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

Activity	Rationale
Commissioning and contractual purposes Invoice Validation Planning Quality and Performance	 Purpose – Anonymous data is used by the Integrated Care Board (ICB) for planning, performance and commissioning purposes, as directed in the practices contract, to provide services as a public authority. Legal Basis – Article 6(1)(e) 'necessary for the performance of a task carried out in the public interest or in the exercise of official authority'; and Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'
	Patients may opt out of having their personal confidential data used for Planning or research. Please contact your surgery to apply a Type 1 Opt out or logon to <u>https://www.nhs.uk/your-nhs-data- matters/manage-your-choice/</u> to apply a National Data Opt Out
	Processor – Sussex ICB
Summary Care Record	Purpose – The NHS in England uses a national electronic record
Including additional information	called the Summary Care Record (SCR) to support patient care. It contains key information from your GP record. Your SCR provides authorised healthcare staff with faster, secure access to essential information about you in an emergency or when you need unplanned care, where such information would otherwise be unavailable.
	Legal Basis – Direct Care under UK GDPR :
	 Article 6(1)(e) 'necessary for the performance of a task carried out in the public interest or in the exercise of official authority'; and Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine
	Patients have the right to opt out of having their information shared with the SCR by completion of the form which can be downloaded <u>here</u> 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

Safeguarding Adults	Data processor –Brighton & Hove Sussex ICB Purpose – We will share personal confidential information with the safeguarding team where there is a need to assess and evaluate any safeguarding concerns and to protect the safety of individuals.
	 Legal Basis – Article 6(1)(e) 'necessary for the performance of a task carried out in the public interest or in the exercise of official authority'; and Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'
	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.
Individual Funding Requests	Processor – NHS Digital 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.
	Sharing of aggregated non identifiable data is permitted.
	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
	 Legal Basis –. Articles 6(1)(a) and 9(1)(h) – explicit consent; or Article 6(1)(c) (where we are <i>legally obligated</i> to share your personal data) for your standard personal data and Article 9(2)(j) (scientific research) for your health data.
	Where you have opted out of having your identifiable information shared for this Planning or Research your information will not be shared.
	Where personal confidential data is shared your consent will need to be required.
Research	Purpose – We may share anonymous patient information with research companies for the purpose of exploring new ways of providing healthcare and treatment for patients with certain conditions. This data will not be used for any other purpose.

	Consent may not be required to share information for this purpose.
	 Legal Basis – Direct Care under UK GDPR: Article 6(1)(e) 'necessary for the performance of a task carried out in the public interest or in the exercise of official authority'; and Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine
	Data Processor – Adult Social Care
Safeguarding Children	Purpose – We will share children's personal information where there is a need to assess and evaluate any safeguarding concerns and to protect the safety of children.
	 Legal Basis - Article 6(1)(e) 'necessary for the performance of a task carried out in the public interest or in the exercise of official authority'; and Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine
	Consent may not be required to share this information.
Risk Stratification – Preventative Care	Data Processor – Front Door For FamiliesPurpose - '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
	Type of Data – Identifiable/Pseudonymised/Anonymised/Aggregate Data

