



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. We will keep your information in written form and/or in digital form

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), the Data Protection Act (DPA) 2018, 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 your permission when the practice is closed. 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 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.

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.

How long do we hold information for?

All records held by the Practice will be kept for the duration specified by national guidance from NHS Digital, [Health and Social Care Records Code of Practice](#). 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 Health and Social Care 2016.

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’. For further information please visit: [The NHS Constitution](#)

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 direct care, or in particular circumstances required by law, such as a public health emergency like an outbreak of a pandemic disease. If you wish to apply a Type 1 Opt Out you can do so by completing this [form](#) and sending it to sxibc-esx.foundryhealthcarelewes@nhs.net.

National data opt-out

The national data opt-out was introduced on 25 May 2018, enabling patients to opt-out from the use of their data for research or planning purposes, in line with the recommendations of the National Data Guardian in her Review of Data Security, Consent and Opt-Outs.

By 2020 all health and care organisations are required to apply national data opt-outs where confidential patient information is used for research and planning purposes. NHS Digital has been applying national data opt-outs since 25 May 2018. Public Health England has been applying national data opt-outs since September 2018.

The national data opt-out replaces the previous ‘type 2’ opt-out, which required NHS Digital not to share a patient’s confidential information for purposes beyond their individual care. Any patient that had a type 2 opt-out recorded on or before 11 October 2018 has had it automatically converted to a national data opt-out. Those aged 13 or over were sent a letter giving them more information and a leaflet explaining the national data opt-out. For more information go to [National data opt out programme](#)

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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.

Right of Access to your information (Subject Access Request)

Under Data Protection Legislation everybody has the right have access to, or request a copy of, information we hold that can identify you, this includes your medical record, there are some safeguards regarding what you will have access and you may find information has been redacted or removed for the following reasons;

- Does not cause harm to the patient
- That legal confidentiality obligations for the non-disclosure of third-party information are adhered to



You do not need to give a reason to see your data. And requests can be made verbally or in writing. Although we may ask you to complete a form in order that we can ensure that you have the correct information you require.

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

You will need to provide proof of identity to receive this information.

If you would like to access your GP record online click here

www.foundryhealthcarelewes.co.uk

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 especially if any of your other contacts details are incorrect. 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 may use this to send you text reminders about your appointments or other health screening information. Please let us know if you do not wish to receive text reminders on your mobile.

Email address

Where you have provided us with your email address, with your consent 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: [http://ico.org.uk/what we cover/register of data controllers](http://ico.org.uk/what-we-cover/register-of-data-controllers)

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: hwlhccg.foundryhealthcarelewes@nhs.net (For the attention of Dr James Annis)

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 Shelley Christou, Patient Services Manager.

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

The Information Commissioner
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

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

The NHS Care Record Guarantee

The NHS Care Record Guarantee for England sets out the rules that govern how patient information is used in the NHS, what control the patient can have over this, the rights individuals have to request copies of their data and how data is protected under Data Protection Legislation.

<http://systems.digital.nhs.uk/infogov/links/nhscrg.pdf>

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.

<https://www.gov.uk/government/publications/the-nhs-constitution-for-england>

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

Activity	Rationale
ICB	<p>Purpose – Anonymous data is used by the ICB for planning and performance as directed in the practices contract.</p> <p>Legal Basis – Contractual</p>

	<p>Processor – High Weald Lewes and Havens</p>
Summary Care Record	<p>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.</p> <p>Legal Basis – Direct Care</p> <p>Please be aware that if you choose to opt-out of SCR, NHS healthcare staff caring for you outside of this surgery may not be aware of your current medications, allergies you suffer from and any bad reactions to medicines you have had, in order to treat you safely in an emergency. Your records will stay as they are now with information being shared by letter, email, phone. If you wish to opt-out of having an SCR please return a completed opt-out form to the practice.</p> <p>Processor – NHS England and NHS Digital</p>
Research	<p>Purpose – We many share personal confidential or anonymous information with research companies. Where you have opted out of having your identifiable information shared for this purpose your information will be removed.</p> <p>Legal Basis – consent is required to share confidential patient information for research, unless there is have support under the Health Service (Control of Patient Information Regulations) 2002 ('section 251 support') applying via the Confidentiality Advisory Group in England and Wales</p> <p>Processor – National Diabetes Audit Programme</p>
Health risk analysis	<p>Purpose: Special category (Health data) Personal data may be shared with the third party in order to provide risk analysis for specific conditions. The purpose is to provide the health care professionals with a timely response to multiple risk factors in order to improve health care for patients. Only those patients who have consented to this process will have their data shared. No personal confidential data will be shared with the third party directly.</p> <p>Legal Basis: under UK GDPR Article 6 1 (e) Public task and article 9 2 (h) Health data. With additional legal basis of Consent.</p> <p>Processor: Metadvice</p>
Individual Funding Requests	<p>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 contracts.</p> <p>Legal Basis - The clinical professional who first identifies that you may need the treatment will explain to you the information that is needed to be collected and processed in order to assess your needs and commission your care; they will gain your explicit consent to share this. You have the right to withdraw your consent at any time</p>

