



Jenner House Surgery

Privacy Notice

Published: May 2026

How we use your personal information

This privacy notice explains what information this GP practice holds about you, why we hold that information and how that information may be used. The healthcare professionals who provide you with care maintain records about your health and any treatment or care you have received previously (e.g. NHS Trust, GP Surgery, Walk-in clinic, etc.). These records help to provide you with the best possible healthcare.

NHS health records may be electronic, on paper or a mixture of both, and we use a combination of working practices and technology to ensure that your information is kept confidential and secure. Records which this GP Practice holds about you may include the following information; details about you, such as your address, carer, legal representative, emergency contact details.

We also hold the following:

- Any contact the surgery has had with you, such as appointments, clinic visits, emergency appointments, etc.
- Notes and reports about your health
- Details about your treatment and care
- Results of investigations such as laboratory tests, x-rays etc.

We hold relevant information from other health professionals, relatives or those who care for you to ensure you receive the best possible care and your records are used to facilitate the care you receive. Information held about you may be used to help protect the health of the public and to help us manage the NHS. Information may be used within the GP practice for clinical audit to monitor the quality of the service provided.

Some of this information will be held centrally and used for statistical purposes. Where we do this, we take strict measures to ensure that individual patients cannot be identified.

Sometimes your information may be requested to be used for research purposes – the surgery will always gain your consent before releasing the information for this purpose.

How do we ensure your records are held confidentiality?

We are committed to protecting your privacy and will only use information collected lawfully in accordance with:

- Data Protection Act 2018
- General Data Protection Regulations 2018
- Human Rights Act 1998
- Common Law Duty of Confidentiality
- Health and Social Care Act 2012

- NHS Codes of Confidentiality
- Information Security and Records Management
- Information: To Share or Not to Share Review

Every member of staff who works for an NHS organisation has a legal obligation to keep information about you confidential.

We will only ever use or pass on information about you if others involved in your care have a genuine need for it. We will not disclose your information to any third party without your permission unless there are exceptional circumstances (i.e. life or death situations), where the law requires information to be passed on and in accordance with the new information sharing principle following Dame Fiona Caldicott's information sharing review (Information: To share or not to share) where "The duty to share information can be as important as the duty to protect patient confidentiality."

This means that health and social care professionals should have the confidence to share information in the best interests of their patients within the framework set out by the Caldicott principles. They should be supported by the policies of their employers, regulators and professional bodies.

Data we collect about you

Records which this GP Practice **will** hold or share about you will include the following:

- Personal Data – means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- Special Categories of Personal Data – this term describes personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.
- Confidential Patient Information – this term describes information or data relating to their health and other matters disclosed to another (e.g. patient to clinician) in circumstances where it is reasonable to expect that the information will be held in confidence. Including both information 'given in confidence' and 'that which is owed a duty of confidence'. As described in the Confidentiality: NHS code of Practice: Department of Health guidance on confidentiality 2003.
- Pseudonymised – The process of distinguishing individuals in a dataset by using a unique identifier which does not reveal their 'real world' identity.
- Anonymised – Data in a form that does not identify individuals and where identification through its combination with other data is not likely to take place
- Aggregated – Statistical data about several individuals that has been combined to show general trends or values without identifying individuals within the data.

How we use your information

Improvements in information technology are also making it possible for us to share data with other healthcare organisations for the purpose of providing you, your family and your community with better care. For example, it is possible for healthcare professionals in other services to access your record with or without your permission when the practice is closed. Where your record is accessed without your permission it is necessary for them to have a legitimate basis in law.

Whenever you use a health or care service, such as attending Accident & Emergency or using Community Care services, important information about you is collected in a patient record for that service. Collecting this information helps to ensure you get the best possible care and treatment.

The information collected about you when you use these services can also be used and provided to other organisations for purposes beyond your individual care, for instance to help with:

- improving the quality and standards of care provided by the service
- research into the development of new treatments and care pathways
- preventing illness and diseases
- monitoring safety
- planning services
- risk stratification
- Population Health Management

Safeguarding of children or vulnerable adults

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

Statutory disclosures

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

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

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

Individuals Rights under UK GDPR

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

1. The right to be informed
2. The right of access

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

Your right to opt out of data sharing and processing

The NHS Constitution states, 'You have a right to request that your personal and confidential information is not used beyond your own care and treatment and to have your objections considered'.

Type 1 Opt Out

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

National data opt-out (NDOO)

The national data opt-out was introduced on 25 May 2018, enabling patients to opt-out from the use of their data for research or planning purposes, in line with the recommendations of the National Data Guardian in her Review of Data Security, Consent and Opt-Outs. The national data opt-out replaces the previous 'Type 2' opt-out, which required NHS Digital not to use a patient's confidential patient information for purposes beyond their individual care, for Planning or Research. Any patient that had a type 2 opt-out recorded on or before 11 October 2018 has had it automatically converted to a national data opt-out. Those aged 13 or over were sent a letter giving them more information and a leaflet explaining the national data opt-out.

COVID Passport access

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

Change of Details

It is important that you tell the practice if any of your details such as your name or address have changed or if any of your details such as date of birth is incorrect in order for this to be amended. You have a responsibility to inform us of any changes so your record is accurate and up to date.

You have the right to object to our sharing your data in these circumstances, but we have an overriding responsibility to do what is in your best interests. Please see below.

Your Summary Care Record

Your summary care record is an electronic record of your healthcare history (and other relevant personal information) held on a national healthcare records database provided and facilitated by NHS England.

