

Fair Processing Notice (template)

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1. Introduction

The UK Data Protection Bill will become law when enacted as the Data Protection Act 2018. It will explicitly bring provisions of the EU General Data Protection Regulation (GDPR) 2016 into UK law and establish continuity of the GDPR. The Act will legislate in areas where the GDPR allows flexibility at national level. It will also introduce legislation on processing for law enforcement purposes (in support of the EU Law Enforcement Directive) and by the intelligence services, and make provision for the Information Commissioner (the UK supervisory authority). The current Data Protection Act (DPA) 1998 will be completely repealed when DPA 2018 comes in force.

This Fair Processing Notice (FPN) has been written in line with the EU GDPR 2016. The FPN will be reviewed when the DPA 2018 comes in force in order to align it with the Act.

2. What is this Fair Processing Notice about?

Fair processing is the conditions which have to be met for any activity involving personal data or special categories of personal data to be lawful. Being transparent and providing accessible information to individuals about how an organisation will use their personal information is a key element of Data Protection Legislations. The most common way to provide this information is in a Fair Processing Notice (FPN).

This FPN is part of our programme to make the data processing activities we are carrying out in order to meet our healthcare obligations transparent.

The FPN tells you about information we collect and hold about you, the legal basis for collecting and holding the information, what we do with it, how we keep it secure (confidential), who we might share it with and what your rights are in relation to your information.

3. Who we are

We are Primrose Hill Surgery, located at 97-99 Regents' Park Road, London, NW1 8UR

4. Types of information we use

We use the following types of information/data:

- Personal data or sensitive personal/special categories of personal data such as:
 - demographics - name, address, date of birth, postcode, NHS number
 - racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, medical/health data, sexual life or sexual orientation data.
- Pseudonymised - about individuals but with identifying details (such as name or NHS number) replaced with a unique code.
- Anonymised - about individuals but with identifying details removed.
- Aggregated - anonymised information grouped together so that it doesn't identify individuals.

5. What we use your personal data and special categories of personal data (known as or sensitive personal) for

We use and share information about you in a number of ways. These include:

Primary uses - information from your GP medical record which can be made available to other NHS and public sector organisations, including doctors, nurses and care professionals in order to help them make the best informed decision, and provide you with the best possible direct care delivery.

Secondary uses - information from your GP medical record involves extracting identifiable data and (usually) sharing that data with other NHS organisations, for the purpose of indirect care. Examples include using your information for [research](#), auditing, and healthcare planning (population health management).

6. Identity and Contact details of the Data Controller and Data Protection Officer

Primrose Hill Surgery
97-99 Regents' Park Road
London NW1 8UR
Dr. Abanti Paul

7. Organisations we share your your personal information with

We share information about you with other GPs, NHS acute or mental health Trusts, local authority, community health providers, pharmacists, commissioning organisations, medical research organisations and some specific non NHS organisations for the purposes of direct and indirect care delivery of care.

We are required under the law to provide you with the following information how we process your personal data, the purpose of proposing, recipient/categories of your personal data, the identity of our Data Protection Officer (DPO), how long we retain personal information about you, the legal basis and justification for the processing, and your right to view, request access copies of your personal information, or object to the processing.

Included below is a table of the organisations we share information about you with split into the following categories. In all cases, the data controller and Data Protection Officer (DPO) are as listed in section 6 above:

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a.

Direct Medical Care and Administration

Recipients or categories of recipients of the personal or special categories of personal data	Purpose of the processing	Data Retention Period	Lawful basis General Data Protection Regulation - <i>Article 6</i> - - <i>Article 9</i> -	Your Rights

