**Detailed Privacy Notice & Data Processing Register**

**Introduction**

The UK Data Protection Act (DPA) 2018 brings the provisions of the EU General Data Protection Regulation (GDPR) 2016 into UK law. The Act also legislates in areas where the GDPR allows flexibility at a national level, introduces legislation on processing for law enforcement and intelligence purposes, and makes provision for the Information Commissioner’s Office (ICO) as the UK Supervisory Authority.

This Detailed Privacy Notice (otherwise known as a Fair Processing Notice) has been written in line with the GDPR and the DPA 2018. A Privacy Notice Poster and Leaflet are also available, which offer more accessible summaries of the information in this Detailed Privacy Notice.

**What Is Meant By Fair Processing?**

Fair Processing is the conditions that have to be met for any activities involving personal data or special categories of personal data to be lawful. Being transparent and providing accessible information to individuals about how an organisation will use their information is a key element of data protection legislations.

This Detailed Privacy Notice is designed to meet these obligations, by telling you about the information we collect and hold about you, the legal basis for this, what we do with this, how we keep it secure (confidential), who we might share it with, and what your rights are in relation to your information

**Who Are We?**

We are Ford Medical Practice, 91-93 Gorsey Lane, Litherland, Liverpool, L21 0DF, UK.

**Why and how do we collect information about you?**

Healthcare professionals who provide you with care are required by law to maintain records about your health and any treatment or care you have received within any NHS organisation. These records help to provide you with the best possible healthcare and ensure the effective management of the local NHS system.

Your information will be collected either electronically (using secure NHS Mail or a secure electronic transfer over an NHS encrypted network connection) or physical information will be sent to your practice in written form. This information will be retained within your GP’s electronic patient record or within your physical medical records.

**What Information Do We Collect About You?**

The healthcare professionals who provide you with care maintain records about your health and any treatment or care you have received previously or elsewhere, e.g. NHS Hospital Trusts, other GP Surgeries, Out of Hours GP Centres, A&E Departments and Walk-in Clinics. Records which we may hold about you may include the following:

* *Personal Data* – meaning any information relating to an identifiable person who can be directly or indirectly identified from the data; this may include but is not limited to the following:
* Your name, date of birth and NHS number
* Your address, postcode, telephone numbers and email address
* Your next of kin emergency contact details
* *Sensitive/ Special Category Data* – for example:
* Any contact the practice has had with you, such as appointments, clinic visits, immunisations, emergency appointments and admissions
* Notes and reports about your health, treatment and care, including results of laboratory and radiological investigations
* Relevant information from other health professionals, relatives or those who care for you, or information provided to the practice by you
* Social care status, racial/ethnic origin, political opinions, union membership, religious/philosophical beliefs, genetic data, and sexual life/orientation.

**How Do We Keep Your Information Safe?**

We ensure the information we hold is kept in secure locations, restrict access to information to authorised personnel only, and protect personal and confidential information held on equipment held on equipment such as laptops with encryption.

Your contemporaneous GP NHS health records are kept electronically. Our GP records database is hosted by EMIS Health Ltd., which is acting as a Data Processor. All information is stored on their secure servers in Leeds and protected by appropriate security, with access restricted to authorised personnel.

We also ensure Data Processors that support us are legally and contractually bound to operate, and can prove security arrangements are in place where data that could or does identify a person are processed.

**How Do We Keep Your Information Confidential?**

The Common Law Duty of Confidentiality (CLDC) means that all patient information, whether held on paper or another record, or held in the memory of the health professional, must not normally be shared without the patient’s consent. However, where sharing is for the purposes of direct care, consent to such sharing may be implied where it is informed, given there is a legitimate relationship between the patient and the health professional.

We maintain our duty of confidentiality to you always. We will only ever use or pass on information about you if others involved in your care have a genuine need for it. We will not disclose your information to any third party without your permission unless there are exceptional circumstances, i.e. life or death situations, or where the law requires information to be passed on.

Confidential patient data will be shared within the healthcare team at the practice, including medical, nursing and administrative staff; they are all trained to ensure your information is kept confidential. We also share medical records with other healthcare teams to whom a patient is referred; these individuals have a professional and contractual duty of confidentiality. Information is shared on a need to know basis and event by event.

**Why and How Do We Use Your Information?**

We use and share information about you in a number of ways, including:

* *Primary Uses* – information from your GP NHS health records, which can be made available to other NHS and public sector organisations, including doctors, nurses and care professionals, in order to help them make the best informed decision, and provide you with the best possible direct care delivery
* *Secondary Uses* – information from your GP NHS health records, where identifiable data is extracted and shared, usually with other NHS organisations, for the purposes of indirect care; e.g. national screening campaigns, managing the NHS and making payments, and checking the quality of care provided.

Other types of information may also be used by other NHS authorities to help check the quality and efficiency of the care we provide, and for statistical purposes to help improve or develop healthcare and monitor wider NHS performance:

* *Pseudonymised* – about individuals but with identifying details replaced with a unique code
* *Anonymised* – about individuals but with identifying details removed
* *Aggregated* – anonymised information grouped together so that it does not identify individuals.

**Who May We Share Your Information With?**

We do not transfer any personal data outside of the European Union, to third countries or international organisations.

In the remainder of this Detailed Privacy Notice, we are required by law to provide you with information about how we process (share) your personal data, namely:

* The *Data Controllers* and *Data Protection Officer*
* The *Recipient* or *Categories of Recipient* of the processed data
* The *Purpose* of the processing
* The *Lawful Basis* for processing
* The *Retention Period* of the data
* The existence of each of your *Rights.*

In each case, the following details apply:

**Who Are The Data Controllers and Data Protection Officer?**

The Data Controllers acting in partnership are:

* Dr Ade Taiwo, Dr Graham Sharrock & Dr Rachel Jacks

**Address***:* Ford Medical Practice, 91-93 Gorsey Lane, Litherland, Liverpool, L21 0DF.

We are registered as a Data Controller and our registration can be viewed online in the public register at: [*https://ico.org.uk/ESDWebPages/Entry/ZZ6608498*](https://ico.org.uk/ESDWebPages/Entry/ZZ6608498)

The practice’s Data Protection Officer (DPO), Dr Ade Taiwo may be contacted at the practice address if you would like any further information about anything relating to our compliance with the GDPR.

**What Is The Data Retention Period?**

Whenever applicable, the Retention Period should be according to the duration specified in the *Records Management Code of Practice for Health and Social Care (2016)*: [*https://www.gov.uk/government/publications/records-management-code-of-practice-for-health-and-social-care*](https://www.gov.uk/government/publications/records-management-code-of-practice-for-health-and-social-care)

**What Are My Rights?**

You have a general right to raise an objection to the processing of your personal data in certain circumstances. For further details of how to exercise this right, please see our *Right to Object* policy on our website: [*http://www.fordmedicalpractice.nhs.uk*](http://www.fordmedicalpractice.nhs.uk)

You have a right to access and correct your personal data, and restrict its processing in certain circumstances. For further details of how to exercise this right, please see our *Right of Access* policy on the same website.

If you have concerns or are unhappy about any of our services, please contact our Practice Manager. Details of how to complain can be found on our website and are available at the surgery. For independent advice about data protection, privacy and data sharing issues, or to exercise your *Right to Complain* to the UK Supervisory Authority, please contact:

**The Information Commissioners Office**

***Address:* Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF**

***Phone:* 0303 123 1113**

**Website:** [***https://ico.org.uk/global/contact-us***](https://ico.org.uk/global/contact-us)

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

You also have a *Right of Erasure* (right to be forgotten) but this will only apply when you had given consent to process your personal health data and later withdrew that consent, and does not apply to the extent where the processing is necessary for:

* Compliance with a legal obligation, the performance of a task in the public interest, or the exercise of an official authority vested in us
* Medical purposes and/or for reasons of public interest in the area of Public Health
* The establishment, exercise or defence of legal claims.

**Direct Medical Care**

**Routine Care - External**

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| Recipients (or categories of recipient) of the data: | Staff working for other healthcare provider organisations |
| How is your data being accessed? | Extraction of information from your GP NHS health records |
| How is your data being accessed? | Extraction of information from your GP NHS health records |
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| What is the purpose of the processing? | To enable healthcare professionals to make the best informed decision about your health needs & provide you with the best possible care, if you visit another healthcare provider organisation for routine care & referrals  To facilitate local administrative purposes such as waiting list management, clinical audit, performance against local targets, activity monitoring, & production of datasets to submit for commissioning purposes & national collections |
| How does this comply with the CLDC? | Consent (implied) – direct care |
| What is the GDPR lawful basis of the processing? | Processing of personal data is permitted under:   Article 6(1)(e) – official authority  Processing of special category data is permitted under:   Article 9(2)(h) – provision of health |
| Are there any other relevant regulations? | The NHS Act (2006) & the Health & Social Care Act (2012) invest statutory functions on GP surgeries  Section 251 of the Health & Social Care (Safety & Quality) Act (2015) – Duty to Share |
| Additional information (if applicable) about:  - The retention period  - Your rights | Not applicable |

**Direct Medical Care**

**Emergency Care**

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| Recipients (or categories of recipient) of the data: | Healthcare professionals or emergency services providing direct medical care to the Data Subject in an emergency |
| How is your data being accessed? | Extraction of information from your GP NHS health records |
| What is the purpose of the processing? | To enable the best possible care to save or protect a patient’s life or to protect them from serious immediate harm; in many of these circumstances the patient may be unable to communicate their wishes |
| How does this comply with the CLDC? | Consent (implied) – direct care  OR Overriding public interest |
| What is the GDPR lawful basis of the processing? | Processing of personal data is permitted under:   Article 6(1)(d) – vital interests  Processing of special category data is permitted under:   Article 9(2)(h) – provision of health |
| Are there any other relevant regulations? | The NHS Act (2006) & the Health & Social Care Act (2012) invest statutory functions on GP surgeries  Section 251 of the Health & Social Care (Safety & Quality) Act (2015) – Duty to Share  General Medical Council Confidentiality Guidance (2017) states that ‘in a medical emergency… you should pass information promptly to those providing the patient’s care’ |
| Additional information (if applicable) about:  - The retention period  - Your rights | We will notify you at the earliest opportunity if we have shared your personal data in an emergency situation |

