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 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 https://www.nhs.uk/your-nhs-data-matters/manage-your-choice/ to apply a National Data Opt Out **Processor** – Frimley ICBHealthy.io
Summary Care Record Including additional information	**Purpose –**The NHS in England uses a national electronic record called the Summary Care Record (SCR) to support patient care. It contains key information from your GP record. Your SCR provides authorised healthcare staff with faster, secure access to essential information about you in an emergency or when you need unplanned care, where such information would otherwise be unavailable. **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 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
EMIS Enterprise Search & Reports	**Purpose:** The EMIS Enterprise Search & Reports product can be used to support both GP Practices and the ICB/ICS in their service review and development. It will enable SCW to extract real time coded anonymised data from the practice and share with the ICB/ICS, to allow them to support the delivery of key NHS objectives around: • Service redesign • Measuring performance and outcomes • Reducing health inequalities • Achieving efficiency savings • improving patient safety The information is being collected to facilitate efficient use of monitoring locally commissioned Primary Care Services as well as enhanced service monitoring. Aid future planning, ensure consistency of searches and ultimately improve patient care **Legal Basis:** this activity is being provided under : **Condition for processing under the GDPR - Article 6** 6(1) E - public interest or under official authority vested in the Controller **Condition for processing Under the GDRP - Article 9** 9(2) H – preventative or occupational nedicine, Medical Diagnosis or treatment, or management of health and Social Care. **Processor:** EMIS & South Central & West CSU.
Connected Care and Thames Valley and Surrey, NHS Buckinghamshire, Oxfordshire and Berkshire West LHCR	**Purpose:** The purpose of the Connected Care Interoperability solution is to enable information about an individual's medical condition and social care packages and requirements to be shared electronically across subscribing health and social care organisations in order to ensure that the care provided is safe and consistent with patients' existing risks, diagnoses, conditions, problems, medication and other treatment. These records are known locally as Connected Care. The purpose of the Thames Valley and Surrey Care Record Interoperability solution (also known as the Local Health and Care Record (LHCR)) is to enable information about an individual's medical condition and social care packages and requirements to be shared electronically across subscribing health and social care

	organisations across the Thames Valley and across Surrey for direct care purposes in order to ensure that the care provided is safe and consistent with patients' existing risks, diagnoses, conditions, problems, medication and other treatment. **Legal basis:** Unless a patient has objected to processing or joint processing and sharing and the sharing organisation has accepted the patient's objection the legal basis for viewing the shared records is also provided by General Data Protection Regulation: 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"; and 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, on the basis of Union or Member state laws.". **Processor: SoftCat – Graphnet – System C – Microsoft.**
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. Where personal confidential data is shared your consent will be required. Where you have opted out of having your identifiable information shared for this Planning or Research your information will not be shared. **Legal Basis –** • 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 – Healthy.io.
OpenSAFELY COVID-19 and Data Analytics Services	**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). 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) EMIS
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 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** – • 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** –Frimley ICB
Safeguarding Adults	**Purpose –** We will share personal confidential information with the safeguarding team where there is a need to assess and evaluate any safeguarding concerns and to protect the safety of individuals. Consent is not 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** – Surrey Safeguarding Adults Board
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.

	Data Processor – Surrey Safeguarding Children Partnership
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** – • 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' **Processors** – Graphnet Connected Care
Public Health Screening programmes (identifiable) Notifiable disease information (identifiable) Smoking cessation (anonymous) Sexual health (anonymous) Vaccination Programmes	Purpose – Personal identifiable and anonymous data is shared. The NHS provides national screening programmes so that certain diseases can be detected at an early stage. These currently apply to bowel cancer, breast cancer, aortic aneurysms and diabetic retinal screening service to name a few. The law allows us to share your contact information , including mobile and email address 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 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 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 – Surrey County Council, Public health England, NHS digital
Regional Health & Social Care BSPS Diagnostic Requests and Results (Universal ICE Solution)	**Purpose** - The purpose of the BSPS Universal ICE solution and the underlying Clinisys Universal ICE systems is to enable users to request diagnostic tests and to enable information about an individual's diagnostic requests and results to be made available in near real time across the broad range of subscribing care providers who have access to the BSPS Universal ICE system. **Legal Basis** - Unless a patient has objected to processing or joint processing and sharing and the sharing organisation has accepted the patient's objection the legal basis for processing the records for the purposes set out above is also provided by the UK General Data Protection Regulation ("GDPR"): • 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)g "processing is necessary for reasons of substantial public interest"; • 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 laws"; and • Article 9(2)i "processing is necessary for reasons of public interest in the area of public health".

