB only organisations that provide your care will see your identifiable data.<br><br>**Legal Basis** –<br>• 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<br>• Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine<br><br>**Data Processors** - Optum, Cerner |
| **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.<br><br>**Legal Basis** –<br>• Article 6(1)(c) 'processing is necessary for compliance with a legal obligation to which the controller is subject'; and<br>• Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'.<br><br>**Data Processors** – NHS England, ICB, Public Health |
| **GP Clinical System** | **Purpose –** NHS GP surgery clinical systems are digital platforms, that manage patient info, allowing online access via the NHS App for appointments, prescriptions, and viewing records (allergies, medicines, results). These systems ensure data sharing between clinicians through GP Connect, improving care, with all practices mandated to provide online access to new record entries. |

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| | 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.<br>Closed records will be archived by NHS England<br><br>**Legal Basis** –<br>• 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<br>• Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'.<br><br>**Processor** – EMIS And PCSE |
| **Medical reports Subject Access Requests** | **Purpose –** Your medical record may be shared in order that:<br><br>Solicitors/persons acting on your behalf can conduct certain actions as instructed by you.<br><br>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.<br><br>**Legal Basis** –<br>• Article 6(1)(a) – consent for personal data; and<br>• Article 9(2)(a) – explicit consent for special-category data.<br><br>**Processor – IGPR,** Solicitors and insurance organisations |
| **Medicines Management Team**<br><br>**Medicines Optimisation Optimise RX** | **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.<br>**Purpose** - Your anonymous aggregated information will be shared in order to optimise medication. This will enable your GP to provide a more efficient medication regime for your personal care. Some of the anonymous information may be used nationally to drive wider understanding of the medication. No patients will be able to identified from the data shared.<br><br>**Legal Basis** –<br>• 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<br>• Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'<br><br>**Processor** – East Sussex ICB Medicines Management Team |
| **GP Federation, Primary Care Network (PCN) Services they provide:**<br>**GP Extended Access**<br>**Video consultations** | **Purpose –** Your medical record will be shared with the Hastings PCN 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 PCN and the Federation will be acting on behalf of the GP practice.<br><br>**Legal Basis** – |

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| | • 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<br>• Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'<br><br>**Processor** – Integrated Family Healthcare |
| **Primary Care Network (PCN)** | **Purpose –** Your medical record will be shared with the PCN in order that they can provide direct care services to the patient population.<br><br>**Legal Basis** –<br>• 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<br>• Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'<br><br>**Processor** – Hastings and St Leonards PCN |
| **Smoking cessation** | **Purpose –** personal information is shared in order for the smoking cessation service to be provided.<br><br>Only those patients who wish to be party to this service will have their data shared<br><br>**Legal Basis** –<br>• 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<br>• Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'<br><br>**Processor –** One You East Sussex |
| **Social Prescribers** | **Purpose** – Access to medical records is provided to social prescribers to undertake a full service to patients dependent on their health social care needs.<br><br>Only those patients who wish to be party to this service will have their data shared<br><br>**Legal Basis** –<br>• 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<br>• Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'<br><br>**Processor – Hastings & St Leonards PCN** |
| **Police** | **Purpose –** Personal confidential information may be shared with the Police authority for certain purposes. The level of sharing and purpose for sharing may vary. Where there is a legal basis for this information to be shared consent will not always be required. |

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| | 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.<br><br>**Legal Basis –** UK GDPR<br><br>• 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<br>• Article 6(1)(f) 'necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity'<br>• Article 9(2)(g) 'necessary for reasons of substantial public interest'<br><br>**Processor –** Police Constabulary |
| **Coroner** | **Purpose –** Personal health records or information relating to a deceased patient may be shared with the coroner**.**<br><br>**Legal Basis –** UK GDPR:<br>• Article 6(1)(c) – to comply with a legal obligation; and<br>• Article 9(2)(h) – 'necessary for the purposes of preventative or occupational medicine'.<br><br>**Processor –** The Coroner |
| **Medical Examiner Service** East Sussex Healthcare NHS Trust. | **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 East Sussex Healthcare NHS Trust.<br><br>**Legal Basis**:<br>Article 6(1)(c) – necessary under a legal obligation to which the controller is subject"; and<br>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"<br><br>**Processor**: Medical Examiners service – East Sussex Healthcare NHS Trust |
| **Non-commissioned, private healthcare providers (e.g. BUPA, Virgin Care, Benenden etc.)** | **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.<br><br>**Legal Basis –** Articles 6(1)(a) and 9(2)(a) consent by the patient given under contract to the provider.<br><br>**Provider** – depend upon private healthcare provider of the patient |

