# Fair Processing Notice (Privacy Notice)
# Your Personal Information – what you need to know

## Your information, what you need to know

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

## Why we collect information about you

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

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

## Our Commitment to Data Privacy and Confidentiality Issues

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

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

## Data we collect about you

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

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

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

## How we use your information

Improvements in information technology are also making it possible for us to share data with other healthcare organisations for the purpose of providing you, your family and your community with better care; for example, it is possible for healthcare professionals in other services to access your record with your permission when the Practice is closed. This is explained further in the Local Information Sharing at Appendix A.

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

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

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

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

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

## How long do we hold information for?

All records held by the Practice will be kept for the duration specified by national guidance: Records Management Code of Practice for Health and Social Care (NHS England). Once information that we hold has been identified for destruction it will be disposed of in the most appropriate way for the type

of information it is. Personal confidential and commercially confidential information will be disposed of by approved and secure confidential waste procedures. We keep a record of retention schedules within our information asset registers, in line with the Records Management Code of Practice for Health and Social Care 2023.

## Individuals Rights under UK GDPR

Under UK GDPR the law provides the following rights for individuals. The NHS uphold these rights in a number of ways:

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

## Your right to opt out of data sharing and processing

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

**Type 1 opt-out**

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

**National data opt-out** (NDOO)

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

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

To find out more or to register your choice to opt out, please visit www.nhs.uk/your-nhs-data-matters. On this web page you will:

- See what is meant by confidential patient information
- Find examples of when confidential patient information is used for individual care and examples of when it is used for purposes beyond individual care
- Find out more about the benefits of sharing data

- Understand more about who uses the data
- Find out how your data is protected
- Be able to access the system to view, set or change your opt-out setting
- Find the contact telephone number if you want to know any more or to set/change your opt-out by phone
- See the situations where the opt-out will not apply.

## Right of Access to your information (Subject Access Request)

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

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

Patients do not need to give a reason to see your data and requests can be made verbally or in writing, although we may ask you to complete a form in order that we can ensure that you have the correct information you required.

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

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

Patients may also request to have online access to their data, they may do this via the NHS APP, or via the Practice's system. If you would like to access your GP record online click here https://www.seasidemedicalcentre.co.uk/

## COVID-19 Vaccination Record

Patients can view their COVID-19 vaccination record in the NHS App, available via this link. The Practice cannot provide COVID-19 vaccination certificates as these are not held in the Practice record.

## Change of Detail

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

## Mobile telephone number

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

## Email address

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

## Notification

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

We are registered as a Data Controller and our registration can be viewed online in the public register at: https://ico.org.uk/ESDWebPages/Search
Any changes to this notice will be published on our website and in a prominent area at the Practice.

## Data Protection Officer

Should you have any data protection questions or concerns, please contact our Data Protection Officer, Dan Clement, at: kmicb.gpdpoteam@nhs.net

## What is the right to know?

The Freedom of Information Act 2000 (FOIA) gives people a general right of access to information held by or on behalf of public authorities, promoting a culture of openness and accountability across the public sector. You can request any non-personal information that the GP Practice holds that does not fall under an exemption. You may not ask for information that is covered by the Data Protection Legislation under FOIA. However, you can request this under a right of access request – see section above 'Access to your information'.

## Right to Complain

If you are unhappy with how we have used or looked after your personal information, you have the right to complain to us. You can do this:

- in person at reception
- by phone: 01323 725667
- in writing to the Practice Manager, Seaside Medical Centre, 18 Sheen Road, Eastbourne, East Sussex, BN22 8DR
- by email: sxicb-esx.smcprescriptionservice@nhs.net

We will acknowledge your complaint within 30 days, investigate it, keep you updated on progress and tell you the outcome.

If you are still unhappy, you can complain to the Information Commissioner's Office (ICO):
The Information Commissioner
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Phone: 0303 123 1113 Website: https://ico.org.uk/make-a-complaint

## The NHS Care Record Guarantee

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

## The NHS Constitution

The NHS Constitution establishes the principles and values of the NHS in England. It sets out the rights patients, the public and staff are entitled to. These rights cover how patients access health services, the quality of care you'll receive, the treatments and programs available to you, confidentiality, information and your right to complain if things go wrong.
https://www.gov.uk/government/publications/the-nhs-constitution-for-england

