

Protecting your Confidentiality – Privacy Notice

Your information, what you need to know

This privacy notice explains why we collect information about you, how that information may 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 within any NHS organisation. 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 may collect information about you which helps us respond to your queries or secure specialist services. We may 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.

We use a locally commissioned Records Storage and Management Service, which entails the off-site storage of paper-based medical records. This service includes the secure handling, scanning, transportation, storage and retrieval of documents. 'Restore Records Management', the supplier awarded the contract, has been vetted and complies with a range of accreditations including, but not limited to, ISO 9001 and ISO 2700. This ensures it provides an enhanced safe and secure full end-to-end document management solution that is appropriate for the scanning and storage of documents that are sensitive in nature.

The practice is compliant with the [national data opt-out policy](#).

Details 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. Where your record is accessed without your permission it is necessary for them to have a legitimate basis in law. 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 and care pathways
- preventing illness and diseases
- monitoring safety
- planning services
- population health management

Safeguarding of children or vulnerable adults

If we have significant concerns or hear about an individual child or vulnerable adult being at risk of harm, we may share relevant information with other organisations, such as local authorities and the Police, involved in ensuring their safety.

Statutory disclosures

Sometimes we are duty bound by laws to disclose information to organisations such as the Care Quality Commission, the Driver and Vehicle Licencing Agency, the General Medical Council, Her Majesty's Revenue and Customs and Counter Fraud services. In these circumstances we will always try to inform you before we are required to disclose and we only disclose the minimum information that the law requires us to do so.

This may only take place when there is a clear legal basis to use this information. All these uses help to provide better health and care for you, your family and future generations. Confidential patient information about your health and care is only used like this where allowed by law or with consent.

Pseudonymised or anonymised data is generally used for research and planning so that you cannot be identified.

A full list 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 [Records Management NHS Code of Practice for Health and Social Care](#). 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 2021.

Individual rights under UK GDPR

Under UK GDPR 2016 the Law provides the following rights for individuals. The NHS upholds these rights in a variety 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.

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'.

There are two forms of opt-out available and you can change your mind about your choice at any time:

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 your record you should make your 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.

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.

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

If you wish to discuss your opt-out choices at any time please visit the your NHS Data Matters website or contact the Practice Manager. He will be able to help you find out more about:

- What is meant by confidential patient information
- When confidential patient information is used for individual care and examples of when it is used for purposes beyond individual care
- The benefits of sharing data
- Who uses the data
- How your data is protected
- How to access the system to view, set or change your opt-out setting
- The situations where the opt-out will not apply

You can also find out more about how patient information is used at:

<https://www.hra.nhs.uk/information-about-patients/> (which covers health and care research)

<https://understandingpatientdata.org.uk/what-you-need-know> (which covers how and why patient information is used, the safeguards and how decisions are made)

Data being used or shared for purposes beyond individual care does not include your data being shared with insurance companies or used for marketing purposes and data would only ever be used in this way with your specific agreement.

Medical student placements

Our practice is involved in the training of medical students. As part of this programme medical students will work in the practice and may be involved in your care. If staff would like a student to be present, they will always ask for your permission before the start of the consultation. The treatment or care you receive will not be affected if you refuse to have a student present during your appointment.

It is usual for GPs to discuss patient case histories as part of their continuing medical education or for the purpose of training GPs and/or medical students. In these situations, the identity of the patient concerned will not be revealed.

Access to your information

Under Data Protection Legislation everybody has the right have access to, or request a copy of, information we hold that can identify them, this includes medical records. There are some safeguards regarding what patients will have access to and they may find information has been redacted or removed for the following reasons;

- It may be deemed to risk causing harm to the patient or others
- The information within the record may relate to third parties who are entitled to their confidentiality, or who have not given their permission for the information to be shared.

Patients do not need to give a reason to see their data. And requests can be made verbally or in writing. Although we may ask them to complete a form in order that we can ensure that they have the correct information required.

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

Patients will need to provide proof of identity to receive this information. We will not share information relating to you with other individuals without your explicit instruction or without sight of a legal document.

Patients may also request to have online access to their data, they may do this via the [NHS App](#), or via the practice's system. If you would like to access your GP record, online click [here](#).

