

STOW SURGERY

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

Activity	Rationale
Commissioning and contractual purposes Planning Quality and Performance	Purpose – Anonymous data is used by the Integrated Care Board (ICB) for planning, performance and commissioning purposes, as directed in the practices contract, to provide services as a public authority. Legal Basis – - Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ Patients may opt out of having their personal confidential data used for Planning or research. Please contact your surgery to apply a Type 1 Opt out or logon to https://www.nhs.uk/your-nhs-data-matters/manage-your-choice/ to apply a National Data Opt Out Processor – NHS Gloucestershire 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. Legal Basis – - Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ Patients have the right to opt out of having their information shared with the SCR by completion of the form which can be downloaded here and returned to the practice. Please note that by opting out of having your information shared with the Summary Care Record could result in a delay to care that may be required in an emergency. Processor – NHS England

Individual Funding Requests	Purpose – We may need to process your personal information where we are required to fund specific treatment for you for a particular condition that is not already covered in our standard NHS contract. The clinical professional who first identifies that you may need the treatment will explain to you the information that is needed to be collected and processed to assess your needs and commission your care; they will gain your explicit consent to share this. You have the right to withdraw your consent at any time but this may affect the decision to provide individual funding. Legal Basis – - Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ Data processor – Medical Secretary
Safeguarding Adults & Children	Purpose – We will share personal confidential information with the safeguarding team where there is a need to assess and evaluate any safeguarding concerns and to protect the safety of individuals. Consent is not required to share information for this purpose. Legal Basis – Direct Care under UK GDPR: - Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine Data Processors - Adults - Gloucestershire County Council Safeguarding Adults Board - Childrens - Gloucestershire County Council Safeguarding Children Board
Risk Stratification – Preventative Care	Purpose - ‘Risk stratification for case finding’ is a process for identifying and managing patients who have or may be at-risk of health conditions (such as diabetes) or who are most likely to need healthcare services (such as people with frailty). Risk stratification tools used in the NHS help determine a person’s risk of suffering a particular condition and enable us to focus on preventing ill health before it develops. Information about you is collected from a number of sources including NHS Trusts, GP Federations and your GP Practice. A risk score is then arrived at through an analysis of your de-

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

Direct Care NHS Trusts Community Providers Pharmacies Enhanced care providers Nursing Homes Other Care Providers	Purpose – Personal information is shared with other secondary care trusts and providers in order to provide you with individual direct care services. This could be hospitals or community providers for a range of services, including treatment, operations, physio, and community nursing, ambulance service. Legal Basis - The processing of personal data in the delivery of direct care and for providers’ administrative purposes in this surgery and in support of direct care elsewhere is supported under the following: • Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and • Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine Processors – Gloucestershire Hospitals NHS Foundation Trust; Gloucestershire Health & Care NHS Foundation Trust; South Western Ambulance Service NHS Foundation Trust, Community Pharmacies, Nursing and Residential Care Providers and Care Agencies.
Care Quality Commission	Purpose – The CQC is the regulator for the English Health and Social Care services to ensure that safe care is provided. They will inspect and produce reports back to the GP practice on a regular basis. The Law allows the CQC to access identifiable data. More detail on how they ensure compliance with data protection law (including UK GDPR) and their privacy statement is <u>available on our website: https://www.cqc.org.uk/about-us/our-policies/privacy-statement</u> Legal Basis – • Article 6(1)(e) ‘...processing is necessary for compliance with a legal obligation’; and • Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine Processors – 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: • Understand the health and care needs of the care system’s population, including health inequalities • Provide support to where it will have the most impact • Identify early actions to keep people well, not only focusing on people in direct contact with services, but looking to join up care across different partners.

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

	Closed records will be archived by NHS England Legal Basis – - Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’. Processor – TPP and Primary Care Support England
Website (Footfall by Silicon Practice)	Purpose – Data will be shared via various online forms and downloaded by the Practice, i.e. request for online access, NHS Healthcheck data collection, questions for doctors, etc. Legal Basis – - Article 6(1)(a) – consent for personal data - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ Processor – Silicon Practice
Surgery Pod	Purpose – To facilitate collection of patient data such as blood pressure, weight and responses to questionnaires. Data is downloaded directly into TPP SystemOne. Legal Basis – - Article 6(1)(a) – consent for personal data - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ Processor – Microtech Group
Lexacom Digital Dictation	Purpose – To record patient information for use in referrals, reports, etc. Uploaded to Lexacom cloud. Legal Basis – - Article 6(1)(a) – consent for personal data - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ Processor – Aprobrum Limited
Medical reports Subject Access Requests	Purpose – Your medical record may be shared in order that: Solicitors/persons acting on your behalf can conduct certain actions as instructed by you. Insurance companies seeking a medical reports where you have applied for services offered by then can have a copy to your medical history for a specific purpose. Legal Basis – Article 6(1)(a) – consent for personal data; and