	Processors - Clinisys ICE and Universal ICE Systems, GP Clinical Systems, Trust Clinical Systems
Direct Care NHS Trusts Community Providers Pharmacies Enhanced care providers Nursing Homes Other Care Providers	**Purpose –** Personal information is shared with other secondary care trusts and providers in order to provide you with individual direct care services. This could be hospitals or community providers for a range of services, including treatment, operations, physio, and community nursing, ambulance service. **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 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 **Processors** – NHS Frimley Health Foundation Trust, Royal Surrey NHS Foundation Trust, Surrey Heath Community Providers, Acenti, Surrey Physio, Forest Care (Holly Lodge, Cedar Lodge), Cornerstone (Marula Lodge), Ashbourne Court Care Home South Central Ambulance service, North Hampshire Urgent Care, Phyllis Tuckwell Hospice Care, Virgin Care. Clockhouse Pharmacy.
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
NHS South, Central and West Commissioning Support Unit – Child Health Information Services (CHIS)	Purpose – South, Central and West Child Health Information Services (SCW CHIS) is commissioned by NHS England to support the monitoring of care delivered to children. Personal data is collected from the child's GP record to enable health screening, physical examination and vaccination services to be monitored to ensure that every child has access to all relevant health interventions. For more information: Fair Processing Notice Child Health Information Services - NHS SCW Support and Transformation for Health and Care (scwcsu.nhs.uk) 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 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 – SCW, Apollo Medical Software Solutions, System C
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 UK GDPR) and their privacy statement is available on our website: https://www.cqc.org.uk/about-us/our-policies/privacy-statement **Legal Basis** – • Article 6(1)(e) ‘…processing is necessary for compliance with a legal obligation’; and • Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine **Processor**s – Care Quality Commission
Population Health Management	**Purpose –** Health and care services work together as ‘Integrated Care Systems’ (ICS) and are sharing data in order to: • 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 identifiable data. **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** - 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)(c) 'processing is necessary for compliance with a legal obligation to which the controller is subject'; 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** – EMIS, Docman 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)(a) – consent for personal data; and • Article 9(2)(a) – explicit consent for special-category data. **Processor –** Solicitors and insurance organisations
Hydrate to Feel Great	**Purpose:** The purpose of this data processing is to support people over 65+ to stay hydrated in their own home, improving their health outcomes and reducing risk of dehydration and related illnesses. **Legal Basis**: Article 6(1)a - The data subject has given consent to the processing of his or her personal data for one or more specific purposes; Article 6 1 (e) Public Task, processing is necessary for you to perform a task in the public. Article 9 2 (a) explicit consent Article 9 2(h) data concerning health Patients may withdraw their consent at any time. **Processor**: NHS England and NHS Sussex ICB
Interface Clinical Review Services	**Purpose:** Where a practice has requested an independent third party, Interface Clinical Services Ltd (Interface), to carry out a clinical review service for them. Interface employs pharmacists to deliver clinical or therapy review services on behalf of the NHS, pharmaceutical industry, medical device or other healthcare companies. **Legal Basis:** **Article 6 1 (e)** Public Task, processing is necessary for you to perform a task in the public. **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:** Interface Clinical Services Ltd, CFH Docmail Ltd.
Interface Clinical Services Ltd	**Purpose**: Personal confidential data will be shared for the purpose of the GALARISSO DERMATOMYOSITIS clinical study. Patient consent to participate will be recorded in the patient's electronic health record. **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**: Interface Clinical Services Ltd
Diabetes Clinical Support Services (Interface Clinical Services Ltd)	**Purpose:** The Optimisation of glucose monitoring service is designed to improve access and uptake of guideline-directed glucose monitoring equipment and to identify opportunities to improve the care of people living with diabetes (PWD). The service involves: • identification of patients who may be eligible for continuous glucose monitoring (CGM) in line with current guidelines • pharmacist-led reviews for PWD to confirm eligibility and suitability for CGM, and to optimise blood glucose and blood ketone testing for PWD using CGM • provision of reports to support the practice in sustained quality improvement in the management of PWD **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**: Interface Clinical Services Ltd
Adult Eating Disorder Service	**Purpose:** As part of the NHS Long Term Plan, there was a requirement to comprehensively monitor and manage the physical health of all people with an eating disorder. Physical health check reviews can involve:

