



## THE HAVEN PRACTICE

### Fair Processing Notice (Privacy Notice)

#### Your Personal 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 GP's, Staff and associated Practitioners are committed to protecting your Privacy and will only process data in accordance with the Data Protection Legislation. This includes the General Data Protection Regulation (EU) 2016/679 (GDPR), now known as the UK GDPR, the Data Protection Act (DPA) 2018, the Law Enforcement Directive (Directive (EU) 2016/680) (LED) and any applicable national Laws implementing them as amended from time to time. The legislation requires us to process personal data only if there is a legitimate basis for doing so and that any processing must be fair and lawful.

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

#### Data we collect about you

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

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

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

## How we share your Health Information

Your GP record contains important information about your health, such as your medical history, medications, allergies, and test results. Sharing this information securely helps NHS staff provide you with safe, joined-up care. Below is an overview of how your information may be shared and your rights.

### GP Connect

GP Connect allows authorised NHS staff (such as NHS 111, hospitals, and community services) to securely view parts of your GP record when they are involved in your care.

- ❖ What is shared? Medications, allergies, test results, consultations, referrals, and immunisations.
- ❖ Who can see it? Only staff directly involved in your care.
- ❖ Can you opt out? Yes – contact the practice to opt out.

More info: <https://digital.nhs.uk/services/gp-connect/gp-connect-in-your-organisation/gp-connect-privacy-notice>

### Summary Care Record (SCR)

Your SCR is a national summary of key health information created from your GP record. It helps NHS staff in other settings (e.g. hospitals) provide safer care.

- ❖ What is shared? Basic details (medications, allergies) and, if you agree, additional information.
- ❖ Can you opt out? Yes – contact the practice to opt out.

More info: <https://digital.nhs.uk/services/summary-care-records-scr/additional-information-in-scr>

### NHS Research and Planning

Sometimes, information from your health record is used to help the NHS plan services or carry out research. This is usually done using anonymised or pseudonymised data.

- ❖ What is shared? Health information that does not identify you.
- ❖ Can you opt out? Yes – via <https://www.nhs.uk/your-nhs-data-matters/overview/>

### Personal Demographics Service (PDS)

The PDS is a national NHS database that holds basic information like your name, address, and NHS number. It helps match you to your records across the NHS.

- ❖ Can you opt out? No, but you can request restricted access in certain cases.

More info: <https://digital.nhs.uk/services/personal-demographics-service>

## Local Shared Care Record (Plexus)

The Sussex Shared Care Record (Plexus) allows health and care professionals across Sussex to view information from your GP record and other providers.

- ❖ What is shared? Medications, allergies, test results, care plans.
- ❖ Can you opt out? Yes – contact the practice.

More info: <https://www.sussex.ics.nhs.uk/our-work/our-priorities/digital/plexus-care-record/plexus-shared-care-record-partners/>

## System to System Sharing EMIS-to-EMIS

Some GP practices use the same clinical system and can securely share your record with other organisations using that system if you are receiving care from them.

- ❖ What is shared? Your full GP record or selected parts
- ❖ Can you opt out? Yes – contact the practice

## Patient Online Services

You can view parts of your own GP record online using the NHS App or other approved apps.

- ❖ What is shared? Medications, allergies, test results, appointment.
- ❖ Who can see it? Only you (or someone you authorise)
- ❖ Can you opt out? Yes – you can choose not to register or withdraw access

## Pseudonymised Data

Pseudonymised data is used in Sussex to help improve services. Your personal details are replaced with a code so you cannot be directly identified

- ❖ What is shared? Pseudonymised health and care information
- ❖ Can you opt out? Yes - via: <https://www.nhs.uk/your-nhs-data-matters/overview/>

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

## How long do we hold information for?

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

## Individuals Rights under UK GDPR

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

- ❖ The right to be informed
- ❖ The right of access
- ❖ The right to rectification
- ❖ The right to erasure (not an absolute right) only applies in certain circumstances
- ❖ The right to restrict processing
- ❖ The right to data portability
- ❖ The right to object
- ❖ 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 screening, or an 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 known 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. 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 <https://digital.nhs.uk/services/national-data-opt-out>

To find out more or to register your choice to opt out, please visit [www.nhs.uk/your-nhs-data-matters](http://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 their 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 required.

