

Fair Processing Notice (Privacy Notice)

Your Personal Information – what you need to know

Your information, what you need to know

This privacy notice explains why we collect information about you, how that information will be used, how we keep it safe and confidential and what your rights are in relation to this.

Why we collect information about you

Health care professionals who provide you with care are required by law to maintain records about your health and any treatment or care you have received. These records help to provide you with the best possible healthcare and help us to protect your safety.

We collect and hold data for the purpose of providing healthcare services to our patients and running our organisation which includes monitoring the quality of care that we provide. In carrying out this role we will collect information about you which helps us respond to your queries or secure specialist services. Your information is held in digital form and is supported by written records as appropriate.

Our Commitment to Data Privacy and Confidentiality Issues

As a GP practice, all of our GPs, staff and associated practitioners are committed to protecting your privacy and will only process data in accordance with the Data Protection Legislation. This includes the General Data Protection Regulation (EU) 2016/679 (GDPR) now known as the UK GDPR, the Data Protection Act (DPA) 2018, the Data (Use and Access) (DUA) Act 2025, the Law Enforcement Directive (Directive (EU) 2016/680) (LED) and any applicable national Laws implementing them as amended from time to time. The legislation requires us to process personal data only if there is a legitimate basis for doing so and that any processing must be fair and lawful.

In addition, consideration will also be given to all applicable Law concerning privacy, confidentiality, the processing and sharing of personal data including the Human Rights Act 1998, the Health and Social Care Act 2012 as amended by the Health and Social Care (Safety and Quality) Act 2015, the common law duty of confidentiality and the Privacy and Electronic Communications (EC Directive) Regulations.

Data we collect about you

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

- **Personal Data** – means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- **Special Categories of Personal Data** – this term describes personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

- Confidential Patient Information – this term describes information or data relating to their health and other matters disclosed to another (e.g. patient to clinician) in circumstances where it is reasonable to expect that the information will be held in confidence. Including both information ‘given in confidence’ and ‘that which is owed a duty of confidence’. As described in the Confidentiality: NHS code of Practice: Department of Health guidance on confidentiality 2003.
- Pseudonymised – The process of distinguishing individuals in a dataset by using a unique identifier which does not reveal their ‘real world’ identity.
- Anonymised – Data in a form that does not identify individuals and where identification through its combination with other data is not likely to take place.
- Aggregated – Statistical data about several individuals that has been combined to show general trends or values without identifying individuals within the data.

How we use your information

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

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 often, anonymised data is used for research and planning so that you cannot be identified in which case your confidential patient information isn’t needed.

Safeguarding of children or vulnerable adults

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

Statutory disclosures

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

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

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

A full list of details including the legal basis, any Data Processor involvement and the purposes for processing information can be found in Appendix A below.

How long do we hold information for?

All records held by the Practice will be kept for the duration specified by national guidance from [Records Management Code of Practice - NHSX](#). Once information that we hold has been identified for destruction it will be disposed of in the most appropriate way for the type of information it is. Personal confidential and commercially confidential information will be disposed of by approved and secure confidential waste procedures. We keep a record of retention schedules within our information asset registers, in line with the Records Management Code of Practice for 2021.

Individuals Rights under UK GDPR

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

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

Your right to opt out of data sharing and processing

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

Type 1 Opt Out

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

National data opt-out (NDOO)

The mandatory implementation of the National Data Opt-Out (NDOO) was 31 July 2022, enabling patients to opt-out from the use of their data for research or planning purposes.

For more information go to [National data opt out programme](#)

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:

- [NHS Health Research Authority](#) (which covers health and care research); and
- [Understanding Patient Data](#) (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.

Right of Access to your information (Subject Access Request)

Under Data Protection Legislation everybody has the right of access to, or request a copy of, information we hold that can identify them, this includes medical records. The patient is only entitled to confirmation, personal data and other information that the provider is able to provide based on a reasonable and proportionate search for the information. There are some safeguards regarding what patients will have access to and they may find information has been redacted or removed for the following reasons;

- It may be deemed to risk causing harm to the patient or others
- The information within the record may relate to third parties who are entitled to their confidentiality, or who have not given their permission for the information to be shared.