# Appendix A

**The Practice will share your information with these organisations where there is a legal basis to do so**

| Activity | Rationale |
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| Commissioning and Contractual Purposes<br>Invoice Validation<br>Planning<br>Quality and Performance | **Purpose** – Anonymous data is used by the Integrated Care Board (ICB) for planning, performance and commissioning purposes, as directed in the Practices contract, to provide services as a Public Authority.<br><br>**Legal Basis** – UK GFPR 6 1(b) Contractual obligation as set out in the Health and Social Care Act for Quality and Safety 2015.<br><br>Patients may opt out of having their personal confidential data used for Planning or research. Please contact the surgery to apply a Type 1 Opt Out or login to https://www.nhs.uk/your-nhs-data-matters/manage-your-choice/ to apply a National Data Opt Out.<br><br>**Processor** – Sussex ICB |
| Summary Care Record Including additional information | **Purpose** – The NHS in England uses a national electronic record called the Summary Care Record (SCR) to support patient care. It contains key information from your GP record. Your SCR provides authorised healthcare staff with faster, secure access to essential information about you in an emergency or when you need unplanned care, where such information would otherwise be unavailable.<br><br>**Legal Basis** – Direct Care under UK GDPR Article 6(1)(e) '…necessary for the performance of a task carried out in the public interest or in the exercise of official authority…' and Article 9(2)(h) '…necessary for the purposes of preventative or occupational medicine'<br><br>Patients have the right to opt out of having their information shared with the SCR by completion of the form which can be downloaded here and returned to the Practice. Please note that by opting out of having your information shared with the Summary Care Record could result in a delay in care that may be required in an emergency.<br><br>**Processor –** NHS England |
| Research | **Purpose** – We may share anonymous patient information with research companies for the purpose of exploring new ways of |

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| | providing healthcare and treatment for patients within certain conditions. This data will not be used for any other purpose.<br><br>Where personal confidential data is shared your consent will need to be required.<br><br>Where you have opted out of having your identifiable information shared for this Planning or Research your information will not be shared.<br><br>**Legal Basis** – Where sharing of personal identifiable data is required the legal basis of Article 6 1(a) and 9 2(h) Consent will be required.<br><br>Where identifiable data is required for research, patient consent will be needed, unless there is a legitimate reason under law to do so or there is support under the Health Service (Control of Patient Information Regulations) 2002 ('section 251 support') applying via the Confidentiality Advisory Group in England and Wales.<br><br>Sharing of aggregated non identifiable data is permitted.<br><br>**Processor** – The Clinical Research Network – Kent, Surrey and Sussex |
| Individual Funding Requests | **Purpose** – We may need to process your personal information where we are required to fund specific treatment for you for a particular condition that is not already covered in our standard NHS contract.<br><br>The clinical professional who first identifies that you may need the treatment will explain to you the information that is needed to be collected and processed in order to assess your needs and commission your care; they will gain your explicit consent to share this. You have the right to withdraw your consent at any time but this may affect the decision to provide individual funding.<br><br>**Legal Basis** – Under UK GDPR Article 6 1(a) consent is required 6 1(e) and Public Task Article 9 2(h) Health Data<br><br>**Data processor** – Sussex ICB |
| Safeguarding Adults | **Purpose –** We will share personal confidential information with the safeguarding team where there is a need to assess and evaluate any safeguarding concerns and to protect the safety of individuals.<br><br>Consent may not be required to share information for this purpose.<br><br>**Legal Basis** - in some cases consent will be required otherwise, Article 6(1)(e) '…necessary for the performance of a task carried out in the public interest or in the exercise of official authority…' |

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<tr><td></td><td>and Article 9(2)(h) '…necessary for the purposes of preventative or occupational medicine'<br><br>Data Processor<br><table><tr><td>Adults</td></tr><tr><td>Social Care Direct<br><br>Phone: 0345 608 0191<br>Minicom 01323 466630<br>Fax: 01323 466567<br>Email: socialcaredirect@eastsussex.gov.uk<br>Text: 07797 878111<br><br>Out of Hours Emergency Duty<br>Phone: 01323 636399</td></tr></table><br>Plus Social Services/other care teams as necessary.</td></tr>
<tr><td>Safeguarding Children</td><td>Purpose – We will share children's personal information where there is a need to assess and evaluate any safeguarding concerns and to protect the safety of children.<br><br>Legal Basis – Article 6(1)(e) '…necessary for the performance of a task carried out in the public interest or in the exercise of official authority…' and Article 9(2)(h) '…necessary for the purposes of preventative or occupational medicine'<br><br>Consent may not be required to share this information.<br>Data Processor<br><table><tr><td>Children - East Sussex</td></tr><tr><td>Single Point of Advice (SPoA) Mon-Thurs 8.30am-5pm and Fri 8.30am-4.30pm.<br>Phone: 01323 464222<br>Email: 0-19.SPOA@eastsussex.gov.uk or<br>0-19.SPOA@eastsussex.gcsx.gov.uk<br>Out of Hours Social Care Service - Children's services: 01273 335905/6</td></tr></table><br>Plus Social Services/other care teams as necessary.</td></tr>
<tr><td>Risk Stratification – Preventative Care</td><td>Purpose - 'Risk stratification for case finding' is a process for identifying and managing patients who have or may be at-risk of health conditions (such as diabetes) or who are most likely to</td></tr>
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| | need healthcare services (such as people with frailty). Risk stratification tools used in the NHS help determine a person's risk of suffering a particular condition and enable us to focus on preventing ill health before it develops.<br><br>Information about you is collected from a number of sources including NHS Trusts, GP Federations and your GP Practice. A risk score is then arrived at through an analysis of your de-identified information. This can help us identify and offer you additional services to improve your health.<br><br>If you do not wish information about you to be included in any risk stratification programmes, please let us know. We can add a code to your records that will stop your information from being used for this purpose. Please be aware that this may limit the ability of Healthcare Professionals to identify if you have or are at risk of developing certain serious health conditions.<br><br>Type of Data – Identifiable/Pseudonymised/Anonymised/Aggregate Data<br><br>**Legal Basis** - UK GDPR Article 6(1)(e) and Article 9(2)(h)<br><br>The use of identifiable data by ICBs and GPs for risk stratification has been approved by the Secretary of State, through the Confidentiality Advisory Group of the Health Research Authority (approval reference (CAG 7-04)(a)/2013)) and this approval has been extended to the end of September 2022 NHS England Risk Stratification which gives us a statutory legal basis under Section 251 of the NHS Act 2006 to process data for risk stratification purposes which sets aside the duty of confidentiality. We are committed to conducting risk stratification effectively, in ways that are consistent with the laws that protect your confidentiality.<br><br>**Processors -** The Practice uses carefully selected third party service providers. When we use a third party service provider to process data on our behalf then we will always have an appropriate agreement in place to ensure that they keep the data secure, that they do not use or share information other than in accordance with our instructions and that they are operating appropriately. Examples of functions that may be carried out by third parties includes:<br><br>• Companies that provide IT services & support, including our core clinical systems; systems which manage patient facing services (such as our website and service accessible through the same); data hosting service providers; systems which |