	• weight or BMI (adjusted for age if appropriate) • blood pressure • relevant blood tests • any problems with daily functioning • assessment of risk (related to both physical and mental health) • an ECG, for people with purging behaviours and/or significant weight changes • a discussion of treatment options. Surrey and Borders Partnership (SABP) as part of their assessment of referrals to the Adults Eating Disorder (AED) service, undertook a health assessment to help identify any physical concerns. Due to the current waiting list for SABP AED services, people waiting to have an assessment were to be offered a physical health check monitoring undertaken by Surrey Heath Primary Care Network (SHCP) This service is to ensure: • monitoring was provided while on the waiting list. • any physical health implications could be identified/flagged to SABP at an earlier stage **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 **Processor: SABP, SHCP, Salus, FICS**
Frimley Medicines Optimisation Service	**Purpose** – The role of the Medicines Optimisation Service is to support patients by helping to ensure that patients are receiving the most clinically appropriate and safe medication, in particular acting on Medicine HealthCare Regulatory Authority (MHRA) safety alerts. It includes ensuring that medications are used safely and effectively within the scope of the service. The Medicines Optimisation Service includes registered healthcare professionals: Pharmacists, Pharmacy Technicians, Dietitians. Your medical record is shared 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** – Frimley ICB ,Bartlett Group Practice, Scriptswitch, TVS care records system, NHS England MedSIP data Tool
Interpretation & Translations Services	**Purpose:** Interpretation and Translation Services for the direct care purpose of the patient during the consultation - Provision of the required interpretation/translation service as per the terms and conditions documentation. To include operations such as collection, recording, organisation, structuring, storage, adaptation, or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of data. **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…' • 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 **Processor:** Dals
Rapid Health	**Purpose**: This software will support the Practice by reducing administrative workload, improving appointment efficiency and prioritising patient needs based on symptom severity. Allowing staff to focus on urgent cases while enhancing overall patient flow. **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"; **Processor:** Rapid Health
Teamnet	**Purpose:** A secure online intranet platform widely used in primary care for internal communication, document storage, workforce management and incident reporting. It supports staff

	collaboration, HR workflows, rota management, policy storage, and distribution of operational updates. **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)b&h** "for the purposes of employment, social secturity or social protection", "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". **Processor: Agilio**
TVS and Docobo for remote Care and monitoring	**Purpose -** The purpose for this joint processing and sharing arrangement is to allow data held in the TVS Care Records to be accessed through and processed by the TVS1 and Docobo for Remote Care and Monitoring (DOC@HOME) solution for presentation to and use by service users (patients and residents) themselves. The purpose of capturing and processing this data is to assist health and social care professionals to make better decisions regarding the planning, delivery, monitoring and review of care to individual service users. **Legal Basis** – 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)g "processing is necessary for reasons of substantial public interest"; 3. 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 domestic law"; and 4. Article 9(2)i "processing is necessary for reasons of public interest in the area of public health". **Processor** – TVS (Graphnet Ltd), Docobo
GP Federation GP Extended Access	**Purpose –** Your medical record will be shared with the Surrey Heath Community providers in order that they can provide direct