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

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

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

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

### **COVID Passport Access**

Patients may access their Covid passport via the [link](#), the practice cannot provide this document as it is not held in the practice record. If you have any issues gaining access to your Covid Passport or letter you should call: 119

### **Change of Details**

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

### **Mobile Telephone Number**

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

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

### **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: <http://ico.org.uk/what-we-cover/register-of-data-controllers>

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

## **Data Protection Officer**

Should you have any data protection questions or concerns, please contact our Data Protection Officer via the surgery at: [sxixb-bh.thehaven@nhs.net](mailto:sxixb-bh.thehaven@nhs.net)

## **What is the right to know?**

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

## **Right to Complain**

If you have concerns or are unhappy about any of our services, please contact the Practice Manager via email: [sue.doyle2@nhs.net](mailto:sue.doyle2@nhs.net) and mark it FAO Practice Manager or via the ICO details listed below.

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

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

Tel 0303 123 1113 or [www.ico.org.uk/global/contact-us](http://www.ico.org.uk/global/contact-us)

## **The NHS Constitution**

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

[The NHS Constitution for England - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

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**Source: NHS SCW Information Governance Services**

**Version: 3.6 GP Privacy Notice Master**

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

Activity	Rationale
Care Quality Commission	<p><b>Purpose</b> – The CQC is the regulator for the English Health and Social Care services to ensure that safe care is provided. They will inspect and produce reports back to the GP practice on a regular basis. The Law allows the CQC to access identifiable data.</p> <p>More detail on how they ensure compliance with data protection law (including UK GDPR) and their Privacy statement is available on our website: <a href="https://www.cqc.org.uk/about-us/our-policies/Privacy-statement">https://www.cqc.org.uk/about-us/our-policies/Privacy-statement</a></p> <p><b>Legal Basis</b> -</p> <ul style="list-style-type: none"> <li>❖ 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</li> <li>❖ Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’</li> </ul> <p><b>Processors</b> – Care Quality Commission</p>
Commissioning and Contractual Purposes Planning Quality and Performance	<p><b>Purpose</b> – 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.</p> <p><b>Legal Basis</b> –</p> <ul style="list-style-type: none"> <li>❖ 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</li> <li>❖ Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’</li> </ul> <p>Patients may opt out of having their personal confidential data used for Planning or research. Please contact your surgery to apply a Type 1 Opt out or logon to <a href="https://www.nhs.uk/your-nhs-data-matters/manage-your-choice/">https://www.nhs.uk/your-nhs-data-matters/manage-your-choice/</a> to apply a National Data Opt Out</p> <p><b>Processor</b> – NHS Sussex Integrated Care Board</p>
Coroner	<p><b>Purpose</b> – Personal health records or information relating to a deceased patient may be shared with the coroner.</p> <p><b>Legal Basis</b> – UK GDPR</p> <ul style="list-style-type: none"> <li>❖ Article 6 (1) (c) to comply with legal obligation</li> <li>❖ Article 9 (2 )(h) necessary for the purposes of preventative or occupational medicine</li> </ul> <p><b>Processor</b> – The Coroner, Medical Examiner</p>



