Privacy Notice

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1. Introduction

The Data Protection Regulations in the UK include two key pieces of law:

- The Data Protection Act 2018
- The UK GDPR

There are other regulations in specific areas which need to be taken into account. This Privacy Notice has been written within the legislative framework as at July 2022. It will be revised as the framework and case law change. This notice was last updated July 2022.

2. What is this Privacy Notice about?

This Privacy Notice is part of the information to data subjects about how personal data is used. Being transparent and providing accessible information to individuals about how organisations will use their personal information is a key element of Data Protection Regulations.

This Privacy Notice is part of our programme to make the data processing activities we are carrying out in order to meet our healthcare obligations transparent.

The Privacy Notice tells you about information we collect and hold about you, the legal basis for collecting and holding the information, what we do with it, how we keep it secure (confidential), who we might share it with and what your rights are in relation to your information.

3. Who we are

We are an NHS General Medical Practice

4. Types of information we use

We use the following types of information/data:

- Personal data or sensitive personal/special categories of personal data such as:
  - demographics – name, address, date of birth, postcode, NHS number
  - racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, medical/health data, sexual life or sexual orientation data.
- Pseudonymised - about individuals but with identifying details (such as name or NHS number) replaced with a unique code.
- Anonymised - about individuals but with identifying details removed.
- Aggregated - anonymised information grouped together so that it doesn't identify individuals.

5. What we use your personal data and special categories of personal data (known as or sensitive personal) for

We use and share information about you in a number of ways. These include:

Primary uses **-** information from your GP medical record which can be made available to other NHS and public sector organisations, including doctors, nurses and care professionals in order to help them make the best informed decision, and provide you with the best possible direct care delivery.

Secondary uses **-** information from your GP medical record involves extracting identifiable data and (usually) sharing that data with other NHS organisations, for the purpose of indirect care. Examples include using your information for research, auditing, and healthcare planning (population health management).

A national opt-out for some secondary uses exists for your data – please see section 15 below.

6. Identity and Contact details of the Data Controller and Data Protection Officer

Practice Contact Details

Holborn Medical Centre, 64-66 Lambs Conduit Street, London, WC1N 3NA

Practice ICO Reference Number: Z8116857

Data Protection Officer

You can contact the data protection officer by post at the practice address, addressed for the attention of the Data Protection Officer.

The Data Protection Officer service is provided across NCL practices by:

Name: Steve Durbin

Email: dpo.ncl@nhs.net

Please quote the practice name in any communication.

7. Organisations we share your your personal information with

We share information about you with other GPs, NHS acute or mental health Trusts, local authorities, community health providers, pharmacists, commissioning organisations, medical research organisations and some specific non-NHS organisations for the purposes of direct and indirect care delivery of care.

We are required under the law to provide you with the following information how we process your personal data, the purpose of proposing, recipient/categories of your personal data, the identity of our Data Protection Officer (DPO), how long we retain personal information about you, the legal basis and justification for the processing, and your right to view, request access copies of your personal information, or object to the processing.

Included below is a table of the organisations we share information about you with split into the following categories. **In all cases, the data controller and Data Protection Officer (DPO) are as listed in section 6 above:**

a. Direct Medical Care and Administration
b. Other primary care services delivered for the purposes of direct care
c. Statutory Disclosures of Information
d. Processing for the Purposes of Commissioning, Planning, Research and Risk Stratification
e. Data Sharing Databases
f. Data Processors

a. **Direct Medical Care and Administration**				
Recipients or categories of recipients of the personal or special categories of personal data	**Purpose of the processing**	**Data Retention Period**	**Lawful basis UK General Data Protection Regulation** ***- Article 6 -*** ***- Article 9 –***	**Your Rights**
NHS Trusts – Hospitals, Community or Mental Health Trusts.	Personal data concerning your GP medical record may be shared with NHS Trusts in order to enable their healthcare professionals make the best informed decision about your health needs, and provide you with the best possible care if you visit the hospital for routine care and referrals. Your personal information may also be processed for local administrative purposes such as: • Waiting list management; • local clinical audit; • Performance against local targets; • activity monitoring; • production of datasets to submit for commissioning purposes and national collections. The source of the information shared in this way is your electronic GP record.	All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care.	The processing of **personal data is** permitted under the following paragraphs: Article 6(1) (c) - processing for legal obligation; Article 6(1) (e) - public interest or in the exercise of official authority. The processing of **special categories of personal data concerning health** is permitted under the following paragraphs: Article 9(2) (b) – processing necessary	**You have the right to:** • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. **Right to object:** In line with the UK GDPR Article 21, you have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of

			in the field of employment, social security and social protection law. Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services. **Related Legislation:** Data Protection Act 2018 Section 10 Section 251B Health and Social Care (Safety and Quality Act) 2015 (Duty to Share); Common Law of Duty of Confidentiality	care, and compliance with a legal obligation to which we are subject. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. **Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk
Emergency Services (Ambulance trusts, police, A&E departments,	There are circumstances when intervention is necessary in order to save or protect a patient's life or to prevent them from serious immediate harm, for example, during a collapse or diabetic coma or serious injury or accident. In many of these circumstances the patient may be unconscious or too ill to communicate.	All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice	The processing of **personal data is** permitted under the following paragraphs:	**You have the right to:** • Make pre-determined decisions about the type and extent of care you will receive in an emergency, these are known as "Advance Directives"; • access, view or request copies of your personal information;

out of hours services, 111)	Medical professionals have a duty of care to share data in emergencies to protect their patients or other persons. In these circumstances, your GP medical record will be shared with emergency healthcare services, the police or fire service in order to enable you receive the best treatment or service. The source of the information shared in this way is your electronic GP record.	for Health and Social Care.	Article 6(1) (c) - processing for legal obligation; Article 6(1) (d) – the processing is necessary in order to protect the vital interests of the data subject The processing of **special categories of personal data concerning health** is permitted under the following paragraph: Article 9 (2) (C) – the processing is necessary to protect the vital interests of the data subject **Related Legislation:** Data Protection Act 2018 Section 10 Section 251B Health and Social Care (Safety and Quality Act) 2015 (Duty to Share);	• request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. **Right to object:** You have the right to object to some or all of your personal information being shared with the recipients. You also have the right to have an "Advance Directive" placed in your records and brought to the attention of relevant healthcare workers or staff. We will notify you at the earliest opportunity where we have shared your personal data in an emergency situation. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. **Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the

			Common Law of Duty of Confidentiality	Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk
GP Federations and Primary Care Networks (groups of Practices working together, and with other providers, to provide joined-up and effective care) **North London Partners**	GP Federations are groups of GPs (patient centered organisation), working collaboratively and developing closer integration with other partners across health, social and third sector partners to facilitate an enhanced delivery of health and care services. Primary Care Networks (PCNs) are similar, but are led at the GP level and may involve a variety of other organisations also noted in this privacy notice. North London Partners are a wider grouping performing similar shared functions to the GP federations. **In each case the Practice remains the data controller for the information about you.** Through various hubs in the community the GP Federation provide direct health and care services such as continued extended access, home visits, universal offers, musculoskeletal service, GP at front door and other neighbourhood services across North Central London (which covers the boroughs of Barnet, Camden, Enfield, Haringey and Islington) If you visit receive treatment/consultation on any of these services, personal data concerning your GP medical record may be shared with the GP Federation and their Multidisciplinary Team (MDT) in order to enable them make	All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care	The processing of **personal data is** permitted under the following paragraphs: Article 6(1) (c) - processing for legal obligation; Article 6(1) (e) - public interest or in the exercise of official authority. The processing of **special categories of personal data concerning health** is permitted under the following paragraph: Article 9 (2) (h) - processing is necessary for medical or social	**You have the right to:** • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. **Right to object:** In line with the UK GDPR Article 21, you have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject.

	the best informed decision about your health/care needs, and provide you with the best possible care. The source of the information shared in this way is your electronic GP record.		care treatment or, the management of health or social care systems and services. **Related Legislation:** Data Protection Act 2018 Section 10 Section 251B Health and Social Care (Safety and Quality Act) 2015 (Duty to Share); Common Law of Duty of Confidentiality	If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. **Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk
Pharmacists - Medicines Optimisation	Medicines optimisation looks at the value which medicines deliver, making sure they are clinically-effective and cost-effective. It is about ensuring patients get the right choice of medicines, at the right time, and are engaged in the process by their clinical team. Medicines optimisation enables community pharmacies to request medication electronically from the Practice and view relevant information from your GP record in order to provide you with the best medicines.	All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care	The processing of **personal data is** permitted under the following paragraphs: Article 6(1) (c) - processing for legal obligation; Article 6(1) (e) - public interest or in	**You have the right to:** • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or,