<p>NHS Trusts - Hospitals, Community or Mental Health Trusts.</p>	<p>Personal data concerning your GP medical record may be shared with NHS Trusts in order to enable their healthcare professionals make the best informed decision about your health needs, and provide you with the best possible care if you visit the hospital for routine care and referrals.</p> <p>Your personal information may also be processed for local administrative purposes such as:</p> <ul style="list-style-type: none"> • Waiting list management; • local clinical audit; • Performance against local targets; • activity monitoring; • production of datasets to submit for commissioning purposes and national collections. <p>The source of the information shared in this way is your electronic GP record.</p>	<p>All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care.</p>	<p>The processing of personal data is permitted under the following paragraphs: Article 6(1)(c) - processing for legal obligation; Article 6(1)(e) - public interest or in the exercise of official authority.</p> <p>The processing of special categories of personal data concerning health is permitted under the following paragraphs: Article 9(2)(b) - processing necessary in the field of employment, social security and social protection law. Article 9(2)(h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services.</p>	<p>You have the right to:</p> <ul style="list-style-type: none"> • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: <ul style="list-style-type: none"> ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. <p>Right to object: In line with the GDPR Article 21, you have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject.</p> <p>If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.</p> <p>Right to complain: If you are dissatisfied with the way the Practice process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information</p>
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<p>Emergency Services (Ambulance trusts, police, A&E departments, out of hours services, 111)</p>	<p>There are circumstances when intervention is necessary in order to save or protect a patient's life or to prevent them from serious immediate harm, for example, during a collapse or diabetic coma or serious injury or accident. In many of these circumstances the patient may be unconscious or too ill to communicate.</p> <p>Medical professionals have a duty of care to share data in emergencies to protect their patients or other persons. In these circumstances, your GP medical record will be shared with emergency healthcare services, the police or fire service in order to enable you receive the best treatment or service.</p> <p>The source of the information shared in this way is your electronic GP record.</p>	<p>All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care.</p>	<p>The processing of personal data is permitted under the following paragraphs:</p> <p>Article 6(1)(c) - processing for legal obligation;</p> <p>Article 6(1)(d) - the processing is necessary in order to protect the vital interests of the data subject</p> <p>The processing of special categories of personal data concerning health is permitted under the following paragraph:</p> <p>Article 9 (2)(C) - the processing is necessary to protect the vital interests of the data subject</p> <p>Related Legislation:</p> <p>Section 251B Health and Social Care (Safety and Quality Act) 2015 (Duty to Share);</p>	<p>You have the right to:</p> <ul style="list-style-type: none"> • Make pre-determined decisions about the type and extent of care you will receive in an emergency, these are known as "Advance Directives"; • access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: <ul style="list-style-type: none"> ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. <p>Right to object: You have the right to object to some or all of your personal information being shared with the recipients. You also have the right to have an "Advance Directive" placed in your records and brought to the attention of relevant healthcare workers or staff.</p> <p>We will notify you at the earliest opportunity where we have shared your personal data in an emergency situation.</p> <p>If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.</p> <p>Right to complain: If you are dissatisfied with the</p>
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<p>GP Federations (groups of Practices working together)</p>	<p>GP Federations are groups of GPs (patient centered organisation), working collaboratively and developing closer integration with other partners across health, social and third sector partners to facilitate an enhanced delivery of health and care services.</p> <p>Through various hubs in the community the GP Federation provide direct health and care services such as continued extended access, home visits, universal offers, musculoskeletal service, GP at front door and other neighbourhood services across Camden.</p> <p>If you visit receive treatment/consultation on any of these services, personal data concerning your GP medical record may be shared with the GP Federation and their Multidisciplinary Team (MDT) in order to enable them make the best informed decision about your health/care needs, and provide you with the best possible care.</p> <p>The source of the information shared in this way is your electronic GP record.</p>	<p>All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care</p>	<p>The processing of personal data is permitted under the following paragraphs:</p> <p>Article 6(1)(c) - processing for legal obligation;</p> <p>Article 6(1)(e) - public interest or in the exercise of official authority.</p> <p>The processing of special categories of personal data concerning health is permitted under the following paragraph:</p> <p>Article 9(2)(h) - processing is necessary for medical or social care treatment or the management of health or social care systems and services.</p> <p>Related Legislation:</p> <p>Section 251B Health and Social Care (Safety and Quality Act) 2015 (Duty to Share);</p> <p>Common Law</p>	<p>You have the right to:</p> <ul style="list-style-type: none"> To access, view or request copies of your personal information; request rectification of any inaccuracy in your personal information; restrict the processing of your personal information where: <ul style="list-style-type: none"> ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. <p>Right to object: In line with the GDPR Article 21, you have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject.</p> <p>If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.</p> <p>Right to complain: If you are dissatisfied with the way the Practice process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at:</p>