	<p>Data processor – Senior IFR Panel Officer, Sussex Commissioning Support Unit</p>
Safeguarding Adults	<p>Purpose – We will share personal confidential information with the safeguarding team where there is a need to assess and evaluate any safeguarding concerns.</p> <p>Legal Basis - Because of public Interest issues, e.g. to protect the safety and welfare of vulnerable adults, we will rely on a statutory basis rather than consent to process information for this use.</p> <p>Data Processor – East Sussex Safeguarding Team</p>
Safeguarding Children	<p>Purpose – We will share childrens personal information where there is a need to assess and evaluate any safeguarding concerns.</p> <p>Legal Basis - Because of public Interest issues, e.g. to protect the safety and welfare of Safeguarding we will rely on a statutory basis rather than consent to share information for this use.</p> <p>Data Processor – East Sussex Safeguarding Children Partnership ESSCP</p>
Risk Stratification = Preventative Care	<p>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.</p> <p>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.</p> <p>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.</p> <p>Type of Data – Identifiable/Pseudonymised/Anonymised/Aggregate Data</p> <p>Legal Basis GDPR Art. 6(1) (e) and Art.9 (2) (h). The use of identifiable data by CCGs and GPs for risk stratification has been approved by the Secretary of State, through the Confidentiality Advisory Group of the Health Research Authority (approval reference (CAG 7-04)(a)/2013)) and this approval has been extended to the end of September 2022 NHS England Risk Stratification which gives us a statutory legal basis under Section 251 of the NHS Act 2006 to process data for risk stratification purposes which sets aside the duty of confidentiality. We are committed to conducting risk stratification effectively, in ways that are consistent with the laws that protect your confidentiality.</p>

	<p>Processors – GRASP</p>
Workload and Workforce transformation	<p>Purpose: The purpose of this project is to use staff and patient data to inform where there is a need for resource to be reviewed to maximise appointment time, depending on the need and volume of patients. The data being used will be Pseudonymised and as such will not be identifiable by the organisation processing the data.</p> <p>It is hoped that by analysing the workflow of clinical time and appointment setting, a more robust workforce pattern can be established to provide a greater service for patients and improve quality.</p> <p>Legal Basis: under UK GDPR 6 1 (e) Public Task 9 2 (h) Health data</p> <p>Processor: Apex, SCW CSU</p>
<p><u>Public Health</u> Screening programmes (identifiable) Notifiable disease information (identifiable) Smoking cessation (anonymous) Sexual health (anonymous)</p>	<p>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. The law allows us to share your contact information with Public Health England so that you can be invited to the relevant screening programme.</p> <p>More information can be found at: https://www.gov.uk/topic/population-screeningprogrammes [Or insert relevant link] or speak to the practice</p> <p>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</p> <p>Data Processors – East Sussex County Council, Public Health https://www.eastsussex.gov.uk/socialcare/providers/health/</p>
<u>NHS Trusts</u>	<p>Purpose – Personal information is shared with other secondary care trusts in order to provide you with direct care services. This could be hospitals or community providers for a range of services, including treatment, operations, physio, and community nursing, ambulance service.</p> <p>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 and 9 conditions as stated below:</p> <p>Processors – Brighton and Sussex University Hospitals, East Sussex Healthcare Trust</p>
<u>Care Quality Commission</u>	<p>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.</p> <p>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) as stated below</p>