Patients do not need to give a reason to see their data. And requests can be made verbally or in writing. Although we may ask them to complete a form in order that we can ensure that they have the correct information required.

Where multiple copies of the same information is requested, the surgery may charge a reasonable fee for the additional copies.

Patients will need to provide proof of identity to receive this information. We will not share information relating to you with other individuals without your explicit instruction or without sight of a legal document.

Patients may also request to have online access to their data; they may do this via the [NHS App and your NHS account](#) or via the practice's system. If you would like to access your GP record online, click <https://www.readinguniversitymedicalpractice.nhs.uk>.

Further information about the service can be found at the [privacy notices for the NHS App](#) managed by NHS England.

Change of Details

It is important that you tell the surgery if any of your contact details such as your name or address have changed, or if any of your other contacts details are incorrect including third party emergency contact details. It is important that we are made aware of any changes **immediately** in order that no information is shared in error.

Mobile telephone number

If you provide us with your mobile phone number, we will use this to send you text reminders about your appointments or other health related information. It is within our legal duty as a public authority to keep our patients updated with important information.

We also use the NHS Account Messaging Service provided by NHS England to send you messages relating to your health and care. You need to be an NHS App user to receive these messages. Further information about the service can be found at the [privacy notice for the NHS App](#) managed by NHS England.

Research opportunities: We may contact you by text message to invite you to take part in health and care research activities on behalf of the research organisation. The message will include details of how to sign up if you are interested. Your details will not be shared with the research organisation.

If you do not wish to receive these types of messages, you can opt out by replying to the text message with the words 'opt out'

Email address

Where you have provided us with your email address, we will use this to send you information relating to your health and the services we provide. If you do not wish to receive communications by email, please let us know.

Notification

Data Protection Legislation requires organisations to register a notification with the Information Commissioner to describe the purposes for which they process personal and sensitive information.

We are registered as a Data Controller, and our registration can be viewed online in the public register at: [Register of fee payers and certificate downloads | ICO](#)

Any changes to this notice will be published on our website and in a prominent area at the Practice.

Data Protection Officer

Should you have any data protection questions or concerns, please contact our Data Protection Officer via the surgery at: bwccg.umg@nhs.net

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. You can request any non-personal information that the GP Practice holds, that does not fall under an exemption. You may not ask for information that is covered by the Data Protection Legislation under FOIA. However, you can request this under a right of access request – see section above ‘Access to your information’.

Right to Complain

If you have concerns or are unhappy about any of our services, please contact the Practice Manager via bwccg.umg@nhs.net. Or via the Information Commissioner’s Office (ICO) details listed below.

For independent advice about data protection, privacy, and data-sharing issues, you can contact:

Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Phone: 0303 123 1113 Website: <https://ico.org.uk/global/contact-us>

The NHS Constitution

The NHS Constitution establishes the principles and values of the NHS in England. It sets out the rights patients, the public and staff are entitled to. These rights cover how patients access health services, the quality of care you’ll receive, the treatments and programs available to you, confidentiality, information, and your right to complain if things go wrong. [The NHS Constitution for England - GOV.UK](#)

In our use of health and care information, we satisfy the common law duty of confidentiality because:

- you have provided us with your consent (we have taken it as implied to provide you with care, or you have given it explicitly for other uses)
- we have support from the Secretary of State for Health and Care following an application to the [Confidentiality Advisory Group \(CAG\)](#) who are satisfied that it isn't possible or practical to seek consent
- we have a legal requirement to collect, share and use the data
- for specific individual cases, we have assessed that the public interest to share the data overrides the public interest served by protecting the duty of confidentiality (for example sharing information with the police to support the detection or prevention of serious crime). This will always be considered on a case-by-case basis, with careful assessment of whether it is appropriate to share the particular information, balanced against the public interest in maintaining a confidential health service