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<p>Pharmacists - Medicines Optimisation</p>	<p>Medicines optimisation looks at the value which medicines deliver, making sure they are clinically-effective and cost-effective. It is about ensuring patients get the right choice of medicines, at the right time, and are engaged in the process by their clinical team.</p> <p>Medicines optimisation enables community pharmacies to request medication electronically from the Practice and view relevant information from your GP record in order to provide you with the best medicines.</p> <p>The source of the information shared in this way is your electronic GP record.</p>	<p>All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care</p>	<p>The processing of personal data is permitted under the following paragraphs:</p> <p>Article 6(1)(c) - processing for legal obligation;</p> <p>Article 6(1)(e) - public interest or in the exercise of official authority.</p> <p>The processing of special categories of personal data concerning health is permitted under the following paragraph:</p> <p>Article 9 (2)(h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services.</p> <p>Related Legislation:</p> <p>Section 251B Health and Social Care (Safety and Quality Act) 2015 (Duty to Share);</p>	<p>You have the right to:</p> <ul style="list-style-type: none"> To access, view or request copies of your personal information; request rectification of any inaccuracy in your personal information; restrict the processing of your personal information where: <ul style="list-style-type: none"> ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. <p>Right to object: In line with the GDPR Article 21, you have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject.</p> <p>If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.</p> <p>Right to complain: If you are dissatisfied with the way the Practice process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at:</p>
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<p>Local Authority - Social Services</p>	<p>Primrose Hill Surgery works closely with Local Authorities to support and care for people of all ages to deliver the best possible social care.</p> <p>Personal data concerning your GP medical record may be shared with Local Authorities and Multidisciplinary Team (MDT) delivering social care in order to enable them make the best informed decision about your social care needs if required.</p> <p>The source of the information shared in this way is your electronic GP record.</p>	<p>All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care.</p>	<p>The processing of personal data is permitted under the following paragraphs:</p> <p>Article 6(1) (c) - processing for legal obligation;</p> <p>Article 6(1) (d) (processing for vital interests of data subject) and/or;</p> <p>Article 6(1) (e) - public interest or in the exercise of official authority.</p> <p>The processing of special categories of personal data concerning health is permitted under the following paragraphs:</p> <p>Article 9(2) (b) - processing necessary in the field of employment, social security and social protection law.</p> <p>Article 9 (2) (h) - processing is necessary for medical or social care</p>	<p>You have the right to:</p> <ul style="list-style-type: none"> • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: <ul style="list-style-type: none"> ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. <p>Right to object: In line with the GDPR Article 21, you have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject.</p> <p>If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.</p> <p>Right to complain: If you are dissatisfied with the way the Practice process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office</p>
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<p>Care Homes</p>	<p>Personal data concerning your GP medical record may be shared with Care Homes and other Multidisciplinary Team (MDT) delivering care in order to enable their care professionals make the best informed decision about your care needs, and provide you with the best possible care if you visit a Care Home.</p> <p>The source of the information shared in this way is your electronic GP record.</p>	<p>All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care</p>	<p>The processing of personal data is permitted under the following paragraphs:</p> <p>Article 6(1) (c) - processing for legal obligation;</p> <p>Article 6(1) (e) - public interest or in the exercise of official authority.</p> <p>The processing of special categories of personal data concerning health is permitted under the following paragraphs:</p> <p>Article 9(2) (b) - processing necessary in the field of employment, social security and social protection law.</p> <p>Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services.</p>	<p>You have the right to:</p> <ul style="list-style-type: none"> To access, view or request copies of your personal information; request rectification of any inaccuracy in your personal information; restrict the processing of your personal information where: <ul style="list-style-type: none"> ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. <p>Right to object: In line with the GDPR Article 21, you have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject.</p> <p>If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.</p> <p>Right to complain: If you are dissatisfied with the way the Practice process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at:</p>
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b. Other primary care services delivered for the purposes of direct care

