

# Operose Health Group Privacy Notice

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## Summary

Keeping your personal data safe is very important to us. This privacy notice will inform you of how we look after your personal data, tell you about your privacy rights and how to exercise your rights under legislation.

Your personal data is stored securely at all times, in our clinical systems. Only authorised individuals who need access for the legal circumstances set out in the sections below can access your personal data.

We may share information about you with other General Practices (GPs), NHS acute or mental health Trusts, community health providers, pharmacists, ambulance services, social services, and NHS commissioning organisations who are directly involved in providing or funding your care needs and for the purpose of indirect care (see secondary uses below). Your data will not be shared with anyone who is not listed in this privacy notice unless we are obliged by law.

We **do not** share your personal information with marketing and advertising companies, and we do not share your data with anyone who would take your data outside of the UK (GDPR) jurisdiction.

We will only share personal information about you with medical research organisations with your consent or as described in the section below, and you have the right to withdraw your consent at any time by contacting the Practice/Service you are registered with. The national data opt-out allows people to opt out of their confidential information being used for research and planning. You can read more about it on the [NHS.uk](https://www.nhs.uk) website.

A full list of the organisations we share information with, and why, is provided in the later section of this Privacy Notice.

## 1. Who we are

Operose Health is the brand name for a number of companies that provide primary healthcare services across England. A full list can be found [here](#)<sup>i</sup>:

## 2. What we do

At Operose Health, we are experts in working with complex health systems to provide the very best healthcare service to our patients and services users, and to transform their quality of healthcare experience. We are part of a global healthcare family with over 30 years' experience of delivering high quality healthcare in the most simple and seamless way to our patients and service users, and we are committed to protecting and respecting their privacy.

Our portfolio of services includes primary care, community outpatient services and referral management services. We respect your right with regards to privacy and data protection when you communicate with us through our websites, events, telephone, or attend any of our face-to-face consultation services.

Your personal data is stored in our secure clinical systems, only those who are involved in delivering your care have access to your personal data. Your data will not be shared with anyone else, unless we are obliged by law.

## 3. Sharing your personal information

We may share information about you with other General Practices (GPs), NHS acute or mental health Trusts, community health providers, pharmacists, ambulance services, social services, and NHS commissioning organisations who are directly involved in providing or funding your care needs or for the purpose of indirect care (see secondary uses below). Your data will not be shared with anyone else, unless we are obliged by law.

We **do not** share your personal information with marketing and advertising companies. We hold your information securely in the UK at all times. Your information is not shared anywhere outside the UK.

We will only share personal information about you with medical research organisations with your explicit consent, and you have the right to withdraw your consent at any time.

A full list of the organisations we share information with, and why, is provided in the later section of this Privacy Notice.

## 4. What is this Privacy Notice about?

A privacy notice is a statement that describes how an organisation collects, uses, retains and discloses personal data, or special categories of personal data. Different organisations sometimes use different terms, and it can be referred to as a privacy statement, a fair processing notice or a privacy policy.

Being transparent and providing accessible information to individuals about how an organisation will use their personal information is a key element of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. To ensure that we

process your personal data fairly, lawfully and transparently we are required by law to provide you with the following information:

- What information we collect and process about you
- How we process your personal data
- The purpose of processing
- Recipients or categories recipients of your personal data
- The identity of our Data Protection Officer
- How long we retain personal information about you
- The lawful bases for processing
- Your rights - to view, request access copies of your personal information, or object to the processing of your personal information.

## 5. Types of personal information we process

At Operose Health, we process the following categories of personal information about our patients and service users:

| Category                                                                                    | Data Type                                                                                                                                                                                                                                                                                                                                      |
|---------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Identity data and contact details                                                           | Such as name, date of birth, gender, NHS number, telephone number, postal address, postcode, email address (if provided) etc.                                                                                                                                                                                                                  |
| Support contact details                                                                     | Names, contact details of carers, relevant close relatives, next of kin and representatives                                                                                                                                                                                                                                                    |
| Special categories of personal data concerning physical, social or mental health condition. | Such as medical history, diagnosis, treatments, test results, appointment, attendances, referrals, care plans, care packages, medication, medical opinions etc.                                                                                                                                                                                |
| Special categories of personal data with protected characteristics                          | Such as racial or ethnic origin, religious or philosophical beliefs, genetic data, sexual life or sexual orientation data, child protection records, adoption records etc.                                                                                                                                                                     |
| Aggregated data                                                                             | A combination of personal data, and special categories of personal data for the purpose of business intelligence and analytical services to enable us to predict future trends and plan our services.                                                                                                                                          |
| Usage data                                                                                  | Our websites use cookies to distinguish you from other user when you access our online services. A cookie is a small file of letters and numbers that we store on your browser when you consent to use of our online services. This helps us to provide you with a good experience when you browse our site and enable us to improve our site. |

## 6. What we process your personal information for

We process personal information about you in a number of ways. These include:

- **Primary uses** – we process personal information concerning your health to enable our registered and regulated healthcare professionals who are directly involved in your care to provide you with the best possible direct care delivery.

Personal information concerning your health or social care is also made available to other health or social care provider organisations who are involved in your health or social care needs to enable them to make the best-informed decision about you when you use their service.

- **Secondary uses** – We process your personal information for purposes of beyond direct care in the following ways:
  - Reviewing the care we provide through clinical audit.
  - Investigating your queries, complaints and legal claims.
  - Ensuring we receive payment for the healthcare you receive.
  - Preparing statistics on NHS performance.
  - Auditing NHS accounts and services.
  - Undertaking health [research](#), and development (with your explicit consent, and you have the right choose whether or not to be involved).
  - For business intelligence and analytical services to enable us to predict future trends and plan our services.
  - Training and educating our healthcare professionals (with your explicit consent, and you have the right choose whether or not to be involved).

## 7. Our identity and contact details

Operose Health includes the entities listed in this Privacy Notice. We can be contacted at:

Operose Health  
108 High Street,  
Great Missenden  
Buckinghamshire  
HP16 0BG

## 8. Our Data Protection Officer

If you have any questions or concerns regarding how your data is being processed, please write to our Data Protection Officer who can be contacted at:

Data Protection Officer  
Operose Health  
108 High Street,  
Great Missenden  
Buckinghamshire  
HP16 0BG

Tel: 020 8678 5624

Email: [dpo@operosehealth.co.uk](mailto:dpo@operosehealth.co.uk)

## 9. Organisations we share your personal information with

Included below is a table of the organisations we share information about you for the **purposes of direct and indirect care**, split into the following categories:

- a. [Direct Medical Care and Administration](#)
- b. [Other primary care services delivered for the purposes of direct care](#)
- c. [Statutory disclosures of Information](#)
- d. [Processing for the purposes of Commissioning, Planning, Research and Risk Stratification](#)
- e. [Data sharing databases](#)
- f. [Processors](#)

### a. Direct Medical Care and Administration

| Recipients or categories of recipients of the personal or special categories of personal data | Purpose of the processing                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <p><b>Lawful basis</b></p> <p><b>UK General Data Protection Regulation (UK GDPR)</b></p> <p>- <i>Article 6</i> -</p> <p>- <i>Article 9</i> -</p> <p><b>Data Protection Act (DPA) 2018</b></p> <p>- <i>Section 10</i> -</p> <p>- <i>Schedule 1</i> -</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
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| <b>NHS Trusts – Hospitals, Community or Mental Health Trusts.</b>                             | <p>Personal data concerning your health is shared with NHS Trusts to enable their healthcare professionals make the best-informed decision about your health needs, and to provide you with the best possible care if you visit the hospital for routine care and referrals.</p> <p>Your personal information may also be processed for local administrative purposes such as:</p> <ul style="list-style-type: none"> <li>• Waiting list management.</li> <li>• Local clinical audit.</li> <li>• Performance against local targets.</li> <li>• Activity monitoring.</li> <li>• Production of datasets to submit for commissioning purposes and national collections.</li> </ul> <p>Your electronic GP record is the source of information that is shared.</p> | <p>The processing of <b>personal data</b> is permitted under the following UK GDPR “condition”:</p> <ul style="list-style-type: none"> <li>• GDPR Article 6(1) (e) – processing is necessary for the performance of a task carried out in the public interest.</li> </ul> <p>The processing of <b>special categories of personal data</b> is permitted under the following UK GDPR “condition”, and DPA “provisions”:</p> <ul style="list-style-type: none"> <li>• GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services.</li> <li>• <a href="#">DPA Section 10 (1) (c) – processing is necessary for health and social care purposes.</a></li> <li>• <a href="#">In accordance with DPA Schedule 1, Part 1, (2) health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services.</a></li> </ul> |