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| **Messaging Service** | **Purpose –** Personal identifiable information shared with the messaging service in order that messages including; appointment reminders; results; campaign messages related to specific patients health needs; and direct messages to patients, can be transferred to the patient in a safe way.<br><br>**Legal Basis** –<br>• 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<br>• Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'<br><br>**Provider** - AccuRX - NHSAPP, Engage 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.<br><br>**Legal Basis** –<br>• 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<br>• Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'<br><br>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 identifiable pictures of children.<br><br>**Processor –** Engage Consult, AccuRX, |
| **MDT meetings** | **Purpose** – For some long term conditions, the practice participates in meetings with staff from other agencies involved in providing care, to help plan the best way to provide care to patients with these conditions. Personal data will be shared with other agencies in order that mutual care packages can be decided.<br><br>**Legal Basis** –<br>• 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<br>• Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'<br><br>**Processor –** MS Teams |
| **General Practice Extraction Service (GPES)**<br>**1. At risk patients data collection Version 3**<br>**2. CVDPREVENT Audit** | **Purpose –** GP practices are required to provide data extraction of their patients personal confidential information for various purposes to NHS England. 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: |

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| **3. Physical Health Checks for people with Severe Mental Illness**<br>*4.* **National Obesity Audit** | 1. At risk patients including severely clinically vulnerable: https://digital.nhs.uk/about-nhs-digital/corporate-information-and-documents/directions-and-data-provision-notices/data-provision-notices-dpns/covid-19-at-risk-patients-data-provision-notice<br><br>2. NHS England has directed NHS England to collect and analyse data in connection with Cardiovascular Disease Prevention Audit: https://digital.nhs.uk/about-nhs-digital/corporate-information-and-documents/directions-and-data-provision-notices/data-provision-notices-dpns/cardiovascular-disease-prevention-audit<br><br>3. GPES Physical Health Checks for people with Severe Mental Illness (PHSMI) data collection. : https://digital.nhs.uk/about-nhs-digital/corporate-information-and-documents/directions-and-data-provision-notices/data-provision-notices-dpns/physical-health-checks-severe-mental-illness?_cldee=cm9iZXJ0LmhhY2tpbmdAbmhzLm5ldA%3d%3d&recipientid=lead-1b4643b1db2feb11bf6f000d3a86b8d5-6b1a1b731c7d46d2b60ec64c42de1be7&esid=b5b9d61e-ab29-eb11-a813-000d3a87467d<br><br>4. National Obesity Audit - NHS Digital: https://digital.nhs.uk/about-nhs-digital/corporate-information-and-documents/directions-and-data-provision-notices/data-provision-notices-dpns/national-obesity-audit?_cldee=MTwqTidD6GQfIUy1RoyIAa-PVa1wntrwim2UURsv-ZqlFQ8QJr4WWoWSwm9kKfGQJQGlt3tFOclBv0ElImRPLA&recipientid=lead-06d96b2b497eee1181790022481b54df-b15fddd95abc4713a5585bcb5b5d5581&esid=43a10bae-8b0e-ee11-8f6e-002248c87a5b<br><br>**Legal Basis -** All GP Practices in England are legally required to share data with NHS England for this purpose under section 259(1)(a) and (5) of the The Health and Social Care Act 2012<br><br>Further detailed legal basis can be found in each link.<br><br>Any objections to this data collection should be made directly to NHS England. enquiries@nhsdigital.nhs.uk<br><br>**Processor –** NHS England |
| **General practice data for planning and research (GDPR)** | **Purpose**: Patients personal confidential data will be extracted and shared with NHS Digital in order to support vital health and care planning and research. Further information can be found here.<br><br>Patients may opt out of having their information shared for Planning or Research by applying a National Data Opt Out or a Type 1 Opt Out. Details of how to Opt Out can be found on our Privacy Notice.<br>For the National Data Opt Out patients are required to register their preference below. https://www.nhs.uk/your-nhs-data-matters/ |