<p><b>Brighton &amp; Mid Sussex Medical Examiners Office</b></p>	<p><b>Purpose:</b> Medical records associated with deceased patients are outside scope of the UK GDPR. However, next of kin details are within the scope of the UK GDPR. We will share specified deceased patient records and next of kin details with the Medical Examiners within Brighton and Mid Sussex Medical Examiner Office.</p> <p><b>Legal Basis:</b></p> <ul style="list-style-type: none"> <li>❖ Article 6(1)(c) – necessary under a legal obligation to which the controller is subject”; and</li> <li>❖ Article 9(2)(h)– “processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services”</li> </ul> <p><b>Processor:</b> Brighton and Mid Sussex Medical Examiner Office</p>
<p><b>Data Analytics Services OpenSAFELY COVID-19</b></p>	<p><b>Purpose:</b> "NHS England has been directed by the government to establish and operate the OpenSAFELY COVID-19 Service and the OpenSAFELY Data Analytics Service. These services provide a secure environment that supports research, clinical audit, service evaluation and health surveillance for COVID-19 and other purposes.</p> <p>Each GP practice remains the controller of its own GP patient data but is required to let approved users run queries on pseudonymised patient data. This means identifiers are removed and replaced with a pseudonym.</p> <p>Only approved users are allowed to run these queries, and they will not be able to access information that directly or indirectly identifies individuals.</p> <p><b>Legal Basis –</b></p> <ul style="list-style-type: none"> <li>❖ UK GDPR – Article 6 basis:</li> <li>❖ UK GDPR Article 6(1)(c) - processing is necessary for compliance with a legal obligation to which the controller is subject (the Directions).</li> <li>❖ UK GDPR Article 9 basis:</li> <li>❖ UK GDPR Article 9(2)(g) - processing is necessary for reasons of substantial public interest, on the basis of domestic law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject, by virtue of compliance with a direction supplemented by:</li> </ul>



	<p>Patients who do not wish for their data to be used as part of this process can register a <a href="#">type 1 opt out</a> with their GP.</p> <p>Here you can find <a href="#">additional information about OpenSAFELY</a>."</p> <p><b>Processor: NHS England, EMIS</b></p>
<p><b>Direct Care</b>  <b>NHS Trusts</b>  <b>Community Providers</b>  <b>Pharmacies</b>  <b>Nursing Homes</b>  <b>Enhanced Care Providers</b>  <b>Other Care Providers</b></p>	<p><b>Purpose</b> - Personal information is shared with other secondary care providers in order to provide you with individual direct care services. This could be hospital or community providers for a range of services, including treatment, operations, physio, community nursing, ambulance service.</p> <p><b>Legal Basis</b> - 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 by the following:</p> <ul style="list-style-type: none"> <li>❖ 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</li> <li>❖ Article 9(2)(h) 'necessary for the purposes of preventative or occupational medicine'</li> </ul> <p><b>Processor</b> – Brighton &amp; Hove University Trusts</p>
<p><b>General Practice Extraction Service (GPES)</b></p> <ol style="list-style-type: none"> <li>1. At risk patients data collection Version 3</li> <li>2. CVDPREVENT Audit</li> <li>3. Physical Health Checks for people with Severe Mental Illness</li> <li>4. National Obesity Audit</li> </ol>	<p><b>Purpose</b> – GP practices are required to <i>provide data extraction</i> of their patients personal confidential information for various purposes to NHS England. The objective of this data collection is on an ongoing basis to identify patients registered at General Practices who fit within a certain criteria, in order to monitor and either provide direct care, or prevent serious harm to those patients. Below is a list of the purposes for the data extraction, by using the link you can find out the detail behind each data extraction and how your information will be used to inform this essential work:</p> <ol style="list-style-type: none"> <li>1. <a href="#">At risk patients including severely clinically vulnerable</a></li> <li>2. <a href="#">NHS England has directed NHS Digital to collect and analyse data in connection with Cardiovascular Disease Prevention Audit</a></li> <li>3. <a href="#">GPES Physical Health Checks for people with Severe Mental Illness (PHSMI) data collection.</a></li> <li>4. <a href="#">National Obesity Audit - NHS Digital</a></li> </ol> <p><b>Legal Basis</b> - 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 Social Care Act 2012. Further detailed legal basis can be found in each link. Any objections to these data collections should be made directly to NHS England enquiries@nhsdigital.nhs.uk</p> <p><b>Processor</b> – NHS England</p>