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|                                                                                                              | <p>In accordance with DPA Part 1, Schedule 1 (2) health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <p><b>Emergency Services (Ambulance trusts, police, A&amp;E departments, out of hours services, 111)</b></p> | <p>There are circumstances when intervention is necessary in order to save or protect a patient's life or to prevent them from serious immediate harm, for example, during a collapse or diabetic coma or serious injury or accident. In many of these circumstances the patient may be unconscious or too ill to communicate.</p> <p>Medical professionals have a duty of care to share data in emergencies to protect their patients or other persons. In these circumstances, your GP medical record will be shared with emergency healthcare services, the police or fire service in order to enable you receive the best treatment or service.</p> <p>Make pre-determined decisions about the type and extent of care you will receive in an emergency; these are known as "Advance Directives".</p> <p>Your electronic GP record is the source of information that is shared.</p> | <p>The processing of <b>personal data</b> is permitted under the following UK GDPR "condition", and DPA "provisions":</p> <ul style="list-style-type: none"> <li>GDPR Article 6(1) (d) – processing is necessary in order to protect the vital interests of the data subject.</li> </ul> <p>The processing of <b>special categories of personal data</b> is permitted under the following UK GDPR "conditions" and DPA "provisions":</p> <ul style="list-style-type: none"> <li>Article 9 (2) (C) – the processing is necessary to protect the vital interests of the data subject.</li> <li>GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services.</li> <li><a href="#">DPA Section 10 (1) (c) – processing is necessary for health and social care purposes.</a></li> <li><a href="#">In accordance with DPA Schedule 1, Part 1, (2) health or social care purposes means the purposes of preventive or</a></li> </ul> |

|                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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|                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <a href="#"><u>occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services.</u></a>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Pharmacists - Medicines Optimisation</b> | <p>Medicines optimisation looks at the value which medicines deliver, making sure they are clinically-effective and cost-effective. It is about ensuring patients get the right choice of medicines, at the right time, and are engaged in the process by their clinical team.</p> <p>Medicines optimisation enables community pharmacies to request medication electronically from our GP Practice and view relevant information from your GP record in order to provide you with the best medicines.</p> <p>Your electronic GP record is the source of information that is shared.</p> | <p>The processing of <b>personal data</b> is permitted under the following UK GDPR “condition”:</p> <ul style="list-style-type: none"> <li>• GDPR Article 6(1) (e) – processing is necessary for the performance of a task carried out in the public interest.</li> </ul> <p>The processing of <b>special categories of personal data</b> is permitted under the following UK GDPR “condition”, and DPA “provisions”:</p> <ul style="list-style-type: none"> <li>• GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services.</li> <li>• <a href="#"><u>DPA Section 10 (1) (c) – processing is necessary for health and social care purposes.</u></a></li> <li>• <a href="#"><u>In accordance with DPA Schedule 1, Part 1, (2) health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services.</u></a></li> </ul> |
| <b>Local Authority – Social Services</b>    | <p>Operose Health Group works closely with Local Authorities to support and care for people of all ages to deliver the best possible social care.</p> <p>Personal data concerning your GP medical record may be shared with Local Authorities and Multidisciplinary Team (MDT) delivering social care in order to enable them to make the best-informed decision about your social care needs if required.</p>                                                                                                                                                                           | <p>The processing of <b>personal data</b> is permitted under the following UK GDPR “condition”:</p> <ul style="list-style-type: none"> <li>• GDPR Article 6(1) (e) – processing is necessary for the performance of a task carried out in the public interest.</li> </ul> <p>The processing of <b>special categories of personal data</b> is permitted under the following UK GDPR “condition”, and DPA “provisions”:</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

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|                   | <p>Your electronic GP record is the source of information that is shared.</p>                                                                                                                                                                                                                                                        | <ul style="list-style-type: none"> <li>GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services.</li> <li><a href="#">DPA Section 10 (1) (c) – processing is necessary for health and social care purposes.</a></li> <li><a href="#">In accordance with DPA Schedule 1, Part 1, (2) health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services.</a></li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>Care Homes</b> | <p>If you are a residence of a Care Home, personal data concerning your GP record will be shared with your care provider and other Multidisciplinary Team (MDT) looking after you to enable them to provide you with the best possible care needs.</p> <p>Your electronic GP record is the source of information that is shared.</p> | <p>The processing of <b>personal data</b> is permitted under the following UK GDPR “condition”:</p> <ul style="list-style-type: none"> <li>GDPR Article 6(1) (e) – processing is necessary for the performance of a task carried out in the public interest.</li> </ul> <p>The processing of <b>special categories of personal data</b> is permitted under the following UK GDPR “condition”, and DPA “provisions”:</p> <ul style="list-style-type: none"> <li>GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services.</li> <li><a href="#">DPA Section 10 (1) (c) – processing is necessary for health and social care purposes.</a></li> <li><a href="#">In accordance with DPA Schedule 1, Part 1, (2) health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services.</a></li> </ul> |

**b. Other primary care services delivered for the purposes of direct care**

| Recipients or categories of recipients of the personal or special categories of personal data  | Purpose of the processing                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <p><b>Lawful basis</b></p> <p><b>UK General Data Protection Regulation (UK GDPR)</b></p> <ul style="list-style-type: none"> <li>- <i>Article 6</i> -</li> <li>- <i>Article 9</i> -</li> </ul> <p><b>Data Protection Act (DPA) 2018</b></p> <ul style="list-style-type: none"> <li>- <i>Section 10</i> -</li> <li>- <i>Schedule 1</i> -</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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| <p><b>Integrated Urgent Care Service (IUC)</b> - covering Out of Hours and NHS 111 service</p> | <p><b>Integrated Urgent Care Service (IUC)</b> is an urgent care service delivered across England for the provision of a functionally integrated 24/7 urgent care access, clinical advice and treatment service for patients. IUC incorporates NHS 111 and Out of Hours (OOH) services, which is often referred to as an IUC Clinical Assessment Service.</p> <p>The purpose of IUC is to ensure that patients receive the best possible healthcare service in their community.</p> <p>If you visit the urgent care centre or call NHS 111 for health-related needs, personal data in your GP record will be shared with healthcare professionals in order to enable them to make the best the best-informed decision about your health needs.</p> <p>Your electronic GP record is the source of information that is shared.</p> | <p>The processing of <b>personal data</b> is permitted under the following UK GDPR “condition”:</p> <ul style="list-style-type: none"> <li>• GDPR Article 6(1) (e) – processing is necessary for the performance of a task carried out in the public interest.</li> </ul> <p>The processing of <b>special categories of personal data</b> is permitted under the following UK GDPR “condition”, and DPA “provisions”:</p> <ul style="list-style-type: none"> <li>• GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services.</li> <li>• <a href="#">DPA Section 10 (1) (c) – processing is necessary for health and social care purposes.</a></li> <li>• <a href="#">In accordance with DPA Schedule 1, Part 1, (2) health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services.</a></li> </ul> |

| <b>Continuing Health Care (CHC)</b>                                                                  | <p>NHS Continuing Health Care (CHC) is free care outside of hospital that is arranged and funded by the NHS to support living with complex medical conditions and on-going healthcare needs which can be delivered in the patient's home, at their care home or in non-acute hospitals.</p> <p>CHC is free, unlike support from social services for which a fee may be charged, depending on your income and savings. CHC is different from NHS Funded Nursing Care, which some people with less complex needs living in care homes receive.</p> <p>If you require CHC needs personal data concerning your GP medical record will be shared with the care home or in non-acute hospitals looking after you.</p> <p>Your electronic GP record is the source of information that is shared.</p> | <p>The processing of <b>personal data</b> is permitted under the following UK GDPR "condition":</p> <ul style="list-style-type: none"> <li>• GDPR Article 6(1) (e) – processing is necessary for the performance of a task carried out in the public interest.</li> </ul> <p>The processing of <b>special categories of personal data</b> is permitted under the following UK GDPR "condition", and DPA "provisions":</p> <ul style="list-style-type: none"> <li>• GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services.</li> <li>• <a href="#">DPA Section 10 (1) (c) – processing is necessary for health and social care purposes.</a></li> <li>• <a href="#">In accordance with DPA Schedule 1, Part 1, (2) health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services.</a></li> </ul> |
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| <b>c. Statutory Disclosures of Information</b>                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Recipients or categories of recipients of the personal or special categories of personal data</b> | <b>Purpose of the processing</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>Lawful basis</b><br><br><b>UK General Data Protection Regulation (UK GDPR)</b><br>- Article 6 -<br>- Article 9 -<br><br><b>Data Protection Act (DPA) 2018</b><br>- Section 10 -<br>- Schedule 1-                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Safeguarding Concerns</b><br>– to prevent an                                                      | Some members of public are recognised as needing safeguarding protection, for example children and                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | The processing of <b>personal data</b> is permitted under the following UK GDPR "condition":                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