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| | **Legal Basis** : The legal basis for this activity can be found at this link : https://digital.nhs.uk/services/nhs-notify/transparency-notice<br><br>**Processor**: NHS Digital |
| **Medication/Prescribing** | **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<br><br>**Legal Basis** –<br>• 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<br>• Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'<br><br>**Processor** – Pharmacy of choice<br>Patients will be required to nominate a preferred pharmacy. |
| **Professional Training** | **Purpose –** We are a training surgery. Our clinical team are required to be exposed to on the job, clinical experience, as well as continual professional development. On occasion you may be asked if you are happy to be seen by one of our GP registrars, pharmacists or other clinical team to assist with their training as a clinical professional. You may also be asked if you would be happy to have a consultation recorded for training purposes. These recordings will be shared and discussed with training GPs at the surgery, and also with moderators at the RCGP and HEE.<br><br>**Legal Basis** –<br>• 6 1 (a) consent, patients will be asked if they wish to take part in training sessions<br>• 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<br>• Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'<br><br>Recordings remain the control of the GP practice and they will delete all recordings from the secure site once they are no longer required.<br><br>**Processor** – RCGP, HEE, iConnect, Fourteen Fish |

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| **Telephony** | **Purpose –** The practice uses an internet-based telephony system that records telephone calls. Patients' individual rights will not be affected by this change. Some recordings may be used by the surgery for training or quality performance purposes.<br>Where a call is recorded for clinical purposes while in a consultation, it will be saved within the patients' medical record.<br><br>Our phone system is set to automatically retain the incoming calls for 6 months. After this point, the recordings are automatically deleted. The 6 months retention period enables us to download and retain exact and unaltered copies of calls where required for medico-legal purposes.<br><br>**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.<br>• 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<br>• Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'<br><br>**Provider – Focus Group-Think Healthcare** |
| **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 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.<br><br>**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.<br><br>**Processor : ICB, NHS England** |
| **Shared Care Record** | **Purpose:** In order for the practice to have access to a shared record, the Integrated Care Service has commissioned a number of systems 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.<br><br>Where data is used for secondary uses no personal identifiable data will be used.<br><br>Where personal confidential data is used for Research explicit consent will be required.<br><br>**Legal Basis** – |

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| | • 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<br>• Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'<br><br>**Processor: NHS England** |
| **Local shared care record** | **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.<br><br>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.<br><br>**Legal Basis** –<br>• 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<br>• Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'<br><br>**Processor:** NHS Digital, ESHT, ICS member providers |
| **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.<br><br>**Legal Basis** –<br>• 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<br>• Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'<br><br>**Processor** : LumiraDX INRStar |
| **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.<br><br>**Legal Basis:** Under GDPR the legitimate purpose for this activity is under contract to provide assistance.<br>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<br><br>**Processor**: SCW CSU |
| **Emotional Wellbeing Service** | **Purpose** – Access to medical records is provided to social prescribers to undertake a full service to patients dependent on their social care needs. |