Recipients or categories of recipients of the personal or special categories of personal data	Purpose of the processing	Data Retention Period	Lawful basis General Data Protection Regulation - Article 6 - - Article 9 -	Your Rights

<p>Integrated Urgent Care Service (IUC) - covering Out of Hours and NHS 111 service</p>	<p>Integrated Urgent Care Service (IUC) is an urgent care service delivered across North Central London (NCL) (Barnet, Camden, Enfield, Haringey and Islington) for the provision of a functionally integrated 24/7 urgent care access, clinical advice and treatment service for patients. IUC incorporates NHS 111 and Out of Hours (OOH) services, which is often referred to as an IUC Clinical Assessment Service.</p> <p>The purpose of IUC is to ensure that patients receive the best possible healthcare service in their community. If you visit the urgent care centre or call NHS 111 for health related needs, personal data in your GP record will be shared with healthcare professionals in order to enable them make the best the best informed decision about your health needs.</p> <p>The source of the information shared in this way is your electronic GP record.</p>	<p>All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care</p>	<p>The processing of personal data is permitted under the following paragraphs :</p> <p>Article 6(1) (c) - processing for legal obligation;</p> <p>Article 6(1) (e) - public interest or in the exercise of official authority.</p> <p>The processing of special categories of personal data concerning health is permitted under the following paragraph:</p> <p>Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services.</p> <p>Related Legislation</p>	<p>You have the right to:</p> <ul style="list-style-type: none"> To access, view or request copies of your personal information; request rectification of any inaccuracy in your personal information; restrict the processing of your personal information where: <ul style="list-style-type: none"> ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. <p>Right to object: In line with the GDPR Article 21, you have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject.</p> <p>If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.</p> <p>Right to complain: If you are dissatisfied with the way the Practice process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at:</p>
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<p>Continuing Health Care (CHC)</p>	<p>NHS Continuing Health Care (CHC) is free care outside of hospital that is arranged and funded by the NHS to support living with complex medical conditions and on-going healthcare needs which can be delivered in the patient's home, at their care home or in non-acute hospitals.</p> <p>CHC is free, unlike support from social services for which a fee may be charged, depending on your income and savings. CHC is different from NHS Funded Nursing Care, which some people with less complex needs living in care homes receive.</p> <p>If you require CHC needs personal data concerning your GP medical record will be shared with the care home or in non-acute hospitals looking after you.</p> <p>The source of the information shared in this way is your electronic GP record.</p>	<p>All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care</p>	<p>The processing of personal data is permitted under the following paragraphs :</p> <p>Article 6(1) (c) - processing for legal obligation;</p> <p>Article 6(1) (e) - public interest or in the exercise of official authority.</p> <p>The processing of special categories of personal data concerning health is permitted under the following paragraphs :</p> <p>Article 9(2) (b) - processing necessary in the field of employment, social security and social protection law.</p> <p>Article 9 (2) (h) - processing is necessary</p>	<p>You have the right to:</p> <ul style="list-style-type: none"> To access, view or request copies of your personal information; request rectification of any inaccuracy in your personal information; restrict the processing of your personal information where: <ul style="list-style-type: none"> ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. <p>Right to object: In line with the GDPR Article 21, you have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject.</p> <p>If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered. Right to complain: If you are dissatisfied with the way the Practice process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office</p>
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C.