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| <p>individual, or to prevent a serious crime</p> | <p>vulnerable adults. If an individual is identified as being at risk from harm, we have a duty to do what we can to protect that individual, and we are bound 'Safeguarding' laws to do so.</p> <p>Where there is a suspected or actual safeguarding issue, we will share information that we hold about you with other relevant agencies such as local Ambulance trusts, the police, A&amp;E departments, out of hours services, 111 or social services.</p> <p>The source of the information shared in this way is your electronic GP record.</p> <p><a href="#">Children Act 1989</a> requires local authorities to investigate where a child is the subject of an emergency protection order, is in police protection or where there is a reasonable cause to suspect that a child is suffering or is likely to suffer harm.</p> <p><a href="#">Care Act 2014</a> (safeguarding adults) sets out a clear legal framework for how local authorities and other parts of the system should protect adults at risk of abuse or neglect.</p> <p>Both Acts for Parliament require local authorities to safeguard and promote the welfare of children and adults who are in need, and to request help from specified authorities including General Practices, NHS Trusts, Integrated Care Boards (ICBs) and NHS England.</p> | <ul style="list-style-type: none"> <li>UK GDPR Article 9 (2) (c) – the processing is necessary to protect the vital interests of the data subject.</li> </ul> <p>The processing of <b>special categories of personal data</b> is permitted under the following UK GDPR “condition”, and DPA “provisions”:</p> <ul style="list-style-type: none"> <li>GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services.</li> <li><a href="#">DPA Section 10 (1) (c) – processing is necessary for health and social care purposes.</a></li> <li><a href="#">In accordance with DPA Schedule 1, Part 1, (2) health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services.</a></li> </ul> <p>The processing of <b>special categories of personal data</b> is permitted under the following UK GDPR “condition”, and DPA “provision”:</p> <p>Article 9 (2) (c) – the processing is necessary to protect the vital interests of the data subject.</p> <p><a href="#">In accordance with DPA Schedule 1, Part 2 (18) (1a) - the condition is met where the processing is necessary for protecting an individual from neglect or physical, mental or emotional harm, or protecting the physical, mental or emotional well-being of an individual.</a></p> <p><b><u>Related Legislations:</u></b></p> <p><a href="#">Section 47 of The Children Act 1989.</a></p> <p><a href="#">Section 45 of Care Act 2014</a></p> |
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| <p><u><b>The Care Quality Commission (CQC)</b></u></p> | <p>The Care Quality Commission (CQC) is a regulatory body established under the Health and Social Care Act. The CQC regulates health and social care services in England to ensure that safe health and care are provided. The law allows CQC to access identifiable patient data/medical records in our clinical system for the purposes of their assessment and investigation of significant safety incident.</p> <p>Your data may be shared with the CQC, its officers and inspection team that visit us from time to time.</p> | <p>The processing of <b>personal data</b> is permitted under the following UK GDPR “condition”:</p> <ul style="list-style-type: none"> <li>• GDPR Article 6(1) (c) - processing for legal obligation.</li> <li>• GDPR Article 6(1) (e) – processing is necessary for the performance of a task carried out in the public interest.</li> </ul> <p>The processing of <b>special categories of personal data</b> is permitted under the following UK GDPR “condition”, and DPA “provisions”:</p> <ul style="list-style-type: none"> <li>• GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services.</li> </ul> <p>The processing of <b>special categories of personal data</b> is permitted under the following UK GDPR “condition”, and DPA “provisions”:</p> <ul style="list-style-type: none"> <li>• GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services.</li> <li>• <a href="#"><u>DPA Section 10 (1) (c) – processing is necessary for health and social care purposes.</u></a></li> <li>• <a href="#"><u>In accordance with DPA Schedule 1, Part 1, (2) health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services.</u></a></li> </ul> |
| <p><b>Law Enforcement and Regulatory Bodies</b></p>    | <p>In some circumstances we may be legally required to share personal information with law enforcements and regulatory bodies (without the consent of the data subject) such as: the Police; Courts of Justice; HMRC and DVLA for the purposes of prevention or detection of crime; apprehension or prosecution of offenders; the</p>                                                                                                                                                                                              | <p>The processing of <b>personal data</b> is permitted under the following UK GDPR “condition”:</p> <ul style="list-style-type: none"> <li>• GDPR Article 6(1) (c) - processing is necessary for compliance with a legal obligation.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

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|                     | <p>assessment or collection of any tax or duty or, of any imposition of a similar nature.</p> <p>Our GPs are obliged to notify the DVLA when fitness to drive requires notification, but an individual cannot or will not notify the DVLA themselves, and if there is concern for road safety, which would be for both the individual and the wider public.</p> <p>We will review each request based on its merits before deciding whether to release information to the relevant authorities.</p> <p>Your electronic GP record is the source of information that is shared.</p> | <p>The processing of <b>special categories of personal data</b> is permitted under the following UK GDPR “condition”, and DPA “provision”:</p> <ul style="list-style-type: none"> <li>Article 9 (2) (G) – the processing is necessary for reasons of substantial public interest.</li> <li>In accordance with <a href="#">DPA Schedule 1, Part 2, (10) (1c) – the condition is met where the processing is necessary for the prevention or detection of an unlawful act.</a></li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Medico-Legal</b> | <p><b>Medico-Legal</b> - Where a medical professional is holding personal data for the purpose of providing medical reports in connection with legal action.</p> <p>Your electronic GP record is the source of information that is shared.</p>                                                                                                                                                                                                                                                                                                                                   | <p>The processing of <b>personal data</b> is permitted under the following UK GDPR “condition”:</p> <ul style="list-style-type: none"> <li>GDPR Article 6(1) (c) - processing is necessary for compliance with a legal obligation.</li> <li>GDPR Article 6(1) (e) – processing is necessary for the performance of a task carried out in the public interest.</li> </ul> <p>The processing of <b>special categories of personal data</b> is permitted under the following UK GDPR “condition”, and DPA “provision”:</p> <ul style="list-style-type: none"> <li>GDPR Article 9 (2) (f) – the processing is necessary for the establishment, exercise or defence of legal claims.</li> <li><a href="#">In accordance with DPA Schedule 1, Part 3, (33) - the conditions for processing for legal claims is met where it is in connection with, any legal proceedings including prospective</a></li> </ul> |

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|                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <a href="#">legal proceedings or; for the purpose of obtaining a legal advice or; establishing exercising or defending legal rights.</a>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <a href="#">General Medical Council (GMC)</a>                  | <p><b>General Medical Council (GMC)</b> is a public body that maintains the official register of medical practitioners in the United Kingdom. Its primary responsibility is ‘to protect, promote and maintain the health and safety of the public’ by controlling entry to the register, and suspending or removing members when necessary.</p> <p>Under the Medical Act 1983, the GMC has the power to request access to a patient’s medical records for the purposes of an investigation into a doctor’s fitness to practice.</p> <p>Your electronic GP record is the source of information that is shared.</p> | <p>The processing of <b>personal data</b> is permitted under the following UK GDPR “condition”:</p> <ul style="list-style-type: none"> <li>• GDPR Article 6(1) (c) - processing is necessary for compliance with a legal obligation.</li> <li>• GDPR Article 6(1) (e) - public interest or in the exercise of official authority;</li> </ul> <p>The processing of <b>special categories of personal data</b> is permitted under the following UK GDPR “condition”, and DPA “provisions”:</p> <ul style="list-style-type: none"> <li>• GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services.</li> <li>• <a href="#">DPA Section 10 (1) (c) – processing is necessary for health and social care purposes.</a></li> <li>• <a href="#">In accordance with DPA Schedule 1, Part 1, (2) health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services.</a></li> </ul> <p><b>Related Legislation:</b></p> <p><a href="#">The Medical Act 1983</a></p> |
| <a href="#">The Parliamentary and Health Service Ombudsman</a> | <p>The Parliamentary and Health Service Ombudsman was set up by Parliament to provide an independent complaint handling service for complaints that have not been resolved by the NHS in England and UK</p>                                                                                                                                                                                                                                                                                                                                                                                                       | <p>The processing of <b>personal data</b> is permitted under the following UK GDPR “conditions”:</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

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|                          | <p>government departments, where you believe they have not acted properly or fairly or have provided a poor service. To do this, the Ombudsman will need to collect and use information we hold about you and your complaint.</p> <p>The Parliamentary and Health Service Ombudsman is allowed to use your information for the purpose of handling your complaint under the <u>Parliamentary Commissioner Act 1967</u>. This legislation also protects information obtained for the purposes of investigating your complaint.</p> <p>Your electronic GP record is the source of information that is shared.</p> | <ul style="list-style-type: none"> <li>• GDPR Article 6(1) (a) - the data subject has given consent to the processing of his or her personal data.</li> <li>• GDPR Article 6(1) (c) - processing is necessary for compliance with a legal obligation.</li> </ul> <p>The processing of <b>special categories of personal data</b> is permitted under the following UK GDPR “conditions”:</p> <ul style="list-style-type: none"> <li>• GDPR Article 9 (2) (a) - the data subject has given explicit consent to the processing of those personal data for one or more specified purposes.</li> </ul> <p>You do not have the right to object to the processing of your personal information, but you have the right to withdraw your consent.</p> <p><b><u>Related Legislation:</u></b></p> <p><u>Parliamentary Commissioner Act 1967.</u></p> |
| <b>NHS Counter Fraud</b> | <p>Under the NHS Act 2006, investigations into fraud in the NHS may require access to confidential patient information.</p> <p>This means that we are compelled by the law to share your data with the NHS counter fraud team where required.</p> <p>Your electronic GP record is the source of information that is shared.</p>                                                                                                                                                                                                                                                                                 | <p>The processing of <b>personal data</b> is permitted under the following UK GDPR “condition”:</p> <ul style="list-style-type: none"> <li>• GDPR Article 6(1) (c) - processing is necessary for compliance with a legal obligation.</li> <li>• GDPR Article 6(1) (e) – processing is necessary for the performance of a task carried out in the public interest.</li> </ul> <p>The processing of <b>special categories of personal data</b> is permitted under the following UK GDPR “condition”, and DPA “provision”:</p> <ul style="list-style-type: none"> <li>• Article 9 (2) (G) – the processing is necessary for reasons of substantial public interest.</li> </ul>                                                                                                                                                                |