	The source of the information shared in this way is your electronic GP record.		the exercise of official authority. The processing of **special categories of personal data concerning health** is permitted under the following paragraph: Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services. **Related Legislation:** Data Protection Act 2018 Section 10 Section 251B Health and Social Care (Safety and Quality Act) 2015 (Duty to Share);	✓ where we no longer need the data for the purposes of the processing. **Right to object:** In line with the UK GDPR Article 21, you have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. **Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire

				Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk
Local Authority – Social Services	The practice works closely with Local Authorities to support and care for people of all ages to deliver the best possible social care. Personal data concerning your GP medical record may be shared with Local Authorities and Multidisciplinary Team (MDT) delivering social care in order to enable them make the best informed decision about your social care needs if required. The source of the information shared in this way is your electronic GP record.	All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care.	The processing of **personal data is** permitted under the following paragraphs: Article 6(1) (c) - processing for legal obligation; Article 6(1) (d) (processing for vital interests of data subject) and/or; Article 6(1) (e) - public interest or in the exercise of official authority. The processing of **special categories of personal data concerning health** is permitted under the following paragraphs: Article 9(2) (b) – processing necessary in the field of employment, social security and social protection law.	**You have the right to:** • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. **Right to object:** In line with the UK GDPR Article 21, you have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. **Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may

			Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services. **Related Legislation:** Data Protection Act 2018 Section 10 Section 251B Health and Social Care (Safety and Quality Act) 2015 (Duty to Share)	raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk
Care Homes	Personal data concerning your GP medical record may be shared with Care Homes and other Multidisciplinary Team (MDT) delivering care in order to enable their care professionals make the best informed decision about your care needs, and provide you with the best possible care if you visit a Care Home. The source of the information shared in this way is your electronic GP record.	All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care	The processing of **personal data is** permitted under the following paragraphs: Article 6(1) (c) - processing for legal obligation; Article 6(1) (e) - public interest or in the exercise of official authority.	**You have the right to:** • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing.

			The processing of **special categories of personal data concerning health** is permitted under the following paragraphs: Article 9(2) (b) – processing necessary in the field of employment, social security and social protection law. Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services. **Related Legislation:** Data Protection Act 2018 Section 10 Section 251B Health and Social Care (Safety and Quality	**Right to object:** In line with the UK GDPR Article 21, you have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. **Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk

			Act) 2015 (Duty to Share)	
b. Other primary care services delivered for the purposes of direct care				
Recipients or categories of recipients of the personal or special categories of personal data	**Purpose of the processing**	**Data Retention Period**	**Lawful basis General Data Protection Regulation** ***- Article 6 -*** ***- Article 9 –***	**Your Rights**
Integrated Urgent Care Service (IUC) - covering Out of Hours and NHS 111 service	**Integrated Urgent Care Service (IUC)** is an urgent care service delivered across North Central London (NCL) (Barnet, Camden, Enfield, Haringey and Islington) for the provision of a functionally integrated 24/7 urgent care access, clinical advice and treatment service for patients. IUC incorporates NHS 111 and Out of Hours (OOH) services, which is often referred to as an IUC Clinical Assessment Service. The purpose of IUC is to ensure that patients receive the best possible healthcare service in their community. If you visit the urgent care centre or call NHS 111 for health related needs, personal data in your GP record will be shared with healthcare professionals in order to enable them make the best the best informed decision about your health needs. The source of the information shared in this way is your electronic GP record.	All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care	The processing of **personal data is** permitted under the following paragraphs: Article 6(1) (c) - processing for legal obligation; Article 6(1) (e) - public interest or in the exercise of official authority. The processing of **special categories of personal data concerning health** is permitted under the following paragraph:	**You have the right to:** • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. **Right to object:** In line with the UK GDPR Article 21, you have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal

			Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services. **Related Legislation:** Data Protection Act 2018 Section 10 Section 251B Health and Social Care (Safety and Quality Act) 2015 (Duty to Share); Common Law of Duty of Confidentiality	data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. **Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk
Continuing Health Care (CHC)	NHS Continuing Health Care (CHC) is free care outside of hospital that is arranged and funded by the NHS to support living with complex medical conditions and on-going healthcare needs which can be delivered in the patient's home, at their care home or in non-acute hospitals. CHC is free, unlike support from social services for which a fee may be charged, depending on your income and savings. CHC	All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care	The processing of **personal data is** permitted under the following paragraphs: Article 6(1) (c) - processing for legal obligation;	**You have the right to:** • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested,

	is different from NHS Funded Nursing Care, which some people with less complex needs living in care homes receive. If you require CHC needs personal data concerning your GP medical record will be shared with the care home or in non-acute hospitals looking after you. The source of the information shared in this way is your electronic GP record.		Article 6(1) (e) - public interest or in the exercise of official authority. The processing of **special categories of personal data concerning health** is permitted under the following paragraphs: Article 9(2) (b) – processing necessary in the field of employment, social security and social protection law. Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services.	✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. **Right to object:** In line with the UK GDPR Article 21, you have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. **Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745

			Related Legislation: Data Protection Act 2018 Section 10 Section 251B Health and Social Care (Safety and Quality Act) 2015 (Duty to Share); Common Law of Duty of Confidentiality	Website: https://ico.org.uk
Resilience networks and Social Prescribing	GP services can only be a part of care, and commonly voluntary/3rd sector organisations can help with conditions by providing support and other services. Where these may be helpful, we will, with your informed consent, share with these organisations to help you	All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care	Article 6 1(a) – consent of the data subject Article 9 2(a)	**You have the right to:** • To withdraw your consent to this processing – this has the same effect as right to object; • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing.

				Right to object: In line with the UK GDPR Article 21, you have a general right to raise an objection to the processing of your personal data – as this is consent based we will immediately arrange for your data to be removed from all those organisations it has been shared with. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. **Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk
c. Statutory Disclosures of Information				
Recipients or categories of recipients of the personal	**Purpose of the processing**	**Data Retention Period**	**Lawful basis General Data Protection Regulation**	**Your Rights**

or special categories of personal data			***- Article 6 -*** ***- Article 9 –***	
Safeguarding Concerns – to prevent an individual, or to prevent a serious crime	Some members of public are recognised as needing safeguarding protection, for example children and vulnerable adults. If an individual is identified as being at risk from harm, we have a duty to do what we can to protect that individual, and we are bound 'Safeguarding' laws to do so. Where there is a suspected or actual safeguarding issue we will share information that we hold about you with other relevant agencies such as local Ambulance trusts, the police, A&E departments, out of hours services, 111 or Social Services) The source of the information shared in this way is your electronic GP record.	All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care.	The processing of **personal data is** permitted under the following paragraphs: Article 6(1) (c) - processing for legal obligation; Article 6(1) (d) – the processing is necessary in order to protect the vital interests of the data subject The processing of **special categories of personal data concerning health** is permitted under the following paragraphs: Article 9 (2) (C) – the processing is necessary to protect the vital interests of the data subject;	This sharing is a legal and professional requirement and therefore there is no right to object. The Children Act 1989 requires local authorities to investigate where a child is the subject of an emergency protection order, is in police protection or where there is a reasonable cause to suspect that a child is suffering or is likely to suffer harm. The Act requires the local authority to safeguard and promote the welfare of children who are in need, within their geographical area and to request help from specified authorities including General Practices, NHS Trusts, Integrated Care Systems / Boards (ICSes / ICBs – formerly CCGs) and NHS England. **Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House

			Article 9(2) (b) – processing necessary in the field of employment, social security and social protection law. **Related Legislation:** Data Protection Act 2018 Section 10 (in particular the provisions under Schedule 2 Part 1 Section 18 relating to safeguarding) Section 47 of The Children Act 1989. Section 45 of the Care Act 2014	Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk
The Care Quality Commission (CQC)	The Care Quality Commission (CQC) is a regulatory body established under the Health and Social Care Act. The CQC regulates health and social care services in England to ensure that safe health and care are provided. The law allows CQC to access identifiable patient data/medical records in our clinical system for the purposes of their assessment and investigation of significant safety incident.	All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care.	The processing of **personal data is** permitted under the following paragraph: Article 6(1) (c) - processing for legal obligation;	**You have the right to:** • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or,

	The data will be shared with the Care Quality Commission, its officers and staff and members of the inspection teams that visit us from time to time. The source of the information shared in this way is your electronic GP record.		The processing of **special categories of personal data concerning health** is permitted under the following paragraph: Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services **Related Legislation:** Data Protection Act 2018 Section 10 The Health and Social Care Act 2008, s64	✓ where we no longer need the data for the purposes of the processing. **Right to object:** You have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. **Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk

Law Enforcement and Regulatory Bodies	In some circumstances the Practice may be legally required to share personal information with law enforcements and regulatory bodies (without the consent of the data subject) such as: the Police; Courts of Justice; HMRC and DVLA for the purposes of prevention or detection of crime; apprehension or prosecution of offenders; the assessment or collection of any tax or duty or, of any imposition of a similar nature. GPs are obliged to notify the DVLA when fitness to drive requires *notification but an individual cannot or will not notify the DVLA themselves, and* if there is concern for road safety, which would be for both the individual and the wider public. The Practice will review each request based on its merits before deciding whether to release information to the 'relevant authorities'. The source of the information shared in this way is your electronic GP record.	All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care.	The processing of **personal data is** permitted under the following paragraphs: Article 6(1) (c) - processing for legal obligation; Article 6(1) (e) - public interest or in the exercise of official authority. The processing of **special categories of personal data concerning health** is permitted under the following paragraph: Article 9 (2) (G) – the processing is necessary for reasons of substantial public interest **Related Legislation:** There are a variety of acts which place responsibilities on health providers to	This sharing is a legal and professional requirement and therefore there is no right to object. Personal data processed these purposes are exempt the first data protection principle (processed lawfully, fairly and in a transparent manner). **Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk

			provide information for law enforcement and regulatory bodies.	
Medical Examiner Service	When a person dies, all death are now reviewed by the medical examiner service. We are required to share information about the deceased's medical record with the examiner. This record may contain information regarding the living – for example, family members, persons who treated the deceased. Data is reviewed only by persons under a professional duty of confidence as part of the medical examiner service.	All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care.	The processing of **personal data is** permitted under the following paragraph: Article 6(1) (c) - processing for legal obligation; Additionally, as the sharing is mandated for improvement of health and care Article 6(1)(e) '…for the performance of a task carried out in the public interest or in the exercise of official authority…' The processing of **special categories of personal data concerning health** is permitted under	This sharing is a legal and professional requirement and therefore there is no right to object. **Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk

			the following paragraphs: Article 9 (2) (b): processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject. Additionally, as the sharing is intended to improve health and care Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services. **Related Legislation** The National Health Service Trust (Scrutiny of Deaths) (England) Order 2021	

Medico-Legal	**Medico-Legal -** Where a medical professional is holding personal data for the purpose of providing medical reports in connection with legal action. The source of the information shared in this way is your electronic GP record.	All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care.	The processing of **personal data is** permitted under the following paragraph: Article 6(1) (c) - processing for legal obligation; The processing of **special categories of personal data concerning health** is permitted under the following paragraphs: Article 9 (2) (b): processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject Art.18 (2): Processing for the establishment, exercise or defence of legal claims.	This sharing is a legal and professional requirement and therefore there is no right to object. **Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk

General Medical Council (GMC)	**General Medical Council** (**GMC**) is a public body that maintains the official register of medical practitioners within the United Kingdom. Its primary responsibility is 'to protect, promote and maintain the health and safety of the public' by controlling entry to the register, and suspending or removing members when necessary. Under the Medical Act 1983, the GMC has the power to request access to a patient's medical records for the purposes of an investigation into a doctor's fitness to practise. The source of the information shared in this way is your electronic GP record.	All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care.	The processing of **personal data is** permitted under the following paragraph: Article 6(1) (c) - processing for legal obligation; The processing of **special categories of personal data concerning health** is permitted under the following paragraph: Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services **Related Legislation:** The Medical Act 1983	**You have the right to:** • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. **Right to object:** You have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject. **Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House

			Data Protection Act 2018 Section 10	Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk
The Health Service Ombudsman (HSO)	**The Health Service Ombudsman (HSO)** was set up by Parliament to provide an independent complaint handling service for complaints that have not been resolved by the NHS in England and UK government departments. The HSO has the power to request access to a patient's medical records for the purpose of an investigation. The source of the information shared in this way is your electronic GP record.	All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care	The processing of **personal data is** permitted under the following paragraph: Article 6(1) (c) - processing for legal obligation; The processing of **special categories of personal data concerning health** is permitted under the following paragraph: Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services	**You have the right to:** • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. **Right to object:** You have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject. **Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data

			Related Legislation: The Health Services Commissioners Act 1993,s12 Data Protection Act 2018 Section 10	Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk
NHS Counter Fraud	Under the NHS Act 2006, investigations into fraud in the NHS may require access to confidential patient information. This means that we are compelled by the law to share your data. The source of the information shared in this way is your electronic GP record.	All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care	The processing of **personal data is** permitted under the following paragraph: Article 6(1) (c) - processing for legal obligation; The processing of **special categories of personal data concerning health** is permitted under the following paragraph: Article 9 (2) (h) - processing is necessary for medical or social	**Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk

			care treatment or, the management of health or social care systems and services **Related Legislation:** s10 NHS Act 2006	
NHS Digital	NHS Digital **(previously known as the Health and Social Care Information Centre)** is a national information and technology partner to the health and social care system. NHS Digital use digital technology to transform the NHS and social care. NHS Digital carries out **National Data collections/** extraction from the GP record. These include: **General Practice Extraction Service (GPES)** This is an extraction of much of your GP data for use by the NHS centrally for planning and research. It is controlled by NHS Digital and is a statutory requirement upon your GP under sections 259(1)(a) and 259(5) of the Health and Social Care Act 2012. Further details for patients are provided at https://digital.nhs.uk/data-and-information/data-collections-and-data-sets/data-collections/general-practice-data-for-planning-and-research. **National Diabetes Audit (NDA)** - A national monitoring system, auditing the care of patients with diabetes. The data extracted for the purpose of NDA includes NHS Number, date of birth and postcode, as well as clinical parameters related to	All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care	The processing of **personal data is** permitted under the following paragraph: Article 6(1) (c) - processing for legal obligation; The processing of **special categories of personal data concerning health** is permitted under the following paragraph: Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social	**You have the right to:** • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. **Right to object:** You do not have the right to object as the sharing is a legal and professional requirement under the law. Whilst there is no right to object under 6(1)(c), NHS Digital respects Type 1 objections (9Nu0) present in the GP record and no data will be extracted and uploaded if so.

	diabetes. NDA is a mandatory data extraction under section 254 of the Health and Social Care Act 2012, this means that we are compelled by law to share your data **Individual GP Level Data (IGPLD) -** A national monitoring system to enable NHS Digital to provide GPs with clinical information on the care provision for their patients. The data extracted includes the NHS number. **I**GPLD is a mandatory data extraction under 254 of the Health and Social Care Act 2012, this means that we are compelled by law to share your data **FGM)** - NHS Digital collects data on FGM within the NHS in England on behalf of the Department of Health (DH). Data collected is used to produce information that helps improve NHS and local authorities to improve on how they support women and girls who have had or, who are at risk of FGM. FGM Enhanced Dataset is a mandatory data extraction under section 254 of the Health and Social Care Act 2012, this means that we are compelled by law to share your data when required. The source of the information shared in this way is your electronic GP record.		care systems and services **Related Legislation:** S254 of the Health and Social Care Act 2012	**Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk
NHS England	NHS England is responsible for securing, planning, designing and paying for Primary Care & Specialised NHS services not otherwise funded by North Central London Integrated Care Board. This includes planned and emergency hospital care, mental health, rehabilitation, community and primary medical care (GP) services. We may often share personal information with NHS England potentially for safeguarding concerns that need escalating beyond our borough.	All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care	The processing of **personal data is** permitted under the following paragraph: Article 6(1) (e) - public interest or in the exercise of official authority.	**You have the right to:** • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested,

	Where required the Practice may also have to share staff personal information with NHS England for the purpose of allegations framework or performers list. The source of the information that may be shared in this instance are in the staff record and patient's electronic GP record.		The processing of **special categories of personal data concerning health** is permitted under the following paragraph: Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services.	✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. **Right to object:** You do not have the right to object as the sharing is a legal and professional requirement under the law. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. **Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk
Public Health	Public Health England is an executive agency of the Department of Health and Social Care, and a distinct organisation with operational autonomy.	All records held by the Practice will be kept for the duration specified in the	The processing of **personal data is** permitted under	**You have the right to:** • To access, view or request copies of your personal information;

	The main purpose of the organisation is to protect and improve the health and wellbeing of citizens. These include the management of smoking, alcohol and obesity; management of epidemics and infections such as flu, measles, tuberculosis or outbreaks of food poisoning. The source of the information shared in this way is your electronic GP record.	Records Management Codes of Practice for Health and Social Care	the following paragraph: Article 6(1) (c) - processing for legal obligation; The processing of **special categories of personal data concerning health** is permitted under the following paragraph: Article 9(2) (b) – processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices. **Related Legislation:**	• request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. **Right to object:** You have a general right to raise an objection to your personal data being shared with the recipient. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. **Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire

			The Health Protection (Notification) Regulations 2010 (SI 2010/659); The Health Protection (Local Authority Powers); Regulations 2010 (SI 2010/657) Data Protection Act 2018 Section 10	Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk
d. **Processing for the Purposes of Commissioning, Planning, Research and Risk Stratification**				
Integrated Care Systems / Boards (ICSes / ICBs) *Formerly known as Clinical Commissioning Groups CCG (s)*	Integrated Care Boards (ICBss) are responsible for securing, planning, designing and paying for your NHS services, including planned and emergency hospital care, mental health, rehabilitation, community and primary medical care (GP) services. This is known as 'Commissioning'. We are part of the Integrated Care System (ICS) responsible for delivery of services. In order to enable North Central London ICB carry its statutory duties the Practice In order to enable North Central London ICB carry out its statutory responsibilities effectively, efficiently and safely, we may share personal data about you with the ICB for the following purposes:	All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care	The processing of **personal data is** permitted under the following paragraph: Article 6(1) (e) - public interest or in the exercise of official authority. The processing of **special categories of personal data concerning health** is permitted under	**You have the right to:** • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing.