<p><b>GP Federation</b>  <b>GP Extended Access</b>  <b>Remote Telephone Services</b></p>	<p><b>Purpose</b> – Your medical record will be shared with the Brighton and Hove 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, GP extended access clinics. The Federation will be acting on behalf of the GP Practice.</p> <p><b>Legal Basis:</b></p> <ul style="list-style-type: none"> <li>❖ 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</li> <li>❖ Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’</li> </ul> <p><b>Processor</b> – Brighton &amp; Hove Federation</p>
<p><b>GP Connect</b></p>	<p><b>Purpose:</b> 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.  <a href="#">GP Connect - NHS England Digital</a>  GP Connect makes patient information available to all appropriate clinicians when and where they need it, to support direct patients care, leading to improvements in both care and outcomes. GP Connect is not used for any purpose other than direct care. GP Connect provides a method of secure information transfer and reduces the need to use less secure or less efficient methods of transferring information, such as email or telephone.  <a href="#">GP Connect transparency notice - NHS England Digital</a></p> <p><b>Legal Basis:</b> 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’</p> <p><b>Processor:</b> NHS England</p>
<p><b>Individual Funding Requests</b></p>	<p><b>Purpose</b> – 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.</p> <p>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</p>

	<p><b>Legal Basis:</b></p> <ul style="list-style-type: none"> <li>❖ 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</li> <li>❖ Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’</li> </ul> <p><b>Data Processor</b> – NHS Sussex</p>
<b>Medication/Prescribing</b>	<p><b>Purpose</b> - Prescriptions containing personal identifiable and health data will be shared with organisations who provide medicines management including chemists/pharmacies, in order to provide patients with essential medication regime management, medicines and or treatment as their health needs dictate. This process is achieved either by face to face contact with the patient or electronically. Pharmacists may be employed to review medication, Patients may be referred to Pharmacists to assist with diagnosis and care for minor treatment, patients may have specified a nominated pharmacy they may wish their repeat or acute prescriptions to be ordered and sent directly to the pharmacy making a more efficient process. Arrangements can also be made with the pharmacy to deliver care and medication.</p> <p><b>Legal Basis:</b></p> <ul style="list-style-type: none"> <li>❖ 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</li> <li>❖ Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’</li> </ul> <p><b>Processor</b> – Pharmacy of choice</p>
<b>Medicines Management Team Medicines Optimisation</b>	<p><b>Purpose</b> – your medical record is shared with the medicines management team Pharmacists, in order that your medication can be kept up to date and any necessary changes can be implemented.</p> <p><b>Legal Basis:</b></p> <ul style="list-style-type: none"> <li>❖ 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</li> <li>❖ Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’</li> </ul> <p><b>Processor</b> – ICB, PCN, Optimise RX</p>
<b>Medical Reports Subject Access Requests</b>	<p><b>Purpose</b> – Your medical record may be shared in order that Solicitors/Persons acting on your behalf can conduct certain actions as instructed by you.</p> <p>Insurance Companies seeking a medical report where you have applied for services offered by them can have a copy of your medical history for a specific purpose.</p>

	<p><b>Legal Basis:</b></p> <ul style="list-style-type: none"> <li>❖ Article 6(1)(a) ‘...consent for personal data’; and</li> <li>❖ Article 9(2)(a) ‘explicit consent for special-category data’</li> </ul> <p><b>Processor</b> – Solicitors or Insurance Companies/IGPR</p>
<b>Messaging Service</b>	<p><b>Purpose</b> – 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.</p> <p><b>Legal Basis:</b></p> <ul style="list-style-type: none"> <li>❖ 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</li> <li>❖ Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’</li> </ul> <p><b>Provider</b> - AccuRX, e-Consult, NHS App</p>
<b>NHS Mail and Office 365 (N365 Applications and Sharepoint)</b>	<p><b>Purpose</b> – NHSmail and Office 365 help NHS staff work more securely and efficiently which directly benefits our patients:</p> <ul style="list-style-type: none"> <li>❖ <b>Security:</b> Emails are encrypted keeping your sensitive information safe.</li> <li>❖ <b>Collaboration:</b> Staff can easily work together saving time and improving care.</li> <li>❖ <b>Reliability:</b> The system is supported 24/7 to avoid service disruptions.</li> <li>❖ <b>National Reach:</b> Staff can easily connect across different NHS organisations.</li> <li>❖ <b>Safety:</b> Advanced protection against viruses and spam keeps information secure.</li> <li>❖ <b>Flexibility:</b> Staff can communicate without disruption even if organisations change.</li> </ul> <p>These tools support the NHS's goal of improving digital care and collaboration.</p> <p><b>Legal Basis:</b></p> <ul style="list-style-type: none"> <li>❖ 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”;</li> <li>❖ Article 9(2)h - “processing is necessary for the purposes of preventive or occupational medicine”;</li> </ul> <p><b>Processor</b> – Accenture <b>Sub Processor:</b> Microsoft</p>