Video consultations Minor injuries services CVD clinics Mental health Services Social Prescribing Clinical Pharmacist Nursing Associate Cancer Navigation Covid Vaccination Centre	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' **Processor** – Surrey Heath Community Providers
Primary Care Network (PCN)	**Purpose –** Your medical record will be shared with the practices in our PCN as below 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** – Upper Gordon Road surgery, Park House Surgery, Park Road Group Practice, Camberley Health Centre, Station Road Surgery, Lightwater Surgery, NHUC Emergency Care
NHS TYPE 2 Diabetes Remission Programme	**Purpose: The NHS Type 2 Diabetes Remission Programme** **Legal Basis:** **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"; **Processor: Oviva UK Ltd**
Early Onset Type 2 Diabetes (EOT2D)	**Purpose**: The practice will discuss with patients meeting the criteria if they wish to be involved in the program. Patient data will then be shared with Oviva who will contact patients to gain consent to continue and deliver direct care to those patients.

	Patient will have the ability to withdraw consent to be part of the program at any time. **Legal Basis:** 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 themanagement of health or social care systems and services"; and **Processor:** Oviva UK Ltd
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 –** One You Surrey
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 – Surrey Heath Community Providers/Surrey Heath Borough Council/Elemental**
National Accelerated Citizen Access Programme	**Purpose -** The overall achievement is the provision of patient data directly to the patient unless individual circumstances render access inappropriate. This is part of GP contractual requirements since 2014 for coded data and 2019/20 for full future information entered onto the GP system. The National Programme aims to enable prospective data access, which means that all entries recorded in a patient's GP health record after the go live date will be visible to them after the agreed date (excluding administrative items (tasks)). Any records added before that date would only be visible if historic coded data access was granted (coded data only). Relevant patients will be provided with prospective data access by default, through their Patient Facing Service (PFS) App, unless their GP determines that access should be restricted on the basis of the exemptions contained in the data protection legislation. If access is restricted, the reason must be documented. **Legal Basis** - Every use of personal data must be lawful and must comply with the Data Protection Act (2018) / UK GDPR and satisfy the common law duty of confidentiality. The basis in law for processing information for the purposes described in this DPIA under the UK GDPR is as follows: • UK GDPR Article 6(1)(e) Necessary for the performance of a task carried out in the public interest and • UK GDPR Article 9(2)(h) Necessary for provision of health and/or social care, including preventative or occupational medicine **Processor - EMIS**
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
Coroner	**Purpose –** Personal health records or information relating to a deceased patient may be shared with the coroner**.** **Legal Basis –** UK GDPR: • Article 6(1)(c) – to comply with a legal obligation; and • Article 9(2)(h) – 'necessary for the purposes of preventative or occupational medicine'. **Processor –** The Coroner
Medical Examiner Service - RAS Triage Service, Community healthcare – Frimley Health NHS Foundation Trust	**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 **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 – Frimley Health NHS Foundation Trust
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
Non-commissioned, private healthcare providers (e.g. BUPA, Virgin Care, etc.)	**Purpose –** Personal information shared with private health care providers in order to deliver direct care to patients at the patient's request. Consent from the patient will be required to share data with Private Providers. **Legal Basis –** Articles 6(1)(a) and 9(2)(a) consent by the patient given under contract to the provider. **Provider** – Any GP private referred services
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 - NHSAPP, econsult.
Automated Patient Registration/Lab report processing – Healthtech-1	**Purpose:** The aim of the Healthtech-1's service is to reduce the time practice staff spend on administration and improve the patient's experience of engaging with the practice. For Healthtech-1 to complete an automated patient registration, the primary data source is from the patient who will manually enter their personal details using their digital device onto the website. Additional special category data points are collected from the patient for the purpose of increasing quality of care for that patient at the relevant GP surgery. For Healthtech-1 to process a lab report, the primary data source is the lab report itself. Other data used in processing includes some demographic information about the patient. Data is accessed through the Healthcare Organisation's electronic healthcare record in 1 way: 1. Healthcare Organisation grant specified Healthtech-1 staff clinical system access. This will be similar access to that granted to administrative staff who are able to process lab reports. The purpose of this access is to perform actions in the clinical system necessary to process and file lab reports. **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"; **Processor:** Healthtech-1
Healthy.io - ACR project for patients with diabetes (and/or other conditions)	**Purpose:** The data is being processed for the purpose of delivery of a programme, sponsored by NHS Digital, to monitor urine for indications of chronic kidney disease (CKD) which is recommended to be undertaken annually for patients at risk of chronic kidney disease e.g., patients living with diabetes. The programme enables patients to test their kidney function from home. We will share your contact details with Healthy.io to enable them to contact you and send you a test kit. This will help identify patients at risk of kidney disease and help us agree any early interventions that can be put in place for the benefit of your care. Healthy.io will only use your data for the purposes of delivering their service to you. If you do not wish to receive a home test kit from Healthy.io we will continue to manage your care within the Practice. Healthy.io are required to hold data we send them in line with retention periods outlined in the Records Management code of Practice for Health and Social Care. Further information about this is available at: https://lp.healthy.io/minuteful_info/.
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
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 –** Surrey County Council Social Care, District nurses, HRCG Care
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.