**Direct Medical Care**

**Medicines Optimisation**

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| Recipients (or categories of recipient) of the data: | Pharmacy teams working within or on behalf of Ford Medical Practice |
| How is your data being accessed? | Access to your GP NHS health records |
| What is the purpose of the processing? | Medicines optimisation looks at the value that medicines deliver, making sure they are clinically effective and cost-effective. It is about ensuring patients get the right choice of medicines at the right time, and are engaged in the process by their clinical team  Administering the CCG-commissioned catheter & stoma product prescriptions services |
| How does this comply with the CLDC? | Consent (implied) – direct care |
| What is the GDPR lawful basis of the processing? | Processing of personal data is permitted under:   Article 6(1)(e) – official authority  Processing of special category data is permitted under:   Article 9(2)(h) – provision of health |
| Are there any other relevant regulations? | The NHS Act (2006) & the Health & Social Care Act (2012) invest statutory functions on GP surgeries  Section 251 of the Health & Social Care (Safety & Quality) Act (2015) – Duty to Share  The Medicines Management Team Data Processing Agreement & Remote Access Documentation |
| Additional information (if applicable) about:  - The retention period  - Your rights | Not applicable |

**Direct Medical Care**

**Home Oxygen Service**

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| Recipients (or categories of recipient) of the data: | Staff working for the commissioned home oxygen service – Air Liquide (Homecare) Ltd. |
| How is your data being accessed? | Extraction of information from your GP NHS health records |
| What is the purpose of the processing? | To enable patients to receive home oxygen when clinically indicated. Sensitive personal clinical data will need to be provided to oxygen suppliers in order to safely provide oxygen at home for the patient |
| How does this comply with the CLDC? | Consent (explicit) – obtained by the practice |
| What is the GDPR lawful basis of the processing? | Processing of personal data is permitted under:   Article 6(1)(e) – official authority  Processing of special category data is permitted under:   Article 9(2)(h) – provision of health |
| Are there any other relevant regulations? | The NHS Act (2006) & the Health & Social Care Act (2012) invest statutory functions on GP surgeries  Section 251 of the Health & Social Care (Safety & Quality) Act (2015) – Duty to Share |
| Additional information (if applicable) about:  - The retention period  - Your rights | Air Liquide (Homecare) Ltd.’s Privacy Statement, which includes information about retention periods, can be found at: https://www.airliquidehealthcare.co.uk/node/416 |

**Direct Medical Care**

**Specific Diabetes Referrals**

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| Recipients (or categories of recipient) of the data: | Staff working for:   * Healthier You: NHS Diabetes Prevention Programme (DPP) – Living Well Taking Control * Diabetes structured education – Merseycare Sefton Community Diabetes Team * Diabetes retinopathy screening – Aintree University Hospital NHS Foundation Trust |
| How is your data being accessed? | Extraction of information from your GP NHS health records |
| What is the purpose of the processing? | DPP: to enable patients diagnosed with impaired glucose regulation (prediabetes) to be invited to the NHS DPP  Structured education: to enable patients diagnosed with type 2 diabetes mellitus to be invited for a structured education programme about the condition  Retinopathy screening: to enable patients diagnosed with diabetes mellitus to receive invitations for diabetic retinopathy screening on a regular basis |
| How does this comply with the CLDC? | Consent (explicit) – obtained by the practice |
| What is the GDPR lawful basis of the processing? | Processing of personal data is permitted under:   Article 6(1)(e) – official authority  Processing of special category data is permitted under:   Article 9(2)(h) – provision of health |
| Are there any other relevant regulations? | The NHS Act (2006) & the Health & Social Care Act (2012) invest statutory functions on GP surgeries  Section 251 of the Health & Social Care (Safety & Quality) Act (2015) – Duty to Share |
| Additional information (if applicable) about:  - The retention period  - Your rights | For Aintree Hospital’s privacy information, visit:  https://www.aintreehospital.nhs.uk/your-visit/your-information-your-rights/ |

**Direct Medical Care**

**Social Services**

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| Recipients (or categories of recipient) of the data: | Social work teams at Sefton Council |
| How is your data being accessed? | Extraction of information from your GP NHS health records |
| What is the purpose of the processing? | Ford Medical Practice works closely with Local Authorities to support & care for people of all ages to deliver the best possible social care. Information may be shared on referral documentation or in multidisciplinary team (MDT) meetings, to enable them to make the best informed decisions about your social care needs |
| How does this comply with the CLDC? | Consent (implied) – direct care |
| Are there any other relevant regulations? | The NHS Act (2006) & the Health & Social Care Act (2012) invest statutory functions on GP surgeries  Section 251 of the Health & Social Care (Safety & Quality) Act (2015) – Duty to Share |
| Additional information (if applicable) about:  - The retention period  - Your rights | For Sefton Council’s adult social care Privacy Notice, visit:  https://www.sefton.gov.uk/media/1454737/asc-privacy-notice.pdf  For Sefton Council’s children’s social care Privacy Notice, visit: https://www.sefton.gov.uk/media/1459517/csc-privacy-notice.pdf |

**Direct Medical Care**

**Care Homes**

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| Recipients (or categories of recipient) of the data: | Professionals and carers working in nursing or residential care homes where a patient is living |
| How is your data being accessed? | Extraction of information from your GP NHS health records |
| What is the purpose of the processing? | Ford Medical Practice works closely with care homes to support & care for people & deliver the best possible social care. Information may be shared during home visits, on Integrated Clinical Community Care Plans (ICCCPs) & in multidisciplinary team (MDT) meetings, to enable them to make the best informed decisions about your care needs |
| How does this comply with the CLDC? | Consent (implied) – direct care |
| What is the GDPR lawful basis of the processing? | Processing of personal data is permitted under:   Article 6(1)(e) – official authority  Processing of special category data is permitted under:   Article 9(2)(h) – provision of health or social care |
| Are there any other relevant regulations? | The NHS Act (2006) & the Health & Social Care Act (2012) invest statutory functions on GP surgeries  Section 251 of the Health & Social Care (Safety & Quality) Act (2015) – Duty to Share |
| Additional information (if applicable) about:  - The retention period  - Your rights | Not applicable |

**Direct Medical Care**

**Continuing Health Care (CHC)**

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| Recipients (or categories of recipient) of the data: | Continuing Health Care (CHC) assessment teams & provider organisations |
| How is your data being accessed? | Extraction of information from your GP NHS health records |
| What is the purpose of the processing? | CHC is free care outside of hospital that is arranged & funded by the NHS, to support living with complex medical conditions & ongoing healthcare needs, which can be delivered in the patient’s home or care home.  Assessment of the eligibility for & effective provision of CHC requires information to be shared with assessment teams & provider organisations, to enable them to make the best informed decisions about your care needs |
| How does this comply with the CLDC? | Consent (implied) – direct care |
| What is the GDPR lawful basis of the processing? | Processing of personal data is permitted under:   Article 6(1)(e) – official authority  Processing of special category data is permitted under:   Article 9(2)(h) – provision of health or social care |
| Are there any other relevant regulations? | The NHS Act (2006) & the Health & Social Care Act (2012) invest statutory functions on GP surgeries  Section 251 of the Health & Social Care (Safety & Quality) Act (2015) – Duty to Share |
| Additional information (if applicable) about:  - The retention period  - Your rights | Not applicable |

**Data Sharing Schemes**

**NHS Digital ‘Spine’ Services**

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| Recipients (or categories of recipient) of the data: | NHS Digital, who becomes the Data Controller for any uploaded information  Also, individuals from healthcare providers who have access to these ‘Spine’ Services – this includes secondary care providers, community pharmacies & the Out of Hours GP Service (Primary Care 24) |
| How is your data being accessed? | Extraction of information from your GP NHS health records |
| What is the purpose of the processing? | Patient Demographics Service (PDS) – helps identify patients, match them to their records & contact them  e-Referral Service (ERS) – allows patients to ‘choose & book’ appointments for their new referrals  Electronic Prescription Service (EPS) – allows us to send prescriptions electronically to community pharmacies  GP2GP – allows electronic health records to be transferred directly, securely & quickly when patients change practice  Summary Care Record (SCR: core & enhanced) – allows other professionals to see certain GP NHS health records |
| How does this comply with the CLDC? | Consent (implied) – direct care: PDS, ERS, GP2GP & the core SCR  Consent (explicit): EPS (obtained by the practice or the community pharmacy) & the enhanced SCR (obtained by the practice and a healthcare professional you are seeing)  Legal obligation: during the COVID-19 Pandemic, NHS Digital has been instructed by the Department of Health & Social Care to convert core SCRs to enhanced SCRs, except where the patient has specifically opted out of either; see <https://digital.nhs.uk/services/summary-care-records-scr/summary-care-records-scr-information-for-patients> |
| What is the GDPR lawful basis of the processing? | Processing of personal data is permitted under:   Article 6(1)(e) – official authority  Processing of special category data is permitted under:   Article 9(2)(h) – provision of health |
| Are there any other relevant regulations? | For more information about NHS Digital Data Sharing, see: <http://www.digital.nhs.uk/summary-care-records> |
| Additional information (if applicable) about: | Data is retained in line with NHS Digital’s ‘Keeping Patient Data Safe’ policies |
| The retention period  - Your rights | You have the right to object to information being shared with NHS Digital for reasons other than your own direct care – known as a Type 1 Objection. However, this will no longer be available after 2020, meaning you will not be able to object to your data being shared when it is legally required under the Health & Social Care Act (2012) |