This record may be shared with other healthcare professionals and additions to this record may also be made by relevant healthcare professionals and organisations involved in your direct healthcare.

You may have the right to demand that this record is not shared with anyone who is not involved in the provision of your direct healthcare. If you wish to enquire further as to your rights in respect of not sharing information on this record, then please contact our Data Protection Officer.

To find out more about the wider use of confidential personal information and to register your choice to opt out if you do not want your data to be used in this way, please visit <https://www.nhs.uk/your-nhs-data-matters/>.

Note if you do choose to opt out, you can still consent to your data being used for specific purposes. However, if you are happy with this use of information you do not need to do anything. You may however change your choice at any time.

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.

1) Data Controller contact details	Jenner House Surgery 159 Cove Road Farnborough Hampshire GU14 0HQ
2) Data Protection Officer contact details	Laura Taw laurataw@nhs.net scwcsu.sussexgpigenquiries@nhs.net
3) Purpose of the processing	Direct Care is care delivered to the individual alone, most of which is provided in the surgery. After a patient agrees to a referral for direct care elsewhere, such as a referral to a specialist in a hospital, necessary and relevant information about the patient, their circumstances and their problem will need to be shared with the other healthcare workers, such as

	<p>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>4) Lawful basis for processing</p>	<p>The Law says we need a legal basis to handle your personal and healthcare information.</p> <p>CONTRACT: We have a contract with NHS England to deliver healthcare services to you. This contract provides that we are under a legal obligation to ensure that we deliver medical and healthcare services to the public.</p> <p>CONSENT: Sometimes we also rely on the fact that you give us consent to use your personal and healthcare information so that we can take care of your healthcare needs. Please note that you have the right to withdraw consent at any time if you no longer wish to receive services from us.</p> <p>NECESSARY CARE: Providing you with the appropriate healthcare, where necessary. The Law refers to this as 'protecting your vital interests' where you may be in a position not to be able to consent.</p> <p>LAW: Sometimes the Law obliges us to provide your information to an organisation (see above).</p> <p><u>SPECIAL CATEGORIES</u></p> <p>The Law states that personal information about your health falls into a special category of information because it is very sensitive. Reasons that may entitle us to use and process your information may be as follows:</p> <p>PUBLIC INTEREST: Where we may need to handle your personal information when it is considered to be in the public interest. For example, when there is an outbreak of a specific disease and we need to contact you for treatment, or we need to pass your information to relevant organisations to ensure you receive advice and/or treatment;</p> <p>CONSENT: When you have given us consent;</p> <p>VITAL INTEREST: If you are incapable of giving consent, and we have to use your information to protect your vital interests (e.g. if you have had an accident and you need emergency treatment);</p>

	<p>DEFENDING A CLAIM: If we need your information to defend a legal claim against us by you, or by another party;</p> <p>PROVIDING YOU WITH MEDICAL CARE: Where we need your information to provide you with medical and healthcare services</p> <p>The processing of personal data in the delivery of direct care and for providers’ administrative purposes in this surgery and in support of direct care elsewhere is supported under the following Article 6 and 9 conditions of the GDPR:</p> <p style="text-align: center;"><i>Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’.</i></p> <p style="text-align: center;"><i>Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services...’</i></p> <p>We will also recognise your rights established under UK case law collectively known as the “Common Law Duty of Confidentiality”*</p>
<p>5) Recipient or categories of recipients of the processed data</p>	<p>The data will be shared with Health and care professionals and support staff in this surgery and at hospitals, diagnostic and treatment centres who contribute to your personal care.</p> <p>We are currently preparing detailed breakdowns for each of the ways in which we use your information. These will be available in the practice.</p>
<p>6) Rights to object</p>	<p>You have the right to object to some or all the information being processed under Article 21. Please contact the Data Controller or the practice. You should be aware that this is a right to raise an objection, that is not the same as having an absolute right to have your wishes granted in every circumstance</p>
<p>7) Right to access and correct</p>	<p>You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law. Your request may be made either verbally or in writing to the practice.</p>
<p>8) Retention period</p>	<p>The data will be retained in line with the law and national guidance. https://digital.nhs.uk/article/1202/Records-Management-Code-of-Practice-for-Health-and-Social-Care-2016</p>
<p>9) Right to Complain.</p>	<p>If you are happy for your data to be extracted and used for the</p>

	<p>purposes described in this privacy notice, then you do not need to do anything. If you have any concerns about how your data is shared, then please contact the practice. Please contact the Practice Manager in the first instance 01252 548141</p> <p>You have the right to complain to the Information Commissioner's Office, you can use this link https://ico.org.uk/global/contact-us/</p> <p>or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)</p> <p>There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)</p>
--	---

WHO WE MAY PROVIDE YOUR PERSONAL INFORMATION TO, AND WHY

Whenever you use a health or care service, such as attending Accident & Emergency or using Community Care Services, important information about you is collected to help ensure you get the best possible care and treatment. This information may be passed to other approved organisations where there is a legal basis, to help with planning services, improving care, research into developing new treatments and preventing illness. All of this helps in providing better care to you and your family and future generations. However, as explained in this privacy notice, confidential information about your health and care is only used in this way where allowed by law and would never be used for any other purpose without your clear and explicit consent.