COVID Passport access

Patients may access their Covid passport via the [link](#), the practice cannot provide this document as it is not held in the practice record. If you have any issues gaining access to your Covid Passport or letter you should call: 119.

Change of Details

It is important that you tell the surgery if any of your contact details such as your name or address have changed, or if any of your other contacts details are incorrect including third party emergency contact details. 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 reminders about your appointments or other health screening information. It is within our legal duty as a public authority to keep our patients updated with important information. Please let us know if you do not wish to receive reminders on your mobile.

We also 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. Further information about the service can be found at the [privacy notice for the NHS App](#) managed by NHS England.

Email address

Where you have provided us with your email address, 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.

Data Protection Officer

Our designated Data Protection Officers are: Matthew Bramall, the Practice Manager - and - Seraphim Patel, GP Data Protection Officer.

Should you have any data protection questions or concerns, please contact the practice Data Protection Officer in the first instance at: edwardst.manager@nhs.net

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](http://ico.org.uk/what-we-cover/register-of-data-controllers)

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

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’.

Complaints

If you have concerns or are unhappy about any of our services, please contact the Practice Manager.

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
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Phone: 0303 123 1113

Website: <https://ico.org.uk/global/contact-us>

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 programmes 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>

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...'

Summary of this Privacy Notice

We have written a shorter two-page guide to provide a summary of how the NHS and care services treat your information. This is available in the form of our [transparency statement](#).

Reviews of and Changes to our Privacy Notice

We will keep our Privacy Notice under regular review. This Privacy Notice was last reviewed on 03 October 2023.

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

Activity	Rationale
<p>Commissioning and contractual purposes Invoice Validation Planning Quality and Performance</p>	<p>Purpose – Anonymous data is used by the Integrated Care Board (ICB) for planning, performance and commissioning purposes, as directed in the practices contract, to provide services as a public authority.</p> <p>Legal Basis – UK GDPR 6 1(b) Contractual obligation as set out in the Health and Social Care Act for Quality and Safety 2015</p> <p>Patients may opt out of having their personal confidential data used for planning or research. Please contact your surgery to apply a Type 1 Opt-out or logon to https://www.nhs.uk/your-nhs-data-matters/manage-your-choice/ to apply a National Data Opt-Out</p> <p>Data Processor – Berkshire, Buckinghamshire & Oxfordshire ICB</p>
<p>Summary Care Record Including additional information</p>	<p>Purpose –The NHS in England uses a national electronic record called the Summary Care Record (SCR) to support patient care. It contains key information from your GP record. Your SCR provides authorised healthcare staff with faster, secure access to essential information about you in an emergency or when you need unplanned care, where such information would otherwise be unavailable.</p> <p>Legal Basis – Direct Care under UK GDPR :</p> <ul style="list-style-type: none"> • Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and • Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine <p>Patients have the right to opt out of having their information shared with the SCR by completion of the form which can be downloaded here and returned to the practice. Please note that opting out of having your information shared with the Summary Care Record could result in a delay to care that may be required in an emergency.</p> <p>Data Processor – NHS England</p>
<p>Research</p>	<p>Purpose – We may share anonymous or pseudonymised patient information with research companies for the purpose of exploring new ways of providing healthcare and treatment for patients with certain conditions. This data will not be used for any other purpose.</p> <p>Where personal confidential data is shared your consent will need to be required.</p> <p>Where you have opted out of having your information shared for this planning or research your information will not be shared.</p> <p>Legal Basis –</p>