<p>Payments, Invoice validation</p>	<p>Processors – Care Quality Commission</p> <p>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 amount 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 (QUOF), for instance the proportion of diabetic patients who have had an annual review. Practices can also receive payments for participating in agreed national or local enhanced services, for instance opening early in the morning or late at night or at the weekends. Practices can also receive payments for certain national initiatives such as immunisation programs and practices may also receive incomes relating to a variety of non patient related elements such as premises. Finally there are short term initiatives and projects that practices can take part in. Practices or GPs may also receive income for participating in the education of medical students, junior doctors and GPs themselves as well as research. In order to make patient based payments basic and relevant necessary data about you needs to be sent to the various payment services. The release of this data is required by English laws.</p> <p>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) ‘as stated below</p> <p>Data Processors – NHS England, CCG, Public Health</p>
<p>Patient Record data base</p>	<p>Purpose – Your medical record will be shared, in order that a data base can be maintained and managed in a secure way</p> <p>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</p> <p>Processor – SystmOne (TPP)</p>
<p>SystmOne Record Sharing (EDSM)</p>	<p>Purpose SystmOne’s Enhanced Data Sharing Model (eDSM) enables GP practices to share patient records securely with other healthcare organisations to support direct care. Implied sharing allows essential medical information to be accessible to an approved list of authorised NHS Sussex organisations, ensuring timely and effective care. Patients can record explicit consent or dissent to tailor how their data is shared.</p> <p>Legal Basis The processing of patient data under eDSM is supported by the following legal bases:</p> <p>Article 6(1)(e): "Necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller."</p> <p>Article 9(2)(h): "Necessary for the provision of health or social care or treatment or the management of health or social care systems."</p>

	<p>These legal bases ensure the appropriate and lawful sharing of medical information for patient care.</p> <p>Patient Options</p> <p>Implied Sharing: Patient records are shared by default to support care unless a specific preference is recorded.</p> <p>Explicit Consent: Patients can authorise specific organisations to access their records.</p> <p>Dissent: Patients can opt out of sharing their records entirely or restrict access to certain organisations.</p> <p>Patients can update their sharing preferences at any time through their GP practice or via SystemOnline.</p> <p>Processor – TPP SystemOne For more information, please contact your GP practice.</p>
<p>General Practice Extraction Service (GPES) <i>(section becomes obsolete 01/09/2021)</i></p>	<p>Purpose – GP practices are required by law to provide data extraction of their patients personal confidential information for various purposes by NHS Digital. The objective of this data collection is on an ongoing basis to identify patients registered at General Practices who fit within a certain criteria, in order to monitor and either provide direct care, or prevent serious harm to those patients. Below is a list of the purposes for the data extraction, by using the link you can find out the detail behind each data extraction and how your information will be used to inform this essential work:</p> <p>You can find the approval certificate and details including individual legal basis for all data extractions by following the link below.</p> <p>https://digital.nhs.uk/data-and-information/information-standards/information-standards-and-data-collections-including-extractions/publications-and-notifications/standards-and-collections/gp-data-collections</p> <p>Legal Basis - All GP Practices in England are legally required to share data with NHS Digital for this purpose under section 259(1)(a) and (5) of the 2012 Act</p> <p>Any objections to these data collections should be made directly to NHS Digital. enquiries@nhsdigital.nhs.uk</p> <p>Processor – NHS Digital or NHS X</p>
<p>General Practice Data for Planning and Research (GPDPR)</p>	<p>Purpose: Patients personal confidential data will be extracted and shared with NHS Digital in order to support vital health and care planning and research. Further information can be found here</p> <p>Patients may opt out of having their information shared for Planning or Research by applying a National Data Opt Out or a Type 1 Opt Out. Details of how to Opt Out can be found on our Privacy Notice. For the National Data Opt Out patients are</p>