	Individual Funding Requests; Continuing Health Care; appeals, queries or compliments; safeguarding concerns; commissioning purposes such as payment for target achievement known as Quality and Outcomes Framework (QOF); and where the Practice is participating in agreed national or local enhanced services. The source of the information shared in this way is your electronic GP record.		the following paragraph: Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services	**Right to object:** You have a general right to raise an objection to your personal data being shared with the recipient. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. **Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk
"**Risk Stratification" (Population Health Management and Case Finding)**	The Practice performs computerised searches of some or all of our records to identify individuals who may be at increased risk of certain conditions or diagnoses i.e. Diabetes, heart disease, risk of falling). Your records may be amongst those searched. This is often called "risk stratification" or "case finding". These searches are sometimes carried out by Data Processors who link our records to other records that they access, such as hospital attendance records. The results of these searches and assessment may then be shared with other	All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care	The processing of **personal data is** permitted under the following paragraph: Article 6(1) (e) - public interest or	**You have the right to:** • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where:

Recipient: **Cerner - HealtheIntent** Ardens – EMIS Templates [INSERT OTHERS AS NEEDED]	healthcare workers, such as specialist, therapists, technicians etc. The information that is shared is to enable the other healthcare workers to provide the most appropriate advice, investigations, treatments, therapies and or care. Risk stratification can be grouped into two purposes namely: **Direct Care** – 'Case Finding' where carried out by a health professional (e.g. GPs and Provider) involved in an individual's care or by a data processor acting under contract with such a provider, it is treated as direct care. **Indirect Care** - understand the local population needs and plan for future requirement. The source of the information shared in this way is your electronic GP record.		in the exercise of official authority. The processing of **special categories of personal data concerning health** is permitted under the following paragraph: Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services **Related Legislation**: Section 251 NHS Act 2006	✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. **Right to object:** You have a general right to raise an objection to your personal data being shared with the recipient. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. **Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk

Prescribing Improvement and alerting **Recipient**: First Databank UK **Optum** [INSERT /REMOVE OTHERS AS NEEDED]	The Practice when prescribing passed pseudonomised data to prescribing improvement and alerting services to ensure that healthcare workers provide the most appropriate treatments and therapies. This allows the NHS to reduce cost and improve patient safety. The source of the information shared in this way is your electronic GP record.	All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care	The processing of **personal data is** permitted under the following paragraph: Article 6(1) (e) - public interest or in the exercise of official authority. The processing of **special categories of personal data concerning health** is permitted under the following paragraph: Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services **Related Legislation**: Section 251 NHS Act 2006	**You have the right to:** • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. **Right to object:** You have a general right to raise an objection to your personal data being shared with the recipient. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. **Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane

				Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk
Nutrition improvement **Recipient**: Oviva UK Ltd (Paediatric Cow's milk allergy) Oviva UK Ltd (Adult Oral Nutritiopn Support) [INSERT /REMOVE OTHERS AS NEEDED]	If your child has a cow's milk allergy, or you are an adult patient with certain nutrition difficulties, Oviva UK will be used as a subprocessor to provide assistance for the condition. The source of the information shared in this way is your electronic GP record.	All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care	The processing of **personal data is** permitted under the following paragraph: Article 6(1) (e) - public interest or in the exercise of official authority. The processing of **special categories of personal data concerning health** is permitted under the following paragraph: Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services	**You have the right to:** • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. **Right to object:** You have a general right to raise an objection to your personal data being shared with the recipient. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. **Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the

			Related Legislation: Section 251 NHS Act 2006	Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk
Research Partners	The practice participates projects and will only agree to do so if there is an agreed clearly defined reason for the research that is likely to benefit healthcare and patients. Such proposals will normally have a consent process, ethics committee approval, and will be in line with the principles of Article 89(1) of UK GDPR. Research organisations do not usually approach patients directly but will ask us to make contact with suitable patients to seek their consent. Occasionally research can be authorised under law without the need to obtain consent. This is known as the Section 251 arrangement. We may also use your medical records to carry out research within the practice. We share information with the following medical research organisations with your explicit consent or when the law allows: [insert names e.g. Clinical Practice Research Datalink]. The source of the information shared in this way is your electronic GP record. You have the right to object to the sharing of your personal health data concerning your GP medical for research purposes.	All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care	The processing of **personal data is** permitted under the following paragraph: Article 6(1) (e) - public interest or in the exercise of official authority. The processing of **special categories of personal data** is permitted under the following paragraph: Article 9 (2) (j) - for archiving purposes in the public interest, scientific or historical research purposes	**You have the right to:** • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. **Right to object:** You have a general right to raise an objection to your personal data being shared with the recipient. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.

	This is exercised via the National Data Opt-out; see the NHS Your Data Matters page.		or statistical purposes in accordance with Article 89(1) based on Union or Member State law	**Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk
Employment Processing	The Practice ensures the protection of the rights and freedoms in respect of the processing of its employees' personal data, in particular for the purposes of the recruitment, obligations performance contract of employment, rights and benefits management planning, health and safety, equality and diversity in the workplace, health and safety at work. The Practice ensures that personal data it collects from employees are used only for employment related purposes or where there is a statutory obligation to share the personal information with to regulatory bodies (e.g. courts, police or NHS England).	All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care	The processing of **personal data is** permitted under the following paragraph: Article 6(1) (e) - public interest or in the exercise of official authority. The processing of **special categories of personal data** is permitted under the following paragraph:	**Employees have the right to:** • To access, view or request copies of their personal information held by the Practice; • request rectification of any inaccuracy to their personal information; • restrict the processing of their personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. **Right to object:** Employees have a general right to raise an objection to the sharing personal data.

			Article 9(2) (b): processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject	If an employee wishes to exercise his/her rights they can contact the Practice (data controller) or the DPO and their request will be carefully considered. **Right to complain:** If an employee is dissatisfied with the way the Practice processes his/her personal data, they have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk
e. **Data Sharing Databases**				
System/database **Recipients or categories of recipients of the personal or special**	**Purpose of the processing**	**Data Retention Period**	**Lawful basis General Data Protection Regulation** ***- Article 6 -*** ***- Article 9 –***	**Your Rights**

categories of personal data				
London Care Record **(in North Central London, provided via** **Cerner - Health Information Exchange (HIE))**	The London Care Record (LCR) is an Electronic Health Record (EHR) linking system that brings together patient data across the health and care system in a secure manner, embedding a single aggregated longitudinal view of the patient natively in each EHR system irrespective of traditional organisational or technological boundaries. The LCR includes information about patients/clients recorded by acute hospitals, mental health, community health, social care and GP Practices. Healthcare professionals across London and the region are able to access can access subsets of their patients/service users' medical or social records from a single system in order to provide the best possible care. The source of the information shared in this way is your electronic GP record for the purposes of direct patient care and indirect care.	All records held by the Practice and in the LCR system are kept for the duration specified in the Records Management Codes of Practice for Health and Social Care	The processing of **personal data is** permitted under the following paragraphs: Article 6(1) (c) - processing for legal obligation; Article 6(1) (e) - public interest or in the exercise of official authority. The processing of **special categories of personal data concerning health** is permitted under the following paragraph: Article 9 (2) (h) - processing is necessary for medical or social care treatment or,	**You have the right to:** • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. **Right to object or opt-out:** You have the right to raise an objection to your personal data being shared in the LCR. You also have the right opt out of the LCR by completing an opt-out with your Practice. Although we will first need to explain how this may affect the care you receive. Opting out of the LCR includes opting out of HealtheIntent. You can opt-out of the London Care Record via the form available online at https://northlondonpartners.org.uk/our-

			the management of health or social care systems and services. **Related Legislation:** Section 251B Health and Social Care (Safety and Quality Act) 2015 (Duty to Share); Common Law of Duty of Confidentiality	working-areas/using-digital-technology-to-improve-health-and-care/info-residents/faqs/ If you wish to exercise any other of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. **Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk
Cerner - HealtheIntent	HealtheIntent is a platform that allows the practice and other healthcare providers to improve healthcare outcomes, patient experience, reduce adverse events and shift towards more preventative care. It covers both sharing and risk stratification. HealtheIntent uses the shared care record (see above, LCR) plus additional data from care providers to give a better picture of your health.	All records held by the Practice and in the LCR system are kept for the duration specified in the Records Management Codes of Practice for Health and Social Care	The processing of **personal data is** permitted under the following paragraphs: Article 6(1) (c) - processing for legal obligation; Article 6(1) (e) - public interest or	**You have the right to:** • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or,