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|                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <ul style="list-style-type: none"> <li><a href="#">In accordance with DPA Schedule 1, Part 2, (14) (1a) – the condition is met where the processing is necessary for the purposes of preventing fraud or a particular kind of fraud.</a></li> </ul> <p><b>Related Legislation:</b></p> <p><a href="#">S10 NHS Act 2006</a></p> <p><a href="#">Serious Crime Act 2007</a></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b><a href="#">NHS Digital</a> – Statutory Data Collection</b> | <p>NHS Digital is a national information and technology partner to the health and social care system. NHS Digital use digital technology to transform the NHS and social care.</p> <p>NHS Digital carries out <a href="#">National Data collections/ extraction</a> from the GP clinical system. These include:</p> <p><b>National Diabetes Audit (NDA)</b> - A national monitoring system, auditing the care of patients with diabetes. The data extracted for the purpose of NDA includes NHS Number, date of birth and postcode, as well as clinical parameters related to diabetes. NDA is a mandatory data extraction under section <a href="#">259 of the Health and Social Care Act 2012</a>, this means that we are compelled by law to share your data</p> <p><b>Individual GP Level Data (IGPLD)</b> - A national monitoring system to enable NHS Digital to provide GPs with clinical information on the care provision for their patients. The data extracted includes the NHS number. IGPLD is a mandatory data extraction under <a href="#">259 of the Health and Social Care Act 2012</a>, this means that we are compelled by law to share your data</p> | <p>The processing of <b>personal data</b> is permitted under the following UK GDPR “condition”:</p> <ul style="list-style-type: none"> <li>GDPR Article 6(1) (c) - processing is necessary for compliance with a legal obligation.</li> <li>GDPR Article 6(1) (e) – processing is necessary for the performance of a task carried out in the public interest.</li> </ul> <p>The processing of <b>special categories of personal data</b> is permitted under the following UK GDPR “condition”, and DPA “provision”:</p> <p>GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services.</p> <p><a href="#">DPA Section 10 (1) (c) – processing is necessary for health and social care purposes;</a></p> <p><a href="#">In accordance with DPA Schedule 1, Part 1, (2) - health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services.</a></p> |

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|                             | <p><b>Female genital mutilation (FGM)</b> - NHS Digital collects data on FGM within the NHS in England on behalf of the Department of Health (DH). Data collected is used to produce information that helps improve NHS and local authorities to improve on how they support women and girls who have had or, who are at risk of FGM.</p> <p>FGM Enhanced Dataset is a mandatory data extraction under section <a href="#">259 of the Health and Social Care Act 2012</a>, this means that we are compelled by law to share your data when required.</p> <p>Your electronic GP record is the source of information that is shared.</p> <p><b><u>Data Retention Period</u></b></p> <p>All records held by the Practice will be kept for the duration specified in the <a href="#">Records Management Codes of Practice for Health and Social Care</a></p> | <p><b><u>Related Legislation:</u></b></p> <p><a href="#">S259 of the Health and Social Care Act 2012</a></p> <p>The processing is necessary for compliance with a legal and professional obligation to which we are subject therefore, you do not have the right to object to the processing of your personal information.</p>                                                                                                                                                                                              |
| <a href="#">NHS England</a> | <p>NHS England is responsible for securing, planning, designing and paying for Primary Care &amp; Specialised NHS services not otherwise funded by Clinical Commissioning Groups (CCGs) This includes planned and emergency hospital care, mental health, rehabilitation, community and primary medical care (GP) services.</p> <p>We may often share personal information with NHS England potentially for safeguarding concerns that need escalating beyond our borough.</p> <p>The processing is necessary for compliance with a legal and professional obligation to which we are subject</p>                                                                                                                                                                                                                                                        | <p>The processing of <b>personal data</b> is permitted under the following UK GDPR “condition”:</p> <ul style="list-style-type: none"> <li>• GDPR Article 6(1) (c) - processing is necessary for compliance with a legal obligation.</li> <li>• GDPR Article 6(1) (e) – processing is necessary for the performance of a task carried out in the public interest.</li> </ul> <p>The processing of <b>special categories of personal data</b> is permitted under the following UK GDPR “condition”, and DPA “provision”:</p> |

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|                                                                | <p>therefore, you do not have the right to object to the processing of your personal information.</p> <p>Your electronic GP record is the source of information that is shared.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <p>GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services.</p> <p><a href="#">DPA Section 10 (1) (c) – processing is necessary for health and social care purposes;</a></p> <p><a href="#">In accordance with DPA Schedule 1, Part 1, (2) - health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services.</a></p>                                                                                                                                                                      |
| <p><a href="#">National Cancer Diagnosis Audit (NCDA).</a></p> | <p>The National Cancer Diagnosis Audit (NCDA) looks at primary and secondary care data relating to patients diagnosed with cancer. It helps to understand pathways to cancer diagnosis, what works well and where improvements could be made.</p> <p>The audit looks specifically at clinical practice in order to understand:</p> <ul style="list-style-type: none"> <li>• interval length from patient presentation to diagnosis;</li> <li>• use of investigations prior to referral;</li> <li>• what the referral pathways for patients with cancer are and how they compare with those recorded by the cancer registry</li> </ul> <p>The processing is necessary for compliance with a legal and professional obligation to which we are subject therefore, you do not have the right to object to the processing of your personal information.</p> | <p>The processing of <b>personal data</b> is permitted under the following UK GDPR “condition”:</p> <ul style="list-style-type: none"> <li>• GDPR Article 6(1) (c) - processing is necessary for compliance with a legal obligation.</li> <li>• GDPR Article 6(1) (e) – processing is necessary for the performance of a task carried out in the public interest.</li> </ul> <p>The processing of <b>special categories of personal data</b> is permitted under the following UK GDPR “condition”, and DPA “provision”:</p> <p>GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services.</p> <p><a href="#">DPA Section 10 (1) (c) – processing is necessary for health and social care purposes;</a></p> |

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|                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <a href="#">In accordance with DPA Schedule 1, Part 1, (2) - health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services.</a>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>d. Processing for Commissioning, Planning, Research and Risk Stratification Purposes</b>          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Recipients or categories of recipients of the personal or special categories of personal data</b> | <b>Purpose of the processing</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <b>Lawful basis</b><br><br><b>UK General Data Protection Regulation (UK GDPR)</b><br>- Article 6 -<br>- Article 9 -<br><br><b>Data Protection Act (DPA) 2018</b><br>- Section 10 –<br>- Schedule 1-                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <a href="#">Integrated Care Boards (ICB)</a>                                                         | <p>Each ICS has an Integrated Care Board (ICB), a statutory organisation bringing the NHS together locally to improve population health and establish shared strategic priorities within the NHS. When ICBs were legally established, clinical commissioning groups (CCGs) were abolished.</p> <p>ICBs are responsible for securing, planning, designing and paying for your NHS services, including planned and emergency hospital care, mental health, rehabilitation, community and primary medical care (GP) services. This is known as ‘Commissioning’.</p> <p>To enable ICB in our geographical areas carry out their statutory responsibilities effectively, efficiently and safely,</p> | <p>The processing of <b>personal data</b> is permitted under the following UK GDPR “condition”:</p> <ul style="list-style-type: none"> <li>GDPR Article 6(1) (e) – processing is necessary for the performance of a task carried out in the public interest.</li> </ul> <p>The processing of <b>special categories of personal data</b> is permitted under the following UK GDPR “condition”, and DPA “provisions”:</p> <ul style="list-style-type: none"> <li>GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services.</li> <li><a href="#">DPA Section 10 (1) (c) – processing is necessary for health and social care purposes.</a></li> <li><a href="#">In accordance with DPA Schedule 1, Part 1, (2) health or social care purposes means the purposes of preventive or</a></li> </ul> |

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|                                                                                     | <p>we may share personal data about you with them for the following purposes:</p> <ul style="list-style-type: none"> <li>• Individual Funding Requests.</li> <li>• Continuing Health Care.</li> <li>• Complaints, appeals, queries or, safeguarding concerns.</li> <li>• Commissioning purposes such as payment for target achievement known as Quality and Outcomes Framework (QOF) and where we participate in agreed national or local enhanced services.</li> </ul> <p>Your electronic GP record is the source of information that is shared.</p>                                                                                                                                                                                                                                                                                                                                    | <p><a href="#">occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services.</a></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <p><b>“Risk Stratification” (Population Health Management and Case Finding)</b></p> | <p>At Operose Health, we perform computerised searches of some or all of our records to identify individuals who may be at increased risk of certain conditions or diagnoses such as diabetes, heart disease, risk of falling. Your records may be amongst those searched. This is often called “risk stratification” or “case finding”. These searches are sometimes carried out by Processors who link our records to other records that they access, such as hospital attendance records. The results of these searches and assessment may then be shared with other healthcare workers, such as specialist, therapists, technicians etc. The information that is shared is to enable the other healthcare workers to provide the most appropriate advice, investigations, treatments, therapies and or care.</p> <p>Risk stratification can be grouped into two purposes namely:</p> | <p>The processing of <b>personal data</b> is permitted under the following UK GDPR “condition”:</p> <ul style="list-style-type: none"> <li>• GDPR Article 6(1) (e) – processing is necessary for the performance of a task carried out in the public interest.</li> </ul> <p>The processing of <b>special categories of personal data</b> is permitted under the following UK GDPR “condition”, and DPA “provisions”:</p> <ul style="list-style-type: none"> <li>• GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services.</li> <li>• <a href="#">DPA Section 10 (1) (c) – processing is necessary for health and social care purposes.</a></li> <li>• <a href="#">In accordance with DPA Schedule 1, Part 1, (2) health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the</a></li> </ul> |