<b>Patient Record data base</b>	<p><b>Purpose</b> – Your medical record will be shared, 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.</p> <p>Closed records will be archived by NHS England.</p> <p><b>Legal Basis:</b></p> <ul style="list-style-type: none"> <li>❖ 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</li> <li>❖ Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’</li> </ul> <p><b>Processor</b> – EMIS, Docman, PCSE</p>
<b>Payments, Invoice validation</b>	<p><b>Purpose</b> - Contract holding GPs in the UK receive payments from their respective governments on a tiered basis. Most of the income is derived from baseline capitation payments made according to the number of patients registered with the practice on quarterly payment days. These amount paid per patient per quarter varies according to the age, sex and other demographic details for each patient. There are also graduated payments made according to the practice’s achievement of certain agreed national quality targets known as the Quality and Outcomes Framework (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 immunisation programs and practices may also receive incomes relating to a variety of non patient related elements such as premises. Finally there are short term initiatives and projects that practices can take part in. Practices or GPs may also receive income for participating in the education of medical students, junior doctors and GPs themselves as well as research. In order to make patient based payments basic and relevant necessary data about you needs to be sent to the various payment services. The release of this data is required by English laws.</p> <p><b>Legal Basis:</b></p> <ul style="list-style-type: none"> <li>❖ Article 6(1)(c) ‘...processing is necessary for compliance with a legal obligation to which the controller is subject’; and</li> <li>❖ Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’</li> </ul> <p><b>Data Processors</b> – NHS England, ICB, Public Health</p>

<b>Patient Survey</b>	<p><b>Purpose:</b> To engage with patients that are registered at the practice to obtain FFT feedback.</p> <p><b>Legal Basis:</b> The legal basis under UK GDPR is Article 6 (1)(e) Public Task, the practice is obliged to engage with patients that are registered with them to obtain FFT feedback to assist with making improvements.</p> <p>Explicit consent (UKGDPR Art. 6 (1)(a) and Art. 9(2)(a))</p> <p><b>Provider:</b> Microsoft Forms</p>
<b>Primary Care Network (PCN)</b>	<p><b>Purpose</b> – Your medical record will be shared with Practices below in order that they can provide direct care services to the patient population.</p> <p><b>Legal Basis:</b></p> <ul style="list-style-type: none"> <li>❖ 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</li> <li>❖ Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’</li> </ul> <p><b>Processor</b> – Preston Park Community Network comprising of Stanford Medical Centre, Beaconsfield, Preston Park Surgery, Warmdene Surgery</p>
<b>Police</b>	<p><b>Purpose</b> – 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 no consent will be required.</p> <p>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.</p> <p><b>Legal Basis – UK GDPR –</b></p> <ul style="list-style-type: none"> <li>❖ Article 6(1)(c) – to comply with a legal obligation; and</li> <li>❖ Article 9(2)(j) – ‘for reasons of substantial public interest’</li> </ul> <p><b>Processor</b> – Police Constabulary</p>
<b>Population Health Management</b>	<p><b>Purpose</b> – Health and care services work together as ‘Integrated Care Systems’ (ICS) and are sharing data in order to:</p> <ul style="list-style-type: none"> <li>❖ Understand the health and care needs of the care system’s population, including health inequalities</li> <li>❖ Provide support to where it will have the most impact</li> <li>❖ 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.</li> </ul>