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

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

	Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine' Patients have the right to opt out of having their information shared with the SCR by completion of the form which can be downloaded here and returned to the practice. Please note that by opting out of having your information shared with the Summary Care Record could result in a delay to care that may be required in an emergency. Processor – NHS England
Research	Purpose – We may share anonymous patient information with research companies for the purpose of exploring new ways of providing healthcare and treatment for patients with certain conditions. This data will not be used for any other purpose. Where personal confidential data is shared your consent will be required. Where you have opted out of having your information shared for this planning or research your information will not be shared. Legal Basis – - Articles 6(1)(a) and 9(1)(a) – explicit consent; or - Article 6(1)(c) (where we are <i>legally obligated</i> to share your personal data) for your standard personal data and Article 9(2)(j) (scientific research) for your health data. Where identifiable data is required for research, patient consent will be needed, unless there is a legitimate reason under law to do so or there is support under the Health Service (Control of Patient Information Regulations) 2002 ('section 251 support') applying via the Confidentiality Advisory Group in England and Wales. Sharing of aggregated non identifiable data is permitted. Processor – Citizen health record
Individual Funding Requests	Purpose – We may need to process your personal information where we are required to fund specific treatment for you for a particular condition that is not already covered in our standard NHS contract. The clinical professional who first identifies that you may need the treatment will explain to you the information that is needed to be collected and processed to assess your needs and commission your care; they will gain your explicit consent to share this. You have the right to withdraw your consent at any time but this may affect the decision to provide individual funding.

	Legal Basis – - Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ Data processor – NHS Thames Valley & NHS England
Safeguarding Adults	Purpose – We will share personal confidential information with the safeguarding team where there is a need to assess and evaluate any safeguarding concerns and to protect the safety of individuals. Consent is not required to share information for this purpose. Legal Basis – Direct Care under UK GDPR: - Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ Data Processor – Reading Borough Council, Wokingham Borough Council
Safeguarding Children	Purpose – We will share children’s personal information where there is a need to assess and evaluate any safeguarding concerns and to protect the safety of children. Legal Basis – - Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ Consent may not be required to share this information. Data Processor – Brighter future for Children, Wokingham Borough Council
Risk Stratification – Preventative Care	Purpose - ‘Risk stratification for case finding’ is a process for identifying and managing patients who have or may be at-risk of health conditions (such as diabetes) or who are most likely to need healthcare services (such as people with frailty). Risk stratification tools used in the NHS help determine a person’s risk of suffering a particular condition and enable us to focus on preventing ill health before it develops. Information about you is collected from a number of sources including NHS Trusts, GP Federations and your GP Practice. A risk score is then arrived at through an analysis of your de-

	identified information. This can help us identify and offer you additional services to improve your health. If you do not wish information about you to be included in any risk stratification programmes, please let us know. We can add a code to your records that will stop your information from being used for this purpose. Please be aware that this may limit the ability of healthcare professionals to identify if you have or are at risk of developing certain serious health conditions. Type of Data – Identifiable/Pseudonymised/Anonymised/Aggregate Data Legal Basis – - Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ Processors – NHS Thames Valley
Public Health Screening programmes (identifiable) Notifiable disease information (identifiable) Smoking cessation (anonymous) Sexual health (anonymous) Vaccination Programmes	Purpose – Personal identifiable and anonymous data is shared. The NHS provides national screening programmes so that certain diseases can be detected at an early stage. These currently apply to bowel cancer, breast cancer, aortic aneurysms and diabetic retinal screening service to name a few. The law allows us to share your contact information, and certain aspects of information relating to the screening with Public Health England so that you can be appropriately invited to the relevant screening programme. More information can be found at: Population screening programmes - GOV.UK [Or insert relevant link] or speak to the practice. Patients may not opt out of having their personal information shared for Public Health reasons. Patients may opt out of being screened at the time of receiving an invitation. Legal Basis – - Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ Data Processors – Reading Borough Council/ Wokingham Borough Council
Direct Care NHS Trusts	Purpose – Personal information is shared with other secondary care trusts and providers in order to provide you with individual