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|                                                                            | <p><b>Direct Care</b> – ‘Case Finding’ where carried out by a health professional (for example GPs and Provider) involved in an individual’s care or by a Processor acting under contract with such a provider, it is treated as direct care.</p> <p><b>Indirect Care</b> – to understand the local population needs and plan for future requirement.</p> <p>Your electronic GP record is the source of information that is shared.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <p><a href="#">management of health care systems or services or social care systems or services.</a></p> <p><b>Related Legislation:</b></p> <p><a href="#">Section 251 NHS Act 2006</a></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <p><b>Processing personal data for the purpose of medical research</b></p> | <p>We only agree to participate in medical research projects if there is an agreed clearly defined reasons for the research, and it is likely to benefit healthcare and patients. Such proposals will have consents of our patients and service users, ethics committee approval, and will be in line with the safeguards and derogations required under the UK GDPR.</p> <p>Research organisations do not usually approach patients directly but will ask us to make contact with our suitable patients to seek their consent. Occasionally research can be authorised under law without the need to obtain consent.</p> <p>We may also use your medical records to carry out medical research within our Surgeries with your explicit consent.</p> <p>We share information with the medical research organisations if you give your explicit consent. Examples of our medical research partners are:</p> <ul style="list-style-type: none"> <li>• <a href="#">uMed</a> - a technology enabled research network that links health data to real-time patient</li> </ul> | <p>The processing of <b>personal data</b> is permitted under the following UK GDPR “conditions”:</p> <ul style="list-style-type: none"> <li>• GDPR Article 6(1) (a) - the data subject has given consent to the processing of his or her personal data.</li> </ul> <p>The processing of <b>special categories of personal data</b> is permitted under the following UK GDPR “conditions” and DPA “provision”:</p> <ul style="list-style-type: none"> <li>• GDPR Article 9 (2) (a) - the data subject has given explicit consent to the processing of those personal data for one or more specified purposes.</li> <li>• GDPR Article 9 (2) (j) processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) (as supplemented by section 19 of the 2018 Act) based on domestic law.</li> <li>• <a href="#">In accordance with DPA Schedule 1, Part 1, (4) - The condition for the processing is met where it is necessary for archiving purposes, scientific or historical research purposes or statistical purposes; carried out in accordance with Article 89(1) of the</a></li> </ul> |

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|                                                                                            | <p>engagement. This enables researchers to centrally communicate with targeted patients and access their healthcare records in real time.</p> <p>Your electronic GP record is the source of information that is shared.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <p><a href="#">GDPR and DPA Section 19, and the processing is in the public interest.</a></p> <p>You do not have the right to object to the processing of your personal information, but you have the right to withdraw your consent.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <p><b>De-identifying/anonymising personal data for the purpose of medical research</b></p> | <p>We are currently involved in a research and patient insights programme called the <a href="#">IQVIA Medical Research Extraction Scheme (MRES)</a> which we provide non-identified/anonymised information from patients' electronic medical records.</p> <p>The data collected is non-identifiable/anonymised which means it <b>DOES NOT</b> include any direct patient identifiers such as names, addresses, NHS numbers, or full dates of birth, nor any direct identifiers of practices participating in this data extraction scheme. Individual patients' records are added into a much larger non-identified database, containing records from millions of patients across the UK and may be linked to other data, such as hospital data.</p> <p>Under the Data Protection Legislation, the principles of data protection do not apply to data that has been rendered anonymous however, if you would like to opt out of the IQVIA MRES data collection scheme, please let us know, and no data from your records will be collected/processed for use in research. This will not affect your care in any way.</p> <p>The source of the information shared in this way is your electronic GP record.</p> | <p>The processing of <b>personal data</b> is permitted under the following UK GDPR "conditions":</p> <ul style="list-style-type: none"> <li>• GDPR Article 6(1) (e) - public interest or in the exercise of official authority.</li> </ul> <p>The processing of <b>special categories of personal data</b> is permitted under the following UK GDPR "conditions" and DPA "provision":</p> <ul style="list-style-type: none"> <li>• Article 9 (2) (i) - for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on the domestic law.</li> <li>• <a href="#">In accordance with DPA Schedule 1, Part 1, (4) - The condition for the processing is met where it is necessary for archiving purposes, scientific or historical research purposes or statistical purposes; carried out in accordance with Article 89(1) of the GDPR and DPA Section 19, and the processing is in the public interest.</a></li> </ul> |

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| <p><b>De-identifying/anonymising personal data for the purpose of medical research</b></p> | <p><u>Clinical Practice Research Datalink (CPRD)</u> is a government organisation that provides anonymised patient data for research to improve patient and public health. You cannot be identified from the information sent to CPRD, and the principles of Data Protection Legislation do not apply to data that has been rendered anonymous however, if you do not want anonymised information from your patient record to be used in research you can opt out by speaking to your doctor.</p> <p><u>NIHR RRDN (National Institute for Health Research Regional Research Delivery Network)</u> In the pursuit of advancing medical research, these professionals, alongside our practice team, may access your patient record for pre-consented activities. This involves identifying potential eligibility for research opportunities and supporting recruitment and follow-up for clinical trials. This collaboration also supports NIHR and NHS's pursuit in improving equality to access research. Any eligible individuals will be contacted by the practice, and their consent will be requested before any further processing takes place.</p> | <p>The processing of <b>personal data</b> is permitted under the following UK GDPR “conditions”:</p> <ul style="list-style-type: none"> <li>• GDPR Article 6(1) (e) - public interest or in the exercise of official authority.</li> </ul> <p>The processing of <b>special categories of personal data</b> is permitted under the following UK GDPR “conditions” and DPA “provision”:</p> <ul style="list-style-type: none"> <li>• Article 9 (2) (i) - for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on the domestic law.</li> <li>• <a href="#">In accordance with DPA Schedule 1, Part 1, (4) - The condition for the processing is met where it is necessary for archiving purposes, scientific or historical research purposes or statistical purposes; carried out in accordance with Article 89(1) of the GDPR and DPA Section 19, and the processing is in the public interest.</a></li> </ul> |
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## e. Data Sharing Databases

| Recipients or categories of recipients of the personal or special categories of personal data                                                                                                                                                                                                                                                                   | Purpose of the processing                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Lawful basis                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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| <p><b><u>National NHS Digital Services “Spine” including:</u></b></p> <ul style="list-style-type: none"> <li>• <a href="#">Patient Demographics Service</a></li> <li>• <a href="#">e-Referral Service</a></li> <li>• <a href="#">Electronic Prescription Service</a></li> <li>• <a href="#">GP2GP</a></li> <li>• <a href="#">Summary Care Record</a></li> </ul> | <p><b><u>Spine</u></b> supports the IT infrastructure for health and social care in England, joining together over 23,000 healthcare IT systems in 20,500 organisations.</p> <p>It hosts key services to support the delivery of your care, to enable healthcare professionals, authorised with an NHS smartcard, to view relevant information about you as follows:</p> <p><b><u>Patient Demographics Service</u></b> – The Personal Demographics Service (PDS) is the national electronic database of NHS patient details such as name, address, date of birth and NHS Number (known as demographic information). It helps healthcare professionals to identify patients and match them to their health records. It also allows them to contact and communicate with patients.</p> <p><b><u>Summary Care Record (SCR)</u></b> – is an electronic record of important patient information, created from GP medical records. It can be seen and used by authorised staff in other areas of the health and care system involved in the patient's direct care.</p> | <p><b>UK General Data Protection Regulation (UK GDPR)</b></p> <ul style="list-style-type: none"> <li>- <i>Article 6</i> -</li> <li>- <i>Article 9</i> -</li> </ul> <p><b>Data Protection Act (DPA) 2018</b></p> <ul style="list-style-type: none"> <li>- <i>Section 10</i> -</li> <li>- <i>Schedule 1</i>-</li> </ul> <p>The processing of <b>personal data</b> is permitted under the following UK GDPR condition:</p> <ul style="list-style-type: none"> <li>• GDPR Article 6(1) (e) - public interest or in the exercise of official authority.</li> </ul> <p>The processing of <b>special categories of personal data</b> is permitted under the following UK GDPR “condition” and DPA “provision”:</p> <ul style="list-style-type: none"> <li>• GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services.</li> <li>• <a href="#">DPA Section 10 (1) (c) – processing is necessary for health and social care purposes;</a></li> <li>• <a href="#">In accordance with DPA Schedule 1, Part 1, (2) - health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services.</a></li> </ul> |

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|  | <p>When your personal health records on your GP Record is uploaded to the spine, NHS Digital becomes the data controller for the uploaded information.</p> <p>The source of the information shared in this way is your electronic GP record.</p> <p>At a minimum, the SCR holds important information about;</p> <ul style="list-style-type: none"> <li>• current medication</li> <li>• allergies and details of any previous bad reactions to medicines</li> <li>• the name, address, date of birth and NHS number of the patient</li> </ul> <p>The patient can also choose to include additional information in the SCR, such as details of long-term conditions, significant medical history, or specific communications needs.</p> <p><b><u>e-Referral Service</u></b> - The NHS e-Referral Service (e-RS) combines electronic booking with a choice of place, date and time for first hospital or clinic appointments. Patients can choose their initial hospital or clinic appointment, book it in the GP surgery at the point of referral, or later at home on the phone or online.</p> <p><b><u>Electronic Prescription Service</u></b> - The Electronic Prescription Service (EPS) sends electronic prescriptions from GP surgeries to pharmacies. Eventually EPS will remove the need for most paper prescriptions.</p> <p><b><u>GP2GP</u></b> - GP2GP allows patients' electronic health records to be transferred directly, securely, and quickly between their old and new practices, when they change</p> | <p>You have the right to raise an objection or opt-out of having an SCR by returning a completed <a href="#">opt-out form</a> to their GP practice. Although we will first need to explain how this may affect the care you receive.</p> |
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|                                                     | <p>GPs. This improves patient care by making full and detailed medical records available to practices, for a new patient's first and later consultations.</p> <p>Your electronic GP record is the source of information that is shared in all of the above instances.</p> <p><b><u>Data Retention Period:</u></b></p> <p>All records held in the Practice EMIS system are kept for the duration specified in the <a href="#">Records Management Codes of Practice for Health and Social Care</a></p>                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <a href="#">NHS Digital – National Data Opt-Out</a> | <p>The national data opt-out applies to the disclosure of confidential patient information for purposes beyond individual care (research and planning) across the health and adult social care system in England. In broad terms the national data opt-out applies unless there is a mandatory legal requirement or an overriding public interest for the data to be shared. The opt-out does not apply when the individual has consented to the sharing of their data or where the data is anonymised.</p> <p>Any person registered on the Personal Demographic Services (PDS) and who consequently has an NHS number allocated to them is able to set a <a href="#">national data opt-out</a>. The opt-out is stored in a central repository against their NHS number on the Spine.</p> <p>The national opt-out applies to a number of datasets including:</p> | <p>The processing of <b>personal data</b> is permitted under the following UK GDPR condition:</p> <ul style="list-style-type: none"> <li>GDPR Article 6(1) (e) - public interest or in the exercise of official authority.</li> </ul> <p>The processing of <b>special categories of personal data</b> is permitted under the following UK GDPR “condition” and DPA “provision”:</p> <ul style="list-style-type: none"> <li>GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services;</li> <li><a href="#">DPA Section 10 (1) (c) – processing is necessary for health and social care purposes;</a></li> <li><a href="#">In accordance with DPA Schedule 1, Part 1, (2) - health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the</a></li> </ul> |