	The HealtheIntent platform contains three main tools - HealtheRecord, HealtheRegistries and HealtheAnalytics, and a data warehouse (HealthEDW). ○ HealthEDW is the data warehouse which securely holds all of the normalised, longitudinal data. Normalised means that all the same measurements are used so there is no confusion, longitudinal means that data is available over time. ○ HealtheRegistries provides a dashboard view for specific population cohorts usually a long-term condition e.g. diabetes. It provides users with an overview of indicators/measures and allows them to see how a patient is doing against these measures e.g. Hba1C result as well as their population (e.g. GP practice). This helps the user identify gaps or duplication in care at both an individual and population level. ○ HealtheAnalytics is a dashboard tool (Tableau) which can be used to identify trends and unwarranted variation in population cohorts. It will also enable clinicians and care professionals to 'drill down' to see which of their patients/clients require specific action.		in the exercise of official authority. The processing of **special categories of personal data concerning health** is permitted under the following paragraph: Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services. **Related Legislation:** Section 251B Health and Social Care (Safety and Quality Act) 2015 (Duty to Share); Common Law of Duty of Confidentiality	✓ where we no longer need the data for the purposes of the processing. **Right to object or opt-out:** You have the right to raise an objection to your personal data being shared in HealtheIntent. You also have the right opt out of HealtheIntent by completing an opt-out form with your Practice. Although we will first need to explain how this may affect the care you receive. Opting out of HealtheIntent includes opting out of the London Care Record. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. **Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk

EMIS Systems Local Record Sharing – Integrated Care	EMIS Local Record Sharing enables your GP medical record held on our secure EMIS Web clinical system to be shared with other healthcare Providers (e.g. acute hospitals, mental and community health and other GPs) who are commissioned to provide to provide health care services within your borough. This local sharing is used to provide direct patient care for services such as continued extended access, home visits, universal offers, musculoskeletal service, GP at front door and other neighbourhood services across North Central London. The information is accessed in real time and on-demand, meaning that data from your GP record is neither extracted, nor uploaded, nor sent anywhere in real time and on-demand, meaning that data from your GP record is neither extracted, nor uploaded, nor sent anywhere. The source of the information shared in this way is your electronic GP record. **National Diabetic Retinal Screening Service** – Diabetic eye screening is carried out in north central London by the North Central London Diabetic Eye Screening Programme (NCL-DESP). NCL-DESP is provided by North Middlesex University Hospital NHS Trust which conducts screening across five London boroughs: Barnet, Camden, Enfield, Haringey and Islington. The source of the information shared in this way is your electronic GP record.	All records held by the Practice and the EMIS Local Record Sharing system are be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care	The processing of **personal data is** permitted under the following paragraphs: Article 6(1) (c) - processing for legal obligation; Article 6(1) (e) - public interest or in the exercise of official authority. The processing of **special categories of personal data concerning health** is permitted under the following paragraphs: Article 9(2) (b) – processing necessary in the field of employment, social security and social protection law. Article 9 (2) (h) - processing is necessary for	**You have the right to:** • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. **Right to object:** You have a general right to raise an objection to your personal data being shared with the recipients. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. **Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane

			medical or social care treatment or, the management of health or social care systems and services **Related Legislation:** Section 251B Health and Social Care (Safety and Quality Act) 2015 (Duty to Share); Common Law of Duty of Confidentiality	Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk
National NHS Digital Services "Spine" including: • Patient Demographics Service • e-Referral Service • Electronic Prescription Service	**Spine** supports the IT infrastructure for health and social care in England, joining together over 23,000 healthcare IT systems in 20,500 organisations. It hosts 5 key services to support the delivery of your care. They enable healthcare professionals, authorised with an NHS smartcard, to view relevant information about you as follows **Patient Demographics Service** – The Personal Demographics Service (PDS) is the national electronic database of NHS patient details such as name, address, date of birth and NHS Number (known as demographic information). It helps healthcare professionals to identify patients and match them to their health records. It also allows them to contact and communicate with patients.	All records held by the Practice and the EMIS Local Record Sharing system are be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care	The processing of **personal data is** permitted under the following paragraph: Article 6(1) (e) - public interest or in the exercise of official authority. The processing of **special categories of personal data concerning health**	**You have the right to:** • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing.

• GP2GP • Summary Care Record	**Summary Care Record (SCR)** – is an electronic record of important patient information, created from GP medical records. It can be seen and used by authorised staff in other areas of the health and care system involved in the patient's direct care. When your personal health records on your GP Record is uploaded to the spine, NHS Digital becomes the data controller for the uploaded information. The source of the information shared in this way is your electronic GP record. At a minimum, the SCR holds important information about; • current medication • allergies and details of any previous bad reactions to medicines • the name, address, date of birth and NHS number of the patient The patient can also choose to include additional information in the SCR, such as details of long-term conditions, significant medical history, or specific communications needs. **e-Referral Service** - The NHS e-Referral Service (e-RS) combines electronic booking with a choice of place, date and time for first hospital or clinic appointments. Patients can choose their initial hospital or clinic appointment, book it in the GP surgery at the point of referral, or later at home on the phone or online. **Electronic Prescription Service** - The Electronic Prescription Service (EPS) sends electronic prescriptions from GP surgeries		is permitted under the following paragraph: Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services	**Right to object or opt-out:** You have the right to raise an objection or opt-out of out of having an SCR by returning a completed opt-out form to their GP practice. Although we will first need to explain how this may affect the care you receive. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. **Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk

	to pharmacies. Eventually EPS will remove the need for most paper prescriptions. **GP2GP** - GP2GP allows patients' electronic health records to be transferred directly, securely, and quickly between their old and new practices, when they change GPs. This improves patient care by making full and detailed medical records available to practices, for a new patient's first and later consultations. The source of the information shared in all of the instances above in this way is your electronic GP record.			
Open Exeter	Open Exeter is a web-enabled viewer which provides the facility for healthcare professionals to share/access patient data held on the National Health Application and Infrastructure Services (NHAIS) systems, including cervical screening, breast screening, organ donor, blood donor and home oxygen. Access to Open Exeter is only possible on the N3 network, and via authorised logons/passwords provided by NHS Digital. The source of the information shared in this way is your electronic GP record.	Data is viewed on screen. If printed, it is destroyed when no longer required (usually within 24 hrs).	The processing of **personal data is** permitted under the following paragraph: Article 6(1) (e) - public interest or in the exercise of official authority. The processing of **special categories of personal data concerning health** is permitted under the following paragraph: Article 9 (2) (h) - processing is necessary for medical or social	**You have the right to:** • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. **Right to object:** You have a general right to raise an objection to your personal data being shared in Open Exeter. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.

			care treatment or, the management of health or social care systems and services	**Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk
f. **Data Processors**				
System/database **Recipients or categories of recipients of the personal or special categories of personal data**	**Purpose of the processing & Data Retention Period**	**Data Retention Period**	**Lawful basis General Data Protection Regulation** ***- Article 6 -*** ***- Article 9 –***	**Your Rights**
AccuRx	AccuRx supply a number of systems to practices including text (SMS) messaging and remote consultations.	Processing is carried out by AccuRx under instruction held as a processing	The processing of **personal data is** permitted under	**You have the right to:** • To access, view or request copies of your personal information;

	Your personal data is passed to them solely for these purposes and not used further.	agreement with your GP. Data is not retained in this system once processed, but transferred to the clinical record system,	the following paragraph: Article 6(1) (e) - public interest or in the exercise of official authority. The processing of **special categories of personal data concerning health** is permitted under the following paragraph: Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services	• request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. **Right to object:** In line with the UK GDPR Article 21, you have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. **Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the

				Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk
Amazon Web Services (AWS)	Amazon web services are used as a sub-processor by some NHS organisations and suppliers, including EMIS and NHS Digital.	Processing is carried out by AWS as a sub-processor to controllers such as Egton and EMIS Health. These organisation are responsible under their contract for the management of the sub-processor. Your GP does not have a direct relationship with AWS.	The processing of **personal data is** permitted under the following paragraph: Article 6(1) (e) - public interest or in the exercise of official authority. The processing of **special categories of personal data concerning health** is permitted under the following paragraph: Article 9 (2) (h) - processing is necessary for medical or social care treatment or,	**You have the right to:** • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. **Right to object:** In line with the UK GDPR Article 21, you have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of

			the management of health or social care systems and services	care, and compliance with a legal obligation to which we are subject. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. **Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk
Microsoft Azure and Office 365	Microsoft are used as a processor by some NHS organisations and suppliers, including GPs, Optum, GP federations and others.	All records held in the Practice EMIS system be kept for the duration specified in the Records Management Codes	The processing of **personal data is** permitted under the following paragraph: Article 6(1) (e) - public interest or	**You have the right to:** • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested,

		of Practice for Health and Social Care "GP records should be retained until 10 years after the patient's death or after the patient has permanently left the country, unless they remain in the UK. Electronic patient records must not be destroyed or deleted for the foreseeable future." Where Microsoft (particularly Azure) is a sub-processor, for example to Optum, your GP does not have a direct relationship and the contracting organisation is responsible under their contract for the management of the sub-processor	in the exercise of official authority. The processing of **special categories of personal data concerning health** is permitted under the following paragraph: Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services	✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. **Right to object:** In line with the UK GDPR Article 21, you have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. **Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire

				Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk
EMIS Health and Egton	**EMIS Health and Egton** are responsible for the provision of a clinical system, software and IT services used by the Practice to securely store and process your medical record. All information about your personal health records are stored in your GP electronic record. This information is then available to practice staff & external bodies as outlined in this document. This data can includes video, audio and photographic evidence from remote consultations.	All records held in the Practice EMIS system be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care "GP records should be retained until 10 years after the patient's death or after the patient has permanently left the country, unless they remain in the UK. Electronic patient records must not be destroyed or deleted for the foreseeable future."	The processing of **personal data is** permitted under the following paragraph: Article 6(1) (e) - public interest or in the exercise of official authority. The processing of **special categories of personal data concerning health** is permitted under the following paragraph: Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services	**You have the right to:** • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. **Right to object:** In line with the UK GDPR Article 21, you have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.

				Right to complain: If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk

NHSMail	The practice uses NHSMail to process and manage email and calendar appointments for staff. As such, it contains a mix of staff and patient personal data. The practice uses NHSMail in line with guidance from NHS Digital Rights and policies in respect of staff personal data are held by NHS Digital as the controller and available at the link below NHSMail Transparency Information The source of this data as a patient is your electronic patient record.	The NHSMail data retention and Information Management policy is available at the link below: NHSMail Data Retention and Information Management Policy	The processing of **personal data is** permitted under the following paragraph: Article 6(1) (e) - public interest or in the exercise of official authority. The processing of **special categories of personal data concerning health** is permitted under the following paragraph: Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services	**You have the right to:** • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. **Right to object:** In line with the UK GDPR Article 21, you have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. **Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data

				Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk

Microsoft Office 365 including Teams, Sharepoint, Onedrive	The practice uses Microsoft Office 365 supplied by NHS Digital for internal information management. As such, it contains a mix of staff and patient personal data. The practice uses Microsoft Office 365 in line with guidance from NHS Digital. The source of this data as a patient is your electronic patient record.	All records held in the Practice EMIS system be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care "GP records should be retained until 10 years after the patient's death or after the patient has permanently left the country, unless they remain in the UK. Electronic patient records must not be destroyed or deleted for the foreseeable future."	The processing of **personal data is** permitted under the following paragraph: Article 6(1) (e) - public interest or in the exercise of official authority. The processing of **special categories of personal data concerning health** is permitted under the following paragraph: Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services	**You have the right to:** • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. **Right to object:** In line with the UK GDPR Article 21, you have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. **Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data

				Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk

North Central London Integrated Care Board (formerly North Central London CCG)	NHS North Central London ICB is responsible for securing, planning, designing and paying for your NHS services, including planned and emergency hospital care, mental health, rehabilitation, community and primary medical care (GP) services, Information Communication Technology (ICT), providing risk stratification services. The ICB act as the Data Processor for EMIS Systems Local Record Sharing and, process personal data from your GP record in accordance with instructions from the Practice. Some services provided by the ICB are shared across London and provided to the ICB by other areas. These are detailed in this document. The source of the information shared in this way is your electronic GP record.	All records held in the Practice EMIS system be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care "GP records should be retained until 10 years after the patient's death or after the patient has permanently left the country, unless they remain in the UK. Electronic patient records must not be destroyed or deleted for the foreseeable future."	The processing of **personal data is** permitted under the following paragraph: Article 6(1) (e) - public interest or in the exercise of official authority. The processing of **special categories of personal data concerning health** is permitted under the following paragraph: Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services	**You have the right to:** • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. **Right to object:** You have a general right to raise an objection to your personal data being shared. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. **Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane

				Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk

South West London Integrated Care Board - GP Practice Data Extraction Services	The GP Practice Data Extraction Services is shared across London, with South West London performing the service. This enables SWL to, on behalf of the NCL area, extract personal data from GP Practice covering all currently registered patients and those ever registered since April 2009 except where patients have explicitly dissented from their information being extracted, for the provision of services back to the practice which may include: Risk stratification; linking data to other data sets; financial reporting; business intelligence; statistical analysis and; information to support delivery of patient care. The source of the information shared in this way is your electronic GP record.	All records held in the Practice EMIS system be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care	The processing of **personal data is** permitted under the following paragraph: Article 6(1) (e) - public interest or in the exercise of official authority. The processing of **special categories of personal data concerning health** is permitted under the following paragraph: Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services	**You have the right to:** • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. **Right to object:** You have a general right to raise an objection to your personal data being shared with NEL CSU. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. **Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane

				Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk

Docman and Docmail	**Docman Limited** act as a data processor and provides cloud-based storage software for electronic patient document. This includes letters that we receive, scan and upload to the patient record, as well as letters that we receive in an electronic format. Generally, Docman enables primary health care organisations capture, file, workflow, view and manage primary care documents efficiently. **Docmail** enables primary health care organisations send letters, invoices and documents directly from computers and other portable devices. The source of the information shared in this way is your electronic GP record for the purposes of direct administrative patient care.	All records held in the Practice EMIS system and the Docman vault are kept for the duration specified in the Records Management Codes of Practice for Health and Social Care "GP records should be retained until 10 years after the patient's death or after the patient has permanently left the country, unless they remain in the UK. Electronic patient records must not be destroyed or deleted for the foreseeable future."	The processing of **personal data is** permitted under the following paragraph: Article 6(1) (e) - public interest or in the exercise of official authority. The processing of **special categories of personal data concerning health** is permitted under the following paragraph: Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services	**You have the right to:** • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. **Right to object:** In line with the UK GDPR Article 21, you have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. **Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data

				Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk
iPlato	**iPlato is** cloud-based text messaging service used by GPs to communicate with their patients. The source of the information shared in this way is your electronic GP record for the purposes of direct administrative patient care.	All personal health records held in the Practice EMIS system and the iPlato system are kept for the duration specified in the Records Management Codes of Practice for Health and Social Care "GP records should be retained until 10 years after the patient's death or after the patient has permanently left the country, unless they remain in the UK.	The processing of **personal data is** permitted under the following paragraph: Article 6(1) (e) - public interest or in the exercise of official authority. The processing of **special categories of personal data concerning health** is permitted under the following paragraph: Article 9 (2) (h) - processing is necessary for	**You have the right to:** • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. **Right to object:** In line with the UK GDPR Article 21, you have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal

		Electronic patient records must not be destroyed or deleted for the foreseeable future."	medical or social care treatment or, the management of health or social care systems and services	data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. **Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk
INhealth Intelligence	QMS-UK are commissioned by NHS England to provide secure data processing solutions for two services: **Child Health Information Service** – information relating to children's vaccinations is shared with North East London Foundation Trust who run one of 4 Child Health Information Services across London.	All records held in the Practice EMIS system and the QMS database are kept for the duration specified in the Records Management Codes	The processing of **personal data is** permitted under the following paragraph: Article 6(1) (e) - public interest or	**You have the right to:** • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where:

		of Practice for Health and Social Care "GP records should be retained until 10 years after the patient's death or after the patient has permanently left the country, unless they remain in the UK.	in the exercise of official authority. The processing of **special categories of personal data concerning health** is permitted under the following paragraph: Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services	✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. **Right to object:** You have a general right to raise an objection to your personal data being shared in QMS. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. **Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk

Better Ltd Urgent Care Plan	Better Ltd are commissioned by South West London on behalf of all parts of London to provide secure data processing solutions for: **Urgent Care Plans** – The NHS aims to provide personalised care based on what matters to you. Care planning enables your wishes and individual care and support needs to be communicated digitally with your healthcare professionals across London. • A care plan can be created following a conversation between you and your healthcare professional (such as a doctor or nurse). Your healthcare professional will listen to you, understand your needs and make notes about: • What is important to you in your day-to-day life • Your preferences or wishes about your care, such as where you prefer to be cared for • What support you need and who is best placed to provide this • Information about others who may be involved in your care, such as relatives • Based on your conversation, your healthcare professional can document this information using a digital system. Your care plan can be continuously updated throughout your life, depending on your needs and wishes. For details, see https://ucp.onelondon.online/patients/ Your healthcare professional will document a clinical recommendation, should you need emergency care. Information on your care plan is visible to all health and care services who are involved in your care.	All records held in the are kept for the duration specified in the Records Management Codes of Practice for Health and Social Care Since the Urgent Care Plan is created voluntarily by patients, patients can withdraw it at any time, in which case it will be deleted.	The processing of **personal data is** permitted under the following paragraph: Article 6(1) (e) - public interest or in the exercise of official authority. The processing of **special categories of personal data concerning health** is permitted under the following paragraph: Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services	**You have the right to:** • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. **Right to object:** You have a general right to raise an objection to your personal data being shared. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. **Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane

	This may include the London Ambulance Service, 111 and Out of Hours GP services who may see you in an emergency.			Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk
GP Connect	GP Connect allows authorised clinical staff to share and view GP practice clinical information and data between IT systems, quickly and efficiently. It is run and managed by NHS England It provides full record sharing to other partners in health and care and is used for a many of the linkages noted elsewhere in this notice. For more details, please visit: https://digital.nhs.uk/services/gp-connect	All records held in the Practice EMIS system are kept for the duration specified in the Records Management Codes of Practice for Health and Social Care GP records should be retained until 10 years after the patient's death or after the patient has permanently left the country, unless they remain in the UK.	The processing of **personal data is** permitted under the following paragraph: Article 6(1) (e) - public interest or in the exercise of official authority. The processing of **special categories of personal data concerning health** is permitted under the following paragraph: Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services	**You have the right to:** • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. **Right to object:** You have a general right to raise an objection to your personal data being shared in QMS. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. **Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at

				section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk
[Insert your Risk Stratification software supplier excluding EMIS (covered above) – e.g. Docobo, MedeAnalytics, Sollis or any listed on NHSE Approved Suppliers	The Practice performs computerised searches of some or all of our records to identify individuals who may be at increased risk of certain conditions or diagnoses i.e. Diabetes, heart disease, risk of falling). Your records may be amongst those searched. This is often called "risk stratification" or "case finding". These searches are sometimes carried out by Data Processors who link our records to other records that they access, such as hospital attendance records. The results of these searches and assessment may then be shared with other healthcare workers, such as specialist, therapists, technicians etc. The information that is shared is to enable the other healthcare workers to provide the most appropriate advice, investigations, treatments, therapies and or care. Risk stratification can be grouped into two purposes namely: **Direct Care** – 'Case Finding' where carried out by a health professional (e.g. GPs and Provider) involved in an individual's care or by a data processor acting under contract with such a provider, it is treated as direct care. **Indirect Care** - understand the local population needs and plan for future requirement.	All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care.	The processing of **personal data is** permitted under the following paragraph: Article 6(1) (e) - public interest or in the exercise of official authority. The processing of **special categories of personal data concerning health** is permitted under the following paragraph: Article 9 (2) (h) - processing is necessary for medical or social care treatment or,	**You have the right to:** • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. **Right to object:** You have a general right to raise an objection to your personal data being shared for the purpose of risk stratification. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.

	The source of the information shared in this way is your electronic GP record.		the management of health or social care systems and services **Related Legislation**: Section 251 NHS Act 2006	**Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk
[insert the names of the organisations you conduct clinical research with]	To enable healthcare professionals working for the Practice to provide information, derived from GP records, about individuals to accredited research organisations. This covers research situations where the data controller (the Practice) is approached by research organisations, directly, to recruit patients for studies. Any research proposal will only be agreed with a clearly defined protocol, consent mechanisms, and relevant research ethics committee approval, and in line with the principles of Article 89(1) of the UK GDPR. Research organisations do not approach patients directly, rather the Practice will invite appropriate patients directly seeking their wish to take part. This Privacy Notice does not cover situations where the	All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care.	The processing of **personal data is** permitted under the following paragraph: Article 6(1) (e) - public interest or in the exercise of official authority. The processing of **special categories of personal data** is permitted under the following paragraph:	**You have the right to:** • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. **Right to object:** You have a general right to raise an objection to your personal data being shared for the purpose of risk stratification.

	Practice has been approached by an organisation seeking personal sensitive data to be disclosed in the absence of consent, i.e. via **Related Legislation**: Section 251 NHS Act 2006 / Health Research Authority (HRA) approval. The source of the information shared in this way is your electronic GP record.		Article 9 (2) (j) - for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member State law **Related Legislation**: Section 251 NHS Act 2006	If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. **Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk
Shred-It	Provides accredited destruction of paper and digital confidential waste	All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care.	The processing of **personal data is** permitted under the following paragraph: Article 6(1) (e) - public interest or in the exercise of official authority.	**You have the right to:** • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or,

			The processing of **special categories of personal data** is permitted under the following paragraph: Article 9 (2) (j) - for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member State law	✓ where we no longer need the data for the purposes of the processing. **Right to object:** You have a general right to raise an objection to your personal data being shared for the purpose of risk stratification. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. **Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk
[insert the name of the organisation responsible financial and	The supplier [insert name] offer a wide range of business assurance services, from internal audit, counter fraud and forensic investigations, risk management and governance.	All records held by the Practice will be kept for the duration specified in the Records	The processing of **personal data is** permitted under	**You have the right to:** • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information;

governance audit]		Management Codes of Practice for Health and Social Care.	the following paragraph: Article 6(1) (e) - public interest or in the exercise of official authority.	• restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. **Right to object:** You have a general right to raise an objection to your personal data being shared for the purpose of risk stratification. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. **Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk

Fairway Training limited	The supplier Fairway Training limited provides practices with a software solution to enable the recording of Human Resources related information of its employees' personal data, in particular for the purposes of the **PAYROLL** The Practice ensures that personal data it collects from employees are used only for employment related purposes or where there is a statutory obligation to share the personal information with to regulatory bodies (e.g. courts, police or NHS England).	All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care.	The processing of **personal data is** permitted under the following paragraph: Article 6 1(e) (public interest or in the exercise of official authority). The processing of **special categories of personal data** is permitted under the following paragraph: Article 9(2) (b): processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject	**Employees have the right to:** • To access, view or request copies of their personal information held by the Practice; • request rectification of any inaccuracy to their personal information; • restrict the processing of their personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. **Right to object:** Employees have a general right to raise an objection to the sharing personal data. If an employee wishes to exercise his/her rights they can contact the Practice (data controller) or the DPO and their request will be carefully considered. **Right to complain:** If an employee is dissatisfied with the way the Practice processes his/her personal data, they have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office

				Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk
X-On/surgery Connect	The supplier X-on Surgery Connect provides practices with a software solution to enable the delivery and recording of telephone calls/video calls for the purposes of care delivery. The Practice ensures that personal data it collects in this way is only used for the purposes of delivery of service, fact checking and quality assurance.	All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care.	The processing of **personal data is** permitted under the following paragraph: Article 6 1(e) (public interest or in the exercise of official authority). The processing of **special categories of personal data** is permitted under the following paragraphs: Article 9(2) (b): processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the	**Persons involved in telephone/video calls have the right to:** • To access, view or request copies of their personal information held by the Practice; • request rectification of any inaccuracy to their personal information; • restrict the processing of their personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. **Right to object:** Users have a general right to raise an objection to the sharing personal data. If a user wishes to exercise his/her rights they can contact the Practice (data controller) or the DPO and their request will be carefully considered. **Right to complain:** If a user is dissatisfied with the way the Practice processes his/her

			controller or of the data subject Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services	personal data, they have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk
GenPra	The supplier GenPra provides practices with a software solution to provide a website, including online patient interactions the purposes of care delivery. The Practice ensures that personal data it collects in this way is only used for the purposes of delivery of service, fact checking and quality assurance.	All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care.	The processing of **personal data is** permitted under the following paragraph: Article 6 1(e) (public interest or in the exercise of official authority). The processing of **special categories of personal data** is permitted under the following paragraphs: Article 9(2) (b): processing is	**Persons involved in telephone/video calls have the right to:** • To access, view or request copies of their personal information held by the Practice; • request rectification of any inaccuracy to their personal information; • restrict the processing of their personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. **Right to object:** Users have a general right to raise an objection to the sharing personal data.

			necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services	If a user wishes to exercise his/her rights they can contact the Practice (data controller) or the DPO and their request will be carefully considered. **Right to complain:** If a user is dissatisfied with the way the Practice processes his/her personal data, they have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk
Consultant Connect [if you don't use Consultant Connect, remove this row]	Consultant Connect provides a national network of consultants for GPs to access in order to assist with your direct care. Telephone advice and guidance, photo-messaging advice and guidance are the key services provided.	All records held by the Practice and the Consultant Connect Sharing system are be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care	The processing of **personal data is** permitted under the following paragraph: Article 6(1) (e) - public interest or in the exercise of official authority.	**You have the right to:** • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or,