Community Providers Pharmacies Enhanced care providers Nursing Homes Other Care Providers	direct care services. This could be hospitals or community providers for a range of services, including treatment, operations, physiotherapy, and community nursing, ambulance service. Legal Basis - The processing of personal data in the delivery of direct care and for providers' administrative purposes in this surgery and in support of direct care elsewhere is supported under the following: • Article 6(1)(e) '...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...'; and • Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine Processors – Royal Berkshire Foundation Trust, Frimley Park Hospital NHS foundation trust
Care Quality Commission	Purpose – The CQC is the regulator for the English Health and Social Care services to ensure that safe care is provided. They will inspect and produce reports back to the GP practice on a regular basis. The Law allows the CQC to access identifiable data. More detail on how they ensure compliance with data protection law (including UK GDPR) and their privacy statement is available on our website: Privacy statement - Care Quality Commission Legal Basis – • Article 6(1)(c) '...processing is necessary for compliance with a legal obligation'; and • Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine Processor – Care Quality Commission
Population Health Management	Purpose – Population health management aims to shift the focus from reactive care to proactive, preventative care. It is a critical function of our new integrated care systems and the foundation to building a healthier future together. Health and care services work together as 'Integrated Care Systems' (ICS) and are sharing data in order to: • Understand the health and care needs of the care system's population, including health inequalities • Provide support to where it will have the most impact • Identify early actions to keep people well, not only focusing on people in direct contact with services but looking to join up care across different partners. Type of Data – Identifiable/Pseudonymised/Anonymised/Aggregate Data.

	NB only organisations that provide your care will see your identifiable data. Legal Basis – - Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine Processor - Optum
Payments	Purpose - Contract holding GPs in the UK receive payments from their respective governments on a tiered basis. Most of the income is derived from baseline capitation payments made according to the number of patients registered with the practice on quarterly payment days. These amounts paid per patient per quarter varies according to the age, sex and other demographic details for each patient. There are also graduated payments made according to the practice’s achievement of certain agreed national quality targets known as the Quality and Outcomes Framework (QOF), for instance the proportion of diabetic patients who have had an annual review. Practices can also receive payments for participating in agreed national or local enhanced services, for instance opening early in the morning or late at night or at the weekends. Practices can also receive payments for participating in agreed national or local enhanced services, for instance opening early in the morning or late at night or at the weekends. Practices can also receive payments for certain national initiatives such as immunisation programs and practices may also receive incomes relating to a variety of non-patient related elements such as premises. Finally, there are short term initiatives and projects that practices can take part in. Practices or GPs may also receive income for participating in the education of medical students, junior doctors and GPs themselves as well as research. In order to make patient-based payments basic and relevant necessary data about you needs to be sent to the various payment services. The release of this data is required by English laws. Legal Basis – - Article 6(1)(c) ‘processing is necessary for compliance with a legal obligation to which the controller is subject’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’. Processor – NHS England, ICB, Public Health
GP Clinical System	Purpose – NHS GP surgery clinical systems are digital platforms, that manage patient info, allowing online access via the NHS App for appointments, prescriptions, and viewing records