	<p>required to register their preference below. https://www.nhs.uk/your-nhs-data-matters/</p> <p>For Type 1 Opt Out they can complete the form and return it to their registered practice for action by the 23rd June 2021. https://nhs-prod.global.ssl.fastly.net/binaries/content/assets/website-assets/data-and-information/data-collections/general-practice-data-for-planning-and-research/type-1-opt-out-form.docx</p> <p>Legal Basis : The legal basis for this activity can be found at this link : General Practice Data for Planning and Research: NHS Digital Transparency Notice - NHS Digital</p> <p>Processor: NHS Digital</p>
<p>Technical Solution Pseudonymisation</p>	<p>Purpose: Personal confidential and special category data in the form of medical record, is extracted under contract for the purpose of pseudonymisation. This will allow no patient to be identified within the data set that is created. SCWCSU has been commissioned to provide a data processing service for the GPs, no other processing will be undertaken under this contract.</p> <p>Legal Basis: Under UKGDPR the legitimate purpose for this activity is under contract to provide assistance. Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below</p> <p>Processor: SCW CSU</p>
<p>Shared Care Record</p>	<p>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 Digital, to enable a shared care record, which will assist in patient information to be used for a number of care related services. These may include Population Health Management, Direct Care, and analytics to assist with planning services for the use of the local health population. Where data is used for secondary uses no personal identifiable data will be used. Where personal confidential data is used for Research explicit consent will be required.</p> <p>Legal Basis: Under UK GDPR Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below</p> <p>Processor: Plexus, NHS Digital, ESHT, ICS member providers</p>
<p>Anticoagulation Monitoring</p>	<p>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.</p> <p>Legal Basis: The legal basis for this activity under UK GDPR is Article 6 1 (b) processing is necessary for the performance of a contract to which the data subject</p>

	<p>is party or to take steps at the request of the data subject prior to entering into a contract. Article 6 (e) Public Task (Direct Care) and 9 2 (h) Health Data</p> <p>Processor : LumiraDX INRStar</p>
iGPR	<p>Purpose – Your medical record will be shared in order that a report can be provided to agencies such as insurance companies or solicitors</p> <p>Legal Basis – Your consent will be required to share your record for this purpose</p> <p>Processor - iGPR</p>
Medicines Optimisation OptimiseRX AnalyseRX Oberoi	<p>Purpose – Your anonymous aggregated information will be shared in order to optimise medication. This will enable your GP to provide a more efficient medication regime for your personal care. Some of the anonymous information may be used nationally to drive wider understanding of the medication is used. No patients will be able to identified from the data shared.</p> <p>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</p> <p>Processor - FDB</p>
Texting Service	<p>Purpose – Personal identifiable information shared with the texting service in order that text messages including appointment reminders, campaign messages related to specific patients health needs and direct messages to patients</p> <p>Legal Basis – Consent from patients and direct care</p> <p>Provider - AccuRX</p>
Remote consultation Including – Video Consultation Clinical photography	<p>Purpose – Personal information including images may be processed, stored and with the patients consent shared, in order to provide the patient with urgent medical advice during the COVID-19 pandemic.</p> <p>Legal Basis – Direct Care and Consent</p> <p>Patients will be asked to provide consent if required to provide photographs of certain areas of concern. There are restrictions on what the practice can accept photographs of. No photographs of the full face, no intimate areas, no pictures of patients who cannot consent to the process. No pictures of children.</p> <p>Processor – AccuRX, e-Consult</p>
Medicines Management Team ICB	<p>Purpose – your medical record is shared with the ICB medicines management team, in order that your medication can be kept up to date and any changes can be implemented.</p> <p>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</p> <p>Processor – Medicines Management team at NHS Sussex ICB</p>

<p>The Medicines Management Team Ltd</p>	<p>Purpose – your medical record is shared with the medicines management team, in order that your medication can be managed, kept up to date, and any changes can be implemented. Carrying out medication reviews, medication reconciliation of discharge summaries, clinical letters etc.</p> <p>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</p> <p>Processor – The Medicines Management Team Ltd: https://www.medicinesteam.co.uk/privacy-notice</p>
<p>Smoking cessation</p>	<p>Purpose – personal information is shared in order for the smoking cessation service to be provided.</p> <p>Legal Basis – consented</p> <p>Processor – OneYou</p>
<p>Social Prescribing</p>	<p>Purpose - the practice patient recording system will be made available to the AGE UK organisation in order to provide a social prescribing service to their patients. Patients will be asked to consent to being referred into the service, and allow their individual record to be accessed at the time of contact. All access in to the GP medical recording system will be monitored.</p> <p>Legal Basis: This activity is being undertaken as an enhanced direct care service. UKGDPR Article 6 1(e) Public Task Article 9 2(h) Health data will apply.</p> <p>Processor: AGE UK</p>
<p>Mental Health provider</p>	<p>Purpose – personal information is shared in order for the Mental Health service to be provided.</p> <p>Legal Basis – consented</p> <p>Processor – STAR</p>
<p>Learning Disability Mortality Programme LeDeR</p>	<p>Purpose - The Learning Disability Mortality Review (LeDeR) programme was commissioned to improve the standard and quality of care for people with a learning disability.</p> <p>Legal Basis: It has approval from the Secretary of State under section 251 of the NHS Act 2006 to process patient identifiable information without the patient’s consent.</p> <p>Processor - Bristol University, NECS</p>
<p>Newsletter</p>	<p>Purpose: The practice has contracted the use of a third party processor to email the Practices newsletter to patients. This is achieved by using a secure portal to upload and send information to patients about essential information relating to the function of the practice. The practice will have total control over the information shared, namely email addresses. Patients will have the right to decline receipt of the newsletter in this way by unsubscribing or letting the practice know their wishes. No patient data will be used for any other purpose.</p>