**Data Sharing Schemes**

**Open Exeter**

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| Recipients (or categories of recipient) of the data: | Staff employed by Ford Medical Practice who have authorised logons/passwords provided by NHS Digital. |
| How is your data being accessed? | Access to data held about you by another Data Controller, though an original source is your GP NHS health records |
| What is the purpose of the processing? | Open Exeter is a web-enabled viewer, only available on the N3 network, which allows authorised healthcare staff to share & access patient data held on the National Health Applications Infrastructure Services (NHAIS), along with information about payments to the practice.  The data on Open Exeter about Data Subjects includes:   * Demographics * Cervical Screening * Breast Screening * Bowel Screening * HPV Vaccination * Childhood immunisations * Pre-School Booster vaccinations * Organ Donor registration details * Blood Donor registration details |
| How does this comply with the CLDC? | *Consent (implied) – direct care* |
| What is the GDPR lawful basis of the processing? | *Processing of personal data is permitted under:*   *Article 6(1)(e) – official authority*  *Processing of special category data is permitted under:*   *Article 9(2)(h) – provision of health* |
| Are there any other relevant regulations? | *For more information about Open Exeter, see:* [*http://www.digital.nhs.uk/NHAIS/open-exeter*](http://www.digital.nhs.uk/NHAIS/open-exeter) |
| Additional information (if applicable) about:  - The retention period  - Your rights | *Data is viewed on screen; if printed, it is destroyed when no longer required (usually within 24 hours)*  *Individuals have the right to opt out of the National Screening Programmes, so that an invitation is no longer received:* [*https://www.gov.uk/government/publications/opting-out-of-the-nhs-population-screening-programmes*](https://www.gov.uk/government/publications/opting-out-of-the-nhs-population-screening-programmes) |

**Data Sharing Schemes**

**EMIS Web Local Record Sharing**

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| Recipients (or categories of recipient) of the data: | Healthcare professionals providing direct medical care to the Data Subject |
| How is your data being accessed? | Access to your GP NHS health records |
| What is the purpose of the processing? | Enables certain GP NHS health records held to be viewed by other local healthcare providers, including:   * Medicines Management Team * Joint Health (musculoskeletal service) * Community Cardiology Service * 7-Day GP (enhanced access GP service) * Primary Care Network Services (GP Federation) * Heart Failure Team * Community Respiratory Team * District Nursing Team * Treatment Room Service * IV Therapy Service * Intermediate Care Services * Local Secondary Care NHS Trusts * Macmillan Cancer Support & Information Centre * Social Prescribing Service (South Sefton PCN) |
| How does this comply with the CLDC? | Consent (explicit) – sought & recorded at the time of access by the healthcare professional who you see |
| What is the GDPR lawful basis of the processing? | Processing of personal data is permitted under:   Article 6(1)(e) – official authority  Processing of special category data is permitted under:   Article 9(2)(h) – provision of health |
| Are there any other relevant regulations? | The NHS Act (2006) & the Health & Social Care Act (2012) invest statutory functions on GP surgeries  Section 251 of the Health & Social Care (Safety & Quality) Act (2015) – Duty to Share |
| Additional information (if applicable) about:  - The retention period  - Your rights | The information is accessed in real time & on demand, meaning that data remains within the GP NHS health record & is not extracted, uploaded or sent anywhere  Contemporaneous, explicit consent is required, meaning your uploaded record is only viewable if you give permission to a healthcare professional you are seeing |

**Data Sharing Schemes**

**Electronic Referral & Information Sharing Service (ERISS)**

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| Recipients (or categories of recipient) of the data: | Call centre & front-line staff (e.g. paramedics) working for North West Ambulance Service NHS Trust (NWAS) |
| How is your data being accessed? | Extraction of information from your GP NHS health records |
| What is the purpose of the processing? | ERISS is a web-enabled viewer, only available on the N3 network & requiring a logon/password authorised by NWAS. It is designed to enhance collaborative working with NWAS by providing a secure portal to inform them of care planning arrangements for specific patient groups, e.g. resuscitation & preferred place of care decisions |
| How does this comply with the CLDC? | Consent (explicit) – obtained by the practice  If a patient does not have the mental capacity to consent, disclosure may be made if it is in their overriding safeguarding interest or following a court order |
| What is the GDPR lawful basis of the processing? | Processing of personal data is permitted under:   Article 6(1)(e) – official authority  Processing of special category data is permitted under:   Article 9(2)(h) – provision of health |
| Are there any other relevant regulations? | The NHS Act (2006) & the Health & Social Care Act (2012) invest statutory functions on GP surgeries  Section 251 of the Health & Social Care (Safety & Quality) Act (2015) – Duty to Share  For more information about ERISS, see:  <http://www.nwas.nhs.uk/professionals/eriss> |
| Additional information (if applicable) about:  - The retention period  - Your rights | When information is uploaded to ERISS by the practice, we must select an expiry date. Before it expires, we are sent an email reminding us to review the information, otherwise it will be removed. The information can also be removed manually at any time by the practice |

**Data Sharing Schemes**

**Special Patient Notes – Out of Hours GP Service**

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| Recipients (or categories of recipient) of the data: | Healthcare professionals & administrative staff working for the Out of Hours GP Service, Primary Care 24 (PC24) |
| How is your data being accessed? | Extraction of information from your GP NHS health records |
| What is the purpose of the processing? | Most GP surgeries have opted out of night/weekend (out of hours) care as part of the 2004 General Medical Services (GMS) GP contract. Since then, out of hours care has been provided by other organisations – the current provider for patients of is PC24.  Healthcare professionals at the Out of Hours GP Service have access to the Summary Care Record (see the NHS Digital ‘Spine’ Services Privacy Notice above). However, this is not always updated straight away & certain crucial medical details may not be included – e.g. if a patient is receiving terminal, palliative or anticipatory care.  Therefore, to improve the safety & quality of patient care in such situations, Ford Medical Practice will add a Special Patient Note to the Out of Hours GP Service, who maintain a database of these on their Adastra clinical system |
| How does this comply with the CLDC? | Consent (explicit) – obtained by the practice  If a patient does not have the mental capacity to consent, disclosure may be made if it is in their overriding safeguarding interest or following a court order |
| What is the GDPR lawful basis of the processing? | Processing of personal data is permitted under:   Article 6(1)(e) – official authority  Processing of special category data is permitted under:   Article 9(2)(h) – provision of health |
| Are there any other relevant regulations? | The NHS Act (2006) & the Health & Social Care Act (2012) invest statutory functions on GP surgeries  Section 251 of the Health & Social Care (Safety & Quality) Act (2015) – Duty to Share |
| How does this comply with the CLDC? | Consent (explicit) – obtained by the practice  If a patient does not have the mental capacity to consent, disclosure may be made if it is in their overriding safeguarding interest or following a court order |
| Additional information (if applicable) about:  - The retention period  - Your rights | PC24 becomes the Data Controller for this shared information – it is the Data Controller for their whole Adastra system. Ford Medical Practice will specify a timeframe for how long the Special Patient Note should remain active, although this may be indefinite. Data is retained in line with the PC24 privacy notice: <https://primarycare24.org.uk/wp-content/uploads/2021/11/PC24-privacy-notice-October-2021.pdf> |

**Data Sharing Schemes**

**NHS 111 - GP Connect**

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| Recipients (or categories of recipient) of the data: | Healthcare professionals working for NHS 111 providers (the most local provider is North West Ambulance Service) & the COVID-19 Clinical Assessment Service (CCAS) provided by South Central Ambulance Service |
| How is your data being accessed? | Access to your GP NHS health records |
| What is the purpose of the processing? | NHS 111 is a telephone and online service that is designed to make it quicker and easier for patients to get the right advice and treatment when they need it urgently, 24 hours a day & 7 days per week.  Clinicians, such as doctors, nurses, pharmacists and paramedics, now play an important role in NHS 111. GP Connect allows them to view real-time data within the patient’s GP NHS health record to inform their assessment and to make direct appointments the patient’s GP surgery.  NHS 111 has been commissioned to provide a dedicated COVID-19 response service (CCAS) to free-up GP surgeries and other parts of the NHS to focus on managing those most at risk of complications from COVID-19. |
| How does this comply with the CLDC? | Consent (explicit) – obtained by NHS 111 prior to any access, except in an absolute emergency and when obtaining permission to view is not possible |
| What is the GDPR lawful basis of the processing? | Processing of personal data is permitted under:   Article 6(1)(e) – official authority  Processing of special category data is permitted under:   Article 9(2)(h) – provision of health |
| Are there any other relevant regulations? | The NHS Act (2006) & the Health & Social Care Act (2012) invest statutory functions on GP surgeries  Section 251 of the Health & Social Care (Safety & Quality) Act (2015) – Duty to Share |
| Are there any other relevant regulations? | The NHS Act (2006) & the Health & Social Care Act (2012) invest statutory functions on GP surgeries  Section 251 of the Health & Social Care (Safety & Quality) Act (2015) – Duty to Share |
| Additional information (if applicable) about:  - The retention period  - Your rights | The information is accessed in real time & on demand, meaning that data remains within the GP NHS health record & is not extracted, uploaded or sent anywhere  Contemporaneous, explicit consent is required, meaning your uploaded record is only viewable if you give permission to a the health professional you are speaking to  Patients have the right to object to this processing – an opt-out exists that can disable it in EMISWeb, if requested |

**Data Sharing Schemes**

**South Sefton Primary Care Network**

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| Recipients (or categories of recipient) of the data: | Healthcare professionals & administrative staff working as part of South Sefton Locality |
| How is your data being accessed? | Extraction of information from your GP NHS health records |
| What is the purpose of the processing? | As part of the NHS Long Term Plan, In time, this will mean more collaborative working & place our locality at the heart of an Integrated Care System incorporating hospitals, community providers, social care organisations, voluntary & faith groups, & other primary care providers such as pharmacists & dentists  For more information about Primary Care Networks, please visit <https://www.england.nhs.uk/primary-care/primary-care-networks/> |
| How does this comply with the CLDC? | Consent (implied) – direct care |
| What is the GDPR lawful basis of the processing? | Processing of personal data is permitted under:   Article 6(1)(e) – official authority  Processing of special category data is permitted under:   Article 9(2)(h) – provision of health |
| Are there any other relevant regulations? | The NHS Act (2006) & the Health & Social Care Act (2012) invest statutory functions on GP surgeries  Section 251 of the Health & Social Care (Safety & Quality) Act (2015) – Duty to Share  The 5-Year Framework for GP Contract Reform to Implement the NHS Long Term Plan is available at <https://www.england.nhs.uk/wp-content/uploads/2019/01/gp-contract-2019.pdf>    A Data Sharing Agreement is available to view on request |
| Additional information (if applicable) about:  - The retention period  - Your rights | Not applicable |