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| | facilitate appointment bookings or electronic prescription services; document management services etc.<br>• Delivery services (for example if we were to arrange for delivery of any medicines to you).<br>• Payment providers (if for example you were paying for a prescription or a service such as travel vaccinations.<br><br>Further details regarding specific third party processors can be supplied on request. |
| Public Health Screening programmes (identifiable)<br>Notifiable disease information (identifiable)<br>Smoking cessation (anonymous)<br>Sexual health (anonymous)<br>Vaccination Programmes | **Purpose –** Personal identifiable and anonymous data is shared.<br>The NHS provides national screening programmes so that certain diseases can be detected at an early stage. These currently apply to bowel cancer, breast cancer, aortic aneurysms and diabetic retinal screening service top name a few. The law allows us to share your contact information and certain aspects of information relating to the screening with Public Health England so that you can be appropriately invited to the relevant screening programme.<br>More information can be found at:<br>https://www.gov.uk/topic/population-screeningprogrammes or speak to the Practice<br>Patients may not op out of having their personal information shared for Public Health reasons.<br><br>Patients may not opt out of being screened at the time of receiving an invitation.<br><br>**Legal Basis** - Sharing personal data for this purpose is governed by the COPI Reg 2. Article 6(1)(e); "…necessary in the exercise of official authority vested in the controller', 6 1(f) Legitimate interests, Article 9(2)(h) Health data as stated below and 9 2(i) public health<br><br>**Data Processors** – Public Health, East Sussex County Council |
| **Lung Cancer Screening** | **Purpose**: To identify patients and invite them to take part in an Enhanced Lung Care Screening. The purpose of this screening is to identify and treat lung conditions to improve outcomes.<br><br>**Legal Basis**:<br>Article 6(1)e<br>"processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller";<br>Article 9(2)h<br>"processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social |

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| | care or treatment or the management of health or social care systems and services";<br><br>**Processor**: InHealth |
| Direct Care<br>NHS Trusts<br>Community Providers<br>Pharmacies<br>Enhanced Care Providers<br>Nursing Homes<br>NHS 111<br>Other Care Providers | **Purpose** – Personal information is shared with other secondary care trusts and providers in order to provide you with direct care services. This could be hospitals or community providers for a range of services including treatment, operations, physio, community nursing and ambulance service.<br><br>**Legal Basis** - The processing of personal data in the delivery of direct care and for providers administrative purposes in this surgery and in support of direct care elsewhere is supported under the following Article 6(1)(e) Direct care and 9 2(h) to provide health or social care.<br><br>In some cases patients may be required to consent to having their record opened by the third party provider before patient's information is accessed. Where there is an overriding need to access<br><br>the GP record in order to provide patients with lifesaving care, their consent will not be required.<br><br>**Processors** – The Practice uses carefully selected third party service providers. When we use a third party service provider to process data on our behalf then we will always have an appropriate agreement in place to ensure that they keep the data secure, that they do not use or share information other than in accordance with our instructions and that they are operating appropriately. Examples of functions that may be carried out by third parties include:<br><br>• Companies that provide IT services & support, including our core clinical systems; systems which manage patient facing services (such as our website and service accessible through the same); data hosting service providers; systems which facilitate appointment bookings or electronic prescription services; document management services etc.<br>• Delivery services (for example if we were to arrange for delivery of any medicines to you).<br>• Payment providers (if for example you were paying for a prescription or a service such as travel vaccinations.<br><br>Further details regarding specific third party processors can be supplied on request.<br><br>**Processors**- ESHT, SCPFT, UHSFT, Sussex MSK, Pure Physio, First Contact Physiotherapist Bespoke Southdown Pharmacy |