	(allergies, medicines, results). These systems ensure data sharing between clinicians through GP Connect, improving care, with all practices mandated to provide online access to new record entries. Your medical record will be processed in order that a data base can be maintained, this is managed in a secure way and there are robust processes in place to ensure your medical record is kept accurate, and up to date. Your record will follow you as you change surgeries throughout your life. Closed records will be archived by NHS England Legal Basis – - Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’. Processor – EMIS and PCSE
Medical reports Subject Access Requests	Purpose – Your medical record may be shared in order that solicitors/persons acting on your behalf can conduct certain actions as instructed by you. Insurance companies seeking a medical report where you have applied for services offered by them, can have a copy of your medical history for a specific purpose. Legal Basis – - Article 6(1)(a) – consent for personal data; and - Article 9(2)(a) – explicit consent for special-category data. Processor – Solicitors and insurance organisations iGPR
Medicines Management Team Medicines Optimisation	Purpose – your medical record is shared with the medicines management team pharmacists, in order that your medication can be kept up to date and any necessary changes to medication can be implemented. Legal Basis – - Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ Processor – NHS Thames Valley
GP Federation Out of hours service Urgent care centre	Purpose – Your medical record will be shared with WestCall and Urgent Care Centre in order that they can provide direct care services to the patient population. This could be in the form of

	video consultations, Minor injuries clinics, GP extended access clinics. The Federation will be acting on behalf of the GP practice. Legal Basis – - Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ Processor – Out of Hours Service - WestCall, Urgent Care Centre
Primary Care Network (PCN)	Purpose – Your medical record will only be shared with the University Medical Group in order that they can provide direct care services to the patient population. Legal Basis – - Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ Processor – University Medical Group
Smoking cessation	Purpose – personal information is shared in order for the smoking cessation service to be provided. Only those patients who wish to be party to this service will have their data shared Legal Basis – - Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ Processor – Smoke Free Life Berkshire/Solutions 4 Health
Social Prescribers	Purpose – Access to medical records is provided to social prescribers to undertake a full service to patients dependent on their health social care needs. Only those patients who wish to be party to this service will have their data shared Legal Basis – - Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’

	Processor – Joy
Police	Purpose – Personal confidential information may be shared with the Police authority for certain purposes. The level of sharing and purpose for sharing may vary. Where there is a legal basis for this information to be shared consent will not always be required. The Police will require the correct documentation in order to make a request. This could be but not limited to, DS 2, Court order, s137, the prevention and detection of a crime. Or where the information is necessary to protect a person or community. Legal Basis – UK GDPR - Article 6(1)(c) – to comply with a legal obligation; and - Article 9(2)(j) – ‘for reasons of substantial public interest’ Processor – Police Constabulary
Coroner	Purpose – Personal health records or information relating to a deceased patient may be shared with the coroner. Legal Basis – UK GDPR: - Article 6(1)(c) – to comply with a legal obligation; and - Article 9(2)(h) – ‘necessary for the purposes of preventative or occupational medicine’. Processor – The Coroner
Medical Examiner Service – RBFT	Purpose: Purpose: Medical records associated with deceased patients are outside scope of the UK GDPR. However, next of kin details are within the scope of the UK GDPR. We will share specified deceased patient records and next of kin details with the Medical Examiners within RBFT. Legal Basis: Article 6(1)(c) – necessary under a legal obligation to which the controller is subject”; and Article 9(2)(h)– “processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services” Processor: Medical Examiners service – RBFT
Non-commissioned, private healthcare providers	Purpose – Personal information shared with private health care providers in order to deliver direct care to patients at the patient’s request. Consent from the patient will be required to share data with Private Providers.

	Legal Basis – Articles 6(1)(a) and 9(2)(a) consent by the patient given under contract to the provider. Provider – BUPA, Berkshire Independent Hospital, Spire Dunedin, Circle
Messaging Service	Purpose – Personal identifiable information shared with the messaging service in order that messages including; appointment reminders; results; campaign messages related to specific patients’ health needs; and direct messages to patients, can be transferred to the patient in a safe way. Legal Basis – - Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ Provider - AccuRX - NHSAPP, Accurx EConsult
Remote consultation Including – Video Consultation Clinical photography	Purpose – Personal information including images may be processed, stored and with the patients consent shared, in order to provide the patient with urgent medical advice. Legal Basis – - Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ Patients may be videoed or asked to provide photographs with consent. There are restrictions on what the practice can accept photographs of. No photographs of the full face, no intimate areas, no pictures of patients who cannot consent to the process. No identifiable pictures of children. Processor –AccuRX
MDT meetings	Purpose – For some long-term conditions, the practice participates in meetings with staff from other agencies involved in providing care, to help plan the best way to provide care to patients with these conditions. Personal data will be shared with other agencies in order that mutual care packages can be decided. Legal Basis – - Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’