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| **and PHC SMI Facilitator Service** | **Legal Basis** – (a) Consent: the individual has given clear consent for you to process their personal data for a specific purpose.<br><br>**Processor** – SPFT (Sussex Partnership Foundation Trust) |
| **PCN Podiatry Service** | **Purpose**: The primary purpose of the PCN running a 'first contact' Podiatry service is to provide additional Podiatry resource to patients and to assist with alleviating pressure Updated: December 2024 from GP Practices. It will allow us to ensure accurate diagnosis and treatment of foot and lower limb conditions and to educate patients on managing these conditions more effectively. The PCN Podiatry service will also enhance patient outcomes when working more effectively with external healthcare providers. The individuals will be patients within our PCN who have been referred into the service by their registered GP or other referring clinician. There will be a direct care relationship where patients will expect their data to be used for their Podiatry related care<br><br>**Legal basis** – PCN lawful bases for processing are: Art 6(1)e) - public task/ official authority to provide direct care<br><br>**Contractual Processor**: PCN |
| **Specialist Services** | **Purpose:** the practice uses the services of third party providers to assist with providing care to patients with specific health needs. Staff employed at these facilities will have access to patients data in order to provider them with a full service. Patients will be asked to consent to having their medical record shared before access is made.<br>**Legal Basis:** under UK GDPR Article 6 1 (a) Consent will be applied<br>Article 6 1 (e) Public Task<br>Article 9 2 (a) Explicit consent<br>Article 9 2 (h) Health data<br>**Processor:** CGL |
| **Medicines Management Team Medicines Optimisation** | **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.<br><br>**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<br><br>**Processor** – Medicines Management Solutions Ltd |
| **Ash Lane Medical Consulting Services** | **Purpose**: The practice may enlist the assistance of a third-party provider to assist them in an analytical review of issued prescriptions. Personal confidential data and special categories of data will be shared with Ash Lane Medical Consulting to complete the tasks required to support the practice.<br><br>**Legal Basis**: Under UK GDPR Acrtile 6 1(f) Legitimate Interest and Article 9 2(h) health data for the management of direct care |

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| | **Processor**: Ash Lane Medical Consulting Services |
| **Prevail \| OPRI Study Project** | **Purpose**: Pseudonymised personal and health data will be used to inform the PREVAIL-OPRI Study project. The data will only be extracted for patients who meet the strict criteria. The project will assist with the NHS management and treatment of patients with Chronic Obstructive Pulmonary Disease (COPD).<br><br>No patient data will be shared if a Type 1 or National data opt out is applied to their record.<br><br>**Legal Basis**: Under UK GDPR 6 1 (b) contractual arrangement with Apollo<br>6 1 (e) Public Task, the practice has a statutory duty to provide health care to patients<br>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"; and<br>9 2 (j) Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with articles 89 (1)…<br><br>**Processor**: Optimum Patient Care (OPC), Apollo |
| **Data Vitality** | **Purpose**: Data Vitality will be supporting the GP Practice in a number of administrative tasks involving patient data and access to medical records. This is to support the practice in coding incoming data such as letters<br><br>**Legal Basis**:<br>Article 6 1 (e) Public Task<br>Article 9 2 (h) Health data<br>**Processor**: Data Vitality Ltd |
| **Off Site Storage of medical records** | **Purpose:** The practice has commissioned the services of an offsite storage facility to provide secure offsite storage for all Lloyd George medical records. The facility has met the NHS standard as a supplier of this service. The practice can assure patients that their medical records will remain in control of the practice and robust mechanisms are in place to protect the security of the patients' personal confidential data.<br>**Legal Basis:** The movement and storage of patient records will be undertaken by contractual obligation between the practice and the companies undertaking the work.<br>Under UK GDPR Article 6 1(b) contractual obligation<br>Article 9 2 (h) Health data.<br>**Processor: HUGH SYMONS** |
| **Prospective online access** | **Purpose**: To allow patients to access their GP medical record online via the NHS App. The view all documents and entries made into their record by the |