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| Care Quality Commission | **Purpose** – The CQC is the regulator for the English Health and Social Care services to ensure that safe care is provided. They will inspect and produce reports back to the GP Practice on a regular basis. The law allows the CQC to access identifiable data.<br><br>More detail on how they ensure compliance with data protection law (including UK GDPR) and their privacy statement is available on their website**:**<br>https://www.cqc.org.uk/about-us/our-policies/privacy-statement<br><br>**Legal Basis** – Article 6(1)(c) "processing is necessary for compliance with a legal obligation to which the controller is subject" and Article 9(2) (h) as stated below<br><br>**Processor**s – Care Quality Commission |
| Population Health Management | **Purpose** – Health and care services work together as 'Integrated Care Systems' (ICS) and are sharing data in order to:<br>• Understand the health and care needs of the care systems population, including health inequalities;<br>• Provide support to where it will have the most impact;<br>• Identify early actions to keep people well, not only focusing on people in direct contact with services, but looking to join up care across different partners.<br>(**NB** this links to the Risk Stratification activity identified above)<br><br>Type of Data – Identifiable/pseudonymised/anonymised/aggregate data. **NB** only organisations that provide your care will your identifiable data.<br><br>**Legal Basis** – Article 6(1)(e); '…necessary in exercise of official authority vested in the controller' and Article 9(2)(h) as stated below.<br><br>**Data Processors** – Optum, Cerner |
| Payments, Invoice validation | **Purpose -** Contract holding GPs in the UK receive payments from their respective governments on a tiered basis. Most of the income is derived from baseline capitation payments made according to the number of patients registered with the Practice on quarterly payment days. These amounts paid per patient, per quarter varies according to the age, sex and other demographic details for each patient. There are also graduated payments made according to the Practice's achievement of certain agreed national quality targets known as the Quality and Outcomes Framework (QOF), for instance the proportion of diabetic patients who have had an annual review. Practices can also receive payments for participating in agreed national or local enhanced services, for instance opening early in the morning or late at night or at the weekends. Practices can also receive payments for certain national initiatives such as |

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| | immunisation programs and Practices may also receive incomes relating to a variety of non-patient related elements such as premises. Finally there are short term initiatives and projects that Practices can take part in. Practices or GPs may also receive income for participating in the education of medical students, junior doctors and GPs themselves as well as research. In order to make patient based payments basic and relevant necessary data about your needs to be sent to the various payment services. The release of this data is required by English laws.<br><br>**Legal Basis** – Article 6(1)(c) "processing is necessary for compliance with a legal obligation to which the controller is subject" and Article 9(2)(h) 'as stated below<br><br>**Data Processors** – NHS England, ICB, Public Health |
| Accountancy & Bookkeeping | **Purpose** – To provide accountancy and bookkeeping services to the practice by reconciling invoices for non-NHS services and for payroll and pension services to all employed staff<br><br>**Legal Basis** –<br>**Article 6(1)b** – it is necessary for the performance of a contract to which the data subject is party<br>**Article 9(2)b** – it is necessary for the purposes of employment, social security or social protection<br><br>**Processor** – Marsh Accounting |
| Patient record data base | **Purpose –** Your medical record will be processed in order that a data base can be maintained, this is managed in a secure way and there are robust processes in place to ensure your medical record is kept accurate and up to date. Your record will follow you as you change surgeries throughout your life.<br><br>Closed records will be archived by NHS England.<br><br>**Legal Basis -** Article 6(1)(e); "necessary… in the exercise of official authority vested in the controller' And Article 9(2)(h) as stated below<br><br>**Processor** – EMIS and PCSE |
| Medical Reports<br>Subject Access Requests<br>iGPR | **Purpose –** Your medical record will be shared in order that:<br><br>Solicitors/persons acting on your behalf can conduct certain actions as instructed by you.<br><br>Insurance companies seeking medical reports where you have applied for services offered by them can have a copy of your medical history a specific purpose. |