We may pass your personal information on to the following people or organisations, because these organisations may require your information to assist them in the provision of your direct healthcare needs. It, therefore, may be important for them to be able to access your information in order to ensure they may properly deliver their services to you:

- **Hospital professionals (such as doctors, consultants, nurses, etc);**
- **Other GPs/Doctors;**
- **Pharmacists;**
- **Nurses and other healthcare professionals;**
- **Dentists;**
- **Any other person that is involved in providing services related to your general healthcare, including mental health professionals.**

OTHER PEOPLE WHO WE PROVIDE YOUR INFORMATION TO

- Commissioners;
- Clinical Commissioning Groups;
- Local authorities;
- Community health services;

- For the purposes of complying with the law e.g. Police, Solicitors, Insurance Companies;
- Anyone you have given your consent to, to view or receive your record, or part of your record. **Please note, if you give another person or organisation consent to access your record we will need to contact you to verify your consent before we release that record. It is important that you are clear and understand how much and what aspects of, your record you give consent to be disclosed.**
- **Extended Access** – we provide extended access services to our patients which means you can access medical services outside of our normal working hours. In order to provide you with this service, we have formal arrangements in place with the Clinical Commissioning Group and with other practices whereby certain practices offer this service on our behalf for you as a patient to access outside of our opening hours.

This means, those practices will have to have access to your medical record to be able to offer you the service; your information is only available to other Practices *if you attend another practice for a consultation.*

Please note to ensure that those practices comply with the law and to protect the use of your information, we have very robust data sharing agreements and other clear arrangements in place to ensure your data is always protected and used for those purposes only.

Farnborough Practices as follows:

- Alexander House Surgery
 - Giffard Drive Surgery
 - Mayfield Medical Centre
 - North Camp Surgery
 - Voyager Family Health
- **Data Extraction by the Clinical Commissioning Group** – the clinical commissioning group at times extracts medical information about you, but the information we pass to them via our computer systems **cannot identify you to them.** This information only refers to you by way of a code that only your practice can identify (it is pseudo-anonymised).

This therefore protects you from anyone who may have access to this information at the Clinical Commissioning Group from **ever** identifying you as a result of seeing the medical information and we will **never** give them the information that would enable them to do this.

There are good reasons why the Clinical commissioning Group may require this pseudo-anonymised information. This information is used to plan and improve services. The information collected includes data such as the area patients live, age, gender, ethnicity, language preference, country of birth and religion. The CCG also collects information about whether patients have long term conditions such as diabetes; blood pressure, cholesterol levels and medication

The data shared is always anonymised, you will never be identified.

THIRD PARTY PROCESSORS

In order to deliver the best possible service, the practice will share data (where required) with other NHS bodies such as other GP practices and hospitals. In addition, the practice will use carefully selected third party service providers. When we use a third party service provider to process data on our behalf then we will always have an appropriate agreement in place to ensure that they keep the data secure, that they do not use or share information other than in accordance with our instructions and that they are operating appropriately.

Examples of functions that may be carried out by third parties includes:

- Companies that provide IT services & support, including our core clinical systems; systems which manage patient facing services (such as our website and service accessible through the same); data hosting service providers; systems which facilitate appointment bookings or electronic prescription services; document management services etc.
- Delivery services (for example if we were to arrange for delivery of any medicines to you).
- Payment providers (if for example you were paying for a prescription or a service such as travel vaccinations).

ANONYMISED INFORMATION

Sometimes we may provide information about you in an anonymised form. If we do so, then none of the information we provide to any other party will identify you as an individual and cannot be traced back to you.

RECORDED INFORMATION

The Practice does not record telephone calls or has any CCTV mechanisms installed.

ACCESS AND SUBJECT ACCESS REQUESTS

You have the right to see what information we hold about you and to request a copy of this information.

If you would like a copy of the information, we hold about you please contact our Administrator on 01252 548141 ext 224.

We will provide this information free of charge however, we may in some **limited and exceptional** circumstances have to make an administrative charge for any extra copies if the information requested is excessive, complex or repetitive.

We have one month to reply to you and give you the information that you require. We would ask, therefore, that any requests you make are in writing and it is made clear to us what and how much information you require, please complete the Data Subject Access Form, available on our website, or pop into the Practice to obtain a hard copy. A link to this form can be found on our website. Please fill in the form and return to the Practice via post or email.

Should we need to clarify what you require, we have one month to reply from when that is received.

Online Access

You may ask us if you wish to have online access to your medical record. However, there will be certain protocols that we have to follow in order to give you online access, including written consent and production of documents that prove your identity.

Please note that when we give you online access, the responsibility is yours to make sure that you keep your information safe and secure if you do not wish any third party to gain access.

For the purposes of data protection, your coded history only will be visible online.

THIRD PARTIES MENTIONED ON YOUR MEDICAL RECORD

Sometimes we record information about third parties mentioned by you to us during any consultation. We are under an obligation to make sure we also protect that third party's rights as an individual and to ensure that references to them which may breach their rights to confidentiality, are removed before we send any information to any other party including yourself. Third parties can include: spouses, partners, and other family members.

We will never pass on your personal information to anyone else who does not need it, or has no right to it, unless you give us clear consent to do so.

REQUESTS FROM THIRD PARTIES FOR YOUR MEDICAL RECORD

It is the policy of Jenner House Surgery that on request of extracts or access to your full medical record by a third party for non-NHS services (e.g. claims, insurance); that we will not share this directly with the requestor. In these circumstances, the practice will contact the patient directly (the Data Controller); advise them of the request and provide the patient with their medical record for onward forwarding.

We firmly believe patients should be in control of what is shared with third parties from their medical record.