	<ul style="list-style-type: none"> Articles 6(1)(a) and 9(1)(h) – explicit consent; OR Article 6(1)(c) (where we are <i>legally obligated</i> to share your personal data) for your standard personal data and Article 9(2)(j) (scientific research) for your health data. <p>Where identifiable data is required for research, patient consent will be needed, unless there is a legitimate reason under law to do so or there is support under the Health Service (Control of Patient Information Regulations) 2002 ('section 251 support') applying via the Confidentiality Advisory Group in England and Wales</p> <p>Sharing of aggregated non identifiable data is permitted.</p> <p>Data Processor – NIHR Clinical Research Network, Synexus Clinical Research, and Clinical Practice Research Datalink (CPRD) MHRA</p>
Individual Funding Requests	<p>Purpose – We may need to process your personal information where we are required to fund specific treatment for you for a particular condition that is not already covered in our standard NHS contract.</p> <p>The clinical professional who first identifies that you may need the treatment will explain to you the information that is needed to be collected and processed in order to assess your needs and commission your care; they will gain your explicit consent to share this. You have the right to withdraw your consent at any time but this may affect the decision to provide individual funding.</p> <p>Legal Basis –</p> <ul style="list-style-type: none"> Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine <p>Data processor –BOB ICB (Integrated Care Board)</p>
Safeguarding Adults	<p>Purpose – We will share personal confidential information with the safeguarding team where there is a need to assess and evaluate any safeguarding concerns and to protect the safety of individuals.</p> <p>Consent is not be required to share information for this purpose.</p> <p>Legal Basis – in some case consent will be required otherwise</p> <ul style="list-style-type: none"> Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine <p>Data Processor – Oxfordshire Safeguarding Adults Board</p>
Safeguarding Children	<p>Purpose – We will share children’s personal information where there</p>

	<p>is a need to assess and evaluate any safeguarding concerns and to protect the safety of children.</p> <p>Legal Basis –</p> <ul style="list-style-type: none"> • Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and • Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine <p>Consent may not be required to share this information.</p> <p>Data Processor – – Oxfordshire Safeguarding Children Board</p>
<p>Risk Stratification – Preventative Care</p>	<p>Purpose - ‘Risk stratification for case finding’ is a process for identifying and managing patients who have or may be at-risk of health conditions (such as diabetes) or who are most likely to need healthcare services (such as people with frailty). Risk stratification tools used in the NHS help determine a person’s risk of suffering a particular condition and enable us to focus on preventing ill health before it develops.</p> <p>Information about you is collected from a number of sources including NHS Trusts, GP Federations and your GP Practice. A risk score is then arrived at through an analysis of your de-identified information. This can help us identify and offer you additional services to improve your health.</p> <p>If you do not wish information about you to be included in any risk stratification programmes, please let us know. We can add a code to your records that will stop your information from being used for this purpose. Please be aware that this may limit the ability of healthcare professionals to identify if you have or are at risk of developing certain serious health conditions.</p> <p>Type of Data – Identifiable/Pseudonymised/Anonymised/Aggregate Data</p> <p>Legal Basis –</p> <ul style="list-style-type: none"> • Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and • Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine <p>Data processor –BOB ICB (Integrated Care Board)</p>
<p>Public Health Screening programmes (identifiable) Notifiable disease information (identifiable)</p>	<p>Purpose – Personal identifiable and anonymous data is shared. The NHS provides national screening programmes so that certain diseases can be detected at an early stage. These currently apply to bowel cancer, breast cancer, aortic aneurysms and diabetic retinal screening service to name a few. The law allows us to share your contact information, and certain aspects of information relating to</p>

<p>Smoking cessation (anonymous) Sexual health (anonymous) Vaccination Programmes</p>	<p>the screening with Public Health England so that you can be appropriately invited to the relevant screening programme.</p> <p>More information can be found at: https://www.gov.uk/topic/population-screening-programmes or speak to the practice.</p> <p>Patients may <u>not</u> opt out of having their personal information shared for Public Health reasons. Patients may opt out of being screened at the time of receiving an invitation.</p> <p>Legal Basis – Sharing personal data for this purpose is governed by the COPI Reg 2.</p> <ul style="list-style-type: none"> • Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ • Article 6 1 (f) Legitimate interests • Article 9(2)(h) Health data as stated above (see p.7). • Article 9 2 (i) Public health <p>Data Processors – Thames Valley Public Health Team, NHS England SE, UK Health Security Agency (HSA) South East, Oxfordshire County Council, Public Health dept</p>
<p>Direct Care (NHS Trusts, Community Providers, Pharmacies, Enhanced care providers, Nursing Homes, Other Care Providers.)</p>	<p>Purpose – Personal information is shared with other secondary care trusts and providers in order to provide you with individual direct care services. This could be hospitals or community providers for a range of services, including treatment, operations, physio, and community nursing, ambulance service.</p> <p>Legal Basis – The processing of personal data in the delivery of direct care and for providers’ administrative purposes in this surgery and in support of direct care elsewhere is supported under the following Article 6 1 (e) direct care and 9 2 (h) to provide health or social care:</p> <p>In some cases patients may be required to consent to having their record opened by the third party provider before patients information is accessed. Where there is an overriding need to access the GP record in order to provide patients with lifesaving care, their consent will not be required.</p> <p>Data Processors – Oxford Health NHS Foundation Trust, Oxford University Hospitals NHS Foundation Trust, Local pharmacies – you will be informed of which pharmacy you are referred to at the time of booking an appointment with them.</p>
<p>Care Quality Commission</p>	<p>Purpose – The CQC is the regulator for the English Health and Social Care services to ensure that safe care is provided. They will inspect and produce reports back to the GP practice on a regular basis. The Law allows the CQC to access identifiable data.</p> <p>More detail on how they ensure compliance with data protection</p>