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| | We use a processor, iGPR Technologies Limited ("iGPR"), to assist us with responding to report requests relating to your patient data, such as subject access requests that you submit to us (or that someone acting on your behalf submits to us) and report requests that insurers submit to us under the Access to Medical Records Act 1988 in relation to a life insurance policy that you hold or that you are applying for. iGPR manages the reporting process for us by reviewing and responding to requests in accordance with our instructions and all applicable laws, including UK data protection laws. The instructions we issue to iGPR include general instructions on responding to requests and specific instructions on issues that will require further consultation with the GP responsible for your care.<br><br>**Legal Basis** – UK GDPR Article 6 1 (a) and 9 2(a) explicit consent will be required before a GP can share your record for either of these purposes.<br><br>**Processor –** Seaside Medical Centre Admin Team |
| Medicines Management Team<br>Medicines Optimisation | **Purpose** – Your medical record is shared with the medicines management pharmacists team in order that your medical record can be kept up to date and any necessary changes to medication can be implemented.<br><br>**Legal Basis** – Article 6(1)(e); "necessary… in the exercise of official authority vested in the controller' and Article 9(2)(h) Health data as stated below<br><br>**Processor** – FDB, Medicines Management, Sussex ICB |
| Pharmalead Ltd( GlucoRx) | **Purpose -** Pharmalead Limited are a third-party prescription services and medication management provider. Your medical record is shared with this service in order that your medical record can be kept up to date and any necessary changes to medication can be implemented.<br><br>**Legal Basis** – Article 6(1)(e); "necessary… in the exercise of official authority vested in the controller' and Article 9(2)(h) Health data as stated below. *UK GDPR Article 6 - Lawfulness of processing: Public Task (6 (1) (e))*<br><br>**Processor** – Pharmalead lts (GlucoRx) |
| Data Shredding Services | **Purpose:** To securely dispose of confidential waste that may contact personal confidential information.<br><br>**Legal Basis:** Article 6(1)e "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"<br><br>**Processor:** Shred-it |

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| GP Federation<br>Engage Consult<br>EAS Service | **Purpose –** Your medical record will be shared with the Federation in order that they can provide direct care services to the patient population. This could be in the form of video consultations, minor injuries clinics and GP enhanced access clinics. The Federation will be acting on behalf of the GP Practice.<br><br>**Legal Basis** - Article 6(1)(e); "necessary… in the exercise of official authority vested in the controller' And Article 9(2)(h) as stated below<br><br>**Processor** – South Downs Health and Care Ltd |
| PCN (Primary Care Network) | **Purpose –** Your medical record will be shared with other PCN GP Practices in order that they can provide direct care services to the patient population.<br><br>**Legal Basis** - Article 6(1)(e); "necessary… in the exercise of official authority vested in the controller' and Article 9(2)(h) as stated below<br><br>**Processor** – Seaside Medical Centre, Park Practice, Arlington Road Surgery, Lighthouse Medical Practice and Grove Road Surgery |
| Vaccinations for housebound patients | **Purpose –** To provide data to a vaccination provider to attend and complete the vaccinations for housebound patients<br><br>**Legal Basis – Article 6(1)(e);** "necessary… in the exercise of official authority vested in the controller' And Article 9(2)(h) Health data as stated below<br><br>**Provider –** Osbon Pharmacy |
| Smoking cessation | **Purpose –** Personal information is shared in order for the smoking cessation service to be provided.<br><br>Only those patients who wish to be party to this service will have their data shared.<br><br>**Legal Basis –** Article 6 1(a) and 9 2(h) consent<br><br>**Processor –** One You Sussex |
| Social Prescribers | **Purpose –** Access to medical records is provided to social prescribers to undertake a full service to patients dependent on their health social care needs.<br><br>Only those patient who wish to be party to the service will have their data shared.<br><br>**Legal Basis –** Article 6 1(e); "necessary … in the exercise of official authority vested in the controller" and Article 9 2(h) Health data as stated below.<br><br>**Processor –** Community Connectors (East Sussex) |

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| Police | **Purpose** - Personal confidential information may be shared with the Police authority for certain purposes. The level of sharing and purpose for sharing may vary. Where there is a legal basis for this information to be shared consent will not always be required.<br><br>The Police will require the correct documentation in order to make a request. This could be but not limited to, DS 2, Court Order, s137, the prevention and detection of a crime, or where the information is necessary to protect a person or community.<br><br>**Legal Basis –** UK GDPR 6 1(c) Legal obligation Article 6 1(f) legitimate interest Article 9 2 (f) requests for legal reasons<br><br>**Processor –** Police Constabulary |
| Coroners<br>Medical Examiner | **Purpose –** Personal health records or information relating to a deceased patient may be shared with the coroner or medical examiner upon request.<br><br>**Legal Basis –** UK GDPR Article 6 1(c) Legal obligation 9 2(h) health data<br><br>**Processor –** The Coroner and Medical Examiner |
| Private Healthcare providers | **Purpose –** Personal information is shared with private health care providers in order to deliver direct care to patients at the patient's request. Consent from the patient will be required to share data with Private Providers.<br><br>**Legal Basis –** Article 6 1(a) and 9 2(h) consented and under contract between the patient and the provider<br><br>**Provider –** Benenden, BUPA, AXA PP etc. |
| Messaging Service | **Purpose –** Personal identifiable information shared with the messaging service in order that messages including: appointment reminders, results, campaign messages related to specific patients health needs and direct messages to patients can be transferred to the patient in a safe way.<br><br>**Legal Basis –** Consent from patients and direct care<br><br>**Provider –** AccuRx, Mjog and Engage Consult |
| Remote Consultation including – Video Consultation Clinical Photography<br><br>Pando<br>AccuRx | **Purpose –** Personal information including images may be processed, stored and with the patients consent shared, in order to provide the patient with urgent medical advice.<br><br>**Legal Basis –** Article 6(1)(e) "necessary … in the exercise of official authority vested in the controller" and Article 9 2(h) Health data as stated below. |