UNDER 16s

Please see Privacy Notice for Under 16s. The principles of this notice remain the same; however, there is additional information on sharing information with parents/guardians.

IF ENGLISH IS NOT YOUR FIRST LANGUAGE

If English is not your first language you can view this Privacy Notice on our website, which can be translated into 103 different languages.

OUR WEBSITE

The only website this Privacy Notice applies to is the Surgery's website. If you use a link to any other website from the Surgery's website, then you will need to read their respective privacy notice. We take no responsibility (legal or otherwise) for the content of other websites.

SECURITY

We take the security of your information very seriously and we do everything we can to ensure that your information is always protected and secure. We regularly update our processes and systems, and we also ensure that our staff are properly trained. We also carry out assessments and audits of the information that we hold about you and make sure that if we provide any other services, we carry out proper assessments and security reviews.

<p>General Practice Data for Planning and Research (GPDPR)</p>	<p>Purpose: Patients personal confidential data will be extracted and shared with NHS Digital in order to support vital health and care planning and research. Further information can be found here</p> <p>Patients may opt out of having their Personal identifiable data shared for Planning or Research by applying a National Data Opt Out or a Type 1 Opt Out. Details of how to Opt Out can be found on our Privacy Notice. For the National Data Opt Out patients are required to register their preference below.</p> <p>https://www.nhs.uk/your-nhs-data-matters/</p> <p>For Type 1 Opt Out, which means that no personal confidential data will be shared outside of the practice for this purpose, patients can complete the form within the link and return it to their registered practice</p> <p>https://nhs-prod.global.ssl.fastly.net/binaries/content/assets/website-assets/data-and-information/data-collections/general-practice-data-for-planning-and-research/type-1-opt-out-form.docx</p> <p>Legal Basis : The legal basis for this activity can be found at this link : General Practice Data for Planning and Research: NHS Digital Transparency Notice - NHS Digital</p> <p>Processor: NHS Digital</p>
--	--

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

Activity	Rationale
Commissioning and contractual purposes Invoice Validation Planning Quality and Performance	<p>Purpose – Anonymous data is used by the CCG for planning, performance and commissioning purposes, as directed in the practices contract, to provide services as a public authority.</p> <p>Legal Basis –</p> <ul style="list-style-type: none"> • UK GDPR 6 1(b) Contractual obligation as set out in the Health and Social Care Act for Quality and Safety 2015 • Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ Patients may opt out of having their personal confidential data used for Planning or research. Please contact your surgery to apply a Type 1 Opt out or logon https://www.nhs.uk/your-nhs-data-matters/manage-your-choice/ <p>Processor – Frimley ICB</p>
Summary Care Record Including additional information	<p>Purpose –The NHS in England uses a national electronic record called the Summary Care Record (SCR) to support patient care. It contains key information from your GP record. Your SCR provides authorised healthcare staff with faster, secure access to essential information about you in an emergency or when you need unplanned care, where such information would otherwise be unavailable.</p> <p>Legal Basis – Direct Care under UK GDPR:</p> <ul style="list-style-type: none"> • Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and • Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine <p>The relevant COPI notice states that its purpose: “...is to require organisations to process confidential patient information for the purposes set out in Regulation 3(1) of COPI to support the Secretary of State’s response to Covid-19 (Covid-19 Purpose). “Processing” for these purposes is defined in Regulation 3(2) and includes dissemination of confidential patient information to persons and organisations permitted to process confidential patient information under Regulation 3(3) of COPI.”</p>

Full details of the Summary Care Record supplementary privacy notice can be found [here](#)
Patients have the right to opt out of having their information shared with the SCR by completion of the form which can be downloaded [here](#) and returned to the practice. Please note that by opting out of having your information shared with the

Summary Care Record could result in a delay to care that may be required in an emergency.

Processor – NHS England and NHS Digital

Purpose – We may share anonymous patient information with research companies for the purpose of exploring new ways of providing healthcare and treatment for patients with certain conditions. This data will not be used for any other purpose.

Where personal confidential data is shared your consent will need to be sought.

Where you have opted out of having your identifiable information shared for this Planning or Research your information will not be shared.

Legal Basis –

Research

- **Articles 6(1)(a) and 9(1)(a) – explicit consent; or**
- Article 6(1)(c) (where we are legally obligated to share your personal data) for your standard personal data and Article 9(2)(j) (scientific research) for your health data.

Where identifiable data is required for research, patient consent will be needed, unless there is a legitimate reason under law to do so or there is support under the Health Service (Control of Patient Information Regulations) 2002 ('section 251 support') applying via the Confidentiality Advisory Group in England and Wales.

Sharing of aggregated non identifiable data is permitted.

Processor – Various

Individual Funding Requests

Purpose – We may need to process your personal information where we are required to fund specific treatment for you for a particular condition that is not already covered in our standard NHS contract.

The clinical professional who first identifies that you may need the treatment will explain to you the information that is needed to be

collected and processed in order to assess your needs and commission your care; they will gain your explicit consent to share this. You have the right to withdraw your consent at any time, but this may affect the decision to provide individual funding.

Legal Basis – Under UK GDPR Article 6 1(a) consent is required Article 9 2 (h) health data

Data processor – NHS South, Central and West Commissioning Support Unit (CSU)

Safeguarding Adults

Purpose – We will share personal confidential information with the safeguarding team where there is a need to assess and evaluate any safeguarding concerns.

Legal Basis – in some case consent will be required otherwise

- Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’;
- and

- Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine

Data Processor – Multi Agency Safeguarding Authorities

Safeguarding Children

Purpose – We will share children’s personal information where there is a need to assess and evaluate any safeguarding concerns.