	<p>The processor will not have access to any other data relating to the patient.</p> <p>Legal Basis : Under UK GDPR 6 1 (b) contractual arrangement with Mailchimp 6 1 (e) Public Task, the practice has a statutory duty to provide health care to patients</p> <p>Processor: Mailchimp</p>
<p>Online Consultations (Anima)</p>	<p>Purpose - PREVENTIVE OR OCCUPATIONAL MEDICINE: Collect medical information and symptoms direct from patients to support the practice in triage, consultations and appointment prioritisation.</p> <p>Legal Basis - Your consent will be required on Anima account creation and the lawful basis for processing data associated with GPs’ online consultation services is Article 6(1)(e)</p> <p>Processor – Anima (continuum Health Limited). Privacy Policy: https://www.animahealth.com/privacy-policy#:~:text=We%20will%20share%20information%20only,direct%20care%20relationship%20with%20you.</p>
<p>Documents Management (Anima)</p>	<p>Purpose - To securely manage and process patient-related documents and correspondence, enabling efficient healthcare administration and supporting the delivery of patient care.</p> <p>Legal Basis -</p> <ul style="list-style-type: none"> • Article 6(1)(e) of GDPR: Processing necessary for tasks in the public interest • Article 9(2)(h) of GDPR: Processing necessary for medical diagnosis, provision of health care, and management of health systems <p>Processor – Anima (continuum Health Limited). Privacy Policy: https://www.animahealth.com/privacy-policy#:~:text=We%20will%20share%20information%20only,direct%20care%20relationship%20with%20you</p>
<p>Healthtech1</p>	<p>Purpose - Personal information is shared with Healthtech 1 for the providers’ administrative purposes of registering patients at the practice using the clinical system, SystemOne.</p> <p>Legal Basis - Providing services for: the provision of health care or treatment the management of health care systems or services or social care systems or services</p> <p>The lawful basis lies within Article 6 of the UK GDPR.: 6(1)(e) Public task: the processing is necessary for ‘You’ to perform a task in the public interest or for your official functions, and the task or function has a clear</p>

	<p>basis in law. The lawful basis of processing special category data lies within Article 9 of the UK GDPR: 9(2)(h) ‘...medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems...’</p> <p>Additionally in Data Protection Act 2018 (Schedule 10, 8. Medical Purposes (1,b)): Medical purposes: 8(1)The processing is necessary for medical purposes and is undertaken by —</p> <p>(a) a health professional, or</p> <p>(b) a person who in the circumstances owes a duty of confidentiality which is equivalent to that which would arise if that person were a health professional.</p> <p>Data Processor - Healthtech1</p>
<p>ABC Federation</p>	<p>Purpose Your medical record is shared with ABC (Alliance for Better Care) Federation, an outsourced service, to assist with the processing of GP practice documents and referrals. This includes typing and sending referral documents on our behalf, ensuring timely and efficient management of your care and supporting the administrative functions of the practice.</p> <p>Legal Basis</p> <ul style="list-style-type: none"> • Article 6(1)(e): "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): "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." <p>Processor ABC (Alliance for Better Care) Federation, acting under the direction of Foundry Healthcare, processes GP practice documents and manages referrals as an outsourced secretarial service. All tasks are carried out securely and in compliance with data protection regulations. https://allianceforbettercare.org/</p>
<p>Insight Solutions</p>	<p>Purpose Your medical record is shared with Insight Solutions, an outsourced service, to assist with the processing of GP practice documents. This ensures that your records are accurately maintained, enabling the efficient delivery of administrative tasks to support your care.</p> <p>Legal Basis</p>