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|                             | <p><b>National Clinical Audit of Rheumatoid and Early Inflammatory</b> - NHS Digital collects this data on behalf of the British Society for Rheumatology to improve the quality of care for patients with Rheumatoid and early.</p> <p><b>National Adult Community Acquired Pneumonia (CAP) Audit</b> - NHS Digital collects this data on behalf of the British Thoracic Society to assess variation in the care of patients hospitalised with pneumonia in the UK.</p> <p><b>Trauma Audit &amp; Research Network (TARN)</b> - NHS Digital collects this Confidential Patient Information on behalf (CPI) on behalf TARN.</p> <p><b>Invoice Backing Data for Contracted Activity</b> - NHS Digital collects this data to enable Commissioners to determine if they are the responsible commissioner. It is important to point out that the national opt-out applies to contracted activity data that has not been rendered anonymous.</p> <p><b>Risk Stratification data for Indirect Care</b> - NHS Digital collects this data for data processors working on behalf of GPs and CCGs. The GP data is linked to other records that they access, such as hospital attendance records to enable CCGs understand the local population needs and plan for future requirement.</p> <p>Your electronic GP record is the source of information that is shared in all of the above instances.</p> | <p><a href="#">management of health care systems or services or social care systems or services.</a></p> <p><b>Related Legislation:</b><br/> <a href="#">Section 251 NHS Act 2006</a></p> <p>You have the right to opt-out of having your data shared for purposes beyond direct care (research and planning). You can do so via the <a href="#">national opt-out website</a></p> |
| <a href="#">Open Exeter</a> | Open Exeter is a web-enabled viewer which provides the facility for healthcare professionals to share/access patient data held on the National Health Application and Infrastructure Services (NHAIS) systems, including                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | The processing of <b>personal data</b> is permitted under the following UK GDPR "condition":                                                                                                                                                                                                                                                                                      |

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|                                                           | <p>cervical screening, breast screening, organ donor, blood donor and home oxygen.</p> <p>Access to Open Exeter is only possible on the Health and Social Care Network (HSCN), and via authorised logons/passwords provided by NHS Digital.</p> <p>Your electronic GP record is the source of information that is shared.</p>                                                                                                                                                                                                                                                                                                                                                       | <ul style="list-style-type: none"> <li><a href="#">GDPR Article 6(1) (e) - public interest or in the exercise of official authority;</a></li> </ul> <p>The processing of <b>special categories of personal data</b> is permitted under the following UK GDPR “condition” and DPA “provisions”:</p> <ul style="list-style-type: none"> <li>GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services;</li> </ul> <p><a href="#">DPA Section 10 (1) (c) – processing is necessary for health and social care purposes;</a></p> <p><a href="#">In accordance with DPA Schedule 1, Part 1, (1a) - the the processing for employment, social security and social protection is met where it is for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the controller or the data subject in connection with employment, social security or social protection;</a></p> |
| <p><a href="#">Dr.iQ Powered by Evergreen askMyGP</a></p> | <p>Dr. iQ is a free online consultation platform for NHS patients, providing fast, safe and effective online consultations with your GP, reducing the need to book and wait for a face-to-face GP appointment. Dr. iQ enables our GP Practices to improve patient experience by ensuring that the right people deal with requests at the right time.</p> <p>By using the Dr. iQ platform (via our website or app) patients/service users can:</p> <ul style="list-style-type: none"> <li>Register with us as their local GP.</li> <li>Book appointments.</li> <li>Attend online consultation with their health professional.</li> <li>View their medical records online.</li> </ul> | <p>The processing of <b>personal data</b> is permitted under the following UK GDPR condition:</p> <ul style="list-style-type: none"> <li>GDPR Article 6(1) (e) - public interest or in the exercise of official authority.</li> </ul> <p>The processing of <b>special categories of personal data</b> is permitted under the following UK GDPR “condition” and DPA “provision”:</p> <ul style="list-style-type: none"> <li>GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services.</li> <li><a href="#">DPA Section 10 (1) (c) – processing is necessary for health and social care purposes;</a></li> </ul>                                                                                                                                                                                                                                                                                                       |

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|                                    | <ul style="list-style-type: none"> <li>Order repeat prescriptions for collection at their preferred pharmacy.</li> </ul> <p>When you access any of our services (via the Dr. iQ app or our website), we use personal information about you (such as name, date of birth, NHS number) and technical information (such as internet protocol address) to:</p> <ul style="list-style-type: none"> <li>Provide you with the best possible healthcare service.</li> <li>To allow you to participate in interactive features of our service, when you choose to do so.</li> <li>To administer and maintain our website or app for internal operations, including troubleshooting, statistical and survey purposes.</li> </ul> <p>To improve our site to ensure that content is presented in the most effective manner.</p> <p>Dr iQ enables you to speak directly to your GP or another clinical staff member via video or audio consultations using our integrated third party platform, Zoom.</p> <p>More information can be found on <a href="#">Privacy   Zoom.</a></p> | <ul style="list-style-type: none"> <li><a href="#">In accordance with DPA Schedule 1, Part 1, (2) - health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services.</a></li> </ul>                       |
| <b>Shared Care Record Partners</b> | <p>Shared Care Records are integrated health and care systems that bring together aggregate summary of health and social care information from multiple health and social care organisations across geographical areas which is intended to support optimal care.</p> <p>Shared Care Records enable health and care professionals to see relevant information about the care and treatment you've had across all services to enable</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <p>The processing of <b>personal data</b> is permitted under the following UK GDPR "condition":</p> <ul style="list-style-type: none"> <li>GDPR Article 6(1) (e) – processing is necessary for the performance of a task carried out in the public interest.</li> </ul> <p>The processing of <b>special categories of personal data</b> is permitted under the following UK GDPR "condition", and DPA "provisions":</p> |

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|                                              | <p>health and/or social professionals involved in your care to provide you with the best possible care.<br/>The source of your information we share in this way is your electronic GP record.<br/>Further information about shared care records can be found on the websites of our shared care record partners:</p> <ul style="list-style-type: none"> <li>• <a href="#">Bedfordshire, Luton and Milton Keynes Shared Health and Care Record</a></li> <li>• <a href="#">The Kent and Medway Care Record</a></li> <li>• <a href="#">Herefordshire and Worcestershire Shared Care Record</a></li> <li>• <a href="#">Black Country and West Birmingham – One Health and Care Record</a></li> <li>• <a href="#">Hampshire and Isle of Wight – Care and Health Information Exchange</a></li> <li>• <a href="#">London Care Record – OneLondon</a></li> </ul> <p><b>Your Right to Object:</b> You have a general right to raise an objection to having your health and/or social care record integrated by contacting us or the relevant shared care partner in your geographical area.</p> | <ul style="list-style-type: none"> <li>• GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services.</li> <li>• <a href="#">DPA Section 10 (1) (c) – processing is necessary for health and social care purposes.</a></li> <li>• <a href="#">In accordance with DPA Schedule 1, Part 1, (2) health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services.</a></li> </ul>                                                                  |
| <a href="#">Population Health Management</a> | <p>We work closely with Integrated Care Systems (ICSs) to prevent ill-health and address health inequalities across wider population. This is often referred to as Population Health Management (PHM) and aims to improve physical and mental health outcomes, promote wellbeing and reduce health inequalities across an entire population with a specific focus on the wider determinants of health (things like health, housing, employment, education), through targeting interventions at those groups most at risk, supporting health prevention as well as treatment.</p> <p>Activities that contribute to the overall provision of services to a population as a whole or a group of patients</p>                                                                                                                                                                                                                                                                                                                                                                              | <p>The processing of <b>personal data</b> is permitted under the following UK GDPR “condition”:</p> <ul style="list-style-type: none"> <li>• GDPR Article 6(1) (e) – processing is necessary for the performance of a task carried out in the public interest.</li> </ul> <p>The processing of <b>special categories of personal data</b> is permitted under the following UK GDPR “condition”, and DPA “provisions”:</p> <ul style="list-style-type: none"> <li>• GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services.</li> <li>• <a href="#">DPA Section 10 (1) (c) – processing is necessary for health and social care purposes.</a></li> </ul> |