Legal Basis – in some case consent will be required otherwise

- Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and
- Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine

Data Processor – Multi Agency Safeguarding Authorities

Risk Stratification – Preventative Care

Purpose – ‘Risk stratification for case finding’ is a process for identifying and managing patients who have or may be at-risk of health conditions (such as diabetes) or who are most likely to need healthcare services (such as people with frailty). Risk stratification tools used in the NHS help determine a person’s risk of suffering a particular condition and enable us to focus on preventing ill health before it develops.

Information about you is collected from a number of sources including NHS Trusts, GP Federations and your GP Practice. A risk score is then arrived at through an analysis of your de-identified information. This can help us identify and offer you additional services to improve your health.

If you do not wish information about you to be included in any risk stratification programmes, please let us know. We can add a code to your records that will stop your information from being used for this purpose. Please be aware that this may limit the ability of healthcare professionals to identify if you have or are at risk of developing certain serious health conditions.

Type of Data – Identifiable/Pseudonymised/Anonymised/Aggregate Data

Legal Basis

UK GDPR Art. 6(1) (e) and Art.9 (2) (h). The use of identifiable data by CCGs and GPs for risk stratification has been approved by the Secretary of State, through the Confidentiality Advisory Group of the Health Research Authority (approval reference (CAG 7-04)(a)/2013)) and this approval has been extended to the end of September 2022 [NHS England Risk Stratification](#) which gives us a statutory legal basis under Section 251 of the NHS Act 2006 to process data for risk stratification purposes which sets aside the duty of confidentiality. We are committed to conducting risk stratification effectively, in ways that are consistent with the laws that protect your confidentiality.

Processors –NHS South, Central and West Commissioning Support Unit (CSU) provide Risk Stratification tools.

Public Health
Screening programmes
(identifiable) Notifiable
disease
information (identifiable)
Smoking cessation
(anonymous)
Sexual health
(anonymous)

Purpose – Personal identifiable and anonymous data is shared. The NHS provides national screening programmes so that certain diseases can be detected at an early stage. These currently apply to bowel cancer, breast cancer, aortic aneurysms and diabetic retinal screening service. The law allows us to share your contact information with Public Health England so that you can be invited to the relevant screening programme.

More information can be found at:
<https://www.gov.uk/topic/population-screeningprogrammes> or
speak to the practice

Legal Basis – Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’

And Article 9(2)(h) Health data as stated below

Data Processors – Hampshire County Council

Direct Care
NHS Trusts
Other Care Providers

Purpose – Personal information is shared with other secondary care trusts and providers in order to provide you with direct care services. This could be hospitals or community providers for a range of services, including treatment, operations, physio, and community nursing, ambulance service.

Legal Basis – The processing of personal data in the delivery of direct care and for providers’ administrative purposes in this surgery and in support of direct care elsewhere is supported under the following Article 6 1 (e) direct care and 9 2 (h) to provide health or social care: In some cases, patients may be required to consent to having their record opened by the third party provider before patients information is accessed. Where there is an overriding need to access the GP record in order to provide patients with lifesaving care, their consent will not be required.

Processors – Frimley Health

Care Quality Commission

Purpose – The CQC is the regulator for the English Health and Social Care services to ensure that safe care is provided. They will inspect and produce reports back to the GP practice on a regular basis. The Law allows the CQC to access identifiable data.

More detail on how they ensure compliance with data protection law (including GDPR) and their privacy statement is [available on our website: https://www.cqc.org.uk/about-us/our-policies/privacystatement](https://www.cqc.org.uk/about-us/our-policies/privacystatement)

Legal Basis – Article 6(1)(c) “processing is necessary for compliance with a legal obligation to which the controller is subject.” And Article 9(2) (h) as stated below

Processors – Care Quality Commission

Population Health
Management

Purpose – Health and care services work together as ‘Integrated Care Systems’ (ICS) and are sharing data in order to:

- Understand the health and care needs of the care system’s population, including health inequalities
- Provide support to where it will have the most impact
- Identify early actions to keep people well, not only focusing on people in direct contact with services but

looking to join up care across different partners.
(NB this links to the Risk Stratification activity identified above)

Type of Data – Identifiable/Pseudonymised/Anonymised/Aggregate Data. NB only organisations that provide your care will see your identifiable data.

Legal Basis – Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) as stated below

Data Processors – Farnborough PCN

Payments, Invoice validation

Purpose – Contract holding GPs in the UK receive payments from their respective governments on a tiered basis. Most of the income is derived from baseline capitation payments made according to the number of patients registered with the practice on quarterly payment days. These amounts paid per patient per quarter varies according to the age, sex and other demographic details for each patient. There are also graduated payments made according to the practice’s achievement of certain agreed national quality targets known as the Quality and Outcomes Framework (QOF), for instance the proportion of diabetic patients who have had an annual review. Practices can also receive payments for participating in agreed national or local enhanced services, for instance opening early in the morning or late at night or at the weekends. Practices can also receive payments for certain national initiatives such as immunisation programs and practices may also receive incomes relating to a variety of non-patient related elements such as premises. Finally, there are short term initiatives and projects that practices can take part in. Practices or GPs may also receive income for participating in the education of medical students, junior doctors and GPs themselves as well as research. In order to make patient-based payments basic and relevant necessary data about you needs to be sent to the various payment services. The release of this data is required by English laws.