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| | Patients may be videoed or asked to provide photographs with consent. There are restrictions on what the Practice can accept photographs of. No photographs of full face, no intimate areas, no pictures of patients who cannot consent to the process and no pictures of children.<br><br>**Processor –** AccuRx, Pando |
| Clinical Photography – Pando | **Purpose:** The practice uses a 'Pando app' to take clinical photographs when appropriate for patient care. The app allows the photographs to be securely sent and saved into patients' medical records to support direct patient care.<br><br>**Legal Basis**<br>Article 6(1)(e); "necessary… in the exercise of official authority vested in the controller' And Article 9(2)(h) Health data as stated below<br><br>**Processors:** Beacon Medical Systems Ltd |
| MDT Meetings<br>Palliative Care Meetings | **Purpose –** For some long term conditions, the Practice participates in meetings with staff from other agencies involved in providing care, to help plan the best way to provide care to patients with these conditions. Personal data will be shared with other agencies in order that mutual care packages can be decided.<br><br>**Legal Basis –** Article 6(1)(e) "necessary … in the exercise of official authority vested in the controller" and Article 9 2(h) Health data as stated below.<br><br>**Processor –** MS Teams |
| COVID-19<br>Research and Planning | **Purpose** – To understand the risks to public health, trends and prevent the spread of infections such as Covid-19 the Government has enabled a number of initiatives which include research and planning during the Covid-19 pandemic which may include the collection of personal confidential data has been necessary. This is to assist with the diagnosis, testing, self-isolating, fitness to work, treatment medical, social interventions and recovery from Covid-19.<br><br>COPI Reg 3 has been extended and you find further information her: coronavirus(COVI-19): notice under Regulartion3(4) of the Health Service (Control of Patient Information) Regulations 2002 – GOV.uk (www.gov.uk)<br><br>NHS England >> OpenSAFELY – the Coronavirus (COVID-19) Research Platform<br><br>**Legal Basis** – In order to share personal confidential data with other agencies for research or planning. Either Article 6 1(a) and 9 2(a) Explicit Consent will be required or the processor would need to meet Section 251 CAG approval or it would need to be approved |

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| | under direct care to patients Article 6 1(e) Public Task and 9 2(h) Health data.<br><br>**Provider** – COVID Vaccination Hubs, BIOBANK, Oxford University |
| General Practice Extraction Service (GPES)<br>**1.** At risk patients data collection V3<br>**2.** Covid-19 Planning and Research Data<br>**3.** CVDPREVENT Audit<br>**4.** Physical Health Checks for people with Severe Mental Illness | **Purpose** – GP Practices are required to provide data extraction of their patient's personal confidential information for various purposes by NHS England. The objective of this data collection is on an ongoing basis to identify patients registered at General Practices who fit within a certain criteria, in order to monitor and either provide direct care or prevent serious harm to those patients. Below is a list of the purposes for the data extraction, by using the link you can find out the detail behind each data extraction and how your information will be used to inform this essential work:<br>**1.** At risk patients including severely clinically vulnerable<br>**2.** Covid-19 Planning and research data to control and prevent the risk of Covid-19<br>**3.** NHS England collects and analyse data in connection with Cardiovascular Disease Prevention Audit<br>**4.** GPES Physical Health Checks for people with Severe Mental Illness (PHSMI) data collection<br><br>**Legal Basis** - All GP Practices in England are legally required to share data with NHS England for this purpose under section 259(1)(a) and (5) of the 2012 Act.<br><br>Further detailed legal basis can be found in each link.<br><br>Any objections to these data collections should be made directly to NHS England. england.contactus@nhs.net<br><br>**Processor** – NHS England |
| Medication/Prescribing | **Purpose –** Prescriptions containing personal identifiable and health data will be shared with organisations who provide medicines management including chemists/pharmacies, in order to provide patients with essential medication regime management, medicines or treatment as their health needs dictate. This process is achieved either by face to face contact with the patient or electronically. Pharmacists may be employed to review medication, care for minor treatment, patients may have specified a nominated pharmacy they may wish their repeat or acute prescriptions to be ordered and sent directly to the pharmacy making a more efficient process. Arrangements can also be made with the pharmacy to deliver medication.<br><br>**Legal Basis –** Article 6(1)(e); "necessary … in the exercise or official authority vested in the controller" and Article 9(2)(h) as stated below<br><br>Patients will be required to nominate a preferred pharmacy. |