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| | GP, including information sent to the GP Practice where exemptions do not apply. Where a patient has requested third party access (family/friends) to their medical records, it is the patient's responsibility to ensure removal of this access if no longer required. Proxy access to the patient's record will be limited unless the patient has requested prospective access.<br><br>**Legal Basis**:<br>**UK GDPR**:<br>• Article 6(1)(e) Necessary for the performance of a task carried out in the public interest<br><br>• Article 9(2)(h) Necessary for provision of health and/or social care, including preventative or occupational medicine<br><br>**Common Law Duty of Confidentiality (CLDC)**:<br>• The CLDC is satisfied as the data subjects are accessing their own data following sign up for a relevant app or platform and selecting the option to view their GP record.<br><br>**Processor**: NHS Digital, Emis |
| **Enhanced Lung Care Screening Programme - Pilot** | **Purpose**: To identify patients and invite them to take part in an Enhanced Lung Care Screening. The purpose of this screening is to identify and treat lung conditions to improve outcomes.<br><br>**Legal Basis**:<br>Article 6(1)e<br>"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";<br>Article 9(2)h<br>"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";<br><br>**Processor**: InHealth |
| **Vaccinations for Housebound patients** | **Purpose –** To provide data to a vaccination provider to attend and complete the vaccinations for housebound patients<br>**Legal Basis –**<br>Article 6(1)(e); "necessary… in the exercise of official authority vested in the controller' And Article 9(2)(h) Health data<br>**Provider –** Pharmacy@Station Plaza Pharmacy, J Andersen Pharmacy ,PCN |
| **Community Pharmacy Consultation Service** | **Purpose** – The NHS Community Pharmacist Consultation Service (CPCS) was launched in October 2019 by NHS England and NHS Improvement, to progress the integration of community pharmacy into local NHS urgent care services, providing more convenient treatment closer to patients' homes. |

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| | **Legal Basis –**<br><br>**Under UK GDPR Article 6 1 (e)** The processing is necessary for a task that is within our remit as a public authority.<br>and<br>9 2(h) The processing is necessary for health or social care purposes<br>**Provider –** Local Pharmacies signed up to offer this service |
| **COPD and Asthma Service support** | **Purpose**: To provide COPD and Asthma patients, a review with a clinical pharmacist to support the management of their condition.<br><br>**Legal Basis**:<br>**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"<br>**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"<br><br>**Processor**: Interface Clinical Services Ltd |
| **DKD Service support** | **Purpose**: To provide Diabetic patients suffering from Diabetic Kidney Disease (DKD), a review with a clinical pharmacist to support the management of their condition.<br><br>**Legal Basis**:<br>**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"<br>**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"<br><br>**Processor**: Interface Clinical Services Ltd |
| **Interface Clinical Services Ltd CVRM Support** | **Purpose:** Personal confidential data will be shared for the purpose of the practice fulfilling their legal and contractual requirements to report QOF Enhancement and Coding services.<br><br>**Legal Basis:**<br>**Article 6(1)e:**<br>"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"<br><br>**Article 9(2)h:** |

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| | "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"<br><br>**Processor:** Interface Clinical Services Ltd |
| **Automated Processing (Robotic Process Automation (RPA))** | **Purpose**: GP Automate uses Robotic Process Automation (RPA) technology to automate and process administrative tasks by mimicking human actions. Products developed by GP Automate integrate directly with EMIS, Microsoft and Hero Health to optimize and support GP Practice workflows.<br><br>**Legal Basis**:<br>**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";<br>**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";<br><br>**Processor**: GP Automate |
| **Patient Survey** | **Purpose:** To engage with patients that are registered with them to obtain FFT feedback.<br>**Legal Basis:** the legal basis under UK GDPR is Article 6 1 (e) Public Task, the practice is obliged to engage with patients that are registered with them to obtain FFT feedback to assist with making improvements.<br>Explicit consent (UKGDPR Art. 6(1)(a) and Art. 9(2)(a))<br>**Provider:** Google Forms |
| **Outsourced Telephony Services** | **Purpose –** The practice will use GPS to provide telephony services to all patients. Patients' individual rights will not be affected by this change. All telephone calls will continue to be recorded and only accessible by the GP Practice Management Staff. Some recordings may be used by the practice for training or quality performance purposes.<br>GPS will have full access to the GP Practice clinical system to allow a full service to be provided.<br><br>**Legal Basis:**<br>**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";<br>**Article 9(2)h** - "processing is necessary for the purposes of preventive or occupational medicine";<br><br>**Provider –** General Practice Solutions (GPS) |
| **Practice Support Services** | **Purpose:** The practice will use GPS to provide medical secretarial support services to all patients.<br>Patients' individual rights will not be affected by this change.<br>GPS will have full access to the GP Practice clinical system to allow a full service to be provided. |

