

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	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.
Planning	Legal Basis –
Quality and Performance	 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 – 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 here and returned to the practice. Please note that
	by opting out of having your information shared with the
	Summary Care Record could result in a delay to care that may be required in an emergency.
	Processor – NHS England and NHS Digital
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 need to 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)(h) – 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** – not applicable as of May 2023 **Individual Funding Purpose** – We may need to process your personal information where Requests we are required to fund specific treatment for you for a particular condition that is not already covered in our standard NHS contract. The clinical professional who first identifies that you may need the treatment will explain to you the information that is needed to be collected and processed in order to assess your needs and commission your care; they will gain your explicit consent to share this. You have the right to withdraw your consent at any time but this may affect the decision to provide individual funding. Legal Basis -• 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 – Sussex 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:



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Safeguarding Children	 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 – Sussex Integrated Care System and relevant health and social care organisations 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.
	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 – West Sussex County Council hosted Safeguarding Team
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 – Sussex ICB
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, 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.
	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 – West Sussex County Council
Direct Care 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 nursing, ambulance service.
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 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 – Local, Regional and Tertiary Specialist NHS Trusts
Direct Care Emergencies	Purpose - There are occasions when intervention is necessary in order to save or protect a patient's life or to prevent them from serious immediate harm, for instance during a collapse or diabetic coma or



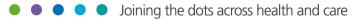
	serious injury or accident. In many of these circumstances the patient may be unconscious or too ill to communicate. In these circumstances we have an overriding duty to try to protect and treat the patient. If necessary we will share the patient's information and possibly sensitive confidential information with other emergency healthcare services, the police or fire brigade, so that they can receive the best treatment. Legal Basis - Article 6(1)(d) "processing is necessary to protect the vital interests of the data subject or of another natural person", Article 9(2)(c) "processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent" and Article 9(2)(h) as stated below. Processors — Local, Regional and Tertiary Specialist NHS Trusts,
	Emergency Services.
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 the CQC Website https://www.cqc.org.uk/about-us/our-policies/privacy-statement
	 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 – 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, Invoice Purpose - Contract holding GPs in the UK receive payments from their validation 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 – EMIS And PCSE
Medical reports	Purpose – Your medical record may be shared in order that:
Subject Access Requests	Collisite and Assessment and the control of the con
	Solicitors/persons acting on your behalf can conduct certain actions as instructed by you.
	as histracted by you.
	Insurance companies seeking a medical reports where you have
	applied for services offered by then can have a copy to your medica 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 officia
	authority'; and
	 Article 9(2)(h) 'necessary for the purposes of preventative or
	occupational medicine'
	Processor – Solicitors and insurance organisations
Medicines Management	Purpose – your medical record is shared with the medicines
Team	management team pharmacists, in order that your medication can be
Medicines Optimisation	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 officia
	authority'; andArticle 9(2)(h) 'necessary for the purposes of preventative or
	occupational medicine'
	0000patto.isca.to.ii.c
	Processor – West Sussex Clinical Commissioning Group
GP Federation	Purpose – Your medical record will be shared with the Alliance for
GP Extended Access	Better Care 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 wil
	be acting on behalf of the GP practice.
	Lacel Paris
	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'
	Processor – Alliance for Better Care
Primary Care Network	Purpose – Your medical record will be shared with the East Grinstead
(PCN)	& Crawley Down PCN in order that they can provide direct care
	services to the patient population.
	Lacal Davis
	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 – Judges Close, Ship Street and Crawley Down Surgeries
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 – West Sussex County Council
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 – East Grinstead and Crawley Down PCN
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
Medical Examiner	deceased patient may be shared with the coroner or medical examiner upon request.
	Legal Basis – UK GDPR Article 6 1 (c) Legal Obligation 9 2 (h) Health data
	Processor – The Coroner
Medical Examiner Service	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
	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
Non-commissioned, private healthcare providers (eg. 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 – Article 6 1 (a) and 9 2 (h) Consented and under contract between the patient and the provider
	Provider – Nuffield Hospital Haywards Heath, Gatwick Park Hospital, North Downs Hospital.
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.
	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, NHS App, Mjog



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 - AccuRX, MS Teams

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)

- At risk patients data collection Version 3
- 2. CVDPREVENT Audit
- 3. Physical Health
 Checks for people
 with Severe
 Mental Illness

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.







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 -

- 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.







Telephony	Processor – RCGP, HEE, iConnect, Fourteen Fish 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 – 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 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.
	Processor : ICB, NHS England
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 Sussex Community Trust, Sussex Partnership Foundation Trust, Brighton Housing Trust,	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: Sussex Community Trust, Sussex Partnership Foundation Trust, Brighton Housing Trust
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

We keep our Privacy Notice under regular review. This notice was last reviewed on 08th November 2023.