carried out in the public interest or in the exercise of officia authority'; and Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine' Processors – Appointed date processor and for subsequen healthcare with the ICB/PCG/Frailty Svs etc Public Health Screening programmes (identifiable) Notifiable disease information (identifiable) Sorking cessation (anonymous) Sexual health (anonymous) (b) the elath resons. More information can be found at https://www.gov.uk/topic/population-screeningprogrammes [O insert relevant link] or speak to the practice Patients may not opt out of having their personal information shared for Public Health reasons. Patients may opt out of being screened at the time of receiving at invitation. Legal Basis: Article 6(1)(e) 'necessary for the performance o		
healthcare with the ICB/PCG/Frailty Svs etc Public Health Screening programmes (identifiable) Notifiable disease information (identifiable) Smoking cessation (anonymous) Sexual health (anonymous) More Information grogrammes (anonymous) Sexual health		 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
Screening programmes (identifiable) 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 retina screening service to name a few. The law allows us to share you contact information, and certain aspects of information relating to this screening with Public Health England so that you can be appropriated invited to the relevant screening programme. Vaccination Programmes More information can be found at https://www.gov.uk/topic/population-screeningprogrammes [O insert relevant link] or speak to the practice Patients may not opt out of having their personal information shared for Public Health reasons. Patients may opt out of being screened at the time of receiving an invitation. • Legal Basis: • Article 6(1)(e) 'necessary for the performance of a tasi carried out in the public interest or in the exercise of officia authority'; and • Direct Care NHS Trusts Community Providers Pharmacies Enhanced care providers Other Care Providers Purpose – Personal information is shared with other secondary care services. This could be hospitals or community providers for a range of services, including treatment, operations, physio, and communit nursing, ambulance service. Varciae affor providers' Other Care Providers Legal Basis The processary for the performance of a tasi care and for providers' administrative purposes in this surgery and in support of direct care elsewhere is supported under the following: • Article 6(1)(e) 'necessary for the performance of a tasi		Processors – Appointed date processor and for subsequent healthcare with the ICB/PCG/Frailty Svs etc
for Public Health reasons. Patients may opt out of being screened at the time of receiving an invitation.• Legal Basis: • Article 6(1)(e) 'necessary for the performance of a task carried out in the public interest or in the exercise of officia authority'; and • Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'Data Processors – Public Health EnglandDirect Care NHS Trusts Community Providers Pharmacies Enhanced care providersPurpose – Personal information is shared with other secondary card trusts and providers in order to provide you with individual direct card 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) 'necessary for the performance of a task	Screening programmes (identifiable) Notifiable disease information (identifiable) Smoking cessation (anonymous) Sexual health (anonymous)	The NHS provides national screening programmes so that certain diseases can be detected at an early stage. These currently apply to bowel cancer, breast cancer, aortic aneurysms and diabetic retinal screening service to name a few. The law allows us to share your contact information, and certain aspects of information relating to the screening with Public Health England so that you can be appropriately invited to the relevant screening programme. More information can be found at: https://www.gov.uk/topic/population-screeningprogrammes [Or
 Article 6(1)(e) 'necessary for the performance of a task carried out in the public interest or in the exercise of official authority'; and Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine' Data Processors – Public Health England Direct Care NHS Trusts Community Providers Pharmacies Enhanced care providers Nursing Homes Other Care Providers Legal Basis The processing of personal data in the delivery of direct care and for providers' administrative purposes in this surgery and it support of direct care elsewhere is supported under the following: Article 6(1)(e) 'necessary for the performance of a task 		Patients may opt out of being screened at the time of receiving an
Direct Care NHS TrustsPurpose – Personal information is shared with other secondary care trusts and providers in order to provide you with individual direct care services. This could be hospitals or community providers for a range of services, including treatment, operations, physio, and community nursing Homes Other Care ProvidersPurpose – Personal information is shared with other secondary care trusts and providers in order to provide you with individual direct care services. This could be hospitals or community providers for a range of services, including treatment, operations, physio, and community nursing, ambulance service.Legal Basis The processing of personal data in the delivery of direct care and for providers' administrative purposes in this surgery and in support of direct care elsewhere is supported under the following:•Article 6(1)(e) 'necessary for the performance of a task		 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
Direct Care NHS TrustsPurpose – Personal information is shared with other secondary care trusts and providers in order to provide you with individual direct care services. This could be hospitals or community providers for a range of services, including treatment, operations, physio, and community nursing Homes Other Care ProvidersPurpose – Personal information is shared with other secondary care trusts and providers in order to provide you with individual direct care services. This could be hospitals or community providers for a range of services, including treatment, operations, physio, and community 		Data Processors - Public Health England
 care and for providers' administrative purposes in this surgery and in support of direct care elsewhere is supported under the following: Article 6(1)(e) 'necessary for the performance of a task 	NHS Trusts Community Providers Pharmacies Enhanced care providers Nursing Homes	Purpose – Personal information is shared with other secondary care trusts and providers in order to provide you with individual direct care services. This could be hospitals or community providers for a range of services, including treatment, operations, physio, and community
		care and for providers' administrative purposes in this surgery and in
authority'; and		• Article 9(2)(h) 'necessary for the purposes of preventative or