**Data Processors**

**EMIS Health Ltd. – EMIS Web**

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| Recipients (or categories of recipient) of the data: | *EMIS Health Ltd. acting as a Data Processor, & available to others with a legitimate relationship to the patient (as outlined in this document)* |
| How is your data being accessed? | *Access to your GP NHS health records* |
| What is the purpose of the processing? | *EMIS Health Ltd. is responsible for the provision of a clinical system, software & IT services used by the practice, to securely store & process your electronic GP health records. The database servers are located in Leeds.*  *It includes demographic data, data typed directly into the record (e.g. consultation notes), data added electronically (e.g. test results), documents that are scanned (e.g. clinic letters & information provided by patients.* |
| How does this comply with the CLDC? | *Consent (implied) – direct care* |
| What is the GDPR lawful basis of the processing? | Processing of personal data is permitted under:   Article 6(1)(e) – official authority  Processing of special category data is permitted under:   Article 9(2)(h) – provision of health |
| Are there any other relevant regulations? | The EMIS Deed of Undertaking for data processing, for all surgeries that it hosts, & their GDPR Addendum Letter are available upon request |
| Additional information (if applicable) about:  - The retention period  - Your rights | The standard NHS data retention policy states: ‘GP records should be retained until 10 years after the patient’s death or after the patient has permanently left the country, unless they remain within the European Union. Electronic patient records must not be destroyed or deleted for the foreseeable future’  Electronic records of ex-patients are held in an archived state |

**Data Processors**

**South Sefton Clinical Commissioning Group (CCG)**

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| Recipients (or categories of recipient) of the data: | South Sefton CCG (SSCCG) acting as a Data Processor, & iMerseyside as a sub-processor |
| How is your data being accessed? | Extraction of information from your GP NHS health records |
| What is the purpose of the processing? | SSCCG is responsible for securing, planning, designing & paying for your NHS services, including planned & emergency hospital care, mental health, rehabilitation, community & primary care (including GP) services, & information communication technology (ICT)  SSCCG also act as the data processor for EMIS Web Local Record sharing, and process personal data from your GP NHS health records in accordance with instructions from the practice |
| How does this comply with the CLDC? | Consent (implied) – direct care |
| What is the GDPR lawful basis of the processing? | Processing of personal data is permitted under:   Article 6(1)(e) – official authority  Processing of special category data is permitted under:   Article 9(2)(h) – provision of health |
| Are there any other relevant regulations? | The Health & Social Care Act (2012), which led to the creation of CCG |
| Additional information (if applicable) about:  - The retention period  - Your rights | Data is retained in line with SSCCG policies |

**Data Processors**

**Cheshire & Merseyside Commissioning Support Unit (CSU)**

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| Recipients (or categories of recipient) of the data: | Cheshire & Merseyside CSU acting as a Data Processor |
| How is your data being accessed? | Extraction of information from your GP NHS health records |
| What is the purpose of the processing? | The General Practice Data Extraction Service (GPES) enables MLCSU to extract personal data from the practice covering all currently registered patients & those ever registered since 2009 (except those who have explicitly dissented), for the provision of services back to the practice, which may include:   * Risk stratification * Linking to other datasets * Financial reporting * Business intelligence * Statistical analysis * Information to support delivery of patient care |
| How does this comply with the CLDC? | Consent (implied) – direct care |
| What is the GDPR lawful basis of the processing? | Processing of personal data is permitted under:   Article 6(1)(e) – official authority  Processing of special category data is permitted under:   Article 9(2)(h) – provision of health |
| Are there any other relevant regulations? | The Health & Social Care Act (2012), which led to the creation of CSUs  For more information about the GPES, see:  <http://content.digital.nhs.uk/gpes> |
| Additional information (if applicable) about:  - The retention period  - Your rights | *Data is retained in line with CSU policies:*  [*https://www.cheshireandmerseysidecsu.nhs.uk/terms-conditions-and-privacy/*](https://www.cheshireandmerseysidecsu.nhs.uk/terms-conditions-and-privacy/) |

**Data Processors**

**Docmail**

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| Recipients (or categories of recipient) of the data: | Docmail Ltd. acting as a Data Processor, & their associated sub-processors |
| How is your data being accessed? | Extraction of information from your GP NHS health records |
| What is the purpose of the processing? | Docmail enables us to send letters, invoices & documents (including mail merges) regarding patients’ medical care, directly from computers, saving time & money compared with traditional Royal Mail |
| How does this comply with the CLDC? | Consent (implied) – direct care (administrative) |
| What is the GDPR lawful basis of the processing? | Processing of personal data is permitted under:   Article 6(1)(e) – official authority  Processing of special category data is permitted under:   Article 9(2)(h) – provision of health |
| Are there any other relevant regulations? | Our data processing agreement with Docmail Ltd. is available upon request |
| Additional information (if applicable) about:  - The retention period  - Your rights | The least amount of personal & special category data possible is provided to Docmail Ltd.  Data is retained in the EU for 30 days in line with Docmail’s Privacy Notice: <https://www.cfhdocmail.com/Downloads/Docmail-Privacy.pdf> |

**Data Processors**

**GP Surgery Connect X-On. – Telephony**

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| Recipients (or categories of recipient) of the data: | GP Surgery Connect acting as a Data Processor |
| How is your data being accessed? | Extraction of information from your GP NHS health records (telephone conversations) |
| What is the purpose of the processing? | Ford Medical Practice requires a telephone system in order for people to contact us & for us to contact them, particularly patients, their representatives & other healthcare providers, including telephone consultations  GP Surgery Connect have installed & provide our telephone system, which uses Session Initiation Protocol (SIP Trunking), a Voice over Internet Protocol (VoIP) technology, where telephone calls are securely transmitted over the internet  SIP trunking offers enhanced security & lower prices, & allows GP Surgery Connect to provide us with additional features like auto attendant, call queuing & ad hoc call recording (for training or monitoring purposes) |
| How does this comply with the CLDC? | Consent (implied) – direct care |
| What is the GDPR lawful basis of the processing? | Processing of personal data is permitted under:   Article 6(1)(e) – official authority  Processing of special category data is permitted under:   Article 9(2)(h) – provision of health |
| Are there any other relevant regulations? | Our agreement with GP Surgery Connect is available upon request |
| Additional information (if applicable) about:  - The retention period  - Your rights | GP Surgery Connect does not store telephone conversations or faxes  Ford Medical Practice does not routinely record all calls but may record a call for training or monitoring purposes. The existence of a call recording will be documented contemporaneously in a patient’s’ GP NHS health records. When a call recording is deleted this will also be documented. Call recordings are stored securely on our telephone system on our premises & will be deleted when no longer required to fulfil the intended purpose. |

**Data Processors**

**AccuRx Ltd. – Chain SMS Text Messaging**

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| Recipients (or categories of recipient) of the data: | AccuRx Ltd. acting as a Data Processor |
| How is your data being accessed? | Extraction of information from your GP NHS health records to send an SMS text message. |
| What is the purpose of the processing? | Over 95% of the UK adult population now use a mobile phone. Chain SMS is a software service provided by AccuRx Ltd., which allows Ford Medical Practice to send individual text messages to patients’ mobile phones  We use Chain SMS for a variety of direct care purposes, including patient recall, receiving clinical information (including photographs), initiating video consultations, patient information & delivering test results. We do not use it for any other purposes, including marketing  The low cost of sending an SMS text message makes more frequent communication possible, & it allows patients to receive messages when away from their home address |
| How does this comply with the CLDC? | Consent (implied) – direct care |
| What is the GDPR lawful basis of the processing? | Processing of personal data is permitted under:   Article 6(1)(e) – official authority  Processing of special category data is permitted under:   Article 9(2)(h) – provision of health |
| Are there any other relevant regulations? | More information about AccuRx & the GDPR, including their Data Processing Agreement & Privacy Policy, can be found at <https://www.accurx.com/gdpr-questions>  and <https://www.accurx.com/patient-privacy> |
| Additional information (if applicable) about:  - The retention period  - Your rights | A copy of every SMS text message sent to a patient is recorded in their EMIS Web GP record. AccuRx stores patient data, including sent clinical photographs, on their secure servers until 10 years after death. Video consultations are not recorded or stored on any servers.  Patients can object to receiving SMS messages by simply asking the surgery to mark their GP record as so. Their mobile number will then only be used for telephone calls. |

**Data Processors**

**iPlato Healthcare Ltd. – Connect (myGP Messaging)**

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| Recipients (or categories of recipient) of the data: | iPlato Ltd. acting as a Data Processor |
| How is your data being accessed? | Extraction of information from your GP NHS health records to send an SMS text message. |
| What is the purpose of the processing? | Over 95% of the UK adult population now use a mobile phone. iPlato’s myGP Messaging is a software service that allows Ford Medical Practice to send individual & cohort text messages to patients’ mobile phones.  We use myGP Messaging for direct care purposes, appointment reminders (these also allow a patient to cancel their appointment by SMS), patient recall and patient information. We do not use it for any other purposes, including marketing  The low cost of sending an SMS text message makes more frequent communication possible, & it allows patients to receive messages when away from their home address |
| How does this comply with the CLDC? | Consent (implied) – direct care |
| What is the GDPR lawful basis of the processing? | Processing of personal data is permitted under:   Article 6(1)(e) – official authority  Processing of special category data is permitted under:   Article 9(2)(h) – provision of health |
| Are there any other relevant regulations? | Our detailed ‘Text Messaging Policy – Chain SMS’ is also relevant for myGP Messaging;  iPlato Healthcare Ltd.’s Data Processing Agreement can be found at <https://www.iplato.com/dpa.pdf>  and there IG FAQs can be found at <https://www.iplato.com/wp-content/uploads/2020/06/iPlato-Connect-and-myGP-IG-FAQ-v2.2.pdf> |
| Additional information (if applicable) about:  - The retention period  - Your rights | A copy of every SMS text message sent to a patient is recorded in their EMIS Web GP record. Personal data will erased or anonymised within 30 days, if the contractual arrangement is terminated.  Patients can object to receiving SMS messages by simply asking the surgery to mark their GP record as so. Their mobile number will then only be used for telephone calls |