General Practice Extraction Service (GPES) 1. At risk patients data collection Version 3 2. CVDPREVENT Audit 3. Physical Health Checks for people with Severe Mental Illness 4. National Obesity Audit	**Purpose –** GP practices are required to provide data extraction of their patients personal confidential information for various purposes to NHS England. The objective of this data collection is on an ongoing basis to identify patients registered at General Practices who fit within a certain criteria, in order to monitor and either provide direct care, or prevent serious harm to those patients. Below is a list of the purposes for the data extraction, by using the link you can find out the detail behind each data extraction and how your information will be used to inform this essential work: 1. At risk patients including severely clinically vulnerable 2. NHS England has directed NHS England to collect and analyse data in connection with Cardiovascular Disease Prevention Audit 3. GPES Physical Health Checks for people with Severe Mental Illness (PHSMI) data collection. 4. National Obesity Audit - NHS Digital **Legal Basis -** All GP Practices in England are legally required to share data with NHS England for this purpose under section 259(1)(a) and (5) of the The Health and Social Care Act 2012 Further detailed legal basis can be found in each link. Any objections to this data collection should be made directly to NHS England. enquiries@nhsdigital.nhs.uk **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 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
Professional Training	**Purpose –** We are a training surgery. Our clinical team are required to be exposed to on the job, clinical experience, as well as continual professional development. On occasion you may be asked if you are happy to be seen by one of our GP registrars, pharmacists or other clinical team to assist with their training as a clinical professional. You may also be asked if you would be happy to have a consultation recorded for training purposes. These recordings will be shared and discussed with training GPs at the surgery, and also with moderators at the RCGP and HEE. **Legal Basis** – • 6 1 (a) consent, patients will be asked if they wish to take part in training sessions • 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' 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, Fourteen Fish

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' **Processor –** 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 criteria. **Processor : ICB, 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 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 GP connect, which is managed by NHS England, to enable a shared care record, which will assist in