Care Quality Commission	 Processors – SUSH, SPFT & SCFT Purpose – The CQC is the regulator for the English Health and Social Care services to ensure that safe care is provided. They will inspect and produce reports back to the GP practice on a regular basis. The Law allows the CQC to access identifiable data. More detail on how they ensure compliance with data protection law (including UK GDPR) and their privacy statement is <u>available on our website</u>: <u>https://www.cqc.org.uk/about-us/our-policies/privacy-statement</u> Legal Basis – Article 6(1)(e) 'necessary for the performance of a task carried out in the public interest or in the exercise of official authority'; and Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine
Population Health Management	 Processors – Care Quality Commission 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. Type of Data – Identifiable/Pseudonymised/Anonymised/Aggregate Data. NB only organisations that provide your care will see your
	 Legal Basis – Article 6(1)(e) 'necessary for the performance of a task carried out in the public interest or in the exercise of official authority'; and Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine
Paymonts	Data Processors - Optum, Cerner
Payments	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)(e) 'necessary for the performance of a task carried out in the public interest or in the exercise of official authority'; and Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine
	Data Processors – NHS England, ICB, Public Health
Patient Record data base	 Purpose – Your medical record will be processed in order that a data base can be maintained, this is managed in a secure way and there are robust processes in place to ensure your medical record 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 for the performance of a task carried out in the public interest or in the exercise of official authority'; and Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'
	Processor – TPP And PCSE
Medical reports Subject Access Requests	Purpose – Your medical record may be shared in order that:
	Solicitors/persons acting on your behalf can conduct certain actions as instructed by you.
	Insurance companies seeking a medical reports where you have applied for services offered by then can have a copy to your medical history for a specific purpose.

	 Legal Basis – Article 6(1)(e) 'necessary for the performance of a task carried out in the public interest or in the exercise of official authority'; and Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'
Medicines Management Team Medicines Optimisation	 Processor – Solicitors, Insurance organisations Purpose – your medical record is shared with the medicines management team pharmacists, in order that your medication can be kept up to date and any necessary changes to medication can be implemented.
	 Legal Basis – Article 6(1)(e) 'necessary for the performance of a task carried out in the public interest or in the exercise of official authority'; and Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'
	Processor – ICB Sussex Medicines Management Team
GP Federation GP Extended Access	 Purpose – Your medical record will be shared with the HERE in order that they can provide direct care services to the patient population. This could be in the form of video consultations, Minor injuries clinics, GP extended access clinics. The Federation will be acting on behalf of the GP practice. Legal Basis – Article 6(1)(e) 'necessary for the performance of a task carried out in the public interest or in the exercise of official authority'; and Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'
Primary Care Network	Processor – Brighton and Hove Primary Care Federation Purpose – Your medical record will be shared with the Brighton North
(PCN)	 & Central PCN in order that they can provide direct care services to the patient population. Legal Basis – Article 6(1)(e) 'necessary for the performance of a task carried out in the public interest or in the exercise of official authority'; and Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'