	Processor – Health and Care staff, e.g. GP's, social workers, nurses.
General Practice Extraction Service (GPES) 1. At risk patients data collection Version 3 2. CVDPREVENT Audit 3. Physical Health Checks for people with Severe Mental Illness 4. National Obesity Audit – NHS Digital	Purpose – GP practices are required to provide data extraction of their patients' personal confidential information for various purposes to NHS England. The objective of this data collection is on an ongoing basis to identify patients registered at General Practices who fit within a certain criteria, in order to monitor and either provide direct care, or prevent serious harm to those patients. Below is a list of the purposes for the data extraction; by using the link you can find out the detail behind each data extraction and how your information will be used to inform this essential work: 1. At risk patients including severely clinically vulnerable 2. NHS England has directed NHS England to collect and analyse data in connection with Cardiovascular Disease Prevention Audit 3. GPES Physical Health Checks for people with Severe Mental Illness (PHSMI) data collection. 4. National Obesity Audit - NHS Digital Legal Basis - All GP Practices in England are legally required to share data with NHS England for this purpose under section 259(1)(a) and (5) of the The Health and Social Care Act 2012 Further detailed legal basis can be found in each link. Any objections to this data collection should be made directly to NHS England. enquiries@nhsdigital.nhs.uk Processor – NHS England
Medication/Prescribing	Purpose: Prescriptions containing personal identifiable and health data will be shared with organisations who provide medicines management including chemists/pharmacies, in order to provide patients with essential medication regime management, medicines and or treatment as their health needs dictate. This process is achieved either by face-to-face contact with the patient or electronically. Pharmacists may be employed to review medication, Patients may be referred to pharmacists to assist with diagnosis and care for minor treatment, patients may have specified a nominated pharmacy they may wish their repeat or acute prescriptions to be ordered and sent directly to the pharmacy making a more efficient process. Arrangements can also be made with the pharmacy to deliver care and medication Legal Basis –

	- Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ Processor – Pharmacy of choice
Professional Training	Purpose – We are a training surgery. Our clinical team are required to be exposed to on the job, clinical experience, as well as continual professional development. On occasion you may be asked if you are happy to be seen by one of our GP registrars, pharmacists or other clinical team to assist with their training as a clinical professional. You may also be asked if you would be happy to have a consultation recorded for training purposes. These recordings will be shared and discussed with training GPs at the surgery, and also with moderators at the RCGP and HEE. Legal Basis – - Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ Recordings remain the control of the GP practice and they will delete all recordings from the secure site once they are no longer required. Processor – University Medical Group
Telephony	Purpose – The practice uses an internet-based telephony system that records telephone calls, for their own purpose and to assist with patient consultations. The telephone system has been commissioned to assist with the high volume and management of calls into the surgery, which in turn will enable a better service to patients. We record incoming and outgoing calls. Our phone system is set to automatically retain calls for 36 months. After this point, the recordings are automatically deleted. The 36-month retention period enables us to download and retain exact and unaltered copies of calls where required for medico-legal purposes. Legal Basis – While there is a robust contract in place with the processor, the surgery has undertaken this service to assist with the direct care of patients in a more efficient way. - Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’