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| | **Processor –** Pharmacy of choice |
| Professional Training | **Purpose** – We are a training surgery. Our clinical team are required to be exposed to on the job, clinical experience as well as continual professional development. On occasion you may be asked if you are happy to be seen by one of our GP registrars, pharmacists or other clinical team to assist with their training as a clinical professional. You may also be asked if you would be happy to have a consultation recorded for training purposes. These recordings will be shared and discussed with training GPs at the surgery and also with moderators at the RCGP and HEE.<br><br>**Legal Basis –** 6 1 (a) consent, patients will be asked if they wish to take part in training sessions and 9 2 (a) - explicit consent will be required when making recordings of consultations.<br><br>Recordings remain the control of the GP Practice and they will delete all recordings from the secure site once they are no longer required.<br><br>**Processor** – RCGP, HEE, iConnect, Fourteen Fish |
| Telephony | **Purpose –** The Practice use an internet-based telephony system that records telephone calls for their own purpose to assist with patient consultations. The telephone system has been commissioned to assist with the high volume and management of calls into the surgery, which in turn will enable a better service to patients. Patient's individual rights will not be affected by this change. Some recordings may be used by the surgery for training or quality performance purposes.<br><br>Patient's individual rights will not be affected by this change. Some recordings may be used by the surgery for training or quality performance purposes.<br><br>Where a call is recorded for clinical purposes while in a consultation, it will be saved within the patients' medical record.<br><br>**Legal Basis** – While there is a robust contract in place with the processor, the surgery has undertaken this service to assist with the direct care of patients in a more efficient way.<br>Article 6 1 (e) "necessary … in the exercise of official authority vested in the controller" and Article 9 2(h) Health data as stated below.<br><br>**Provider** – X-On |
| Learning Disability Mortality Programme LeDeR | **Purpose -** The Learning Disability Mortality Review (LeDeR) programme was commissioned by NHS England to investigate the death of patients with learning difficulties and autism to assist with processes to improve the standard and quality of care for people |

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| | living with a learning disability and autism. Records of deceased patients who meet with this criteria will be shared with NHS England.<br><br>**Legal Basis -** It has approval from the Secretary of State under section 251 of the NHS Act 2006 to process patient identifiable information without who fit within a certain criteria.<br><br>**Processor :** ICB, NHS England |
| Technical Solution Pseudonymisation | **Purpose -** Personal confidential and special category data in the form of medical record, is extracted under contract for the purpose of pseudonymisation. This will allow no patient to be identified within the data set that is created. SCW CSU has been commissioned to provide a data processing service, no other processing will be undertaken under this contract.<br><br>**Legal Basis** – Under UK GDPR the legitimate purpose for this activity is under contract to provide assistance. Article 6 1 (e) "necessary … in the exercise of official authority vested in the controller" and Article 9 2(h) Health data as stated below.<br><br>**Processor –** SCW CSU |
| Shared Care Record | **Purpose** - In order for the Practice to have access to a shared record, the Integrated Care Service has commissioned a number of systems including GP connect, which is managed by NHS England, to enable a shared care record, which will assist in patient information to be used for a number of care related services. These may include Population Health Management, Direct Care, and analytics to assist with planning services for the use of the local health population.<br><br>Where data is used for secondary uses no personal identifiable data will be used.<br><br>Where personal confidential data is used for Research explicit consent will be required.<br><br>**Legal Basis** - Article 6(1)(e); "necessary… in the exercise of official authority vested in the controller' and Article 9(2)(h) Health data as stated below.<br><br>**Processor** - NHS England |
| Local shared Care Record Care Identity Service SCR | **Purpose** – Health and Social care services are developing shared systems to share data efficiently and quickly. It is important for anyone treating you to be able to access your shared record so that they have all the information they need to care for you. This will be during routine appointments and in urgent situations such as going to A&E, call 111 or going to an out of hours appointment. It is also quicker for staff to access a shared record than to try to contact other staff by phone or email. |