	Processor – Carden Surgery, Seven Dial & University of Sussex Health
	Centre
Smoking cessation	Purpose – personal information is shared in order for the smoking cessation service to be provided.
	Only those patients who wish to be party to this service will have their data shared
	 Legal Basis – Article 6(1)(e) 'necessary for the performance of a task carried out in the public interest or in the exercise of official authority'; and Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'
	Processor – Montpelier Surgery
Social Prescribers	Purpose – Access to medical records is provided to social prescribers to undertake a full service to patients dependent on their health social care needs.
	Only those patients who wish to be party to this service will have their data shared
	 Legal Basis – Article 6(1)(e) 'necessary for the performance of a task carried out in the public interest or in the exercise of official authority'; and Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'
	Processor – AGE UK
Police	Purpose – Personal confidential information may be shared with the Police authority for certain purposes. The level of sharing and purpose for sharing may vary. Where there is a legal basis for this information to be shared consent will not always be required.
	The Police will require the correct documentation in order to make a request. This could be but not limited to, DS 2, Court order, s137, the prevention and detection of a crime. Or where the information is necessary to protect a person or community.
	 Legal Basis – UK GDPR Article 6(1)(c) – to comply with a legal obligation; and Article 9(2)(j) – 'for reasons of substantial public interest'
	Processor – Police Constabulary
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Coroner Non-commissioned, private healthcare providers(e.g. BUPA,	 Purpose – Personal health records or information relating to a deceased patient may be shared with the coroner or medical examiner upon request. Legal Basis – UK GDPR Article 6 1 (c) to comply with a legal obligation 9 2 (h) Health data Processor – The Coroner 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
Virgin Care, etc)	 Private Providers. Legal Basis – Article 6 1 (a) and 9 2 (h) Consented and under contract between the patient and the provider Provider – Private Healthcare
Messaging Service	 Purpose – Personal identifiable information shared with the messaging service in order that messages including; appointment reminders; results; campaign messages related to specific patients health needs; and direct messages to patients, can be transferred to the patient in a safe way. Legal Basis – Article 6(1)(e) 'necessary for the performance of a task carried out in the public interest or in the exercise of official authority'; and Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'
	Provider - AccuRX, econsult
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. Legal Basis – Article 6(1)(e) 'necessary for the performance of a task carried out in the public interest or in the exercise of official authority'; and Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'
	Patients may be videoed or asked to provide photographs with consent. There are restrictions on what the practice can accept photographs of. No photographs of the full face, no intimate areas, no pictures of patients who cannot consent to the process. No pictures of children.
	Processor – e-Consult, AccuRX,