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| | **Legal Basis:**<br>**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";<br>**Article 9(2)h** - "processing is necessary for the purposes of preventive or occupational medicine";<br><br>**Processor:** General Practice Solutions (GPS) |
| **Adult Vaccination: Shingles and Pneumococcal National Immunisation Programmes** | **Purpose**: To ensure patients are up to date with their adult immunisations – To support direct patient care<br><br>**Legal Basis:** Article 6(1)e and Article 9(2)h – Direct Care<br><br>**Processor**: CHASE Search and Selection Limited |
| **Smoking cessation** | **Purpose** – The Practice wishes to commence Face to Face appointments for patients wishing to access the Smoking Cessation and Health Check services.<br>This service will be provided by One You East Sussex which is part of Thrive Tribe Ltd and commissioned by East Sussex County Council.<br><br>**Legal Basis** –<br>• 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<br>• Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'<br><br>**Data Processors** – OneYou East Sussex |
| **Accurx Ambient Scribe** | **Purpose**:<br>We are using a tool called Accurx Ambient Scribe to help us take notes during your appointment. This AI-powered tool listens to our conversation and creates a written summary in real-time allowing us to focus more on you instead of spending time typing.<br>With your permission we record the conversation, and the audio is deleted immediately once it's transcribed into text. We then use the text to create notes, letters and summaries about your care which we always review before adding to your medical records.<br>This tool helps us save time so we can dedicate more of it to providing you with the best possible care.<br><br>**Legal Basis**: Article 6 (1)e<br>It is necessary for the performance of a task carried out in the public interest or under official authority vested in the controller<br>Article 9 (2)h<br>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;<br><br>**Processor:** AccuRx |

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| **Novartis – Lipid Management** | **Purpose:** Novartis Pharmaceuticals UK Limited offer support to Sussex practices with optimising lipid management for secondary prevention patients & the implementation of lipid injectable therapy (Inclisiran) where clinically appropriate. This is in line with the Sussex LCS & the QOF CHOL indicators.<br><br>**Legal Basis:**<br>**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";<br>**Article 9(2)h** - "processing is necessary for the purposes of preventive or occupational medicine";<br><br>**Processor:** Apodi Healthcare Limited |
| **NHSMail and Office 365 (N365 Applications and SharePoint)** | **Purpose**:<br>NHSmail and Office 365 help NHS staff work more securely and efficiently which directly benefits our patients:<br>• **Security**: Emails are encrypted keeping your sensitive information safe.<br>• **Collaboration**: Staff can easily work together saving time and improving care.<br>• **Reliability**: The system is supported 24/7 to avoid service disruptions.<br>• **National Reach**: Staff can easily connect across different NHS organisations.<br>• **Safety**: Advanced protection against viruses and spam keeps information secure.<br>• **Flexibility**: Staff can communicate without disruption even if organisations change.<br>These tools support the NHS's goal of improving digital care and collaboration.<br><br>**Legal Basis**:<br>**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";<br>**Article 9(2)h** - "processing is necessary for the purposes of preventive or occupational medicine";<br><br>**Processor**: Accenture<br>**Sub-processor:** Microsoft |
| **Request for information processing** | **Purpose**: The iGPR Electronic Reporting Solution provides GP Practices a solution to manage Subject Access Requests (SARs) under UK GDPR *and other requests for information* that are received from patients and third parties. The solution integrates directly with the practice clinical system.<br><br>**Legal Basis**: Under GDPR the surgery has used its legal basis of Article 6 1 (e) Public Task<br>Article 9 2 (h) health data |