Legal Basis – Article 6(1)(c) “processing is necessary for compliance with a legal obligation to which the controller is subject.” And Article 9(2)(h) ‘as stated below

Data Processors – NHS England, CCG, Public Health

Patient Record data base

Purpose – Your medical record will be processed in order that a data base can be maintained, this is managed in a secure way and there are robust processes in place to ensure your medical record is kept accurate, and up to date. Your record will follow you as you change surgeries throughout your life.

Closed records will be archived by NHS England

Legal Basis – Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) as stated below

Processor – EMIS, PCSE.

Medical reports
Subject Access Requests

Purpose – Your medical record may be shared in order that solicitors acting on your behalf can conduct certain actions as instructed by you.

Insurance companies seeking a medical report where you have applied for services offered by them can have a copy to your medical history for a specific purpose.

Legal Basis – Your explicit consent will be required before a GP can share your record for either of these purposes.

Processor – Emis

Medicines Optimisation

Purpose – Your anonymous aggregated information will be shared in order to optimise medication. This will enable your GP to provide a more efficient medication regime for your personal care. Some of the anonymous information may be used nationally to drive wider understanding of the medication is used.

Legal Basis – Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below

Processor -Frimley ICS

Medicines Management
Team

Purpose – your medical record is shared with the medicines management team, in order that your medication can be kept up to date and any changes can be implemented.

Legal Basis – Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below

Processor – Frimley ICS Meds Management Team

GP Federation

Purpose – Your medical record will be shared with the Salus in order that they can provide direct care services to the patient population. This could be in the form of video consultations, Minor injuries clinics, GP extended access clinics

Legal Basis – Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below

Processor – Salus

PCN

Purpose – Your medical record will be shared with the Farnborough PCN in order that they can provide direct care services to the patient population.

Legal Basis – Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below

Processor – Jenner House, Alexander House Surgery, Voyager Family Health, Mayfield Medical Centre, Giffard Drive, North Camp Surgery.

Smoking cessation

Purpose – personal information is shared in order for the smoking cessation service to be provided.

Only those patients who wish to be party to this service will have their data shared

Legal Basis – consented

Processor – Hampshire County Council

Social Prescribers

Purpose – Access to medical records is provided to social prescribers to undertake a full service to patients dependent on their social care needs.

Only those patients who wish to be party to this service will have their data shared

Legal Basis – Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below

Processor – Salus

Police	<p>Purpose – Personal confidential information may be shared with the Police authority for certain purposes. The level of sharing and purpose for sharing may vary. Where there is a legal basis for this information to be shared no consent will be required.</p> <p>The Police will require the correct documentation in order to make a request. This could be but not limited to, DS 2, Court order, s137, the prevention and detection of a crime.</p> <p>In some cases, consent may be required.</p> <p>Legal Basis – GDPR – Article 6 1 (f) legitimate interest 6 1 (c) Legal Obligation. Article 9 2 (f) requests for legal reasons</p> <p>Processor – Police Constabulary</p>
Coroner	<p>Purpose – Personal information relating to a patient may be shared with the coroner upon request.</p> <p>Legal Basis – UK GDPR Article 6 1 (c) Legal Obligation 9 2 (h) Health data</p> <p>Processor – The Coroner</p>
Private healthcare providers	<p>Purpose – Personal information shared with private health care providers in order to deliver direct care to patients at the patient’s request. Consent from the patient will be required to share data with Private Providers.</p> <p>Legal Basis – Consented and under contract between the patient and the provider</p> <p>Provider – Multi Private Health Care</p>
Texting Service	<p>Purpose – Personal identifiable information shared with the texting service in order that text messages including appointment reminders, campaign messages related to specific patients’ health needs and direct messages to patients</p> <p>Legal Basis – GDPR Article 6 1 (b) Contract, Article 6 1 (e) Public task, Article 9 2 (h)</p> <p>Provider – Accurx, X-On</p>

Remote consultation
Including – Video
Consultation
Clinical photography

Purpose – Personal information including images may be processed, stored and with the patients consent shared, in order to provide the patient with urgent medical advice during the COVID-19 pandemic.

Legal Basis – Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below

Patients will be asked to provide consent if required to provide photographs of certain areas of concern. There are restrictions on what the practice can accept photographs of. No photographs of the full face, no intimate areas, no pictures of patients who cannot consent to the process. No pictures of children.

Processor – e-Consult, Accurx, X-On, MS Teams.

MDT meetings

Purpose – For some long-term conditions, such as diabetes, the practice participates in meetings with staff from other agencies involved in providing care, to help plan the best way to provide care to patients with these conditions.

During COVID 19 the practice may use secure video meeting platform to discuss patient needs.

Legal Basis – Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below

Processor – MS Teams

COVID-19
Research and Planning

Purpose – To understand the risks to public health, trends and prevent the spread of infections such as Covid-19 the government has enabled a number of initiatives which include research and planning during the Covid-19 pandemic which may include the collection of personal confidential data has been necessary. This is to assist with the diagnosis, testing, self-isolating, fitness to work, treatment medical, social interventions and recovery from Covid-19.

Legal Basis – Notice under Regulation 3(4) of the Health Service (Control of Patient Information) Regulations 2002 (COPI), which were made under sections 60 (now section 251 of the NHS Act 2006) and 64 of the Health and Social Care Act 2001.