	patient information to be used for a number of care related services. These may include Population Health Management, Direct Care, and analytics to assist with planning services for the use of the local health population. 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 North Hampshire Urgent Care, Frimley Health Foundation Trust, HCRG Care Group, Phyllis Tuckwell Hospice Care	**Purpose:** Health and Social care services are developing shared systems to share data efficiently and quickly. It is important for anyone treating you to be able to access your shared record so that they have all the information they need to care for you. This will be during your routine appointments and in urgent situations such as going to A&E, calling 111 or going to an Out of hours appointment. It is also quicker for staff to access a shared record than to try to contact other staff by phone or email. 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:** North Hampshire Urgent Care, Frimley Health Foundation Trust, Community nursing HCRG Care Group, Phyllis Tuckwell Hospice Care
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
Referrals	Purpose – Your medical record will be shared in order that a referral can be made to other providers Legal Basis – Your consent will be required to share your record for this purpose Processor – DXS.
Speech and Language Therapy service	**Purpose:** Personal confidential data will be shared with the Speech and Language Therapy service in order to provide a full and accurate service to patients who require this service. No other patients data will be shared during this service. Patients will have agreed to be referred into the service and understand that their record will be accessed by the service provider. **Legal Basis:** this activity is being provided under the auspice of Direct Care. Under GDPR the Article 6 1 (e) Public Task And Article 9 (h) Health Data will apply **Processor:** Central Surrey Health Ltd.
NHS Login	If you access Rapid Health using your NHS login details, the identity verification services are managed by NHS England. NHS England is the controller for any personal information you provided to NHS England to get an NHS login account and verify your identity and uses that personal information solely for that single purpose. For this personal information, our role is a "data processor" only and we must act under the instructions provided by NHS England (as the "data controller") when verifying your identity. For more information on NHS login, see the NHS login privacy notice and NHS login terms and conditions.

Stoma/Catheter Prescribing Service	**Purpose**: To establish a new regional Appliance Prescribing Service managed by Bullen. The service will handle all prescribing and ongoing prescription management, ensuring that appliance orders match patient needs and reduce unnecessary waste. **Legal Basis:** 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"; 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, on the basis of domestic law". **Sharing Data Controllership**: Bullen acting as individual data controllers
NHS App	You can access Rapid Health on the NHS App using your NHS login details. If you sign in using NHS login, we will ask your permission to share your NHS login information with our service. This allows us to fill in some personal details for you, such as your name, date of birth and contact details. We will not use your NHS login information for any other purposes. You can only share your NHS login information if you have proved your identity to NHS login. You can choose not to share your NHS login information with Rapid Health but you will need to enter your information yourself whilst using the service. For more information, see the NHS login privacy notice and NHS login terms and conditions.
Malnutrition / Hydration Project	**Purpose**

	• Enable people to stay well, safe and independent at home for longer, the project supports healthier nutritional and hydration patterns and behaviours. • Provide the right care in the right place at the right time the project supports proactive intervention, before people become increasingly dependent on health and care services; therefore 'at the right time • Addressing health inequalities and support the priorities of Health & Wellbeing boards The high-level objectives of the service are: • To provide people with knowledge and understanding to enable them to make simple sustainable changes to calorie and fluid intake. • To improve wellbeing and reduce the demand on health and social care services including Urgent & Emergency Care **Legal Basis –** 1.GDPR 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"; **Data Processor** – Surrey Heath Community Providers Limited. EMIS Web will be used to generate searches in order to identify relevant patients GP Practices will remain Data Controllers for Clinical records held on EMIS.
Oxford-RCGP Research and Surveillance Centre	**Purpose** To provide data for the national surveillance system, observing infection rates across a range of communicable diseases and vaccination efficacy based on changes to routine data. **Legal Basis:** 1. 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' 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 on the basis of union or member state law or pursuant to contract with a health professional and subject to conditions and safeguards' **Processor**: Oxford Royal College of General Practitioners Clinical Informatics Digital Hub (ORCHID)
Community Dermatology Project	**Purpose** Dermatology services in the acute sector have been under significant pressure due to increasing GP referral demands and lack of consultant capacity, which has translated into long waiting times for routine appointments and increased use of the Urgent Suspected Cancer route to manage increasing urgent demand. Key deliverables are:- ● provide an alternative route for patients to be treated where input by a consultant dermatologist is not necessary but where a more specialised knowledge of dermatology, than would be typically available within primary care, is required ● grow and strengthen local capacity by developing confidence, through interworking and relationship building between primary and secondary care clinicians, to provide the best outcomes for patients ● ensure patients are better managed in primary care by upskilled local GPwSI/GPwERs (holding diploma accreditation) who will work closely with local dermatology consultants to provide capacity and joined-up patient care **Legal Basis –** 1.GDPR 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"; **Data Processor** – Surrey Heath Community Providers Limited, Xyla (Acacium Group), GP Practices will remain Data Controllers for Clinical records held on EMIS.