	<p><b>Type of Data –</b> Identifiable/Pseudonymised/Anonymised/Aggregate Data. NB only organisations that provide your care will see your identifiable data.</p> <p><b>Legal Basis –</b></p> <ul style="list-style-type: none"> <li>❖ 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</li> <li>❖ Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’</li> </ul> <p><b>Data Processors - Optum</b></p>
<p><b>Private healthcare providers</b> <b>Non-Commissioned</b></p>	<p><b>Purpose –</b> Personal information shared with private health care providers in order to deliver direct care to patients at the patients request. Consent from the patient will be required to share data with Private Providers</p> <p><b>Legal Basis –</b> Article 6 1 (a) and 9 2 (a) Consent by the patient given under contract to the provider</p> <p><b>Provider –</b> Private Health Providers, Montefiore Hospital and Nuffield Hospital, BUPA</p>
<p><b>Public Health</b> <b>Screening programmes (identifiable)</b> <b>Notifiable disease information (identifiable)</b> <b>Smoking cessation (anonymous)</b> <b>Sexual health (anonymous)</b> <b>Vaccination Programmes</b></p>	<p><b>Purpose –</b> Personal identifiable and anonymous data is shared. The NHS provides national screening programmes so that certain diseases can be detected at an early stage. These currently apply to bowel cancer, breast cancer, aortic aneurysms and diabetic retinal screening service. The law allows us to share your contact information with Public Health England so that you can be invited to the relevant screening programme. More information can be found at: <a href="https://www.gov.uk/topic/population-screeningprogrammes">https://www.gov.uk/topic/population-screeningprogrammes</a> Or speak to the Practice</p> <p>Patients may not opt out of having their personal information shared for Public Health reasons. Patients may opt out of being screened at the time of receiving an invitation.</p> <p><b>Legal Basis –</b></p> <ul style="list-style-type: none"> <li>❖ 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</li> <li>❖ Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’</li> </ul> <p><b>Data Processors –</b> Public Health England</p>



<b>Remote Consultation including Video Consultation Clinical Photography</b>	<p><b>Purpose</b> – Personal information including images may be processed, stored and with the patients consent shared, in order to provide the patient with urgent medical advice.</p> <p><b>Legal Basis:</b></p> <ul style="list-style-type: none"> <li>❖ 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</li> <li>❖ Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’</li> </ul> <p>Patients may be videoed or asked to provide photographs with consent. There are restrictions on what the practice can accept photographs of. No photographs of the full face, no intimate areas, no pictures of patients who cannot consent to the process. No pictures of children.</p> <p><b>Processor</b> – e-Consult</p>
<b>Risk Stratification Preventative Care</b>	<p><b>Purpose</b> - ‘Risk stratification for case finding’ is a process for identifying and managing patients who have or may be at-risk of health conditions (such as diabetes) or who are most likely to need healthcare services (such as people with frailty). Risk stratification tools used in the NHS help determine a person’s risk of suffering a particular condition and enable us to focus on preventing ill health before it develops.</p> <p>Information about you is collected from a number of sources including NHS Trusts, GP Federations and your GP Practice. A risk score is then arrived at through an analysis of your de-identified information. This can help us identify and offer you additional services to improve your health.</p> <p>If you do not wish information about you to be included in any risk stratification programmes, please let us know. We can add a code to your records that will stop your information from being used for this purpose. Please be aware that this may limit the ability of healthcare professionals to identify if you have or are at risk of developing certain serious health conditions.</p> <p><b>Type of Data</b> – Identifiable/Pseudonymised/Anonymised/Aggregate Data</p> <p><b>Legal Basis: -</b></p> <ul style="list-style-type: none"> <li>❖ 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</li> <li>❖ Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’</li> </ul> <p><b>Processors</b> – The Haven Practice</p>