MDT meetings	 Purpose – For some long term conditions, the practice participates in meetings with staff from other agencies involved in providing care, to help plan the best way to provide care to patients with these conditions. Personal data will be shared with other agencies in order that mutual care packages can be decided. Legal Basis – Article 6(1)(e) 'necessary for the performance of a task carried out in the public interest or in the exercise of official authority'; and Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'
	Processor – MS Teams,
General Practice Extraction Service (GPES) 1. At risk patients data collection Version 3 2. CVDPREVENT Audit 3. Physical Health Checks for people with Severe	Purpose – GP practices are required to provide data extraction of their patients personal confidential information for various purposes to NHS Digital. The objective of this data collection is on an ongoing basis to identify patients registered at General Practices who fit within a certain criteria, in order to monitor and either provide direct care, or prevent serious harm to those patients. Below is a list of the purposes for the data extraction, by using the link you can find out the detail behind each data extraction and how your information will be used to inform this essential work:
Mental Illness	1. <u>At risk patients including severely clinically vulnerable</u>
	2. <u>NHS England has directed NHS Digital to collect and analyse</u> <u>data in connection with Cardiovascular Disease Prevention</u> <u>Audit</u>
	3. <u>GPES Physical Health Checks for people with Severe Mental</u> <u>Illness (PHSMI) data collection</u> .
	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. <u>enquiries@nhsdigital.nhs.uk</u>
	Processor – NHS England
Medication/Prescribing	Purpose: Prescriptions containing personal identifiable and health data will be shared with organisations who provide medicines management including chemists/pharmacies, in order to provide patients with essential medication regime management, medicines and or treatment as their health needs dictate. This process is achieved either by face to face contact with the patient or
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	 electronically. Pharmacists may be employed to review medication, Patients may be referred to pharmacists to assist with diagnosis and care for minor treatment, patients may have specified a nominated pharmacy they may wish their repeat or acute prescriptions to be ordered and sent directly to the pharmacy making a more efficient process. Arrangements can also be made with the pharmacy to deliver care and medication Legal Basis : Article 6(1)(e) 'necessary for the performance of a task carried out in the public interest or in the exercise of official authority'; and
	 Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'
	Processor – Pharmacy of choice
Off Site Storage of medical records	Purpose – the practice has contracted the facility of an offsite storage facility to provide secure offsite storage for all Lloyd George medical records. The practice can assure patients that their medical records will remain in control of the practice and robust mechanisms are in place to protect the security of the patient's personal confidential data.
	Legal Basis: The movement and storage of patients records will be undertaken by contractual obligation between the practice and the companies undertaking the work.
	Under UK GDPR Article 6 1 (b) Contractual obligation
	Articles 6 1 (e) Public Task
	Article 9 2 (h) Health date.
	Processor- Niche Oasis
Telephony	Purpose – The practice use an internet based telephony system that records telephone calls, for their own purpose and to assist with patient consultations. The telephone system has been commissioned to assist with the high volume and management of calls into the surgery, which in turn will enable a better service to patients.
	Legal Basis – While there is a robust contract in place with the processor, the surgery has undertaken this service to assist with the direct care of patients in a more efficient way.
	 Article 6(1)(e) 'necessary for the performance of a task carried out in the public interest or in the exercise of official authority'; and Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'
	Provider – LouisComm
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Learning Disability Mortality Programme LeDer	 Purpose : The Learning Disability Mortality Review (LeDeR) programme was commissioned by NHS England to investigate the death of patients with learning difficulties and Autism to assist with processes to improve the standard and quality of care for people living with a learning disability and Autism. Records of deceased patients who meet with this criteria will be shared with NHS England. Legal Basis: It has approval from the Secretary of State under section 251 of the NHS Act 2006 to process patient identifiable information who fit within a certain criteria.
Technical Solution	Processor : ICB, NHS England
Pseudonymisation	Purpose: Personal confidential and special category data in the form of medical record, is extracted under contract for the purpose of pseudonymisation. This will allow no patient to be identified within the data set that is created. SCWCSU has been commissioned to provide a data processing service for the GPs, no other processing will be undertaken under this contract.
	Legal Basis: Under UK GDPR the legitimate purpose for this activity is under contract to provide assistance. Article 6(1)(e); "necessary in the exercise of official authority vested in the controller' And Article 9(2)(h) Health data as stated below
	Processor: SCW CSU
Shared Care Record	Purpose: In order for the practice to have access to a shared record, the Integrated Care Service has commissioned a number of systems including <u>GP connect</u> , which is managed by NHS England, to enable a shared care record, which will assist in patient information to be used for a number of care related services. These may include Population Health Management, Direct Care, and analytics to assist with planning services for the use of the local health population.
	Where data is used for secondary uses no personal identifiable data will be used.
	Where personal confidential data is used for Research explicit consent will be required.
	 Legal Basis – Article 6(1)(e) 'necessary for the performance of a task carried out in the public interest or in the exercise of official authority'; and Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'
	Processor: NHS England
Local shared care record	Purpose: Health and Social care services are developing shared
Sussex ICB	systems to share data efficiently and quickly. It is important for

	anyone treating you to be able to access your shared record so that they have all the information they need to care for you. This will be during your routine appointments and in urgent situations such as going to A&E, calling 111 or going to an Out of hours appointment. It is also quicker for staff to access a shared record than to try to contact other staff by phone or email.
	Only authorised staff can access the systems and the information they see is carefully checked so that it relates to their job. Systems do not share all your data, just data which services have agreed is necessary to include.
	 Legal Basis: Article 6(1)(e) 'necessary for the performance of a task carried out in the public interest or in the exercise of official authority'; and Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'
	Processor: NHS Digital, ICS Member providers
Anticoagulation Monitoring	Purpose: Personal Confidential data is shared with LumiraDX in order to provide an anticoagulation clinic to patients who are on anticoagulation medication. This will only affect patients who are within this criteria.
	 Legal Basis: Article 6(1)(e) 'necessary for the performance of a task carried out in the public interest or in the exercise of official authority'; and Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'
	Processor : LumiraDX INRStar

Community Medical Examiners – RSCH	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 RSCH
	Legal Basis: Article 6(1)(c) – necessary under a legal obligation to which the controller is subject"; and Article 9(2)(h)– "processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services" Processor: Medical Examiners service – RSCH

Prospective online	Purpose: To allow patients to access their GP medical record online
access	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 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, TPP

We keep our Privacy Notice under regular review. This notice was last reviewed in October 2023.

Joining the dots across health and care
 Appendix A – GP Privacy Notice V7