			The processing of **special categories of personal data concerning health** is permitted under the following paragraph: Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services	✓ where we no longer need the data for the purposes of the processing. **Right to object or opt-out:** You have the right to raise an objection or opt-out of out of having an SCR by returning a completed opt-out form to their GP practice. Although we will first need to explain how this may affect the care you receive. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. **Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk
Niche Health (iGPR)	[Delete as needed]	All records held by the Practice and the	The processing of **personal data is**	**You have the right to:**

	We use the [iGPR system provided by Niche Health for the purposes of providing you with medical reports and subject access request responses that are correctly managed in respect of the rights of others. These providers work as a processor on our behalf. They do not retain or use your medical records for any purpose other than fulfilling your requests.	Consultant Connect Sharing system are be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care	permitted under the following paragraph: Article 6(1) (e) - public interest or in the exercise of official authority. The processing of **special categories of personal data concerning health** is permitted under the following paragraph: Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services	• To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. **Right to object or opt-out:** You have the right to raise an objection or opt-out of out of having an SCR by returning a completed opt-out form to their GP practice. Although we will first need to explain how this may affect the care you receive. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. **Right to complain:** If you are dissatisfied with the way the Practice processes your data, you have the right to appeal/complain. You may raise the issue with the Practice's Data Protection Officer, contact details are given at section 6, or if not satisfied, with the Information Commissioner (ICO). The ICO can be contacted at: Information Commissioner's Office

				Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Website: https://ico.org.uk
Intercom/eConsult	The practice utilises eConsult for the purposes of routine patient care. The eConsult privacy policy is available at: https://econsult.net/nhs-patients/privacy-policy	eConsults are saved to medical record of the patient. The email to which they were attached after 6 months	These documents are processed under the following legal basis: 6(1)(e) Public Task And is permitted under: 9(2)(h) Provision of Health and Social Care	Patients legal rights Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights: 1. Request access to your personal data 2. Request correction of your personal data 3. Request erasure of your personal data 4. Object to processing of your personal data 5. Request restriction of processing your personal data 6. Request transfer of your personal data 7. Right to withdraw consent If you wish to exercise any of the rights set out above, please contact us at privacy@econsult.health. No fee usually required You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable

				fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances. What we may need from you We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response. Time limit to respond We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

8. What is EMIS Systems Local Record Sharing?

Your GP medical record is held on our secure clinical system called EMIS Web. This clinical system allows for local record sharing with other healthcare providers who are commissioned in your area to provide care (e.g. acute hospitals, mental and community health). Through this record sharing, clinicians are able to see clinical information entered by other organisations who are party to the EMIS local record sharing agreement.

This local sharing is used to provide direct patient care for services such as continued extended access, home visits, universal offers, musculoskeletal service, GP at front door and other neighbourhood services across North Central London in line the local care delivery strategy.

It also enables specific GPs identify their patients with highly complex, multiple morbidity and/or frailty, who might benefit from targeted multi-disciplinary team support as part of case management and care planning (the "Case Finding Purpose").

How will my information be made available?

The information is accessed in real time and on-demand, meaning that data from your GP record is neither extracted, nor uploaded, nor sent anywhere. The data remains within your GP EMIS database and users are allowed read-view access only. If you have any concerns regarding EMIS local record sharing you can opt out by speaking to your GP Surgery.

9. What do we use anonymised data for?

We use anonymised data to plan health care services. Specifically we use it to:

- check the quality and efficiency of the health services we provide;
- prepare performance reports on the services we provide and,
- review the healthcare we provide in order they are of the highest standard.

10. Details of data linkage with other datasets

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

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

The organisation responsible for processing de-identified and linked data under this category, on behalf of the Practice is North Central London Clinical Commissioning Group. We ensure that the data processor is legally and contractually bound to operate and prove security arrangements are in place where data that could or does identify a person are processed.

11. What safeguards are in place to ensure data that identifies me is secure?

We only use information that may identify you in accordance with the data protection legislation. This requires us to process personal data only if there is a lawful basis for doing so and that any processing must be fair and lawful.

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

Our appropriate technical and security measures include:

- The ability to ensure ongoing confidentiality, integrity, availability and resilience of our systems;
- the ability to quickly restore availability and access to personal information in the event of a physical or technical incident; and
- a process regularly testing, assessing and evaluating the effectiveness of security measures, and ensure they comply with the concept of privacy by design and default.

The NHS Digital Code of Practice on Confidential Information applies to all of our staff, and they are required to protect your information, inform you of how your information will be used, and allow you to decide if and how your information can be shared. All Practice staff are trained to ensure information is kept confidential.

We are registered with the Information Commissioner's Office (ICO) as a data controller and collects data for a variety of purposes. A copy of the registration is available through the **ICO website**. You can search by our Practice name or ICO Data Protection Register number, both of which are given at section 6 above (contact details).

12. What are your rights?

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

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

These rights will only apply where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject.

Your right to erasure (right to be forgotten) will only apply where you had given 'consent' to process your personal health data and later withdrew the consent, **and does not apply to the extent** where the processing of your personal health data is necessary for:

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

You can exercise your rights at any time by contacting the Practice (data controller) or the Data Protection Officer (DPO) at the contact addresses given, although we will first need to explain how this may affect the care you receive and any overriding legitimate grounds for the processing that may apply.

13. Gaining access to the data we hold about you

You have the right to see or have a copy of personal data we hold that can identify you. You do not need to give a reason to see your data. However, some information may be withheld under some exceptional circumstances.

If you want to access your personal information you must do so in writing by either **completing our** Subject Access Request (SAR) form FROM OUR WEBSITE by contacting the practice at the address given or by contacting our DPO at the address given. Note that as the DPO does not have access to personal data, the DPO will forward requests to the practice, however it is a legal right for you to use this route should you choose.

14. What is the right to know?

The Freedom of Information Act 2000 (FOIA) gives people a general right of access to information held by or on behalf of public authorities, promoting a culture of openness and accountability across the public sector.

g. What sort of information can I request?

In theory, you can request any information that the Practice holds that does not fall under an exemption under the FOI Act. You may not ask for information that is covered by the Data Protection Regulations under FOIA i.e. personal data. However, you can request this under a Subject Access Request – see section above 'Gaining access to the data we hold about you'.

h. How do I make a request for information?

Your request must be in writing and can be either posted or emailed to:

Email: emailadmin.hmc@nhs.net

Post: Holborn Medical Centre, 64-66 Lamb's Conduit Street, London, WC1N 3NA

15. How the NHS and care services use your information

Whenever you use a health or care service, such as attending Accident & Emergency or using Community Care services, important information about you is collected in a patient record for that service. Collecting this information helps to ensure you get the best possible care and treatment. The information collected about you when you use these services can also be used and provided to other organisations for purposes beyond your individual care, for instance to help with:

- improving the quality and standards of care provided
- research into the development of new treatments
- preventing illness and diseases
- monitoring safety
- planning services

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

Most of the time, anonymised data is used for research and planning so that you cannot be identified in which case your confidential patient information isn't needed.

You have a choice about whether you want your confidential patient information to be used in this way. If you are happy with this use of information you do not need to do anything. If you do choose to opt out your confidential patient information will still be used to support your individual care. To find out more or to register your choice to opt out, please visit www.nhs.uk/your-nhs-data-matters. On this web page you will:

- See what is meant by confidential patient information
- Find examples of when confidential patient information is used for individual care and examples of when it is used for purposes beyond individual care
- Find out more about the benefits of sharing data
- Understand more about who uses the data
- Find out how your data is protected
- Be able to access the system to view, set or change your opt-out setting
- Find the contact telephone number if you want to know any more or to set/change your opt-out by phone
- See the situations where the opt-out will not apply

You can also find out more about how patient information is used at: https://www.hra.nhs.uk/information-about-patients/ (which covers health and care research); and https://understandingpatientdata.org.uk/what-you-need-know (which covers how and why patient information is used, the safeguards and how decisions are made)

You can change your mind about your choice at any time.

Data being used or shared for purposes beyond individual care does not include your data being shared with insurance companies or used for marketing purposes and data would only be used in this way with your specific agreement.

Health and care organisations have until 2020 to put systems and processes in place so they can be compliant with the national data opt-out and apply your choice to any confidential patient

information they use or share for purposes beyond your individual care. Our organisation is compliant with the national data opt-out policy.

16. Glossary of Terms

Common Law of Duty of Confidentiality - is not written out in one document like the UK GDPR or an Act of Parliament. Common Law is also referred to as 'judge-made' or case law. In practice, this means that all patient/client information, whether held on paper, computer, visually or audio recorded, or held in the memory of the professional, must not normally be disclosed without the consent of the patient/client. However, where the disclosure/sharing of the patient/client information is for the purpose of Direct Care consent to such disclosure/sharing may be implied where it is informed, given there is a legitimate relationship between the patient/client and the health professional.

Data Protection Legislation - means any laws or regulations applying to personal data in the UK.

Personal Data - means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Special Categories of Personal Data – data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation shall be prohibited.