Statutory Disclosures of Information

Recipients or categories of recipients of the personal or special categories of personal data	Purpose of the processing	Data Retention Period	Lawful basis General Data Protection Regulation - <i>Article 6</i> - - <i>Article 9</i> -	Your Rights

<p>Safeguarding Concerns - to prevent an individual, or to prevent a serious crime</p>	<p>Some members of public are recognised as needing safeguarding protection, for example children and vulnerable adults. If an individual is identified as being at risk from harm, we have a duty to do what we can to protect that individual, and we are bound ‘Safeguarding’ laws to do so. Where there is a suspected or actual safeguarding issue we will share information that we hold about you with other relevant agencies such as local Ambulance trusts, the police, A&E departments, out of hours services, 111 or Social Services)</p> <p>The source of the information shared in this way is your electronic GP record.</p>	<p>All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care.</p>	<p>The processing of personal data is permitted under the following paragraphs :</p> <p>Article 6(1) (c) - processing for legal obligation;</p> <p>Article 6(1) (d) - the processing is necessary in order to protect the vital interests of the data subject</p> <p>The processing of special categories of personal data concerning health is permitted under the following paragraphs :</p> <p>Article 9 (2) (C) - the processing is necessary to protect the vital interests of the data subject;</p> <p>Article 9(2) (b) - processing necessary</p>	<p>This sharing is a legal and professional requirement and therefore there is no right to object.</p> <p><u>The Children Act 1989</u> requires local authorities to investigate where a child is the subject of an emergency protection order, is in police protection or where there is a reasonable cause to suspect that a child is suffering or is likely to suffer harm.</p> <p>The Act requires the local authority to safeguard and promote the welfare of children who are in need, within their geographical area and to request help from specified authorities including General Practices, NHS Trusts, Clinical Commissioning Groups (CCGs) and NHS England.</p> <p>Right to complain: If you are dissatisfied with the way the Practice process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner’s Office Wycliffe House Water Lane Wilmslow Cheshire</p> <p>Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/</p>
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<p>The Care Quality Commission (CQC)</p>	<p>The Care Quality Commission (CQC) is a regulatory body established under the Health and Social Care Act. The CQC regulates health and social care services in England to ensure that safe health and care are provided. The law allows CQC to access identifiable patient data/medical records in our clinical system for the purposes of their assessment and investigation of significant safety incident.</p> <p>The data will be shared with the Care Quality Commission, its officers and staff and members of the inspection teams that visit us from time to time.</p> <p>The source of the information shared in this way is your electronic GP record.</p>	<p>All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care.</p>	<p>The processing of personal data is permitted under the following paragraph: Article 6(1) (c) - processing for legal obligation;</p> <p>The processing of special categories of personal data concerning health is permitted under the following paragraph: Article 9 (2) (h) - processing is necessary for medical or social care treatment or the management of health or social care systems and services</p> <p>Related Legislation :</p> <p>The Health and Social Care Act 2008, s64</p>	<p>You have the right to:</p> <ul style="list-style-type: none"> To access, view or request copies of your personal information; request rectification of any inaccuracy in your personal information; restrict the processing of your personal information where: <ul style="list-style-type: none"> ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. <p>Right to object: You have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject.</p> <p>If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.</p> <p>Right to complain: If you are dissatisfied with the way the Practice process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office Wyndley House</p>
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<p>Law Enforcement and Regulatory Bodies</p>	<p>In some circumstances the Practice may be legally required to share personal information with law enforcements and regulatory bodies (without the consent of the data subject) such as: the Police; Courts of Justice; HMRC and DVLA for the purposes of prevention or detection of crime; apprehension or prosecution of offenders; the assessment or collection of any tax or duty or, of any imposition of a similar nature.</p> <p>GPs are obliged to notify the DVLA when fitness to drive requires <i>notification but an individual cannot or will not notify the DVLA themselves, and if there is concern for road safety, which would be for both the individual and the wider public.</i> The Practice will review each request based on its merits before deciding whether to release information to the ‘relevant authorities’.</p> <p>The source of the information shared in this way is your electronic GP record.</p>	<p>All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care.</p>	<p>The processing of personal data is permitted under the following paragraphs :</p> <p>Article 6(1) (c) - processing for legal obligation;</p> <p>Article 6(1) (e) - public interest or in the exercise of official authority.</p> <p>The processing of special categories of personal data concerning health is permitted under the following paragraph:</p> <p>Article 9 (2) (G) - the processing is necessary for reasons of substantial public interest</p>	<p>This sharing is a legal and professional requirement and therefore there is no right to object. Personal data processed these purposes are exempt the first data protection principle (processed lawfully, fairly and in a transparent manner).</p> <p>Right to complain: If you are dissatisfied with the way the Practice process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner’s Office Wycliffe House Water Lane Wilmslow Cheshire</p> <p>Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/</p>
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<p>Medico-Legal</p>	<p>Medico-Legal - Where a medical professional is holding personal data for the purpose of providing medical reports in connection with legal action.</p> <p>The source of the information shared in this way is your electronic GP record.</p>	<p>All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care.</p>	<p>The processing of personal data is permitted under the following paragraph: Article 6(1)(c) - processing for legal obligation;</p> <p>The processing of special categories of personal data concerning health is permitted under the following paragraphs :</p> <p>Article 9 (2) (b): processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject</p> <p>Art.18 (2): Processing for the establishment, exercise or defence of legal claims.</p>	<p>This sharing is a legal and professional requirement and therefore there is no right to object.</p> <p>Right to complain: If you are dissatisfied with the way the Practice process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire</p> <p>Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/</p>
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<p>General Medical Council (GMC)</p>	<p>General Medical Council (GMC) is a public body that maintains the official register of medical practitioners within the United Kingdom. Its primary responsibility is 'to protect, promote and maintain the health and safety of the public' by controlling entry to the register, and suspending or removing members when necessary.</p> <p>Under the Medical Act 1983, the GMC has the power to request access to a patient's medical records for the purposes of an investigation into a doctor's fitness to practise.</p> <p>The source of the information shared in this way is your electronic GP record.</p>	<p>All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care.</p>	<p>The processing of personal data is permitted under the following paragraph: Article 6(1)(c) - processing for legal obligation;</p> <p>The processing of special categories of personal data concerning health is permitted under the following paragraph: Article 9(2)(h) - processing is necessary for medical or social care treatment or the management of health or social care systems and services</p> <p>Related Legislation</p> <p>ⓘ</p> <p>The Medical Act 1983</p>	<p>You have the right to:</p> <ul style="list-style-type: none"> • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: <ul style="list-style-type: none"> ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. <p>Right to object: You have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject.</p> <p>Right to complain: If you are dissatisfied with the way the Practice process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire</p> <p>Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/</p>