	<ul style="list-style-type: none">• Article 6(1)(e): "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): "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." <p>Processor Insight Solutions, acting under the direction of Foundry Healthcare, processes GP practice documents securely and in accordance with data protection regulations. Privacy Policy: https://www.insightsol.co.uk/about/privacy-policy/</p>
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<p>ACR project for patients with diabetes</p>	<p>Purpose – The data is being processed for the purpose of delivery of a programme, sponsored by NHS Digital, to monitor urine for indications of chronic kidney disease (CKD) which is recommended to be undertaken annually for patients at risk of chronic kidney disease e.g., patients living with diabetes. The programme enables patients to test their kidney function from home.</p> <p>We will share your contact details with Healthy.io to enable them to contact you and confirm that you wish them to send you a test kit. This will help identify patients at risk of kidney disease and help us agree any early interventions that can be put in place for the benefit of your care. Healthy.io will only use your data for the purposes of delivering their service to you. If you do not wish to receive a home test kit from Healthy.io, we will continue to manage your care within the Practice. Healthy.io are required to hold data we send them in line with retention periods outlined in the Records Management code of Practice for Health and Social Care.</p> <p>Further information about this is available at: http://bit.ly/uACRtest.</p> <p>Legal Basis – Direct Care</p> <p>The sharing is to support Direct Care which is covered under</p> <p>Article 6(1)(e): “necessary... in the exercise of official authority vested in the controller’</p> <p>And</p> <p>Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services...”</p> <p>Processor – Healthy.io</p>
<p>Prospective online access</p>	<p>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.</p> <p>Legal Basis: UK GDPR:</p> <ul style="list-style-type: none"> • 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 <p>Common Law Duty of Confidentiality (CLDC):</p> <ul style="list-style-type: none"> • 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. <p>Processor: NHS Digital, TPP SystemOne</p>

<p>Heidi Health (AI Scribe)</p>	<p>Purpose</p> <p>Foundry Healthcare uses Heidi Health, an AI scribe software, to transcribe consultations and enhance documentation processes. Explicit consent is obtained from patients before using Heidi during consultations, ensuring accurate and efficient record-keeping.</p> <p>Legal Basis</p> <p>The processing of patient data via Heidi Health is supported by:</p> <ul style="list-style-type: none"> • Article 6(1)(e): "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): "Necessary for the provision of health or social care or treatment or the management of health or social care systems." • Explicit Consent (Article 6(1)(a) and Article 9(2)(a)): Explicit consent is obtained before Heidi Health is used during consultations. <p>Processor</p> <p>Heidi Health operates under the direction of Foundry Healthcare to securely transcribe consultation notes. Heidi Health ensures no patient data is used to train or improve AI models.</p> <p>For more information, visit Heidi Health's website or contact support@heidihealth.com</p>
	<p>Purpose</p> <p>When you call to order medication or book appointments, your call and relevant details may be processed via Voice Connect on behalf of the practice. This enables secure PIN-protected ordering of repeat prescriptions and appointment booking, with your instructions entered directly into the clinical system. Personal and special category data (such as name, date of birth, NHS number, medication details, appointment information) may be processed. Voice Connect acts as a secure processor, and no personal data is used for training or analysis—only anonymised data is handled if any system audits or improvements are conducted. All processing is subject to human oversight to ensure accuracy and protection.</p> <p>Legal Basis</p> <ul style="list-style-type: none"> • Article 6(1)(e): Necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller (i.e., the practice). • Article 9(2)(h): Necessary for the provision of health or social care or treatment, or the management of health or social care systems and services. <p>Processor</p> <p>Voice Connect Ltd (a specialist telephony processor working with EMIS, SystmOne, Vision, and other clinical systems processes your call data securely under the</p>