AI-Assisted Clinical Documentation (Heidi Scribe)	**Purpose** To support the provision of direct patient care through AI-assisted clinical documentation. Heidi Health Ltd's Heidi Scribe platform is used to transcribe consultation discussions and generate draft clinical notes, summaries and other clinical documentation for review and approval by the clinician. The system supports accurate record keeping, reduces administrative burden and improves the efficiency and quality of clinical documentation. **Legal Basis:** 1. 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' 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 on the basis of union or member state law or pursuant to contract with a health professional and subject to conditions and safeguards' **Processor:** • Heidi Health Ltd (AI Clinical Documentation Platform) • Amazon Web Services (AWS) (Hosting Provider) • Kinde (Authentication Provider)
Inspira Heart Health	**Purpose** To provide a Primary Care Heart Failure Service for patients registered with Bartlett Group Practice. The service is delivered by Inspira Health and supports the identification, review and management of patients with diagnosed or suspected heart failure. Authorised clinical auditors and Consultant Cardiologists review patient records to identify patients who may benefit from specialist assessment, medicines optimisation, additional investigations, referral to specialist services and ongoing monitoring, with the aim of improving patient outcomes and supporting direct patient care. **Legal Basis:** 1. 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' **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 on the basis of union or member state law or pursuant to contract with a health professional and subject to conditions and safeguards' **Processor:** • Inspira Health (Data Processor / Service Provider) • Consultant Cardiologists engaged by Inspira Health (Authorised Healthcare Professionals delivering the service)

Digitisation of Paper Medical Records

The NHS Long Term plan published in 2019 requires the digitisation of all primary care paper medical records, commonly known as 'Lloyd George' records or 'A4 medical records'

Having paper based medical records restricts the use of technology to provide 'joined up' services and therefore the current paper records will be transferred to a digital format and then destroyed.

This will involve the current patient paper medical records being scanned and then entered directly into a patient's electronic medical record. This work will be completed by a third-party supplier, **Iron Mountain UK plc,** whose security standards have been reviewed by Frimley Clinical Commissioning Group.

We are required by Data Protection law to provide you with the following information about how we handle your information.

Data Controller contact details	Bartlett Group Practice 1 Beech Road Frimley Green Surrey GU16 6QQ
Data Protection Officer contact details	Laura Taw: IG Consultant and DPO SCWCSU Via Contact - Wendy Foster – Practice Manager

Purpose of the processing	Transferring the current paper medical records into patients' electronic medical records.
Lawful basis for processing	The following provisions of the General Data Protection Regulation permit us to digitise existing paper medical records: Article 6(1)(e) – 'processing is necessary…in the exercise of official authority vested in the controller...'' Article 9(2)(h) – 'processing is necessary for the purpose of preventative…medicine…the provision of health or social care or treatment or the management of health or social care systems and services...'
Recipient or categories of recipients of the processed data	The paper patient records will be shared with **Iron Mountain UK plc**, who will scan and digitise the current paper medical records before destroying them.
Right to access and correct	You have the right to access your medical record and have any errors or mistakes corrected. Please speak to a member of staff or look at our 'subject access request' policy on the practice website – Bartlett Group Practice
Retention period	GP medical records will be kept in line with the law and national guidance. Information on how long records can be kept can be found at: https://www.nhsx.nhs.uk/information-governance/guidance/records-management-code/records-management-code-of-practice-2021/ or speak to the practice. The paper medical records will be destroyed 60 days after they are transferred to an electronic format.

The practice holds medical records to provide medical treatment and advice and patients have a relationship with a GP in order for them to be provide health and care service to you. We therefore do not require your consent to transfer these papers records to an electronic format.

If you have any questions about this project, please contact Wendy Foster, Practice Manager at frimleyicb.bgpfgpatientservicemanager@nhs.net

Details of Supplier:

Iron Mountain UK Plc
Ground Floor,
4 More London Riverside,
London
SE1 2AU

United Kingdom.

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