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| | **Processor**: iGPR Technologies Ltd |
| **GP Connect** | **Purpose:**<br>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.<br>GP Connect - NHS England Digital : https://digital.nhs.uk/services/gp-connect<br>GP Connect makes patient information available to all appropriate clinicians when and where they need it, to support direct patients care, leading to improvements in both care and outcomes.<br>GP Connect is not used for any purpose other than direct care.<br>GP Connect provides a method of secure information transfer and reduces the need to use less secure or less efficient methods of transferring information, such as email or telephone.<br>GP Connect transparency notice - NHS England Digital : https://digital.nhs.uk/services/gp-connect/gp-connect-in-your-organisation/transparency-notice<br><br>**Legal Basis:**<br>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<br>Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'<br>**Processor:**<br>NHS England |
| **OpenSAFELY COVID-19 and Data Analytics Services** | **Purpose:**<br>"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.<br><br>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.<br><br>Only approved users are allowed to run these queries, and they will not be able to access information that directly or indirectly identifies individuals.<br><br>**Legal Basis** –<br>UK GDPR – Article 6 basis:<br>UK GDPR Article 6(1)(c) - processing is necessary for compliance with a legal obligation to which the controller is subject (the Directions).<br>UK GDPR Article 9 basis:<br>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: |

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| | 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.<br>Here you can find additional information about OpenSAFELY.:<br>https://www.opensafely.org/<br><br>**Processor:**<br>NHS England , The Phoenix Partnership (TPP), EMIS |
| **EMIS Writeback** | Our GP practice uses a system functionality called EMIS writeback. It allows other authorised NHS organisations involved in your direct care to add relevant clinical information directly into your GP record.<br>**Legal Basis:**<br>Article 6(1)e – Task carried out in the public interest.<br>Article 9(2)h – Provision of Health or Social Care.<br>GP practice remains the data controller for your GP record.<br>**Processor:** Optum, GP Connect |
| **GP Pharmacy Support Services** | **Purpose:** MORPh is a pharmacist managed, and pharmacist led organisation with approaching 20 years of experience in supporting pharmacy professionals working in primary care. Their approach is one of involvement, integration and participation, with learning being embedded into practice using a case-based approach.<br>The core function of services is to conduct medication and therapy reviews in patients with chronic conditions in order to improve care. Services will be conducted by teams of pharmacists and/or pharmacy technicians as appropriate.<br>**Legal Basis:**<br>**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";<br>**Article 9(2)h** - "processing is necessary for the purposes of preventive or occupational medicine";<br><br>**Processor: Morph Consultancy Ltd** |
| **Callcare Ltd** | **Purpose –** to provide telephone answering service for the GP practice. CallCare Ltd, a private company, has been engaged to provide this service, and as part of this service, they will be given access to the GP practice clinical information system (EMISweb), including all patient medical records.<br><br>**Legal Basis**<br>**Article 6(1)e) –** public task/official authority (to provide direct care to patients)<br>**Article 9(2)h)** – health and social care<br><br>**Provider –** Callcare Ltd |
| **Electronic reporting solution** – Managed Service | **Purpose**: The iGPR Electronic Reporting Solution provides GP Practices a solution to manage Subject Access Requests (SARs) under UK GDPR *and other requests for information* that are received from patients and third parties. The solution integrates directly with the practice clinical system. iGPR acts as a data Processor and securely reviews, prepares and supplies |

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| | copies of medical records or reports when we as your GP practice are either legally required or when you have given your consent.<br><br>**Legal Basis**: Under GDPR the surgery has used its legal basis of<br>Article 6 1(c) it is necessary under a legal obligation to which the controller is subject<br>Article 6 1 (e) Public Task - it is necessary for the performance of a task carried out in the public interest or under official authority vested in the controller<br>Article 9 2 (a) health data - the data subject has given explicit consent<br><br>**Processor**: iGPR Technologies Ltd |
| **Document Management** | **Purpose –** The Surgery has commissioned the assistance of a third-party processor to assist with processing documents that are received into the practice. This will include appropriate coding and storing onto patients record.<br><br>**Legal Basis –** Under GDPR the surgery has used its legal basis of:<br>Article 6 1 (e) Public Task<br>Article 9 2 (h) health data<br><br>**Processor –** Anima AI |

We keep our Privacy Notice under regular review. This notice was last reviewed in June 2026.

## Lawful basis for processing:

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

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