	<p>direction of the practice. Technical and organisational safeguards are in place to comply with GDPR and NHS data security standards. Voice Connect retains call logs according to NHS and contractual requirements and deletes them per their retention policy. https://voiceconnect.co.uk/wp-content/uploads/2023/11/Voice_Connect_-_Privacy_Notice_-_2023-10-31.pdf</p>
<p>AI Workflow Tool (HERE)</p>	<p>Purpose</p> <p>Your clinical letters may be processed by Practice Unbound and its technical partner Blum on behalf of Foundry Healthcare. This is part of a project to develop an AI tool that supports administrative staff in handling patient correspondence more efficiently. The tool analyses clinical letters and recommends appropriate coding and actions within your Electronic Patient Record (EPR). While the letters may contain personal and special category data (such as your name, NHS number, and clinical information), only pseudonymised information will be used to train the AI model. Identifiable information will not be used for model training. All data is handled under strict human oversight to ensure appropriate and secure use.</p> <p>Legal Basis</p> <ul style="list-style-type: none"> • Article 6(1)(e): "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): "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." <p>Processor</p> <p>Practice Unbound and Blum are acting on behalf of Foundry Healthcare to support the processing of clinical letters. Only pseudonymised data is used to train AI models. All processing is carried out securely and in compliance with data protection legislation. https://practiceunbound.org/</p>
<p>Blood Glucose Test Strip and Lancet Prescription Review</p>	<p>Purpose</p> <p>This service reviews the prescribing of blood glucose test strips and lancets at the GP practice to ensure they align with ICB formulary guidance and practice preferences. Where appropriate, prescriptions may be updated to Contour Plus test strips and Microlet lancets to support safe and effective diabetes management.</p> <p>Legal Basis</p>

	<p>The processing of patient data under this service is based on:</p> <p>Article 6(1)(e) – Necessary for tasks carried out in the public interest.</p> <p>Article 9(2)(h) – Necessary for the provision and management of health care.</p> <p>These legal bases allow the GP practice to review and update prescriptions to ensure best practice prescribing.</p> <p>Processor</p> <p>The GP practice is the Data Controller, with a designated Data Processor conducting the review securely and in compliance with data protection regulations.</p> <p>Patient Choice</p> <p>Patients can contact the GP practice if they wish to discuss their prescription or opt out of any changes.</p>
<p>SID (Sussex Integrated Dataset)</p>	<p>Purpose</p> <p>Foundry Healthcare contributes to the Sussex Integrated Dataset (SID), which supports Population Health Management across the Sussex Health and Care Partnership (SHCP).</p> <p>The SID enables health and care organisations across Sussex to analyse and plan services more effectively, improving health outcomes and care coordination for local residents.</p> <p>Data shared into the SID is pseudonymised before transfer, meaning individuals are not directly identifiable. The pseudonymised data may, in limited cases, be re-identified for direct care purposes (for example, to support specific patient groups identified through population health analysis).</p> <p>Legal Basis</p> <p>The processing of personal data for inclusion in the Sussex Integrated Dataset is underpinned by the following legal bases:</p> <ul style="list-style-type: none"> • Article 6(1)(e) – Public Task: Processing is necessary for the performance of a task

	<p>carried out in the public interest or in the exercise of official authority, as defined in the Health and Social Care Act 2012.</p> <ul style="list-style-type: none"> Article 9(2)(h) – Provision and management of health and social care systems: Processing is necessary for the purposes of preventive or occupational medicine, medical diagnosis, or the management of health and social care systems and services. <p>These legal bases enable the sharing and analysis of data for research, planning and system improvement (secondary uses / indirect care) across SHCP, while maintaining the confidentiality and protection of individuals’ information.</p> <p>Processor</p> <p>The Sussex Health and Care Partnership (SHCP) acts as the data processor for the SID, managing the combined dataset on behalf of contributing organisations.</p> <p>Data is stored securely, with strict governance, and is only accessible to approved projects that demonstrate clear benefit to health and care services across Sussex.</p> <p>For more information on Population Health Management in Sussex, visit the Sussex Health and Care Partnership website or contact sxicb.contactus@nhs.net</p>
<p>OpenSAFELY</p>	<p>NHS England has been directed by the government to establish and operate the OpenSAFELY COVID-19 Service and the OpenSAFELY Data Analytics Service. These services provide a secure environment that supports research, clinical audit, service evaluation and health surveillance for COVID-19 and other purposes.</p> <p>Each GP practice remains the controller of its own GP patient data but is required to let approved users run queries on pseudonymised patient data. This means identifiers are removed and replaced with a pseudonym.</p> <p>Only approved users are allowed to run these queries, and they will not be able to access information that directly or indirectly identifies individuals.</p> <p>Patients who do not wish for their data to be used as part of this process can register type 1 opt out with their GP. Find additional information about OpenSAFELY.</p>



Reviews of and Changes to our Privacy Notice

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

Lawful basis for processing:

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 and 9 conditions of the 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 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...'