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<p>The Health Service Ombudsman (HSO)</p>	<p>The Health Service Ombudsman (HSO) was set up by Parliament to provide an independent complaint handling service for complaints that have not been resolved by the NHS in England and UK government departments.</p> <p>The HSO has the power to request access to a patient's medical records for the purpose of an investigation.</p> <p>The source of the information shared in this way is your electronic GP record.</p>	<p>All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care</p>	<p>The processing of personal data is permitted under the following paragraph: Article 6(1) (c) - processing for legal obligation;</p> <p>The processing of special categories of personal data concerning health is permitted under the following paragraph: Article 9 (2) (h) - processing is necessary for medical or social care treatment or the management of health or social care systems and services</p> <p>Related Legislation :</p> <p>The Health Services Commissioners Act 1993,s12</p>	<p>You have the right to:</p> <ul style="list-style-type: none"> To access, view or request copies of your personal information; request rectification of any inaccuracy in your personal information; restrict the processing of your personal information where: <ul style="list-style-type: none"> ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. <p>Right to object: You have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject.</p> <p>Right to complain: If you are dissatisfied with the way the Practice process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire</p> <p>Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/</p>
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<p>NHS Counter Fraud</p>	<p>Under the NHS Act 2006, investigations into fraud in the NHS may require access to confidential patient information. This means that we are compelled by the law to share your data.</p> <p>The source of the information shared in this way is your electronic GP record.</p>	<p>All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care</p>	<p>The processing of personal data is permitted under the following paragraph: Article 6(1) (c) - processing for legal obligation;</p> <p>The processing of special categories of personal data concerning health is permitted under the following paragraph: Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services</p> <p><u>Related Legislation</u> : s10 NHS Act 2006</p>	<p>Right to complain: If you are dissatisfied with the way the Practice process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire</p> <p>Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/</p>
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<p>NHS Digital</p>	<p>NHS Digital (previously known as the Health and Social Care Information Centre) is a national information and technology partner to the health and social care system. NHS Digital use digital technology to transform the NHS and social care.</p> <p>NHS Digital carries out National Data collections/ extraction from the GP record. These include:</p> <p>National Diabetes Audit (NDA) - A national monitoring system, auditing the care of patients with diabetes. The data extracted for the purpose of NDA includes NHS Number, date of birth and postcode, as well as clinical parameters related to diabetes. NDA is a mandatory data extraction under section 254 of the Health and Social Care Act 2012, this means that we are compelled by law to share your data</p> <p>Individual GP Level Data (IGPLD) - A national monitoring system to enable NHS Digital to provide GPs with clinical information on the care provision for their patients. The data extracted includes the NHS number. IGPLD is a mandatory data extraction under 254 of the Health and Social Care Act 2012, this means that we are compelled by law to share your data</p> <p>FGM) - NHS Digital collects data on FGM within the NHS in</p>	<p>All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care</p>	<p>The processing of personal data is permitted under the following paragraph: Article 6(1)(c) - processing for legal obligation;</p> <p>The processing of special categories of personal data concerning health is permitted under the following paragraph: Article 9(2)(h) - processing is necessary for medical or social care treatment or the management of health or social care systems and services</p> <p>Related Legislation : S254 of the Health and Social Care Act 2012</p>	<p>You have the right to:</p> <ul style="list-style-type: none"> To access, view or request copies of your personal information; request rectification of any inaccuracy in your personal information; restrict the processing of your personal information where: <ul style="list-style-type: none"> ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. <p>Right to object: You do not have the right to object as the sharing is a legal and professional requirement under the law.</p> <p>Whilst there is no right to object under 6(1)(c), NHS Digital respects Type 1 objections (9Nu0) present in the GP record and no data will be extracted and uploaded if so.</p> <p>Right to complain: If you are dissatisfied with the way the Practice process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire</p> <p>Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/</p>
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<p>NHS England</p>	<p>NHS England is responsible for securing, planning, designing and paying for Primary Care & Specialised NHS services not otherwise funded by Camden This includes planned and emergency hospital care, mental health, rehabilitation, community and primary medical care (GP) services.</p> <p>We may often share personal information with NHS England potentially for safeguarding concerns that need escalating beyond our borough.</p> <p>Where required the Practice may also have to share staff personal information with NHS England for the purpose of allegations framework or performers list.</p> <p>The source of the information that may be shared in this instance are in the staff record and patient's electronic GP record.</p>	<p>All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care</p>	<p>The processing of personal data is permitted under the following paragraph: Article 6(1) (e) - public interest or in the exercise of official authority. The processing of special categories of personal data concerning health is permitted under the following paragraph: Article 9 (2) (h) - processing is necessary for medical or social care treatment or the management of health or social care systems and services.</p>	<p>You have the right to:</p> <ul style="list-style-type: none"> To access, view or request copies of your personal information; request rectification of any inaccuracy in your personal information; restrict the processing of your personal information where: <ul style="list-style-type: none"> ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. <p>Right to object: You do not have the right to object as the sharing is a legal and professional requirement under the law.</p> <p>If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.</p> <p>Right to complain: If you are dissatisfied with the way the Practice process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire</p> <p>Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/</p>
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<p>Public Health</p>	<p>Public Health England is an executive agency of the Department of Health and Social Care, and a distinct organisation with operational autonomy.</p> <p>The main purpose of the organisation is to protect and improve the health and wellbeing of citizens. These include the management of smoking, alcohol and obesity; management of epidemics and infections such as flu, measles, tuberculosis or outbreaks of food poisoning.</p> <p>The source of the information shared in this way is your electronic GP record.</p>	<p>All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care</p>	<p>The processing of personal data is permitted under the following paragraph: Article 6(1)(c) - processing for legal obligation;</p> <p>The processing of special categories of personal data concerning health is permitted under the following paragraph: Article 9(2)(b) - processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices.</p>	<p>You have the right to:</p> <ul style="list-style-type: none"> • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: <ul style="list-style-type: none"> ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. <p>Right to object: You have a general right to raise an objection to your personal data being shared with the recipient.</p> <p>If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.</p> <p>Right to complain: If you are dissatisfied with the way the Practice process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire</p> <p>Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/</p>
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d. Processing for the Purposes of Commissioning, Planning, Research and Risk Stratification