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|                                 | <p>with particular conditions can be split along two main paths/purposes namely, PHM stratification and segmentation for “case finding and targeted intervention” purposes (i.e. individual care) and, PHM stratification and segmentation for planning, commissioning, research etc (i.e. purposes beyond individual care).</p> <p><a href="#">Please read more about PHM here.</a></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <ul style="list-style-type: none"> <li><a href="#">In accordance with DPA Schedule 1, Part 1, (2) health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services.</a></li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Hippo Labs Recall System</b> | <p>We use services provided by Hippo Labs Ltd, a UK-based healthcare technology company, to support proactive patient care and improve clinical outcomes. Hippo Labs assists us in identifying patients who may benefit from specific health reviews or interventions and helps automate the process of inviting patients to book appointments.</p> <p>We may share the following patient information with Hippo Labs:</p> <ul style="list-style-type: none"> <li>NHS number</li> <li>Date of birth</li> <li>Contact details (e.g. mobile number, email address)</li> <li>Relevant clinical codes and appointment history</li> </ul> <p>This data is used solely to:</p> <ul style="list-style-type: none"> <li>Identify patients eligible for care recalls</li> <li>Send appointment invitations and reminders</li> <li>Track completion of care activities</li> </ul> <p>Data protection and security:</p> | <p>The processing of <b>personal data</b> is permitted under the following UK GDPR condition:</p> <ul style="list-style-type: none"> <li>GDPR Article 6(1) (e) - public interest or in the exercise of official authority.</li> </ul> <p>The processing of <b>special categories of personal data</b> is permitted under the following UK GDPR “condition” and DPA “provision”:</p> <ul style="list-style-type: none"> <li>GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services.</li> <li><a href="#">DPA Section 10 (1) (c) – processing is necessary for health and social care purposes;</a></li> <li><a href="#">In accordance with DPA Schedule 1, Part 1, (2) - health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services.</a></li> </ul> |

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|                                                                                                      | <p>Hippo Labs is fully compliant with UK GDPR and NHS Digital standards. All data is processed securely within the UK, and access is strictly controlled. No data is used for marketing purposes or shared with third parties.</p> <p>Patients have the right to:</p> <ul style="list-style-type: none"> <li>• Request access to their data</li> <li>• Object to data processing</li> <li>• Request correction or deletion of inaccurate data</li> </ul> <p>If you have concerns or wish to opt out of this service, please contact our practice directly</p> |                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>f. Processors</b>                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Recipients or categories of recipients of the personal or special categories of personal data</b> | <b>Purpose of the processing</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <p><b>Lawful basis</b></p> <p><b>UK General Data Protection Regulation (UK GDPR)</b></p> <ul style="list-style-type: none"> <li>- <i>Article 6</i> -</li> <li>- <i>Article 9</i> -</li> </ul> <p><b>Data Protection Act (DPA) 2018</b></p> <ul style="list-style-type: none"> <li>- <i>Section 10</i> -</li> <li>- <i>Schedule 1</i> -</li> </ul>                                     |
| <a href="#">EMIS Health</a><br><a href="#">SystmOne - TPP</a>                                        | <p>EMIS Health and SystmOne – TPP provide clinical systems used by Operose Health Group to securely store and process your medical records.</p> <p>Information about your personal health records is stored in your GP electronic record which is accessed by our registered and regulated health and care professionals to provide you with the very best care.</p>                                                                                                                                                                                          | <p>The processing of <b>personal data</b> is permitted under the following UK GDPR condition:</p> <ul style="list-style-type: none"> <li>• GDPR Article 6(1) (e) - public interest or in the exercise of official authority.</li> </ul> <p>The processing of <b>special categories of personal data</b> is permitted under the following UK GDPR “condition” and DPA “provision”:</p> |

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|                                    | <p>Your electronic GP record is the source of information that is shared.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <ul style="list-style-type: none"> <li>GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services.</li> <li><a href="#">DPA Section 10 (1) (c) – processing is necessary for health and social care purposes;</a></li> <li><a href="#">In accordance with DPA Schedule 1, Part 1, (2) - health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services.</a></li> </ul>                                                                                                                                                                                                                                                                                                                                                                                     |
| <a href="#">Docman and Docmail</a> | <p><a href="#">Docman</a> Limited act as a Processor and provides cloud-based storage software for electronic patient document. This includes paper letters that we receive, scan and upload to a patient record, as well as letters that we receive in an electronic format.</p> <p>Generally, Docman enables primary health care organisations capture, file, workflow, view and manage primary care documents efficiently.</p> <p><b>Docmail</b> enables primary health care organisations send letters, invoices and documents directly from computers and other portable devices.</p> <p>Your electronic GP record is the source of information that is shared.</p> | <p>The processing of <b>personal data</b> is permitted under the following UK GDPR condition:</p> <ul style="list-style-type: none"> <li>GDPR Article 6(1) (e) - public interest or in the exercise of official authority.</li> </ul> <p>The processing of <b>special categories of personal data</b> is permitted under the following UK GDPR “condition” and DPA “provision”:</p> <ul style="list-style-type: none"> <li>GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services.</li> <li><a href="#">DPA Section 10 (1) (c) – processing is necessary for health and social care purposes;</a></li> <li><a href="#">In accordance with DPA Schedule 1, Part 1, (2) - health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services.</a></li> </ul> |

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| <p><a href="#"><u>iPlato</u></a></p>     | <p><a href="#"><u>iPlato</u></a> is cloud-based text messaging service used by GPs to communicate with their patients.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                               | <p>The processing of <b>personal data</b> is permitted under the following UK GDPR condition:</p> <ul style="list-style-type: none"> <li>• GDPR Article 6(1) (e) - public interest or in the exercise of official authority.</li> </ul> <p>The processing of <b>special categories of personal data</b> is permitted under the following UK GDPR “condition” and DPA “provision”:</p> <ul style="list-style-type: none"> <li>• GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services.</li> <li>• <a href="#"><u>DPA Section 10 (1) (c) – processing is necessary for health and social care purposes;</u></a></li> <li>• <a href="#"><u>In accordance with DPA Schedule 1, Part 1, (2) - health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services.</u></a></li> </ul> |
| <p><a href="#"><u>Redcentric</u></a></p> | <p><a href="#"><u>Redcentric</u></a> is commissioned by Operose Health Group to deliver telephony services to enable our GP Practices to deliver a safe and secure patient service by being more responsive to call demand around appointments, test results and prescription delivery.</p> <p>When you use our services for purposes such as telephone consultation, or you just want to speak to a healthcare professional for advice, your call may be recorded and stored as part of the health record, to enable us to provide you with the best possible care.</p> | <p>The processing of <b>personal data</b> is permitted under the following UK GDPR condition:</p> <ul style="list-style-type: none"> <li>• GDPR Article 6(1) (e) - public interest or in the exercise of official authority.</li> </ul> <p>The processing of <b>special categories of personal data</b> is permitted under the following UK GDPR “condition” and DPA “provision”:</p> <ul style="list-style-type: none"> <li>• GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services.</li> <li>• <a href="#"><u>DPA Section 10 (1) (c) – processing is necessary for health and social care purposes;</u></a></li> </ul>                                                                                                                                                                                                                                                                                                                                                                   |

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| <a href="#"><u>X-On Surgery Connect</u></a>                  | <p><a href="#"><u>X-On</u></a> is a cloud based telephony service commissioned across Operose Health to enable our GP Practices to deliver a safe and secure patient service by being more responsive to call demand around appointments, test results and prescription delivery.</p> <p>When you use our services for purposes such as telephone consultation, or you just want to speak to a healthcare professional for advice, your call may be recorded and stored as part of the health record, to enable us to provide you with the best possible care.</p> | <p>The processing of <b>personal data</b> is permitted under the following UK GDPR condition:</p> <ul style="list-style-type: none"> <li>• GDPR Article 6(1) (e) - public interest or in the exercise of official authority.</li> </ul> <p>The processing of <b>special categories of personal data</b> is permitted under the following UK GDPR “condition” and DPA “provision”:</p> <ul style="list-style-type: none"> <li>• GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services.</li> <li>• <a href="#"><u>DPA Section 10 (1) (c) – processing is necessary for health and social care purposes;</u></a></li> </ul> <p><a href="#"><u>In accordance with DPA Schedule 1, Part 1, (2) - health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services.</u></a></p> |
| <a href="#"><u>Quality Medical Solutions UK (QMS-UK)</u></a> | <p>QMS-UK are commissioned by NHS England to provide secure data processing solutions for two services:</p> <ul style="list-style-type: none"> <li>• Child Health Information Service – information relating to children’s vaccinations.</li> <li>• National Diabetic Retinal Screening Service.</li> </ul> <p>Your electronic GP record is the source of information that is shared.</p>                                                                                                                                                                          | <p>The processing of <b>personal data</b> is permitted under the following UK GDPR condition:</p> <ul style="list-style-type: none"> <li>• GDPR Article 6(1) (e) - public interest or in the exercise of official authority.</li> </ul> <p>The processing of <b>special categories of personal data</b> is permitted under the following UK GDPR “condition” and DPA “provision”:</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |

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| <a href="#">AccuRx</a> | <p><a href="#">AccuRx is an NHS Digital approved platform for web-based video consultation system and messaging system</a> to enable health and social care teams to communicate with each other and with patients.</p> <p>Video consultations allows our healthcare professionals to carry out observations during their consultations in the same way they would during a face-to-face appointment, to provide our patients the with the best possible care.</p> <p>In the video consultation, healthcare professionals are able record the observations and outcome of the consultation in the same way as a face-to-face consultation is recorded in the patient's electronic record and any agreed actions are carried out. The connection prioritises 'peer-to-peer' between our registered health professionals and patient's communication device, and follows <a href="#">NHS best practice guidelines</a> on health and social care cloud security.</p> <p>Messaging service allows us to communicate directly to patients via text message or through the <a href="#">NHS app</a>.</p> | <p>The processing of <b>personal data</b> is permitted under the following UK GDPR condition:</p> <ul style="list-style-type: none"> <li>GDPR Article 6(1) (e) - public interest or in the exercise of official authority.</li> </ul> <p>The processing of <b>special categories of personal data</b> is permitted under the following UK GDPR "condition" and DPA "provision":</p> <ul style="list-style-type: none"> <li>GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services.</li> <li><a href="#">DPA Section 10 (1) (c) – processing is necessary for health and social care purposes;</a></li> <li><a href="#">In accordance with DPA Schedule 1, Part 1, (2) - health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services.</a></li> </ul> |