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| | Only authorised staff can access the systems and the information they see is carefully checked so that it relates to their job. Systems do not share all your data, just data which services have agreed is necessary to include.<br><br>**Legal Basis** - Article 6 1 (e) "necessary … in the exercise of official authority vested in the controller" and Article 9 2(h) Health data as stated below.<br><br>**Processor** – CIS SCR |
| Anticoagulation Monitoring | **Purpose** – Personal confidential data is shared with LumiraDX in order to provide an anticoagulation clinic to patients who are on anticoagulation medication. This will only affects patients who are within this criteria.<br><br>**Legal Basis** – Under UK GDPR is Article 6 1 (e) "necessary … in the exercise of official authority vested in the controller" and Article 9 2(h) Health data as stated below.<br><br>**Processor** – LumiraDX INRStar |
| Off Site Storage of medical records | **Purpose:** The practice has commissioned the services of an offsite storage facility to provide secure offsite storage for all Lloyd George medical records. The facility has met the NHS standard as a supplier of this service. The practice can assure patients that their medical records will remain in control of the practice and robust mechanisms are in place to protect the security of the patients' personal confidential data.<br><br>**Legal Basis:** The movement and storage of patient records will be undertaken by contractual obligation between the practice and the companies undertaking the work.<br><br>Under UK GDPR Article 6 1(b) contractual obligation<br><br>Article 9 2 (h) Health data.<br><br>Processor: OASIS group |
| Document Management | **Purpose –** The Surgery has commissioned the assistance of a third-party processor to assist with processing documents that are received into the practice. This will include appropriate coding and storing onto patients record.<br><br>**Legal Basis –** Under UK GDPR the surgery has used its legal basis of:<br>Article 6 1 (e) Public Task<br>Article 9 2 (h) health data<br><br>**Processor –** Nova Healthcare Ltd, Docman |

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| Numed – Envisage Patient Self Check- in system | **Purpose** – Personal confidential data is accessed to allow patients to self-check-in for their appointments at the practice.<br>Data and confirmation of attendance will be visible to the clinician in their clinical room.<br><br>**Legal Basis**<br><br>6 1 (e) Public task<br><br>9 2 (h) Direct health care<br><br>**Provider** – Numed - Envisage. |
| CCTV | **Purpose:** The practice has installed CCTV cameras to enhance the security of the buildings, staff and visitors to the surgery. The system will be monitored by the surgery staff, no images will be shared outside of the surgery without a legal reason. Where there is evidence of a crime information may be shared with the Police in the detection and prevention of a crime. Legal Basis: This system has been commission by the surgery under contract, with the minimum use of personal data, specifically images. No personal confidential or Special category data will be shared by using this system. Where there is a need to share images for the detection or prevention of a crime the legal basis under UK<br><br>CCTV will not be used for any purpose other than those specified above.<br><br>**Legal Basis**<br>**6 1 (e)** processing is necessary for the performance of a task carried out in the public interest<br><br>**Provider** - Haven Security Ltd |
| Diabetes Clinical Support Services<br>COPD Clinical Support Services<br>Asthma review service | **Purpose**: To provide Diabetes patients, a review with a clinical pharmacist to support the management of their condition.<br>**Purpose**: To provide COPD patients, a review with a clinical pharmacist to support the management of their condition.<br>**Purpose:** Personal confidential data will be shared for the purpose of the practice fulfilling their legal and contractual requirements to report QOF Enhancement and Coding services<br>**Purpose**: To provide Diabetes patients, a review with a clinical pharmacist to support the management of their condition.<br><br>**Legal Basis**:<br><br>**Article 6(1)e** - "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"<br><br>**Article 9(2)h** - "processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the |

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| | working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services”<br><br>**Processor**: Interface Clinical Services Ltd |
| Screening programme | **Purpose**: To identify patients and invite them to take part in an Enhanced Lung Care Screening. The purpose of this screening is to identify and treat lung conditions to improve outcomes.<br><br>**Legal Basis**:<br>Article 6(1)e<br>“processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller”;<br>Article 9(2)h<br>“processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services”;<br><br>**Processor**: InHealth |
| Interface Clinical Services Ltd | **Purpose:** Personal confidential data will be shared for the purpose of the practice fulfilling their legal and contractual requirements to report QOF Enhancement and Coding services.<br>**Purpose:** The IQVIA Healthcare Analytics Network (IHAN) will provide “Connected Data” to give Interface the ability to drive demonstrable service efficiencies, move from individual practice extraction to ‘at scale’ working and undertake service feasibility. Using IHAN will allow Interface to increase the number of GP practices participating in clinical trials, adopt new service models of care, improve clinical trial design, develop algorithms for early disease detection and identification of at-risk patients, identify patients with rare diseases and enable epidemiological and other scientific studies to improve real-world understanding of disease aetiology, care management, treatment outcomes, etc.<br><br>**Legal Basis:**<br>**Article 6(1)e:**<br>“processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller”<br><br>**Article 9(2)h:**<br>“processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or |

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| | social care or treatment or the management of health or social care systems and services”<br><br>**Processor:** Interface Clinical Services Ltd |

## Reviews of and Changes to our Privacy Notice

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

## Lawful basis for processing:

The processing of personal data in the delivery of direct care and for providers’ administrative purposes in this surgery and in support of direct care elsewhere is supported under the following Article 6 and 9 conditions of the UK GDPR:

- Article 6(1)(e) ‘…necessary for the performance of a task carried out in the public interest or in the exercise of official authority…’ and
- Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services...”