	<p>law (including UK GDPR) and their privacy statement is available at: https://www.cqc.org.uk/about-us/our-policies/privacy-statement</p> <p>Legal Basis – Article 6(1)(c) “processing is necessary for compliance with a legal obligation to which the controller is subject.” And Article 9(2) (h) as stated above (see p.7).</p> <p>Processors – Care Quality Commission</p>
<p>Population Health Management</p> <p>(BOB ICB, NHS England, The Thames Valley & Surrey (TVS) Care Records.)</p>	<p>Purpose – Health and care services work together as ‘Integrated Care Systems’ (ICS) and are sharing data in order to:</p> <ul style="list-style-type: none"> • Understand the health and care needs of the care system’s population, including health inequalities • Provide support to where it will have the most impact • Identify early actions to keep people well, not only focusing on people in direct contact with services, but looking to join up care across different partners. <p>(NB this links to the Risk Stratification activity identified above)</p> <p>Type of Data – Identifiable/Pseudonymised/Anonymised/Aggregate Data. Only organisations that provide your care will see your identifiable data.</p> <p>Anonymous data is also shared with the National Association of Primary Care to support work on health inequalities.</p> <p>In addition to the BOB ICB, the TVS Shared Care Record is also undertaking this activity over the Thames Valley & Surrey area.</p> <p>To opt out of this data sharing, patients can register a “Type One Opt-Out” with the GP practice. You can find more information about how to do this on the NHS website.</p> <p>Legal Basis –</p> <ul style="list-style-type: none"> • Article 6(1)(e): “necessary... in the exercise of official authority vested in the controller • Article 9(2)(g): “processing is necessary for reasons of substantial public interest” • Article 9(2)(h): “processing is necessary... for the provision of health or social care or treatment or the management of health or social care systems and services” • Article 9(2)(i): “processing is necessary for reasons of public interest in the area of public health” <p>Data Processor – Optum, Cerner, Graphnet</p>
<p>Payments, Invoice validation</p>	<p>Purpose – Contract holding GPs in the UK receive payments from their respective governments on a tiered basis. Most of the income is derived from baseline capitation payments made according to the number of patients registered with the practice on quarterly payment days. These amounts paid per patient per quarter vary according to the age, sex and other patient demographic details.</p>

	<p>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.</p> <p>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.</p> <p>Practices can also receive payments for certain national initiatives such as immunisation programs.</p> <p>Practices may also receive incomes relating to a variety of non-patient related elements such as premises.</p> <p>Finally there are short term initiatives and projects that practices can take part in.</p> <p>Practices or GPs may also receive income for participating in the education of medical students, junior doctors and GPs themselves as well as research.</p> <p>In order to make patient based payments basic and relevant necessary data about you needs to be sent to the various payment services. The release of this data is required by English laws.</p> <p>Legal Basis – Article 6(1)(c) “processing is necessary for compliance with a legal obligation to which the controller is subject.” And Article 9(2)(h) ‘as stated above (see p.7).</p> <p>Data Processors – NHS England, BOB ICB, Public Health</p>
Patient Record database	<p>Purpose – Your medical record will be processed in order that a database can be maintained, this is managed in a secure way and there are robust processes in place to ensure your medical record is kept accurate, and up to date. Your record will follow you as you change surgeries throughout your life.</p> <p>Closed records will be archived by NHS England.</p> <p>Legal Basis – Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) as stated above (see p.7).</p> <p>Data Processor – EMIS Health and Primary Care Support England (PCSE)</p>
Medical reports Subject Access Requests	<p>Purpose – Your medical record may be shared in order that:</p> <ul style="list-style-type: none"> • Solicitors/persons 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 them can have a copy to your medical history for a specific purpose. <p>Legal Basis –</p> <ul style="list-style-type: none"> • Article 6(1)(a) – consent for personal data; and • Article 9(2)(a) – explicit consent for special-category data. <p>Data Processor – iGPR, Solicitors, Insurance organisations</p>
Medicines Management	<p>Purpose – your medical record is shared with the medicines</p>