[Coronavirus \(COVID-19\): notice under regulation 3\(4\) of the Health Service \(Control of Patient Information\) Regulations 2002, which were made under sections 60 \(now section 251 of the NHS](#)

[Act 2006\)](#)

[and 64 of the Health and Social Care Act 2001 – Biobank – GOV.UK \(www.gov.uk\)](#)

[Coronavirus \(COVID-19\): notification to organisations to share information – GOV.UK \(www.gov.uk\)](#)

Provider – Biobank, NHS Digital, NHS England, other organisations included in the roll out of vaccinations, treatment and care of patients suffering with Covid-19

Purpose – GP practices are required to provide data extraction of their patient’s personal confidential information for various purposes to NHS Digital. The objective of this data collection is on an ongoing basis to identify patients registered at General Practices who fit within a certain criterion, in order to monitor and either provide direct care, or prevent serious harm to those patients. Below is a list of the purposes for the data extraction; by using the link you can find out the detail behind each data extraction and how your information will be used to inform this essential work:

General Practice
Extraction Service (GPES)
1. At risk patients data
collection Version 3
2. Covid-19 Planning
and Research data
3. CVDPREVENT
Audit
4. Physical Health
Checks for people with
Severe Mental Illness

1. [At risk patients including severely clinically vulnerable](#)
2. Covid-19 Planning and Research data, to control and prevent the risk of Covid-19
3. [NHS England has directed NHS Digital to collect and analyse data in connection with Cardiovascular Disease Prevention Audit](#)
4. [GPES Physical Health Checks for people with Severe Mental Illness \(PHSMI\) data collection.](#)

Legal Basis – All GP Practices in England are legally required to share data with NHS Digital for this purpose under section 259(1)(a) and (5) of the 2012 Act

Further detailed legal basis can be found in each link.

Any objections to this data collection should be made directly to NHS Digital. enquiries@nhsdigital.nhs.uk

Processor – NHS Digital or NHS X

Medication/Prescribing

Purpose: Prescriptions containing personal identifiable and health

data will be shared with chemists/pharmacies, in order to provide patients with essential medication or treatment as their health needs dictate. This process is achieved either by face-to-face contact with the patient or electronically. Where patients have specified a nominated pharmacy, they may wish their repeat or acute prescriptions to be ordered and sent directly to the pharmacy making a more efficient process. Arrangements can also be made with the pharmacy to deliver medication

Legal Basis: Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below

Patients will be required to nominate a preferred pharmacy.

Processor – Pharmacy of choice

Professional Training

Purpose – We are a GP training surgery. On occasion you may be asked if you are happy to be seen by one of our GP registrars. You may also be asked if you would be happy to have a consultation recorded for training purposes. These recordings will be shared and discussed with training GPs at the surgery, and also with moderators at the RCGP and HEE.

Legal Basis – 6 1 (a) consent, patients will be asked if they wish to take part in training sessions.

9 2 (a) – explicit consent will be required when making recordings of consultations

Recordings remain the control of the GP practice, and they will delete all recordings from the secure site once they are no longer required.

Processor – RCGP, HEE, iConnect,

Telephony

Purpose – The practice use an internet based telephony system that records telephone calls, patients will have the right to decline recordings of calls as is their individual right. The calls will be held on the external server for a duration of 3 years unless requested for them to be removed sooner. The telephone system has been commissioned to assist with the high volume and management of calls into the surgery, which in turn will enable a better service to patients.

Legal Basis – While there is a robust contract in place with the

processor, the surgery has undertaken this service to assist with the direct care of patients in a more efficient way.
Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below

Provider – Surgery Connect – X-ON

Learning Disability
Mortality Programme
LeDer

Purpose: The Learning Disability Mortality Review (LeDeR) programme was commissioned by NHS England to investigate the death of patients with learning difficulties to assist with processes to improve the standard and quality of care for people living with a learning disability.

Legal Basis: It has approval from the Secretary of State under section 251 of the NHS Act 2006 to process patient identifiable information who fit within a certain criterion.

Processor: CCG, NHS England

Technical Solution
Pseudonymisation

Purpose: Personal confidential and special category data in the form of medical record, is extracted under contract for the purpose of pseudonymisation. This will allow no patient to be identified within the data set that is created. SCWCSU has been commissioned to provide a data processing service for the GPs, no other processing will be undertaken under this contract.

Legal Basis: Under GDPR the legitimate purpose for this activity is under contract to provide assistance.

Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below

Processor: SCW CSU

Shared Care Record

Purpose: In order for the practice to have access to a shared record, the Integrated Care Service has commissioned a number of systems including GP connect, which is managed by NHS Digital, to enable a shared care record, which will assist in patient information to be used for a number of care related services. These may include Population Health Management, Direct Care, and analytics to assist with planning services for the use of the local health population.

Where data is used for secondary uses no personal identifiable data will be used.

Where personal confidential data is used for Research explicit consent will be required.

Legal Basis: Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below

Processor: Plexus, NHS Digital, ESHT, ICS member providers

Anticoagulation
Monitoring

Purpose: Personal Confidential data is shared with LumiraDX in order to provide an anticoagulation clinic to patients who are on anticoagulation medication. This will only affect patients who are within this criterion.

Legal Basis: The legal basis for this activity under UK GDPR is Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below

Processor: LumiraDX INR Star

Xyla Elective Care (XEC)

Purpose: Personal confidential data will be shared for the purpose of providing a Dermatology Virtual Triage service. Data will be shared to enable Xyla Elective Care (XEC) specialists to be able to support them in patient management by providing advice and referring patients as their condition dictates.

Legal Basis: Under UK GDPR the legal basis for this activity is for direct care:

Article 6(1)e

“processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller”; Article 9(2)h

“processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services.” On the basis of union or member state law or pursuant to contract with a health professional and subject to conditions and safeguards.