	Article 9(2)(a) – explicit consent for special-category data. Processor – Solicitors and insurance organisations
Medicines Management Team Medicines Optimisation	Purpose – your medical record is shared with the medicines management team pharmacists, in order that your medication can be kept up to date and any necessary changes to medication can be implemented. Legal Basis – - Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ Processor – Gloucestershire ICB and Gloucestershire Hospitals NHS Foundation Trust
Primary Care Network (PCN)	Purpose – Your medical record will be shared with staff/services commissioned and/or recruited by the North Cotswolds Primary Care Network in order that they can provide direct care services to the patient population. Staff employed by other GP Practices within the Primary Care Network may also provide direct care services to the wider patient population. Legal Basis – - Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ Processor – Mann Cottage Surgery, Moreton in Marsh; White House Surgery, Moreton in Marsh; Cotswold Medical Practice, Bourton on the Water and Northleach;; Chipping Campden Surgery.
Smoking cessation (including Quit Manager software)	Purpose – personal information is shared in order for the smoking cessation service to be provided. Only those patients who wish to be party to this service will have their data shared Legal Basis – - Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ Processor – Public Health, Gloucestershire County Council

Social Prescribers, also known as the Cotswold Community Wellbeing Service	Purpose – Access to medical records is provided to social prescribers to undertake a full service to patients dependent on their health social care needs. Only those patients who wish to be party to this service will have their data shared Legal Basis – - Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ Processor – The team of Social Prescribers are employed by Gloucestershire Rural Community Council.
Voluntary services GoodSAM Cotswold Friends (including Dispensary Delivery Service) P3	Purpose – Information may be provided to voluntary services to undertake a service to patients dependent on their social care needs. The surgery operates a delivery service from the dispensary which is supported by volunteers supplied by Cotswold Friends. Demographic information is shared with the volunteers in addition to special instructions regarding the medicine being delivered (i.e. controlled drug so not to be left unattended, fridge item etc) Legal Basis – Consented (including a specific consent form for the delivery service) Processor – GoodSAM (https://nhsvolunteerresponders.org.uk/privacy-policy/services), Cotswold Friends (https://cotswoldfriends.org/privacy.php) and P3 (https://www.p3charity.org/downloads/privacy-statement-referrals-and-enquiries.pdf)
Police	Purpose – Personal confidential information may be shared with the Police authority for certain purposes. The level of sharing and purpose for sharing may vary. Where there is a legal basis for this information to be shared consent will not always be required. The Police will require the correct documentation in order to make a request. This could be but not limited to, DS 2, Court order, s137, the prevention and detection of a crime. Or where the information is necessary to protect a person or community. Legal Basis – UK GDPR - Article 6(1)(c) – to comply with a legal obligation; and - Article 9(2)(j) – ‘for reasons of substantial public interest’

	Processor – Police Constabulary
Coroner	Purpose – Personal health records or information relating to a deceased patient may be shared with the coroner. Legal Basis – UK GDPR: • Article 6(1)(c) – to comply with a legal obligation; and • Article 9(2)(h) – ‘necessary for the purposes of preventative or occupational medicine’. Processor – The Coroner
Non-commissioned, private healthcare providers (e.g. BUPA, Virgin Care, etc.)	Purpose – Personal information shared with private health care providers in order to deliver direct care to patients at the patient’s request. Consent from the patient will be required to share data with Private Providers. Legal Basis – Articles 6(1)(a) and 9(2)(a) consent by the patient given under contract to the provider. Provider – Any private provider
Commissioned, private healthcare providers / Any Qualified Provider	Purpose – Personal information shared with private health care providers in order to deliver direct care to patients at the patient’s request. Consent from the patient will be required to share data with Private Providers. Legal Basis – Articles 6(1)(a) and 9(2)(a) consent by the patient given under contract to the provider. Provider – Any private provider commissioned by the NHS for example InHealth, Cobalt Health, Psychiatry-UK, Physiological Measurements Limited and private hospitals
Improving Diabetes Care	Purpose – Information that does not identify individual patients is used to enable focussed discussions to take place at practice-led local diabetes review meetings between health care professionals. This enables the professionals to improve the management and support of these patients. Legal Basis – UK GDPR: • Article 6(1)(c) – to comply with a legal obligation; and • Article 9(2)(h) – ‘necessary for the purposes of preventative or occupational medicine’. Processor – Gloucestershire Health and Care NHS Foundation Trust and Gloucestershire ICB
Remote consultation Including – Video Consultation Clinical photography	Purpose – Personal information including images may be processed, stored and with the patients consent shared, in order to provide the patient with urgent medical advice. Legal Basis –

	- Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ Patients may be videoed or asked to provide photographs with consent. There are restrictions on what the practice can accept photographs of. No photographs of the full face, no intimate areas, no pictures of patients who cannot consent to the process. No pictures of children. Processor – Pando, AccuRX
OptimiseRX	Purpose – Your anonymous information will be shared in order to optimise your medication within your medical record. This will enable your GP to provide a more efficient medication regime. Legal Basis - Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ Processor – First Databank UK Ltd
Multi-Disciplinary Team meetings	Purpose – For some long-term conditions, the practice participates in meetings with staff from other agencies involved in providing care, to help plan the best way to provide care to patients with these conditions. Personal data will be shared with other agencies in order that mutual care packages can be decided. Legal Basis – - Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ Processor – Gloucestershire Health & Care NHS Foundation Trust, North Cotswolds Primary Care Network, Residential and Nursing Home Providers, Gloucestershire County Council, Police Constabulary
General Practice Extraction Service (GPES) - At risk patients data collection Version 3 - CVDPREVENT Audit - Physical Health Checks for people with Severe Mental Illness - National Obesity Audit	Purpose – GP practices are required to provide data extraction of their patients personal confidential information for various purposes to NHS England. The objective of this data collection is on an ongoing basis to identify patients registered at General Practices who fit within a certain criteria, in order to monitor and either provide direct care, or prevent serious harm to those patients. Below is a list of the purposes for the data extraction, by using the link you can find out the detail behind each data extraction and how your information will be used to inform this essential work: At risk patients including severely clinically vulnerable

	2. NHS England has directed NHS England to collect and analyse data in connection with Cardiovascular Disease Prevention Audit 3. GPES Physical Health Checks for people with Severe Mental Illness (PHSMI) data collection. 4. National Obesity Audit - NHS Digital Legal Basis - All GP Practices in England are legally required to share data with NHS England for this purpose under section 259(1)(a) and (5) of the The Health and Social Care Act 2012 Further detailed legal basis can be found in each link. Any objections to this data collection should be made directly to NHS England. enquiries@nhsdigital.nhs.uk Processor – NHS England
Medication/Prescribing	Purpose: Prescriptions containing personal identifiable and health data will be shared with organisations who provide medicines management including chemists/pharmacies, in order to provide patients with essential medication regime management, medicines and or treatment as their health needs dictate. This process is achieved either by face to face contact with the patient or electronically. Pharmacists may be employed to review medication, Patients may be referred to pharmacists to assist with diagnosis and care for minor treatment, patients may have specified a nominated pharmacy they may wish their repeat or acute prescriptions to be ordered and sent directly to the pharmacy making a more efficient process. Arrangements can also be made with the pharmacy to deliver care and medication Legal Basis – • Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and • Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ Processor – Community Pharmacies
Professional Training	Purpose – We are a training Practice. Our clinical team are required to be exposed to on the job, clinical experience, as well as continual professional development. On occasion you may be asked if you are happy to be seen by one of our GP registrars, pharmacists or other clinical team to assist with their training as a clinical professional. You may also be asked if you would be happy to have a consultation recorded for training purposes. These recordings will be shared and discussed with training GPs at the surgery, and also with moderators at the RCGP and HEE. Legal Basis –

	- Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ Recordings remain the control of the GP practice and they will delete all recordings from the secure site once they are no longer required. Processor – RCGP, HEE, iConnect, Fourteen Fish
Telephony	Purpose – The practice uses an internet-based telephony system that records telephone calls, for their own purpose and to assist with patient consultations. The telephone system has been commissioned to assist with the high volume and management of calls into the surgery, which in turn will enable a better service to patients. Legal Basis – While there is a robust contract in place with the processor, the surgery has undertaken this service to assist with the direct care of patients in a more efficient way. - Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ Provider – Southern Communications Group Southwest and RPM Business Communications Ltd
Learning Disability Mortality Programme LeDer	Purpose: The Learning Disability Mortality Review (LeDeR) programme was commissioned by NHS England to investigate the death of patients with learning difficulties and Autism to assist with processes to improve the standard and quality of care for people living with a learning disability and Autism. Records of deceased patients who meet with this criteria will be shared with NHS England. Legal Basis: It has approval from the Secretary of State under section 251 of the NHS Act 2006 to process patient identifiable information who fit within a certain criteria. Processor : ICB, NHS England
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.