<p>Team Medicines Optimisation</p>	<p>management team pharmacists, in order that your medication can be kept up to date and any necessary changes to medication can be implemented.</p> <p>Legal Basis – Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated above (see p.7).</p> <p>Data Processor – Berkshire, Buckinghamshire & Oxfordshire ICB</p>
<p>GP Federation</p> <p>Providing services such as:</p> <ul style="list-style-type: none"> • Urgent Care Centre • College Nursing • Primary Consultation & Advice Service (CAS) • Winter Paediatric Hub • Community Gynaecology Service 	<p>Purpose – Your medical record will be shared with PML 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, Oxford College Nursing Service. The Federation will be acting on behalf of the GP practice.</p> <p>Legal Basis – Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated above (see p.7).</p> <p>Data Processor – PML</p>
<p>Oxford Central Primary Care Network (PCN)</p> <p>Includes services such as:</p> <ul style="list-style-type: none"> • Enhanced Access • Physiotherapy • Social prescribing • COVID vaccination 	<p>Purpose – Your medical record will be shared with the Oxford Central PCN in order that they can provide direct care services to the patient population.</p> <p>Legal Basis – Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated above (see p.7).</p> <p>Data Processor – KES@Northgate, 27@Northgate, 28@Northgate, Dr Leaver & Partners, Observatory Medical Practice</p>
<p>Oxford City Primary Care (OCPC) Ltd</p> <p>Providing services such as:</p> <ul style="list-style-type: none"> • Primary Care Visiting Service • Urgent Care Centre 	<p>Purpose – Your medical record will be shared with our local Oxford City Primary Care company in order that they can provide direct care services to the patient population. This could be in the form of the Urgent Care Centre or the Primary Care Visiting service.</p> <p>Access to the Primary Care record and PCN EMIS Clinical Services care record for both the GP Practice and the cross-organisational multi-disciplinary teams will ensure that healthcare professionals are able to make informed, timely decisions when planning, delivering and/or managing your care and treatment. Authorised staff involved in your care can securely view your primary care record and new information captured can be instantly shared back to your registered GP Practice.</p> <p>Legal Basis - Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) as stated above (see p.7).</p> <p>Processor – EMIS, Oxford City Primary Care (OCPC), Oxford Central PCN</p>
<p>Smoking cessation</p>	<p>Purpose – personal information is shared in order for the smoking</p>

	<p>cessation service to be provided.</p> <p>Only those patients who wish to be party to this service will have their data shared.</p> <p>Legal Basis – Article 6 1 (a) and 9 2 (h) consent</p> <p>Data Processor – Stop for Life Oxon</p>
Police	<p>Purpose – Personal confidential information may be shared with the Police authority for certain purposes. The level of sharing and purpose for sharing may vary. Where there is a legal basis for this information to be shared consent will not always be required.</p> <p>The Police will require the correct documentation in order to make a request. This could be but not limited to, DS 2, Court order, s137, the prevention and detection of a crime. Or where the information is necessary to protect a person or community.</p> <p>Legal Basis – UK GDPR –6 1 (c) Legal Obligation. Article 6 1 (f) legitimate interest Article 9 2 (f) requests for legal reasons</p> <p>Data Processor – Police Constabulary</p>
Coroner	<p>Purpose – Personal health records or information relating to a deceased patient may be shared with the coroner or medical examiner upon request.</p> <p>Legal Basis – UK GDPR Article 6 1 (c) Legal Obligation 9 2 (h) Health data</p> <p>Data Processor – The Coroner</p>
Medical Examiners’ Office for Oxfordshire	<p>Purpose – Medical records associated with deceased patients are outside scope of the UK GDPR. However, next of kin details are within the scope of the UK GDPR. We will share specified deceased patient records and next of kin details with the Medical Examiners within Oxford University Hospitals NHS Foundation Trust.</p> <p>Legal Basis –</p> <ul style="list-style-type: none"> • Article 6(1)(c) – necessary under a legal obligation to which the controller is subject”; and • Article 9(2)(h)– “processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services”. <p>Data Processor – Medical Examiners Service, OUH NHS FT</p>
Private healthcare providers	<p>Purpose – Personal information shared with private health care providers in order to deliver direct care to patients at the patient’s request. Consent from the patient will be required to share data with Private Providers.</p>