Joint Controller: Xyla Elective Care (XEC), Frimley Health NHS Foundation Trust

Processor: Cinapsis

<p>Oviva Type 2 Diabetes Path to Remission</p>	<p>Purpose: The NHS Type 2 Diabetes Remission Programme</p> <p>Legal Basis:</p> <ol style="list-style-type: none"> 1. Article 6(1)e “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller”; 2. Article 9(2)h “processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services”; and <p>Processor: Oviva UK Ltd</p>
<p>Medical Examiner Officers RAS Triage Service – Frimley Health NHS Foundation Trust RDU01 – Specialty – Community Healthcare.</p>	<p>Purpose: Purpose: Medical records associated with deceased patients are outside scope of the UK GDPR. However, next of kin details are within the scope of the UK GDPR. We will share specified deceased patient records and next of kin details with the Medical Examiners within Frimley Health Foundation Trust.</p> <p>Legal Basis:</p> <p>Article 6(1)c “It is necessary under a legal obligation to which the controller is subject” Article 9(2)h “processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services”; and</p>
<p>Prospective online access</p>	<p>Processor: Medical Examiners service – Frimley Health Foundation Trust</p> <p>Purpose: To allow patients to access their GP medical record online via the NHS App. The view all documents and entries made into their record by the GP, including information sent to the GP Practice where exemptions do not apply. Where a patient has requested third party access (family/friends) to their medical records, it is the</p>

patient's responsibility to ensure removal of this access if no longer required. Proxy access to the patient's record will be limited unless the patient has requested full access.

Legal Basis:

UK GDPR:

- Article 6(1)(e) Necessary for the performance of a task carried out in the public interest
- Article 9(2)(h) Necessary for provision of health and/or social care, including preventative or occupational medicine.

Common Law Duty of Confidentiality (CLDC):

- The CLDC is satisfied as the data subjects are accessing their own data following sign up for a relevant app or platform and selecting the option to view their GP record.

Processor: NHS Digital, EMIS Web

Purpose: To ensure patients are up to date with their adult immunisations – To support direct patient care

Legal Basis: Article 6(1)e and Article 9(2)h – Direct Care

Processor: CHASE Search and Selection Limited

Purpose:

"NHS England has been directed by the government to establish and operate the OpenSAFELY COVID-19 Service and the OpenSAFELY Data Analytics Service. These services provide a secure environment that supports research, clinical audit, service evaluation and health surveillance for COVID-19 and other purposes.

Each GP practice remains the controller of its own GP patient data but is required to let approved users run queries on pseudonymised patient data. This means identifiers are removed and replaced with a pseudonym.

Only approved users are allowed to run these queries, and they will not be able to access information that directly or indirectly identifies individuals.

Legal Basis –

UK GDPR – Article 6 basis:

UK GDPR Article 6(1)(c) - processing is necessary for compliance with a legal obligation to which the controller is subject (the Directions).

Adult Vaccination:
Shingles and
Pneumococcal National
Immunisation
Programmes

OpenSAFELY COVID-19
and Data Analytics
Services

UK GDPR Article 9 basis:

UK GDPR Article 9(2)(g) - processing is necessary for reasons of substantial public interest, on the basis of domestic law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject, by virtue of compliance with a direction supplemented by:

Patients who do not wish for their data to be used as part of this process can register a [type 1 opt out](#) with their GP.

Here you can find [additional information about OpenSAFELY](#)."

Processor:

NHS England
The Phoenix Partnership (TPP)
Optum

Lung Cancer Screening

Purpose: To identify patients and invite them to take part in an Enhanced Lung Care Screening. The purpose of this screening is to identify and treat lung conditions to improve outcomes.

Legal Basis:

Article 6(1)e

"processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller";

Article 9(2)h

"processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services";

Processor: InHealth

Community Children's Service

Purpose:

Provide community health services to children

Legal Basis:

Article 6(1)(e) - Public task, Article 9(2)(h) - Health care

Name of Provider: HCRG Care Group

**NHSMail and Office 365
(N365 Applications and
Sharepoint)**

Purpose:

NHSMail and Office 365 help NHS staff work more securely and efficiently which directly benefits our patients:

Security: Emails are encrypted keeping your sensitive information safe.

Collaboration: Staff can easily work together saving time and improving care.

Reliability: The system is supported 24/7 to avoid service disruptions.

National Reach: Staff can easily connect across different NHS organisations.

Safety: Advanced protection against viruses and spam keeps information secure.

Flexibility: Staff can communicate without disruption even if organisations change.

These tools support the NHS's goal of improving digital care and collaboration.

Legal Basis:

Article 6 (1)e - IT IS NECESSARY FOR THE PERFORMANCE OF A TASK CARRIED OUT IN THE PUBLIC INTEREST OR UNDER OFFICIAL AUTHORITY VESTED IN THE CONTROLLER

Article 9(2)h - PROCESSING IS NECESSARY FOR THE PURPOSES OF PREVENTIVE OR OCCUPATIONAL MEDICINE, FOR THE ASSESSMENT OF THE WORKING CAPACITY OF THE EMPLOYEE, MEDICAL DIAGNOSIS, THE PROVISION OF HEALTH OR SOCIAL CARE OR TREATMENT OR THE MANAGEMENT OF HEALTH OR SOCIAL CARE SYSTEMS

Processor: Accenture

Sub-processor: Microsoft