	Provider – Surgery Connect – X-ON
Learning Disability Mortality Programme LeDer	Purpose: The Learning Disability Mortality Review (LeDeR) programme was commissioned by NHS England to investigate the death of patients with learning difficulties and Autism to assist with processes to improve the standard and quality of care for people living with a learning disability and Autism. Records of deceased patients who meet with this criteria will be shared with NHS England. Legal Basis: It has approval from the Secretary of State under section 251 of the NHS Act 2006 to process patient identifiable information who fit within a certain criteria. Processor : NHS Thames Valley, NHS England
GP Connect	Purpose: In order for the practice to have access to a shared record, the Integrated Care Service has commissioned a number of systems including GP Connect, which is managed by NHS England. GP Connect - NHS England Digital GP Connect makes patient information available to all appropriate clinicians when and where they need it, to support direct patients care, leading to improvements in both care and outcomes. GP Connect is not used for any purpose other than direct care. GP Connect provides a method of secure information transfer and reduces the need to use less secure or less efficient methods of transferring information, such as email or telephone. GP Connect transparency notice - NHS England Digital Legal Basis – - Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ Processor: NHS England
Shared Care Record	Purpose: The shared care record will assist in patient information being used for a number of care related services. These may include Population Health Management, Direct Care, and analytics to assist with planning services for the use of the local health population. Where data is used for secondary uses no personal identifiable data will be used.

	Where personal confidential data is used for research explicit consent will be required. Legal Basis – - Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ Processor: NHS England
Local shared care record (Connective Care)	Purpose: Health and Social care services are developing shared systems to share data efficiently and quickly. It is important for anyone treating you to be able to access your shared record so that they have all the information they need to care for you. This will be during your routine appointments and in urgent situations such as going to A&E, calling 111 or going to an Out of hours appointment. It is also quicker for staff to access a shared record than to try to contact other staff by phone or email. Only authorised staff can access the systems and the information they see is carefully checked so that it relates to their job. Systems do not share all your data, just data which services have agreed is necessary to include. Legal Basis – - Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ Processor: Frimley Park Hospital NHS foundation trust
Anticoagulation Monitoring	Purpose: Personal Confidential data is shared with LumiraDX in order to provide an anticoagulation clinic to patients who are on anticoagulation medication. This will only affect patients who are within this criteria. Legal Basis – - Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ Processor: LumiraDX INRStar
Online access	Purpose: To allow patients to access their GP medical record online via the NHS App. The view all documents and entries made into their record by the GP, including information sent to

	the GP Practice where exemptions do not apply. Where a patient has requested third party access (family/friends) to their medical records, it is the patient's responsibility to ensure removal of this access if no longer required. Proxy access to the patient's record will be limited unless the patient has requested full access. Legal Basis: UK GDPR: - Article 6(1)(e) Necessary for the performance of a task carried out in the public interest - Article 9(2)(h) Necessary for provision of health and/or social care, including preventative or occupational medicine Common Law Duty of Confidentiality (CLDC): - The CLDC is satisfied as the data subjects are accessing their own data following sign up for a relevant app or platform and selecting the option to view their GP record. Processor: NHS Digital, Optum- Emis
EMIS Consultation Writeback	Purpose: Our GP practice uses a system functionality called EMIS consultation writeback. It allows other authorised NHS organisations involved in your direct care to add relevant clinical information directly into your GP record. Legal Basis: Article 6(1)e – Task carried out in the public interest. Article 9(2)h – Provision of Health or Social Care. Processor: Optum - Emis
Electronic reporting solution – Managed Service	Purpose: The iGPR Electronic Reporting Solution provides GP Practices a solution to manage Subject Access Requests (SARs) under UK GDPR <i>and other requests for information</i> that are received from patients and third parties. The solution integrates directly with the practice clinical system. iGPR acts as a data Processor and securely reviews, prepares and supplies copies of medical records or reports when we as your GP practice are either legally required or when you have given your consent. Legal Basis: Under GDPR the surgery has used its legal basis of Article 6 1(c) it is necessary under a legal obligation to which the controller is subject Article 6 1 (e) Public Task - it is necessary for the performance of a task carried out in the public interest or under official authority vested in the controller Article 9 2 (a) health data - the data subject has given explicit consent Processor: iGPR Technologies Ltd