**Data Processors**

**Egton – Lloyd George Digitisation**

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| Recipients (or categories of recipient) of the data: | Egton (a division of Egton Medical Information Systems Ltd.) acting as a Data Processor |
| How is your data being accessed? | Access to your GP NHS health records |
| What is the purpose of the processing? | Lloyd George Digitisation involves the bulk scanning of all our hard copy patient notes making them available in digital format, with the potential to upload into our EMIS Web clinical system  Digitisation frees up practice space, makes the records more accessible to practice staff, removes the risk of complete loss by fire or flood, & allows all of a patient’s GP NHS Health Record to be held in a single record  A requirement for digitisation has been included in the 5-Year Framework for GP Contract Reform, & Egton has been awarded the contract for South Sefton CCG GP Practices |
| How does this comply with the CLDC? | Consent (implied) – direct care |
| What is the GDPR lawful basis of the processing? | Processing of personal data is permitted under:   Article 6(1)(e) – official authority  Processing of special category data is permitted under:   Article 9(2)(h) – provision of health |
| Are there any other relevant regulations? | The 5-Year Framework for GP Contract Reform to Implement the NHS Long Term Plan is available at <https://www.england.nhs.uk/wp-content/uploads/2019/01/gp-contract-2019.pdf> |
| Additional information (if applicable) about:  - The retention period  - Your rights | A Data Processing Impact Assessment (DPIA) has been completed by NHS Informatics Merseyside, which explains the process in detail, and has been approved the practice  Restore Plc. is a company who work with Egton and who destroy the records. Restore Plc encompasses a number of divisions - their Restore Digital division perform the scanning & their Restore Shred division perform the destruction  More information about Digitisation, including about retention periods, can be found at <https://www.egton.net/all-services/lloyd-george-digitisation/> |

**Data Processors**

**Apex Insight – Workload Analysis & Workforce Planning Tool**

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| Recipients (or categories of recipient) of the data: | Apex (Edenbridge Healthcare Ltd.) & Insight (PA Consulting Group Ltd.) acting as Data Processors. |
| How is your data being accessed? | Extraction of information from your GP NHS health records, which will be anonymised at source, plus specific workforce data (staff names, roles, patient-facing hours by each clinician per week, & contracted hours per week). |
| What is the purpose of the processing? | The role of Primary Care is changing across the NHS. Most localities are expecting GP-led services to play an increased role as more activity is delivered in community settings. To be sustainable in this new model, Primary Care must make informed decisions on how it can continue to provide high quality, safe & sustainable care.  Apex Insight provides a practice with tools to make decisions based on comprehensive data sets. It provides wide-ranging workload analysis & workforce planning capability that gives practices the clarity to make decisions with confidence. Practice-level information can be consolidated to inform local strategic planning. |
| How does this comply with the CLDC? | Consent (implied) – direct care (planning) |
| What is the GDPR lawful basis of the processing? | Processing of personal data is permitted under:   Article 6(1)(e) – official authority  Processing of special category data is permitted under:   Article 9(2)(h) – provision of health |
| Are there any other relevant regulations? | All practices in South Sefton CCG have agreed to utilise Apex Insight in the pilot phase for 12 months as part of their Local Quality Contract (LQC) for general practice. |
| Additional information (if applicable) about:  - The retention period  - Your rights | A Data Processing Impact Assessment (DPIA) has been completed by NHS Informatics Merseyside, which explains the Tool in Detail, and has been approved by the practice  Patient consent settings will be honoured in that personal data for a patient whose record contains a dissent entry for record sharing will not be shared, unless the record contains a later entry that states consent has been given.  Once the processing period has expired or in the event that the Data Processing Agreement is terminated, all data shall be either returned or destroyed after a period of 1 year, to a standard recommended in the most current NHS Guidelines and Standards. |

**Data Processors**

**eConsult Health Ltd. – GP Online Consultation Service**

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| Recipients (or categories of recipient) of the data: | eConsult Health Ltd. acting as a Data Processor |
| How is your data being accessed? | Access to your GP NHS health records |
| What is the purpose of the processing? | eConsult’s GP Online Consultation Service allows our patients to contact the practice without having to wait on the phone or take time to come into the practice in person, especially if a patient is not sure whether they need a face to face consultation. Online consultations enable patients to use a secure online system to ask questions and report symptoms and we can then respond by signposting patients to the right person, e.g. a Doctor, or to another appropriate service or support |
| How does this comply with the CLDC? | Consent (explicit) – direct care: patients access the service via our practice website or the NHS App if they wish to use it; there is no obligation for them to do so |
| What is the GDPR lawful basis of the processing? | Processing of personal data is permitted under:   Article 6(1)(e) – official authority  Processing of special category data is permitted under:   Article 9(2)(h) – provision of health |
| Are there any other relevant regulations? | The 5-Year Framework for GP Contract Reform to Implement the NHS Long Term Plan is available at <https://www.england.nhs.uk/wp-content/uploads/2019/01/gp-contract-2019.pdf> |
| Additional information (if applicable) about:  - The retention period  - Your rights | Further information can be found in eConsult’s privacy notice: <https://econsult.net/gp-online-consultation-service-privacy-notice/>  A Data Processing Impact Assessment (DPIA) has been completed by NHS Informatics Merseyside, and this has been approved by the practice  eConsult deletes all personal data associated with a consultation once the summary has been sent to Ford Medical Practice. Uploading of clinical photographs is completely optional & processes are in place to avoid intimate photographs of children being sent. |

**Mandatory Disclosures of Information**

**NHS Digital**

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| Recipients (or categories of recipient) of the data: | NHS Digital (previously known as the Health & Social Care Information Centre) |
| How is your data being accessed? | Extraction of information from your GP NHS health records |
| What is the purpose of the processing? | National Diabetes Audit (NDA): a national monitoring system, auditing the care of patients with diabetes  Individual GP Level Data (IGPLD): a national monitoring system to enable NHS Digital to provide GPs with clinical information on the care provision for their patients  Female Genital Mutilation (FGM): NHS Digital collects data on FGM within the NHS in England on behalf of the Department of Health & Social Care  NHS Health Checks: NHS Digital collects data on NHS Health Checks on behalf Public Health England  GP Appointments Data in Support of Winter Pressures: collection of anonymised appointment level data to improve understanding of capacity & utilisation in GP |
| What is the purpose of the processing? | National Diabetes Audit (NDA): a national monitoring system, auditing the care of patients with diabetes  Individual GP Level Data (IGPLD): a national monitoring system to enable NHS Digital to provide GPs with clinical information on the care provision for their patients  Female Genital Mutilation (FGM): NHS Digital collects data on FGM within the NHS in England on behalf of the Department of Health & Social Care  NHS Health Checks: NHS Digital collects data on NHS Health Checks on behalf Public Health England  GP Appointments Data in Support of Winter Pressures: collection of anonymised appointment level data to improve understanding of capacity & utilisation in GP |
| What is the purpose of the processing? | National Diabetes Audit (NDA): a national monitoring system, auditing the care of patients with diabetes  Individual GP Level Data (IGPLD): a national monitoring system to enable NHS Digital to provide GPs with clinical information on the care provision for their patients  Female Genital Mutilation (FGM): NHS Digital collects data on FGM within the NHS in England on behalf of the Department of Health & Social Care  NHS Health Checks: NHS Digital collects data on NHS Health Checks on behalf Public Health England  GP Appointments Data in Support of Winter Pressures: collection of anonymised appointment level data to improve understanding of capacity & utilisation in GP |
| How does this comply with the CLDC? | Legal obligation |
| What is the GDPR lawful basis of the processing? | Processing of personal data is permitted under:   Article 6(1)(c) – legal obligation  Processing of special category data is permitted under:   Article 9(2)(h) – provision of health |
| Are there any other relevant regulations? | These data extractions are mandatory under Section 254 of the Health & Social Care Act (2012)  More information about NHS Digital data extractions can be found at: <http://www.nhsdatasharing.info> |
| Additional information (if applicable) about:  - The retention period  - Your rights | Data is retained in line with NHS Digital’s ‘Keeping Patient Data Safe’ policies  Whilst these data extractions are mandatory, NHS Digital respects Type 1 objections present in the GP record, & no data will be extracted or uploaded if so.  There is no right of objection to NHS Digital sharing names or addresses of patients who are suspected of having committed an immigration offence |

**Mandatory Disclosures of Information**

**National Data Opt Out**

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| Recipients (or categories of recipient) of the data: | NHS Digital (acting as a data controller), which then makes this information available to other healthcare organisations, if required |
| How is your data being accessed? | Extraction of information from your GP NHS health records |
| What is the purpose of the processing? | The National Data Opt Out is a national system by which individuals can express an objection to the sharing of their confidential information for purposes beyond direct medical care; e.g. research and planning purposes |
| How does this comply with the CLDC? | Legal obligation |
| What is the GDPR lawful basis of the processing? | Processing of personal data is permitted under:   Article 6(1)(c) – legal obligation  Processing of special category data is permitted under:   Article 9(2)(h) – provision of health |
| Are there any other relevant regulations? | This data extraction is mandatory under Section 254 of the Health & Social Care Act (2012)  More information about NHS Digital data extractions can be found at: <http://www.nhsdatasharing.info> |
| Additional information (if applicable) about:  - The retention period  - Your rights | Patients can find out more and set their opt-out choice at http://www.nhs.uk/your-nhs-data-matters  A summary of NHS Digital’s GDPR information regarding the National Data Opt Out, which includes information about the retention period & your rights, can be found at <https://digital.nhs.uk/>services/national-data-opt-out-programme/supporting-patients-information-and-resources    All newly registered patients at Ford Medical Practice are provided with information about the National Data Opt-Out at the time of their registration |