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|                            | <p>More on AccuRx can be found on their Privacy Notice - <a href="#">Accurx   Privacy Policy</a></p> <p>NHS App Messaging Privacy Notice - <a href="#">NHS App privacy policy: messaging services - NHS (www.nhs.uk)</a></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <a href="#">Healthy.io</a> | <p>NHS has commissioned <a href="#">Healthy.io</a>, as part of a national NHS programme, to deliver a service providing at home urine test kits so patients at risk of chronic kidney disease can conduct this important test at home using a smartphone.</p> <p>The data is being processed for the purpose of delivery of a national programme to monitor urine for indications of chronic kidney disease (CKD) which is recommended to be undertaken annually for patients at risk of chronic kidney disease e.g., patients living with diabetes. The programme enables patients to test their kidney function from home. We will share your contact details with Healthy.io to enable them to contact you and offer to send you a test kit. This will help identify patients at risk of kidney disease and help us agree any early interventions that can be put in place for the benefit of your care.</p> <p>Healthy.io will only use your data for the purposes of delivering this service to you. If you do not wish to receive a home test kit from Healthy.io we will continue to manage your care within the Practice. Healthy.io are required to hold data we send them in line with applicable law. Further information about this is available on <a href="#">Digital home kidney health testing service</a></p> | <p>The processing of <b>personal data</b> is permitted under the following UK GDPR condition:</p> <ul style="list-style-type: none"> <li>GDPR Article 6(1) (e) - public interest or in the exercise of official authority.</li> </ul> <p>The processing of <b>special categories of personal data</b> is permitted under the following UK GDPR “condition” and DPA “provision”:</p> <ul style="list-style-type: none"> <li>GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services.</li> <li><a href="#">DPA Section 10 (1) (c) – processing is necessary for health and social care purposes;</a></li> <li><a href="#">In accordance with DPA Schedule 1, Part 1, (2) - health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services.</a></li> </ul> |

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| <a href="#"><u>Healthtech - 1</u></a> | <p>Operose Health has commissioned Healthtech – 1 to set up an automated process for new registration requests to our practices.</p> <p>The source of data is the information you record on your registration form.</p> | <p>The processing of <b>personal data</b> is permitted under the following UK GDPR condition:</p> <ul style="list-style-type: none"> <li>• GDPR Article 6(1) (e) - public interest or in the exercise of official authority.</li> </ul> <p>The processing of <b>special categories of personal data</b> is permitted under the following UK GDPR “condition” and DPA “provision”:</p> <ul style="list-style-type: none"> <li>• GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services.</li> <li>• <a href="#"><u>DPA Section 10 (1) (c) – processing is necessary for health and social care purposes;</u></a></li> <li>• <a href="#"><u>In accordance with DPA Schedule 1, Part 1, (2) - health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services.</u></a></li> </ul> |
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## **10. Details of data linkage with other datasets**

Data may be de-identified and linked so that it can be used to improve health care and development and monitor NHS performance. Where data is used for statistical purposes, stringent measures are taken to ensure individual patients cannot be identified.

When analysing current health services and proposals for developing future services it is sometimes necessary to link separate individual datasets to be able to produce a comprehensive evaluation. This may involve linking primary care GP data with other data such as secondary uses service (SUS) data (inpatient, outpatient and A&E). In some cases, there may also be a need to link local datasets which could include a range of acute-based services such as radiology, physiotherapy, audiology etc, as well as mental health and community-based services such as Improving Access to Psychological Therapies (IAPT), community nursing, podiatry etc. When carrying out this analysis, the linkage of these datasets is always done using a unique identifier that does not reveal a person's identity.

Integrated Care Boards within our geographical areas are responsible for processing de-identified and linked data under this category, on our behalf. We ensure that the Processor is legally and contractually bound to operate and prove security arrangements are in place where data that could or does identify a person are processed.

## **11. Data retention period**

All records held by Operose Health will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care 2021 and supplemented by our Records Management Standards.

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for. To determine the appropriate retention period for personal data, the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements have all been considered.

## **12. The details of transfers of the personal data to any third countries or international organisations**

We do not transfer your personal data to any third countries or international organisations.

## **13. What safeguards are in place to ensure data that identifies you is secure?**

We only use information that may identify you in accordance with UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. These legislations require us to process your data only if there is a lawful basis for doing so and that any processing must be fair, lawful and transparent.

We also ensure the information we hold is kept in secure locations, restrict access to information to authorised personnel only, protect personal and confidential information held on equipment such as laptops with encryption (which masks data so that unauthorised users cannot see or make sense of it).

Our appropriate technical and security measures include:

- The ability to ensure ongoing confidentiality, integrity, availability and resilience of our systems.

- The ability to quickly restore availability and access to personal information in the event of a physical or technical incident; and
- A process regularly testing, assessing and evaluating the effectiveness of security measures, and ensure they comply with the concept of privacy by design and default;
- Encryption; Firewalls / VPN; Password protected files; Restricted Access Folders and System Audit.

## 14. Cookies

Our websites use cookies to distinguish you from other user when you access our online services. A cookie is a small file of letters and numbers that we store on your browser when you consent to use of our online services. This helps us to provide you with a good experience when you browse our site and enable us to improve our websites.

### We use the following cookies:

- **Strictly necessary cookies:** These are cookies that are required for the operation of our site. They include, for example, cookies that enable you to login to secure areas of our websites.
- **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our site when they are using it. This helps us to improve the way our websites work, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our site. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visit to our site, the pages you have visited and the links you have followed. We will use this information to make our site more relevant to your interests. We may also share this information with third parties for this purpose.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

Except for essential cookies, all cookies will expire after 12 months.

## 15. What are your general rights?

Where information from which you can be identified is held, you have the:

- Right of access to view or request copies of the record
- Right to rectification of inaccurate personal data or special categories of personal data
- Right to restriction of the processing of your data where accuracy of the data is contested, processing is unlawful or where we no longer need the data for the purposes of the processing
- Right not to be subject to any automated individual decision-making
- Right to data portability by requesting the data which you provided to us (not data generated by us) in a structured, commonly used machine-readable format. Your right to portability shall apply only where:
  - data is processed by automated means, and

- you provided consent to the processing or,
- the processing is necessary for the fulfilment of a contract.

## **16. Right to object**

In line with the Data Protection Legislation, you do not have the right to object to the processing of your personal information where:

- The purpose of the processing is for direct provision of care or safeguarding concerns. As a primary care and community health provider, we have legitimate compelling grounds under the Health and Social Care Act 2012 to process your personal information for the purposes of direct care delivery, and to prevent an individual from harm, or to prevent a serious crime. This include personal information concerning your health which we share with other GP Practices, NHS acute or mental health Trusts, social services, community health providers and pharmacists who are also involved in your care.
- The processing is necessary for compliance with a legal obligation to which we are subject. This includes information we share with statutory organisations, law enforcement and regulatory bodies such as NHS Digital (statutory data collection), NHS Counter Fraud, the Police, Courts of Justice, HMRC and DVLA.

**You do not have the right to object** to the processing of your personal information for risk stratification for indirect care purpose such as understanding the local population needs and plan for future requirement in line with [Section 251 NHS Act 2006](#) .

**You have the right to opt-out of:** [Summary Care Record, NHS Digital – National Data Opt-Out](#).

## **17. Right to erasure (right to be forgotten)**

Your right to erasure (right to be forgotten) applies where you had given ‘consent’ to process your personal data and later withdrew the consent. Right to erasure does not apply to the extent where the processing of your personal health data is necessary for:

- Compliance with a legal obligation which we are subject to, under the UK law or, for the performance of a task carried out in the public interest or, in the exercise of official authority vested on us;
- medical purposes and/or for reasons of public interest in the area of public health; archiving purposes in the public interest, scientific or historical research purposes or statistical purposes;
- the establishment, exercise or defense of legal claims.

## **18. Exercising your right or gaining access to the data we hold about you**

By contacting your registered practice, you can exercise your rights at any time, or request to see or have copies of personal information we hold about you.

## 19. Right to complain

If you are dissatisfied with the way we process your data, please contact us and we will try to resolve your complaint. You also have the right to appeal/complain to the Information Commissioner (ICO). The ICO can be contacted at:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

Tel: 0303 123 1113 or 01625 545 745

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

## Operose Health Group Entity Names

| Entity Name                                 | Data Protection Registration Number |
|---------------------------------------------|-------------------------------------|
| Operose Health Limited                      | ZA269280                            |
| AT Medics Limited                           | Z9497012                            |
| AT Learning Limited                         | ZA792188                            |
| AT Technology Services Limited              | ZA239650                            |
| Primary Care Partners Limited               | ZA688561                            |
| Operose Health Corporate Management Limited | Z2932107                            |
| Operose Health (Group) Limited              | Z9518807                            |
| Operose Health (Group) UK Limited           | Z1159942                            |
| The Practice Surgeries Limited              | Z1159956                            |
| Chilvers & McCrea Limited                   | Z7794195                            |
| The Practice U Surgeries Limited            | Z4783305                            |
| Phoenix Primary Care Limited                | Z1273035                            |
| Phoenix Primary Care (South) Limited        | Z3383510                            |