	<p>Legal Basis – Article 6 1 (a) and 9 2 (a) Consented and under contract between the patient and the provider</p> <p>Data Processor – BUPA, Nuffield Health, etc.</p>
Messaging Service	<p>Purpose – Personal identifiable information shared with the messaging service in order that messages including: appointment reminders, results, campaign messages related to specific patients’ health needs, and direct messages to patients, can be transferred to the patient in a safe way.</p> <p>Legal Basis – UK GDPR Article 6 1 (b) Contract, Article 6 1 (e) Public task, Article 9 2 (h) Health data</p> <p>Data Processor – Accurx, e-Consult, NHS App</p>
Remote consultation Including: <ul style="list-style-type: none"> • Video Consultation • Clinical photography 	<p>Purpose – Personal information including images may be processed, stored and with the patients consent shared, in order to provide the patient with urgent medical advice.</p> <p>Legal Basis – Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated above (see p.7).</p> <p>Patients may be videoed or asked to provide photographs with consent. There are restrictions on what the practice can accept photographs of. No photographs of the full face, no intimate areas, no pictures of patients who cannot consent to the process. No pictures of children.</p> <p>Data Processor – e-Consult, Accurx</p>
MDT meetings	<p>Purpose – For some long-term conditions, the practice participates in meetings with staff from other agencies involved in providing care, to help plan the best way to provide care to patients with these conditions. Personal data will be shared with other agencies in order that mutual care packages can be decided.</p> <p>Legal Basis – Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated above (see p.7).</p> <p>Data Processor – MS Teams</p>
General Practice Extraction Service (GPES) <ol style="list-style-type: none"> 1. At risk patients data collection Version 3 2. CVDPREVENT Audit 3. Physical Health Checks for people with Severe Mental 	<p>Purpose – GP practices are required to provide data extraction of their patients’ personal confidential information for various purposes to NHS Digital. The objective of this data collection is on an ongoing basis to identify patients registered at General Practices who fit within a certain criterion, in order to monitor and either provide direct care, or prevent serious harm to those patients. Below is a list of the purposes for the data extraction, by using the link you can find out the detail behind each data extraction and how your information will be used to inform this essential work:</p>

<p>Illness</p> <p>4. National Obesity Audit</p>	<ol style="list-style-type: none"> 1. At risk patients including severely clinically vulnerable 2. NHS England has directed NHS Digital to collect and analyse data in connection with Cardiovascular Disease Prevention Audit 3. GPES Physical Health Checks for people with Severe Mental Illness (PHSMI) data collection 4. National Obesity Audit - NHS Digital <p>Legal Basis – All GP Practices in England are legally required to share data with NHS Digital for this purpose under section 259(1)(a) and (5) of the Health and Social Care 2012 Act</p> <p>Further detailed legal basis can be found in each link.</p> <p>Any objections to this data collection should be made directly to NHS Digital. enquiries@nhsdigital.nhs.uk</p> <p>Data Processor – NHS England</p>
<p>Medication/Prescribing</p>	<p>Purpose – Prescriptions containing personal identifiable and health data will be shared with organisations who provide medicines management including chemists/pharmacies, in order to provide patients with essential medication regime management, medicines and/or treatment as their health needs dictate. This process is achieved either by face-to-face contact with the patient or electronically.</p> <p>Pharmacists may be employed to review medication, patients may be referred to pharmacists to assist with diagnosis and care for minor treatment, patients may have specified a nominated pharmacy they may wish their repeat or acute prescriptions to be ordered and sent directly to the pharmacy making a more efficient process. Arrangements can also be made with the pharmacy to deliver care and medication.</p> <p>Legal Basis – Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ and Article 9(2)(h) Health data as stated above (see p.7).</p> <p>Data Processor – Pharmacy of choice</p>
<p>Professional Training</p>	<p>Purpose – We are a training surgery. Our clinical team are required to be exposed to on the job, clinical experience, as well as continual professional development. On occasion you may be asked if you are happy to be seen by one of our GP registrars, pharmacists or other clinical team to assist with their training as a clinical professional.</p> <p>You may also be asked if you would be happy to have a consultation recorded for training purposes. These recordings will be shared and discussed with training GPs at the surgery, and also with moderators at the RCGP and HEE.</p> <p>Legal Basis – 6 1 (a) consent, patients will be asked if they wish to</p>