<p>Clinical Commissioning Groups CCG (s)</p>	<p>Clinical Commissioning Group (CCGs) are responsible for securing, planning, designing and paying for your NHS services, including planned and emergency hospital care, mental health, rehabilitation, community and primary medical care (GP) services. This is known as ‘Commissioning’.</p> <p>In order to enable Camden CCG carry its statutory duties the Practice</p> <p>In order to enable Camden CCG carry out its statutory responsibilities effectively, efficiently and safely, we may share personal data about you with the CCG for the following purposes: Individual Funding Requests; Continuing Health Care; appeals, queries or compliments; safeguarding concerns; commissioning purposes such as payment for target achievement known as Quality and Outcomes Framework (QOF); and where the Practice is participating in agreed national or local enhanced services.</p> <p>The source of the information shared in this way is your electronic GP record.</p>	<p>All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care</p>	<p>The processing of personal data is permitted under the following paragraph: Article 6(1)(e) - public interest or in the exercise of official authority.</p> <p>The processing of special categories of personal data concerning health is permitted under the following paragraph: Article 9(2)(h) - processing is necessary for medical or social care treatment or the management of health or social care systems and services</p>	<p>You have the right to:</p> <ul style="list-style-type: none"> To access, view or request copies of your personal information; request rectification of any inaccuracy in your personal information; restrict the processing of your personal information where: <ul style="list-style-type: none"> ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. <p>Right to object: You have a general right to raise an objection to your personal data being shared with the recipient.</p> <p>If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.</p> <p>Right to complain: If you are dissatisfied with the way the Practice process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner’s Office Wycliffe House Water Lane Wilmslow Cheshire</p> <p>Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/</p>
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<p>“Risk Stratification” (Population Health Management and Case Finding)</p> <p>Recipient: Emis</p>	<p>The Practice performs computerised searches of some or all of our records to identify individuals who may be at increased risk of certain conditions or diagnoses i.e. Diabetes, heart disease, risk of falling). Your records may be amongst those searched. This is often called “risk stratification” or “case finding”. These searches are sometimes carried out by Data Processors who link our records to other records that they access, such as hospital attendance records. The results of these searches and assessment may then be shared with other healthcare workers, such as specialist, therapists, technicians etc. The information that is shared is to enable the other healthcare workers to provide the most appropriate advice, investigations, treatments, therapies and or care.</p> <p>Risk stratification can be grouped into two purposes namely:</p> <p>Direct Care - ‘Case Finding’ where carried out by a health professional (e.g. GPs and Provider) involved in an individual’s care or by a data processor acting under contract with such a provider, it is treated as direct care.</p> <p>Indirect Care - understand the local population needs and plan for future requirement.</p> <p>The source of the information shared in this way is your electronic GP record.</p>	<p>All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care</p>	<p>The processing of personal data is permitted under the following paragraph: Article 6(1)(e) - public interest or in the exercise of official authority.</p> <p>The processing of special categories of personal data concerning health is permitted under the following paragraph: Article 9(2)(h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services</p> <p>Related Legislation :</p> <p>Section 251 NHS Act 2006</p>	<p>You have the right to:</p> <ul style="list-style-type: none"> To access, view or request copies of your personal information; request rectification of any inaccuracy in your personal information; restrict the processing of your personal information where: <ul style="list-style-type: none"> ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. <p>Right to object: You have a general right to raise an objection to your personal data being shared with the recipient.</p> <p>If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.</p> <p>Right to complain: If you are dissatisfied with the way the Practice process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner’s Office Wycliffe House Water Lane Wilmslow Cheshire</p> <p>Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/</p>
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<p>Research Partners</p>	<p>Primrose Hill Surgery participates projects and will only agree to do so if there is an agreed clearly defined reason for the research that is likely to benefit healthcare and patients. Such proposals will normally have a consent process, ethics committee approval, and will be in line with the principles of Article 89(1) of GDPR.</p> <p>Research organisations do not usually approach patients directly but will ask us to make contact with suitable patients to seek their consent. Occasionally research can be authorised under law without the need to obtain consent. This is known as the Section 251 arrangement.</p> <p>We may also use your medical records to carry out research within the practice. We share information with the following medical research organisations with your explicit consent or when the law allows: Noclor</p> <p>The source of the information shared in this way is your electronic GP record.</p> <p>You have the right to object to the sharing of your personal health data concerning your GP medical for research purposes.</p>	<p>All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care</p>	<p>The processing of personal data is permitted under the following paragraph:</p> <p>Article 6(1) (e) - public interest or in the exercise of official authority.</p> <p>The processing of special categories of personal data is permitted under the following paragraph:</p> <p>Article 9 (2) (j) - for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member State law</p>	<p>You have the right to:</p> <ul style="list-style-type: none"> To access, view or request copies of your personal information; request rectification of any inaccuracy in your personal information; restrict the processing of your personal information where: <ul style="list-style-type: none"> ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. <p>Right to object: You have a general right to raise an objection to your personal data being shared with the recipient.</p> <p>If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.</p> <p>Right to complain: If you are dissatisfied with the way the Practice process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire</p> <p>Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/</p>
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<p>Employee nt Processing</p>	<p>The Practice ensures the protection of the rights and freedoms in respect of the processing of its employees' personal data, in particular for the purposes of the recruitment, obligations performance contract of employment, rights and benefits management planning, health and safety, equality and diversity in the workplace, health and safety at work.</p> <p>The Practice ensures that personal data it collects from employees are used only for employment related purposes or where there is a statutory obligation to share the personal information with to regulatory bodies (e.g. courts, police or NHS England).</p>	<p>All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care</p>	<p>The processing of personal data is permitted under the following paragraph: Article 6(1)(e) - public interest or in the exercise of official authority.</p> <p>The processing of special categories of personal data is permitted under the following paragraph: (2)(b): processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject</p>	<p>Employees have the right to:</p> <ul style="list-style-type: none"> • To access, view or request copies of their personal information held by the Practice; • request rectification of any inaccuracy to their personal information; • restrict the processing of their personal information where: <ul style="list-style-type: none"> ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. <p>Right to object: Employees have a general right to raise an objection to the sharing personal data.</p> <p>If an employee wishes to exercise his/her rights they can contact the Practice (data controller) or the DPO and their request will be carefully considered.</p> <p>Right to complain: If an employee is dissatisfied with the way the Practice process his/her personal data, they have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire</p> <p>Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/</p>
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e.