NHSMail and Office 365 (N365 Applications and SharePoint)	Purpose: NHSMail and Office 365 help NHS staff work more securely and efficiently which directly benefits our patients: · Security: Emails are encrypted keeping your sensitive information safe. · Collaboration: Staff can easily work together saving time and improving care. · Reliability: The system is supported 24/7 to avoid service disruptions. • National Reach: Staff can easily connect across different NHS organisations. • Safety: Advanced protection against viruses and spam keeps information secure. • Flexibility: Staff can communicate without disruption even if organisations change. These tools support the NHS's goal of improving digital care and collaboration. Legal Basis: Article 6(1)e - “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller”; Article 9(2)h - “processing is necessary for the purposes of preventive or occupational medicine”; Processor: Accenture Sub-processor: Microsoft
Child Health Information Services (CHIS)	Purpose – South Central and West Child Health Information Services (SCW CHIS) is commissioned by NHS England to support the monitoring of care delivered to children. Personal data is collected from the child’s GP record to enable health screening, physical examination and vaccination services to be monitored to ensure that every child has access to all relevant health interventions. For more information: Fair Processing Notice Child Health Information Services - NHS SCW Support and Transformation for Health and Care (scwcsu.nhs.uk) Legal Basis – Article 6(1)(e); ‘necessary... in the exercise of official authority vested in the controller’ and Article 9(2)(h) as stated below. Processor – SCW, Apollo Medical Software Solutions, SystemC
JifJaff MyBotGP	Purpose: JifJaff Ltd, as an organisation, will not process any personal data. The practice is simply purchasing the software and subscribing to technical support. Additionally, the delivery of technical support will not entail the processing of any personal data. The practice is to use JifJaff MyBotGP (“the RPA Bot”) software – a Bot – to file the practice’s “normal” pathology results.

	The Bot will be used to automate the filing of Pathology results on the practice's existing systems, mimicking the keystrokes that a clerical staff member would normally perform when undertaking this task. JiffJaff Ltd, as the manufacturer, has undertaken a Clinical Risk Management test to the standard DCB0129. Attached documents include Clinical Safety Case Report, Hazard Log, Risk Management Plan & Risk Management System Legal Basis of Processing: The lawful basis for the use of JiffJaff for the provision of health and/or social care services is: Article 6(1)(e) '...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...' Article 9(2)(h) '... the provision of health or social care or treatment of management of health or social care systems...' Processor – University Medical Group
Anima	Purpose: To provide cloud-based real-time transcription services for patient consultations administered by the practice. This helps the practice to accurately capture the content of patient consultations. This helps to support the provision of direct care by maintaining accurate patient records within the practice, recording all communications with the patient as part of their consultations is necessary. Artificial intelligence ('AI') is used in the product to perform some select functions, including to suggest potential clinical codes based on the content of the consultation. Legal Basis – Article 6(1)e "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"; and Article 9(2)h "processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services, on the basis of domestic law". Audio recordings used to generate notes are not stored permanently, they are processed and then automatically deleted, ensuring your data remains private and secure.

	The patient can opt out of the use of this software as the clinician will always ask for consent to use before the consultation is recorded. Processor: Continuum Health Limited (supplier of Anima)
Appliance Prescribing Service	Purpose: Appliance Prescribing Service takes control of prescribing and ongoing prescription management, realigning product decisions around the needs of the patient and addressing waste issues by ensuring quantities requested are in line with patient requirements. Legal Basis – Article 6(1)e “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller”; and Article 9(2)h “processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services, on the basis of domestic law”. Patients who do not wish their data to be used as part of this process and do not wish to use this service should inform the practice so arrangement can be made regarding the prescribing of appliances. Processor: Bullen appliance prescribing service is patient management system. Bullen uses Microsoft Dynamic Great Plains system to keep records of care and supported by ISC Software Ltd. Bullen also use EMIS Web. Bullen realigns product decisions around the needs of the patient and addressing waste issues by ensuring quantities requested are in line with patient requirements.

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