	<p>take part in training sessions.</p> <p>9 2 (a) - explicit consent will be required when making recordings of consultations.</p> <p>Recordings remain the control of the GP practice and they will delete all recordings from the secure site once they are no longer required.</p> <p>Data Processor – RCGP, HEE</p>
Telephony	<p>Purpose – The practice uses an internet-based telephony system that records telephone calls, for their own purpose and to assist with patient consultations. The telephone system has been commissioned to assist with the high volume and management of calls into the surgery, which in turn will enable a better service to patients. We record incoming and outgoing calls.</p> <p>Our phone system is set to automatically retain calls for 3 years. After this point, the recordings are automatically deleted. The 3 year retention period enables us to download and retain exact and unaltered copies of calls where required for medico-legal purposes.</p> <p>Legal Basis – While there is a robust contract in place with the processor, the surgery has undertaken this service to assist with the direct care of patients in a more efficient way.</p> <p>Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ and Article 9(2)(h) Health data as stated above (see p.7).</p> <p>Data Processor – Surgery Connect, X-On</p>
Learning Disability Mortality Programme LeDeR	<p>Purpose – The Learning Disability Mortality Review (LeDeR) programme was commissioned by NHS England to investigate the death of patients with learning difficulties and Autism to assist with processes to improve the standard and quality of care for people living with a learning disability and Autism. Records of deceased patients who meet with this criterion will be shared with NHS England.</p> <p>Legal Basis – It has approval from the Secretary of State under section 251 of the NHS Act 2006 to process patient identifiable information who fit within a certain criterion.</p> <p>Data Processor – BOB ICB (Integrated Care Board), NHS England</p>
Anticoagulation Monitoring	<p>Purpose: Personal Confidential data is shared with LumiraDX in order to provide an anticoagulation clinic to patients who are on anticoagulation medication. This will only affect patients who are within these criteria.</p> <p>Legal Basis –</p> <ul style="list-style-type: none"> Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and

	<ul style="list-style-type: none"> Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ <p>Processor : LumiraDX INRStar</p>
Shared Care Record	<p>Purpose – In order for the practice to have access to a shared record, the Integrated Care Board has commissioned a number of systems including GP connect, which is managed by NHS Digital, to enable a shared care record, which will enable patient information to be used for a number of care related services (see separate GP Connect section below). These systems may also include Population Health Management and analytics to assist with planning services for the use of the local health population.</p> <p>Where data is used for secondary uses no personal identifiable data will be used.</p> <p>Where personal confidential data is used for Research explicit consent will be required.</p> <p>Legal Basis – Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated above (see p.7).</p> <p>Data Processor – NHS England</p>
<p>Local shared care record:</p> <ul style="list-style-type: none"> The Thames Valley & Surrey (TVS) Care Records, Health Information Exchange (HIE) 	<p>Purpose – Health and social care services are developing shared systems to share data efficiently and quickly. It is important for anyone treating you to be able to access your shared record so that they have all the information they need to care for you. This will be during your routine appointments and in urgent situations such as going to A&E, calling 111 or going to an Out-Of-Hours appointment. It is also quicker for staff to access a shared record than to try to contact other staff by phone or email.</p> <p>Only authorised staff can lawfully access the systems and the information they see is carefully checked so that it relates to their job. Systems do not share all your data, just data which services have agreed is necessary to include.</p> <p>For more information on the TVS Care Records and HIE, you can visit their website at https://www.thamesvalleysurreycarerecords.net/</p> <p>If you wish to opt out from this data sharing, you will need to let the practice know so they can change your record sharing settings. Please contact the surgery and ask us to record that you have refused consent for upload to local shared electronic record.</p> <p>Legal Basis – Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated above (see p.7).</p> <p>Data Processors – Graphnet, Cerner</p>