	Where data is used for secondary uses no personal identifiable data will be used. Where personal confidential data is used for Research explicit consent will be required. Legal Basis – - Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ Processor: NHS England
Local shared care record – JUYI – Joining Up Your Information	Purpose: Health and Social care services are developing shared systems to share data efficiently and quickly. It is important for anyone treating you to be able to access your shared record so that they have all the information they need to care for you. This will be during your routine appointments and in urgent situations such as going to A&E, calling 111 or going to an Out of hours appointment. It is also quicker for staff to access a shared record than to try to contact other staff by phone or email. Only authorised staff can access the systems and the information they see is carefully checked so that it relates to their job. Systems do not share all your data, just data which services have agreed is necessary to include. Legal Basis – - Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ Processor: – NHS Gloucestershire ICB, Kainos, Orion
Child Health Information Service	Purpose - We wish to make sure that your child has the opportunity to have immunisations and health checks when they are due. We share information about childhood immunisations, the 6-8 week new baby check and breast-feeding status with health visitors and school nurses. Legal Basis – Direct Care Processors/Recipients – SCW CSU, on behalf of NHS England and Apollo Data Extraction Services
Clinical Audit (including Primary Care Data Extraction Process (PCDES))	Purpose – Information will be used by the ICB for clinical audit to monitor the quality of the service provided to patients with long terms conditions. When required, information will be held centrally and used for statistical purposes (e.g. the National

	Diabetes Audit). When this happens, strict measures are taken to ensure that individual patients cannot be identified from the data. Legal Basis – 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...’ Processors/Recipients – Gloucestershire ICB
Coronavirus (COVID-19) Research Platform - OpenSAFELY	OpenSAFELY is a secure, open-source software platform for analysis of electronic health data. The system provides access to de-identified (pseudonymised) personal data to support approved projects. The purposes for processing are to identify medical conditions and medications that affect the risk or impact of Covid-19 infection on individuals. Your personal data is collected from various sources including Primary care (GP) records processed by TPP and EMIS. Legal Basis: Data is processed under the legal basis of the COVID-19 Public Health Directions 2020 and Data Provision Notice. Further information is available at: https://digital.nhs.uk/about-nhs-digital/corporate-information-and-documents/directions-and-data-provision-notice/data-provision-notice-dpns/opensafely-covid-19-service-data-provision-notice
Department for Work and Pensions	Purpose – Our practice is legally required to provide limited data to the Department for Work and Pensions for the management of the social care system and fraud prevention. Legal Basis – Article 9(2)(b) ‘necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection..’ Processors/Recipients – Department for Work & Pensions
National Fraud Initiative - Cabinet Office	Purpose – The use of data by the Cabinet Office for data matching is carried out with statutory authority. It does not require the consent of the individuals concerned under Data Protection legislation. Data matching by the Cabinet Office is subject to a Code of Practice. For further information see: https://www.gov.uk/government/publications/code-of-data-matching-practice-for-national-fraud-initiative Legal Basis – Part 6 of the Local Audit and Accountability Act 2014

	Processors/Recipients – Cabinet Office / Local Fraud team
National Registries	Purpose – National Registries (such as the Learning Disabilities Register) have statutory permission under Section 251 of the NHS Act 2006, to collect and hold service user identifiable information without the need to seek informed consent from each individual service user. Legal Basis – Section 251 of the NHS Act 2006
Anticoagulation Monitoring	Purpose: Personal Confidential data is shared with INRStar in order to provide an anticoagulation clinic to patients who are on anticoagulation medication. This will only affect patients who are within this criteria. Legal Basis – - Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ Processor : INRStar
Near Patient Testing	Purpose: Personal Confidential data is shared with LumiraDX in order to provide a testing service to patients who are symptomatic of Covid or to test locally for infection (CRP). This will only affect patients who are within this criteria. Legal Basis – - Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and - Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’ Processor : LumiraDX
iGPR	Purpose – Your medical record will be shared in order that a report can be provided to agencies such as insurance companies or solicitors 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...’ Processors/Recipients – iGPR
Xero	Purpose – Preparation of invoices for non-NHS services 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...’ Processors/Recipients – Xero

Medical Examiner Service (Change to community Medical Examiners name) – Gloucestershire Hospitals NHS Foundation Trust	Purpose: Purpose: Medical records associated with deceased patients are outside scope of the UK GDPR. However, next of kin details are within the scope of the UK GDPR. We will share specified deceased patient records and next of kin details with the Medical Examiners within Gloucestershire Hospitals NHS Foundation Trust Legal Basis: Article 6(1)(c) – necessary under a legal obligation to which the controller is subject”; and Article 9(2)(h)– “processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services” Processor: Medical Examiners service – Gloucestershire Hospitals NHS Foundation Trust
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We keep our Privacy Notice under regular review. This notice was last reviewed in June 2024