**Mandatory Disclosures of Information**

**COVID-19 Data Collections**

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| Recipients (or categories of recipient) of the data: | NHS Digital, on behalf of NHS England & Improvement (NHSE/I) & the Secretary of State for Health & Social Care |
| How is your data being accessed? | Extraction of information from your GP NHS health records |
| What is the purpose of the processing? | The health and social care system is facing significant pressures due to the COVID-19 outbreak. Health and care information is essential to deliver care to individuals, to support health and social care services and to protect public health. Information will also be vital in researching, monitoring, tracking and managing the outbreak.  The following data extractions have been mandated:  Shielded patients: <https://digital.nhs.uk/about-nhs-digital/corporate-information-and-documents/directions-and-data-provision-notices/data-provision-notices-dpns/covid-19-at-risk-patients-data-provision-notice>    Research & planning: <https://digital.nhs.uk/about-nhs-digital/corporate-information-and-documents/directions-and-data-provision-notices/data-provision-notices-dpns/gpes-data-for-pandemic-planning-and-research> |
| How does this comply with the CLDC? | Legal obligation |
| What is the GDPR lawful basis of the processing? | Processing of personal data is permitted under:   Article 6(1)(c) – legal obligation  Processing of special category data is permitted under:   Article 9(2)(g) – substantial public interest |
| Are there any other relevant regulations? | These data extractions are mandatory under Section 259 of the Health & Social Care Act (2012).  In March 2020, the Department of Health and Social Care gave notice under Regulation 3(4) of COPI 2002, requiring GP surgeries to process confidential data for COVID-19 purposes: <https://www.nhsx.nhs.uk/covid-19-response/data-and-information-governance/information-governance/copi-notice-frequently-asked-questions/> |
| Additional information (if applicable) about:  - The retention period  - Your rights | During this period of emergency, National Data Opt-Outs will not apply to this data, due to the substantial public interest in sharing it. Please see our ‘NHS 111 - GP Connect’, ‘NHS Digital ‘Spine’ Services’ and ‘Public Health England’ privacy notices for information about other COVID-19 related data sharing |

**Mandatory Disclosures of Information**

**COVID-19 – Combined Intelligence for Population Health Action (CIPHA)**

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| Recipients (or categories of recipient) of the data: | System C/Graphnet, working as a Data Processor for Cheshire and Merseyside Health and Care Partnership |
| How is your data being accessed? | Extraction of information from your GP NHS health records |
| What is the purpose of the processing? | A near real-time, person-level, linked dataset across Cheshire & Merseyside, to enable combined intelligence that can support a set of COVID-19 related population health analytics, designed to inform both population level planning and targeting of direct care. The intelligence will be made available to appropriate users across the system in the form of a set of dashboards within an intelligence platform called ‘Power BI’. There are four use cases:   * + Capacity and demand monitoring   + Epidemiology (mortality and incidence monitoring)   + Population stratification (vulnerable groups)   + Pseudonimised data for place-based intelligence |
| How does this comply with the CLDC? | Legal obligation |
| What is the GDPR lawful basis of the processing? | Processing of personal data is permitted under:   Article 6(1)(c) – legal obligation  Processing of special category data is permitted under:   Article 9(2)(g) – substantial public interest |
| Are there any other relevant regulations? | These data extractions are mandatory under Section 259 of the Health & Social Care Act (2012).  In March 2020, the Department of Health and Social Care gave notice under Regulation 3(4) of COPI 2002, requiring GP surgeries to process confidential data for COVID-19 purposes: <https://www.nhsx.nhs.uk/covid-19-response/data-and-information-governance/information-governance/copi-notice-frequently-asked-questions/> |
| Additional information (if applicable) about:  - The retention period  - Your rights | The data will be retained for as long as the purpose above remains valid but no later than 31st March 2021  Type 1 opts out (those who do not want their information shared outside of General Practice for purposes other than direct care) will be upheld. This means that data for people who have objected to sharing their data will not flow from the GP record into the Graphnet solution |

**Mandatory Disclosures of Information**

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| **NHS England (NHSE)** |

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| Recipients (or categories of recipient) of the data: | NHS England (NHSE), who becomes the Data Controller for any information retained on a database |
| How is your data being accessed? | Extraction of information from your GP NHS health records or your staff records. |
| What is the purpose of the processing? | 1) NHSE is responsible for securing, planning, designing & paying for primary care & specialised services not otherwise funded by South Sefton CCG  2) We may share personal & special category data with NHSE for safeguarding concerns that need escalating beyond our region. We may also have to share staff personal information with NHSE for the purpose of investigating allegations against a performer (GP) |
| How does this comply with the CLDC? | For 1) Consent (implied) – direct care  For 2) Overriding public interest |
| What is the GDPR lawful basis of the processing? | Processing of personal data is permitted under:   Article 6(1)(e) – public interest or official authority  Processing of special category data is permitted under:   For 1) Article 9(2)(h) – provision of health   For 2) Article 9(2)(g) – public interest |
| Are there any other relevant regulations? | The NHSE Performer List policies & procedures: <https://www.england.nhs.uk/commissioning/primary-care/primary-care-comm/performer-list-policies-procedures> |
| Additional information (if applicable) about:  - The retention period  - Your rights | Data is retained in line with NHSE’s Privacy Notice:  <https://www.england.nhs.uk/contact-us/privacy-notice> |

**Mandatory Disclosures of Information**

**Public Health England (PHE)**

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| Recipients (or categories of recipient) of the data: | Public Health England (PHE) is an executive agency of the Department of Health & Social Care, & a distinct organisation with operational autonomy |
| How is your data being accessed? | Extraction of information from your GP NHS health records |
| What is the purpose of the processing? | The main purpose of PHE is to protect & improve the health & wellbeing of citizens. There are occasions when it is mandatory for us to supply personal or special category data to PHE; for example notification of certain diseases & the provision of information in the public interest, in cases such as epidemics, pandemics & other public health emergencies, & root cause analysis of healthcare associated infections |
| How does this comply with the CLDC? | Legal obligation, or Regulation 3 of the Health Service (Control of Patient Information) Regulations (2002) |
| What is the GDPR lawful basis of the processing? | Processing of personal data is permitted under:   Article 6(1)(c) – legal obligation  Processing of special category data is permitted under:   Article 9(2)(i) – public health |
| Are there any other relevant regulations? | The Health Protection (Notification) Regulations (2010)  The Health Protection (Local Authority Powers) Regulations (2010)  The Health Protection (Part 2A Orders) Regulation (2010)  The Public Health (Control of Disease) Act (1984)  The Public Health (Infectious Diseases) Regulations (1988)  The Health Service (Control of Patient Information) Regulations (2002) |
| Additional information (if applicable) about:  - The retention period  - Your rights | Data is retained in line with PHE policies on storing identifiable data: <https://www.gov.uk/government/organisations/public-health-england/about/personal-information-charter>    In March 2020, the Department of Health and Social Care gave notice under Regulation 3(4) of COPI 2002, requiring GP surgeries to process confidential data for COVID-19 purposes: <https://www.nhsx.nhs.uk/covid-19-response/data-and-information-governance/information-governance/copi-notice-frequently-asked-questions/> |

**Mandatory Disclosures of Information**

**Safeguarding**

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| Recipients (or categories of recipient) of the data: | Child or adult social care services at Sefton Council (depending on your age & address), along with other relevant agencies such as the Police, North West Ambulance Service, A&E departments, 111 & the out of hours GP service |
| How is your data being accessed? | Extraction of information from your GP NHS health records |
| What is the purpose of the processing? | Some members of the public are recognised as needing safeguarding protection, for example children and vulnerable adults  If an individual is identified as being at risk from harm, we have a duty to do what we can to protect that individual by sharing relevant information we hold about them, & we are bound by safeguarding laws to do so |
| How does this comply with the CLDC? | Legal obligation & overriding public interest |
| What is the GDPR lawful basis of the processing? | Processing of personal data is permitted under:   Article 6(1)(c) – legal obligation  Processing of special category data is permitted under:   Article 9(2)(b) – social protection law |
| Are there any other relevant regulations? | Section 47 of The Childrens Act (1989)  Section 29 of Data Protection Act (1998)  Section 45 of the Care Act (2014)  In addition there are circumstances when we will seek the consent of the individual or their representative to share information with local child protection services, the relevant law being Section 17 Childrens Act (1989) |
| Additional information (if applicable) about:  - The retention period  - Your rights | The data will be retained for active use during any investigation & thereafter retained in an inactive stored form according to the law & national guidance  Safeguarding is a legal & professional requirement so there is no right to object |

**Mandatory Disclosures of Information**

**NHS Counter Fraud**

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| Recipients (or categories of recipient) of the data: | NHS Counter Fraud Authorities |
| How is your data being accessed? | Extraction of information from your GP NHS health records |
| What is the purpose of the processing? | Under the NHS Act (2006), investigations into fraud in the NHS may require access to confidential patient information; this means that we are compelled by the law to share your data |
| How does this comply with the CLDC? | Legal obligation |
| What is the GDPR lawful basis of the processing? | Processing of personal data is permitted under:   Article 6(1)(c) – legal obligation  Processing of special category data is permitted under:   Article 9(2)(h) – provision of health |
| Are there any other relevant regulations? | Section 10 of the NHS Act (2006) |
| Additional information (if applicable) about:  - The retention period  - Your rights | This sharing is a legal & professional requirement so there is no right to object  Data is retained in line with NHS Counter Fraud policies on storing identifiable data: <https://cfa.nhs.uk/privacy> |

**Mandatory Disclosures of Information**

**Law Enforcement & Regulatory Bodies**

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| Recipients (or categories of recipient) of the data: | *Law enforcement authorities such as the Police, Courts of Justice, HM Revenue & Customs (HMRC), & the Driver & Vehicle Licensing Agency (DVLA)* |
| How is your data being accessed? | *Extraction of information from your GP NHS health records* |
| What is the purpose of the processing? | In some circumstances the practice may be legally required to share personal information with law enforcement or regulatory bodies, for the purposes of prevention or detection of crime, apprehension or prosecution of offenders, the assessment or collection of any tax or duty, or any imposition of a similar nature  For any disclosures to the Police, there must be a legal duty to disclose, or a sufficiently important reason to disclose & a legal basis for doing so. Only the minimum or relevant information to satisfy the request will be provided  GPs are obliged to notify the DVLA when fitness to drive requires notification but an individual cannot or will not notify the DVLA themselves, & if there is concern for road safety for both the individual and the wider public.  The practice will review each request based on its merits before deciding whether to release information |
| How does this comply with the CLDC? | Legal obligation & overriding public interest |
| What is the GDPR lawful basis of the processing? | Processing of personal data is permitted under:   Article 6(1)(c) – legal obligation OR   Article 6(1)(e) – public interest or official authority  Processing of special category data is permitted under:   Article 9(2)(g) – public interest |
| Are there any other relevant regulations? | The Prevention of Terrorism Act (1989) & the Terrorism Act (2000)  The Road Traffic Act (1988)  The Female Genital Mutilation Act (2003)  Schedule 36, Part 1 of the Finance Act (2008) |
| Additional information (if applicable) about:  - The retention period  - Your rights | This sharing is a legal and professional requirement so there is no right to object  The data will be retained by these organisations according to the law & national guidance |