<b>Safeguarding Adults</b>	<p><b>Purpose</b> – 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.</p> <p>Consent may be required to share information for this purpose.</p> <p><b>Legal Basis</b> – Direct Care under UK GDPR:</p> <ul style="list-style-type: none"> <li>❖ 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</li> <li>❖ Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine</li> </ul> <p><b>Data Processor</b> – Brighton and Hove Safeguarding Hub/Health and Social Care Adult/NHS Sussex Designated Nurses or Named GP Professional</p>
<b>Safeguarding Children</b>	<p><b>Purpose</b> – 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.</p> <p><b>Legal Basis</b> –</p> <ul style="list-style-type: none"> <li>❖ 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</li> <li>❖ Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine</li> </ul> <p><b>Data Processor</b> – Front Door for Families/NHS Sussex Designated Nurses/Named GP Professional</p>
<b>Shared Care Record</b>	<p><b>Purpose</b> - In order for the practice to have access to a shared record, the Integrated Care Service has commissioned a number of systems including <a href="#">GP connect</a>, 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.</p> <p>Where data is used for secondary uses no personal identifiable data will be used.</p> <p>Where personal confidential data is used for Research explicit consent will be required.</p> <p><b>Legal Basis:</b></p> <ul style="list-style-type: none"> <li>❖ 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</li> <li>❖ Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’</li> </ul> <p><b>Processor</b> - NHS England</p>

<b>Local shared care record Information Sharing Gateway</b>	<p><b>Purpose:</b> Health and Social care services are developing shared systems to share data efficiently and quickly. It is important for anyone treating you to be able to access your shared record so that they have all the information they need to care for you. This will be during your routine appointments and in urgent situations such as going to A&amp;E, calling 111 or going to an Out of hours appointment. It is also quicker for staff to access a shared record than to try to contact other staff by phone or email.</p> <p>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.</p> <p><b>Legal Basis -</b></p> <ul style="list-style-type: none"> <li>❖ 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</li> <li>❖ Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’</li> </ul> <p><b>Processor: Information Sharing Gateway</b></p>
<b>Social Prescribers</b>	<p><b>Purpose</b> – Access to medical records is provided to social prescribers to undertake a full service to patients dependent on their health social care needs.</p> <p>Only those patients who wish to be party to this service will have their data shared.</p> <p><b>Legal Basis:</b></p> <ul style="list-style-type: none"> <li>❖ 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</li> <li>❖ Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’</li> </ul> <p><b>Processor – Age UK</b></p>
<b>Summary Care Record including Additional Information</b>	<p><b>Purpose</b> –The NHS in England uses a national electronic record called the Summary Care Record (SCR) to support patient care. It contains key information from your GP record. Your SCR provides authorised healthcare staff with faster, secure access to essential information about you in an emergency or when you need unplanned care, where such information would otherwise be unavailable.</p> <p><b>Legal Basis –</b></p> <ul style="list-style-type: none"> <li>❖ 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</li> <li>❖ Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’</li> </ul>

	<p>Patients have the right to opt out of having their information shared with the SCR by completion of the form which can be downloaded <a href="#">here</a> and returned to the practice. Please note that by opting out of having your information shared with the Summary Care Record could result in a delay to care that may be required in an emergency.</p> <p><b>Processor – NHS England</b></p>
<b>Telephony</b>	<p><b>Purpose –</b> The practice use an internet based telephony system that records incoming and outgoing telephone calls and these calls may be used to investigate compliance with Practice Policies, to support the investigation of complaints and to ensure the Practice complies with regulatory procedures, for their own purpose and to assist with patient consultations. The telephone system has been commissioned to assist with the high volume and management of calls into the surgery, which in turn will enable a better service to patients.</p> <p><b>Legal Basis –</b> 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.</p> <ul style="list-style-type: none"> <li>❖ 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</li> <li>❖ Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’</li> </ul> <p><b>Provider –</b> Surgery Connect – X-ON,</p>

## Reviews of and Changes to our Privacy Notice

We will keep our Privacy Notice under regular review. This notice was last reviewed in February 2024 by SCW.

**Dated: January 2026**

**Review: October 2024 by SCW**

**Source: NHS SCW Information Governance Services**

**Version: 9.0 GP privacy Notice**