**Mandatory Disclosures of Information**

**The Care Quality Commission (CQC)**

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| Recipients (or categories of recipient) of the data: | The Care Quality Commission (CQC), its officers & staff, & members of their inspection team who visit us |
| How is your data being accessed? | Access to or extraction of information from your GP NHS health records |
| What is the purpose of the processing? | The CQC is a body established under the Health and Social Care Act (2008), regulating health & social care services in England to ensure that safe health & care are provided  The law allows them to access identifiable patient data/ records in our clinical system for the purposes of their assessment & investigation of a significant safety incident |
| How does this comply with the CLDC? | Legal obligation |
| What is the GDPR lawful basis of the processing? | Processing of personal data is permitted under:   Article 6(1)(c) – legal obligation  Processing of special category data is permitted under:   Article 9(2)(h) – provision of health |
| Are there any other relevant regulations? | Section 64 of the Health & Social Care Act (2008) |
| Additional information (if applicable) about:  - The retention period  - Your rights | If data provided to the CQC, then it will be retained in line with CQC policies on storing identifiable data: <http://www.cqc.org.uk/about-us/our-policies/privacy-statement> |

**Mandatory Disclosures of Information**

**The Health Service Ombudsman**

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| Recipients (or categories of recipient) of the data: | Investigative teams from the (Parliamentary &) Health Service Ombudsman |
| How is your data being accessed? | Extraction of information from your GP NHS health records |
| What is the purpose of the processing? | The Health Service Ombudsman was set up by Parliament to provide an independent complaint handling service for complaints that have not been resolved by the NHS in England and UK government departments  They have the power to request access to a patient’s medical records for the purpose of an investigation |
| How does this comply with the CLDC? | Legal obligation |
| What is the GDPR lawful basis of the processing? | Processing of personal data is permitted under:   Article 6(1)(c) – legal obligation  Processing of special category data is permitted under:   Article 9(2)(h) – provision of health |
| Are there any other relevant regulations? | Section 12 of the Health Services Commissioners Act (1993) |
| Additional information (if applicable) about:  - The retention period  - Your rights | If data provided to the Health Services Ombudsman, then it will be retained in line with their policies on storing identifiable data. |

**Mandatory Disclosures of Information**

**The General Medical Council (GMC)**

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| Recipients (or categories of recipient) of the data: | General Medical Council (GMC) employees performing a Fitness to Practice investigation |
| How is your data being accessed? | Extraction of information from your GP NHS health records |
| What is the purpose of the processing? | The GMC is a public body that maintains the official register of medical practitioners within the UK. Its primary responsibility is ‘to protect, promote and maintain the health & safety of the public’ by controlling entry to the register, & suspending or removing members when necessary  Under the Medical Act 1983, the GMC has the power to request access to a patient’s medical records for an investigation into a doctor’s fitness to practice |
| How does this comply with the CLDC? | Legal obligation |
| What is the GDPR lawful basis of the processing? | Processing of personal data is permitted under:   Article 6(1)(c) – legal obligation  Processing of special category data is permitted under:   Article 9(2)(h) – provision of health |
| Are there any other relevant regulations? | The Medical Act 1983 |
| Additional information (if applicable) about:  - The retention period  - Your rights | Data is retained in line with GMC policies on storing identifiable data: <https://www.gmcuk.org/privacy_policy.asp> |

**Mandatory Disclosures of Information**

**Medical Defence Organisations (MDOs)**

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| Recipients (or categories of recipient) of the data: | Medico-legal teams from the Medical & Dental Defence Union of Scotland (MDDUS), Medical Protection Society (MPS) or the Medical Defence Union (MDU) |
| How is your data being accessed? | Extraction of information from your GP NHS health records |
| What is the purpose of the processing? | Disclosure of information from a patient’s record to a medical defence organisation (MDO) in the event of actual or possible legal proceedings |
| How does this comply with the CLDC? | Legal obligation/proceedings |
| What is the GDPR lawful basis of the processing? | Schedule 2, Paragraph 5 of the forthcoming Data Protection Act (2018) states that the listed GDPR provisions do not apply to personal data where disclosure of the data is necessary, either:   1. For the purpose of, or in connection with, legal proceedings (including prospective legal proceedings), or 2. For the purpose of obtaining legal advice or otherwise establishing, exercising or defending legal rights to the extent that the application of those provisions would prevent the controller from making the disclosure |
| Are there any other relevant regulations? | No |
| Additional information (if applicable) about:  - The retention period  - Your rights | This sharing is a legal and professional requirement so there is no right to object  When seeking medico-legal advice from defence organisations (i.e. not formal or likely legal proceedings) then information from an individual’s record may be disclosed to the MDO. That information will be:   * Relevant, i.e. not the entire GP record, & * Anonymised or de-identified   The retention period for legal proceedings is usually 10 years |

**Mandatory Disclosures of Information**

**Complaints**

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| Recipients (or categories of recipient) of the data: | Communication between practice staff & the patient or their representative |
| How is your data being accessed? | Extraction of information from your GP NHS health records |
| What is the purpose of the processing? | Storage of communication following a complaint about care received at the practice  Any such communication (emails, letters or faxes) is stored in a hard copy (i.e. emails are printed) & separately from the GP NHS health records |
| How does this comply with the CLDC? | Consent (implied) – direct care |
| What is the GDPR lawful basis of the processing? | Processing of personal data is permitted under:   Article 6(1)(e) – official authority  Processing of special category data is permitted under:   Article 9(2)(h) – provision of health |
| Are there any other relevant regulations? | No |
| Additional information (if applicable) about:  - The retention period  - Your rights | Data is retained for 3 years following the resolution of the complaint |

**Other Data Processing**

**Permissive Disclosures to Other Third Parties**

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| Recipients (or categories of recipient) of the data: | A patient’s solicitors, employers or insurance companies |
| How is your data being accessed? | Extraction of information from your GP NHS health records |
| What is the purpose of the processing? | To enable healthcare professionals working at Ford Medical Practice to provide information in the form of a medical report to third party organisations such as solicitors (e.g. for personal injury claims), employers (e.g. for occupational health purposes) & insurance companies (e.g. for life assurance) |
| What is the GDPR lawful basis of the processing? | Processing of personal data is permitted under:   Article 6(1)(e) – official authority  Processing of special category data is permitted under:   Article 9(2)(a) – explicit consent   Article 9(2)(b) – employment   Article 9(2)(f) – legal claims |
| How does this comply with the CLDC? | Consent (explicit) – obtained by us for all SARs |
| Are there any other relevant regulations? | No |
| Additional information (if applicable) about:  - The retention period  - Your rights | We do not, & cannot, disclose information under a Subject Access Request (SAR) to solicitors, employers or insurance companies.  Any data retained by these organisations will be in line with their policies on storing identifiable data |

**Other Data Processing**

**Patient Online**

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| Recipients (or categories of recipient) of the data: | The Data Subject (you), or your parent, guardian or representative |
| How is your data being accessed? | Access to your GP NHS health records |
| What is the purpose of the processing? | To enable patients to securely access their GP NHS health records online & be able to book appointments, request repeat medication & view (read-only) their medical information |
| How does this comply with the CLDC? | Consent (explicit) – obtained by the practice |
| Are there any other relevant regulations? | Information can also be found at:  https://www.nhs.uk/nhsengland/aboutnhsservices/  doctors/pages/gp-onlineservices.aspx  https://www.nhs.uk/using-the-nhs/nhs-services/the-nhs-app/privacy-policy/  https://patient.emisaccess.co.uk |
| Additional information (if applicable) about:  - The retention period  - Your rights | The source of the information shared in this way is your electronic GP health record & you have rights directly related to that (see EMIS Health Ltd. - EMIS Web) |
| Are there any other relevant regulations? | Information can also be found at:  https://www.nhs.uk/nhsengland/aboutnhsservices/  doctors/pages/gp-onlineservices  <https://www.nhs.uk/using-the-nhs/nhs-services/the-nhs-app/privacy-policy/>  <https://patient.emisaccess.co.uk> |

**Other Data Processing**

**NHS.net – Email Messages (Medical Purposes)**

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| Recipients (or categories of recipient) of the data: | The Data Subject (you), or your parent, guardian or representative |
| How is your data being accessed? | Extraction of information from your GP NHS health records |
| What is the purpose of the processing? | To enable staff at Ford Medical Practice to communicate with patients or their representatives by email for direct care purposes. A patient may choose to send us a clinical photograph by email if they are unable to send this using the AccuRx Chain SMS system or eConsult. They may also wish to email the practice NHS.net address in order to initiate correspondence relating to their direct care. At the present time, we do not routinely initiate correspondence relating to a patient’s direct care ourselves by NHS.net |
| How does this comply with the CLDC? | Consent (implied) – direct care |
| What is the GDPR lawful basis of the processing? | Processing of personal data is permitted under:   Article 6(1)(e) – official authority  Processing of special category data is permitted under:   Article 9(2)(h) – provision of health |
| |  | | --- | | Are there any other relevant regulations? | | **No** |
| Additional information (if applicable) about:  - The retention period  - Your rights | Patients and their representatives are free to provide Ford Medical Practice with their email address – there is no obligation to do so & we will remove the email address from the registration page on EMISWeb if requested  All emails sent via NHS.net that contain personal data should be deleted as soon as possible, and at the latest within one calendar year. If there is a need to retain the email for longer, it should be exported and attached to the the patient’s EMISWeb GP Record |

**Other Data Processing**

**Non-Medical Communications**

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| Recipients (or categories of recipient) of the data: | The Data Subject (you) |
| How is your data being accessed? | Extraction of information from your GP NHS health records |
| What is the purpose of the processing? | To enable staff at Ford Medical Practice to communicate with patients for non-medical purposes  At the moment, the only time we will do this is when communicating with the Patient Participation Group |
| How does this comply with the CLDC? | Not applicable – the information is being shared directly with you |
| Are there any other relevant regulations? | The Privacy & Electronic Communications (EC Directive) Regulations (2003) – PECR (direct marketing) |
| Additional information (if applicable) about:  - The retention period  - Your rights | Patients may choose not to provide consent for this purpose, or withdraw consent for this at any time.  To object to, or opt-out of, non-medical communication by the surgery, simply contact us in any way – in person, by telephone, by fax, by letter or by email  We will record & action any such objection accordingly, ensuring no such communications are sent to you |

**Other Data Processing**

**Pharmacy Collection of FP10 Prescriptions**

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| Recipients (or categories of recipient) of the data: | Community pharmacies providing direct medical care to the Data Subject |
| How is your data being accessed? | Extraction of information from your GP NHS health records |
| What is the purpose of the processing? | To enable community pharmacies to collect paper prescriptions (FP10s) from the surgery on behalf of patients, where that patient has not chosen to enable  the Electronic Prescription Service (EPS)  This Privacy Notice covers situations where a patient nominates a pharmacy (or service) to either:   * Collect the prescription directly from the surgery, or * For the surgery to post the prescription to the service/pharmacy (e.g. for appliances)   Not consenting to this processing would require the Data Subject to collect the prescription from the surgery in person. The only exception to this is where a patient has consented to an EPS nomination but a prescription cannot be sent by EPS (e.g. a Controlled Drug) |
| How does this comply with the CLDC? | Consent (explicit) – obtained by the practice  If a patient does not have the mental capacity to consent, disclosure may be made if it is in their overriding safeguarding interest or following a court order |
| What is the GDPR lawful basis of the processing? | Processing of personal data is permitted under:   Article 6(1)(e) – official authority  Processing of special category data is permitted under:   Article 9(2)(h) – provision of health |
| Are there any other relevant regulations? | No |
| Additional information (if applicable) about:  - The retention period  - Your rights | Not applicable |

**Other Data Processing**

**Accessing Your Information on Other Databases**

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| Recipients (or categories of recipient) of the data: | Staff employed by Ford Medical Practice who have authorised access to these databases |
| How is your data being accessed? | Access to data held about you by another Data Controller, though an original source may be your GP NHS health records |
| What is the purpose of the processing? | Open Exeter – see the Open Exeter Privacy Notice above  The EMIS Web Extended Record – just as EMIS Web Local Record Sharing enables certain GP NHS health records to be viewed by some other local healthcare providers (see the related Privacy Notice above), we are also able to view certain health records made on EMIS Web by some of those providers, to improve the continuity of medical care  Cheshire & Merseyside CSU’s Aristotle Business Intelligence Portal – as part of our Local Quality Contract (LQC) with South Sefton CCG, we are required to monitor & validate our outpatient clinic referral rates (see the related CSU Privacy Notice above)  Southport & Ormskirk Hospitals’ Sunquest ICE database – access is available directly through a patient’s EMIS Web GP record (via the N3 network) & enables us to obtain  information about some investigations requested by other healthcare providers & processed by the same laboratory |
| How does this comply with the CLDC? | Consent (implied) – direct care OR  Consent (explicit) – for the EMIS Web Extended Record: sought & recorded at the time of access |
| What is the GDPR lawful basis of the processing? | Processing of personal data is permitted under:   Article 6(1)(e) – official authority  Processing of special category data is permitted under:   Article 9(2)(h) – provision of health |
| Are there any other relevant regulations? | No |
| Additional information (if applicable) about:  - The retention period  - Your rights | Data may be:   Viewed on screen – in which case, it is not retained   Downloaded directly into the GP NHS health record (Sunquest ICE) – thus this is retained according to the ‘EMIS Health Ltd - EMIS Web’ policy; or   Printed out – if so, it is destroyed when no longer required, usually within 24 hours |

**Other Data Processing**

**Healthcare Commissioning & Planning**

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| Recipients (or categories of recipient) of the data: | South Sefton Clinical Commissioning Group (SSCCG) |
| How is your data being accessed? | Extraction of information from your GP NHS health records |
| What is the purpose of the processing? | SSCCG is responsible for securing, planning, designing & paying for your NHS services, including planned & emergency hospital care, mental health, rehabilitation, community & primary care (including GP) services – this is known as ‘commissioning’  To enable SSCCG to carry out its statutory responsibilities effectively, efficiently and safely, we may share personal data about you with the CCG for the following purposes:   * Individual Funding Requests (IFRs) * Continuing Health Care (CHC) * Appeals, queries or compliments * Safeguarding concerns * Commissioning purposes, such as payment for target achievement known as Quality and Outcomes Framework (QOF) * Where the practice is participating in agreed national or local enhanced services |
| How does this comply with the CLDC? | Consent (implied) – direct care |
| What is the GDPR lawful basis of the processing? | Processing of personal data is permitted under:   Article 6(1)(e) – official authority  Processing of special category data is permitted under:   Article 9(2)(h) – provision of health |
| Are there any other relevant regulations? | The Health & Social Care Act (2012), which led to the creation of CCGs |
| Additional information (if applicable) about:  - The retention period  - Your rights | Data is retained in line with SSCCG policies |

**Other Data Processing**

**Risk Stratification**

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| Recipients (or categories of recipient) of the data: | The data will be shared for processing with Cheshire 7 Merseyside CSU, South Sefton CCG, & provider organisations including NHS Trusts |
| How is your data being accessed? | Extraction of information from your GP NHS health records |
| What is the purpose of the processing? | The practice performs computerised searches of some or all of our records to identify individuals who may be at increased risk of certain conditions or diagnoses; your records may be amongst those searched. This is often called ‘risk stratification’ or ‘case finding’  These searches are sometimes carried out by Data Processors, who link our records to other records that they access, such as hospital attendance records. The results of these searches and assessments may then be shared with other healthcare workers. This enables them to provide the most appropriate health or social care  Risk stratification can be grouped into two purposes:   * ‘Case finding’ carried out by a health professional involved in providing an individual’s care, or by a   Data Processor acting under contract with such a provider   * To understand the local population needs & plan for future requirement |
| How does this comply with the CLDC? | Consent (implied) – direct care |
| What is the GDPR lawful basis of the processing? | Processing of personal data is permitted under:   Article 6(1)(e) – official authority  Processing of special category data is permitted under:   Article 9(2)(h) – provision of health |
| Are there any other relevant regulations? | Section 251 of the National Health Service Act (2006) |
| Additional information (if applicable) about:  - The retention period  - Your rights | See the Data Processor Privacy Notices above  Processing of this type is only lawful where it results in individuals being identified with their associated calculated risk. It is not lawful for this processing to be used for other purposes, such as “health analytics”  If any processing of this data occurs outside the practice, your identity will not be visible to the Data Processors |

**Other Data Processing**

**Research**

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| Recipients (or categories of recipient) of the data: | Accredited research organisations |
| How is your data being accessed? | Access to or extraction of information from your GP NHS health records |
| What is the purpose of the processing? | Ford Medical Practice may be approached by research organisations to recruit patients for studies, & will only agree to do so if there is a clearly defined reason for the research that is likely to benefit healthcare and patients  Such proposals will normally have a consent process, ethics committee approval & will be in line with the principles of Article 89(1) of GDPR. At the present time, we are not taking part in any such research projects  Occasionally, research can be authorised under law without the need to obtain consent – this is known as the Section 251 arrangement |
| How does this comply with the CLDC? | Consent (explicit) – obtained by the practice or a research partner; OR  Regulation 5 of the Health Service (Control of Patient Information) Regulations (2002) – Section 251 approval |
| What is the GDPR lawful basis of the processing? | Processing of personal data is permitted under:   Article 6(1)(e) – official authority  Processing of special category data is permitted under:   Article 9(2)(j) – research purposes |
| Are there any other relevant regulations? | The Health Service (Control of Patient Information) Regulations (2002) |
| Additional information (if applicable) about:  - The retention period  - Your rights | Data will be retained in line with the research organisation’s policies on storing identifiable data, & retention periods will be defined in the research protocol |

**Other Data Processing**

**Employment Planning**

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| Recipients (or categories of recipient) of the data: | The Partners & management staff at Ford Medical Practice; also the Care Quality Commission (CQC) & HM Revenue & Customs (HMRC) |
| How is your data being accessed? | Extraction of information from your staff records |
| What is the purpose of the processing? | As employers, we need to keep certain information so that we can remain your employer & manage payments. This is a combination of personal & financial information  We are required by law to hold certain types of data on those we employ under the Health & Social Care Act (2008) and this data is examined during CQC inspection visits. We required to share information about you with NHS Digital under a submission known as the ‘Workforce Minimum Dataset’. We are also required by HMRC & various taxation laws to keep financial records The following data may be stored in your staff records: name, date of birth, address, telephone numbers, next of kin details, National Insurance number, bank details, professional membership numbers, NHS pension details, Disclosure & Barring Service (DBS) checks, contract, job description, curriculum vitae, references & relevant health details (e.g. immunisations & occupational health needs) |
| How does this comply with the CLDC? | Legal obligation |
| What is the GDPR lawful basis of the processing? | Processing of personal data is permitted under:   Article 6(1)(c) – legal obligation  Processing of special category data is permitted under:   Article 9(2)(b) – employment law  The practice ensures that personal & special category data it collects from employees are used only for employment related purposes or where there is a statutory obligation to share it with regulatory bodies |
| Are there any other relevant regulations? | The Health & Social Care Act (2008)  Information about the CQC: <http://www.cqc.org.uk/>    Details of the Workforce Minimum Dataset: <https://digital.nhs.uk/data-and-information/areas-of-interest/workforce/workforce-minimum-data-set-wmds>    The Income Tax (Pay As You Earn) Regulations (2003) |
| Are there any other relevant regulations? | The Health & Social Care Act (2008)  Information about the CQC: http://www.cqc.org.uk/  Details of the Workforce Minimum Dataset: https://digital.nhs.uk/data-and-information/areas-of-interest/workforce/workforce-minimum-data-set-wmds  The Income Tax (Pay As You Earn) Regulations (2003) |
| Additional information (if applicable) about:  - The retention period  - Your rights | There is no right to have records deleted except when ordered by a court of Law. You have the right to object to some or all of the information being shared with the CQC. There is no right to have UK taxation related data deleted except after certain statutory periods  The data will be retained for active use during the processing & thereafter according to NHS policies, taxation & employment law |