Data Sharing Databases

System/ database Recipients or categories of recipients of the personal or special categories of personal data	Purpose of the processing	Data Retention Period	Lawful basis General Data Protection Regulation - <i>Article 6</i> - - <i>Article 9</i> -	Your Rights

<p>Care Integrated Digital Record (CIDR)</p>	<p>Care Integrated Digital Record (CIDR) is an electronic record linking information from health and social care organisations across Camden. Health and care professionals can view their patients/client these records through an online portal to enable them provide the best possible to patients and clients. CIDR includes information about patients/clients recorded by acute hospitals, mental health, community health, social care and GP Practices.</p> <p>Healthcare professionals across North Central London are able to access their patient's records through CIDR to enable them to make the best informed decision about their patient's health and provide the best possible care.</p> <p>The source of the information shared in this way is your electronic GP record for the purposes of direct care.</p>	<p>All records held by the Practice and in the CIDR system are kept for the duration specified in the Records Management Codes of Practice for Health and Social Care</p>	<p>The processing of personal data is permitted under the following paragraphs :</p> <p>Article 6(1) (c) - processing for legal obligation;</p> <p>Article 6(1) (e) - public interest or in the exercise of official authority.</p> <p>The processing of special categories of personal data concerning health is permitted under the following paragraph:</p> <p>Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services.</p> <p>Related Legislation</p>	<p>You have the right to:</p> <ul style="list-style-type: none"> To access, view or request copies of your personal information; request rectification of any inaccuracy in your personal information; restrict the processing of your personal information where: <ul style="list-style-type: none"> ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. <p>Right to object or opt-out: You have the right to raise an objection to your personal data being shared in CIDR. You also have the right opt out of having a CIDR record by completing an opt-out form with your Practice. Although we will first need to explain how this may affect the care you receive.</p> <p>If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.</p> <p>Right to complain: If you are dissatisfied with the way the Practice process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire</p>
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<p>Cerner - Health Information Exchange (HIE)</p> <p>Note: HIE implementation across North London is at the design phase, therefore, it is not mandatory to have this in your FPN until HIE has been implemented and is using GP Practice data.</p> <p>Practices will be updated as HIE design and implementation progresses.</p> <p>Please note, the legal basis for processing personal data and special categories of personal data in the HIE will not change as these were adopted from BMA and IG Alliance guidance.</p>	<p>Health Information Exchange (HIE) is an Electronic Health Record (EHR) linking system that brings together patient data across the health and care system in a secure manner, embedding a single aggregated longitudinal view of the patient natively in each EHR system irrespective of traditional organisational or technological boundaries.</p> <p>HIE includes information about patients/clients recorded by acute hospitals, mental health, community health, social care and GP Practices.</p> <p>Healthcare professionals across North London are able to access can access subsets of their patients/service users' medical or social records from a single system in order to provide the best possible care.</p> <p>The source of the information shared in this way is your electronic GP record for the purposes of direct patient care and indirect care.</p> <p>The source of the information shared in this way is your electronic GP record.</p>	<p>All records held by the Practice and in the HIE system are kept for the duration specified in the Records Management Codes of Practice for Health and Social Care</p>	<p>The processing of personal data is permitted under the following paragraphs:</p> <p>Article 6(1) (c) - processing for legal obligation;</p> <p>Article 6(1) (e) - public interest or in the exercise of official authority.</p> <p>The processing of special categories of personal data concerning health is permitted under the following paragraph:</p> <p>Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services.</p> <p>Related Legislation</p>	<p>You have the right to:</p> <ul style="list-style-type: none"> To access, view or request copies of your personal information; request rectification of any inaccuracy in your personal information; restrict the processing of your personal information where: <ul style="list-style-type: none"> ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. <p>Right to object or opt-out: You have the right to raise an objection to your personal data being shared in HIE. You also have the right opt out of HIE by completing an opt-out form (note: opt-out forms will be developed when HIE implementation starts) with your Practice. Although we will first need to explain how this may affect the care you receive.</p> <p>If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.</p> <p>Right to complain: If you are dissatisfied with the way the Practice process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office Wycliffe House</p>
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<p>EMIS Systems Local Record Sharing - Integrated Care</p>	<p>EMIS Local Record Sharing enables your GP medical record held on our secure EMIS Web clinical system to be shared with other healthcare Providers (e.g. acute hospitals, mental and community health and other GPs) who are commissioned to provide to provide health care services within your borough.</p> <p>This local sharing is used to provide direct patient care for services such as continued extended access, home visits, universal offers, musculoskeletal service, GP at front door and other neighbourhood services across Camden.</p> <p>The information is accessed in real time and on-demand, meaning that data from your GP record is neither extracted, nor uploaded, nor sent anywhere in real time and on-demand, meaning that data from your GP record is neither extracted, nor uploaded, nor sent anywhere.</p> <p>The source of the information shared in this way is your electronic GP record.</p>	<p>All records held by the Practice and the EMIS Local Record Sharing system are be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care</p>	<p>The processing of personal data is permitted under the following paragraphs :</p> <p>Article 6(1) (c) - processing for legal obligation;</p> <p>Article 6(1) (e) - public interest or in the exercise of official authority.</p> <p>The processing of special categories of personal data concerning health is permitted under the following paragraphs :</p> <p>Article 9(2) (b) - processing necessary in the field of employment, social security and social protection law.</p> <p>Article 9 (2) (h) - processing is necessary for medical or social</p>	<p>You have the right to:</p> <ul style="list-style-type: none"> To access, view or request copies of your personal information; request rectification of any inaccuracy in your personal information; restrict the processing of your personal information where: <ul style="list-style-type: none"> ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. <p>Right to object: You have a general right to raise an objection to your personal data being shared with the recipients.</p> <p>If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.</p> <p>Right to complain: If you are dissatisfied with the way the Practice process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire</p> <p>Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/</p>
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<p>National NHS Digital Services “Spine” including:</p> <ul style="list-style-type: none"> • Patient Demographics Service • e-Referral Service • Electronic Prescription Service • GP2GP • Summary Care Record 	<p>Spine supports the IT infrastructure for health and social care in England, joining together over 23,000 healthcare IT systems in 20,500 organisations.</p> <p>It hosts 5 key services to support the delivery of your care. They enable healthcare professionals, authorised with an NHS smartcard, to view relevant information about you as follows</p> <p>Patient Demographics Service - The Personal Demographics Service (PDS) is the national electronic database of NHS patient details such as name, address, date of birth and NHS Number (known as demographic information). It helps healthcare professionals to identify patients and match them to their health records. It also allows them to contact and communicate with patients.</p> <p>Summary Care Record (SCR) - is an electronic record of important patient information, created from GP medical records. It can be seen and used by authorised staff in other areas of the health and care system involved in the patient’s direct care.</p> <p>When your personal health records on your GP Record is uploaded to the spine, NHS Digital becomes the data controller for the uploaded information.</p> <p>The source of the information shared in this way is your electronic GP record.</p>	<p>All records held by the Practice and the EMIS Local Record Sharing system are be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care</p>	<p>The processing of personal data is permitted under the following paragraph: Article 6(1)(e) - public interest or in the exercise of official authority.</p> <p>The processing of special categories of personal data concerning health is permitted under the following paragraph: Article 9(2)(h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services</p>	<p>You have the right to:</p> <ul style="list-style-type: none"> • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: <ul style="list-style-type: none"> ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. <p>Right to object or opt-out: You have the right to raise an objection or opt-out of out of having an SCR by returning a completed opt-out form to their GP practice. Although we will first need to explain how this may affect the care you receive.</p> <p>If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.</p> <p>Right to complain: If you are dissatisfied with the way the Practice process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner’s Office Wycliffe House Water Lane Wilmslow Cheshire</p>
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<p>Open Exeter</p>	<p>Open Exeter is a web-enabled viewer which provides the facility for healthcare professionals to share/access patient data held on the National Health Application and Infrastructure Services (NHAIS) systems, including cervical screening, breast screening, organ donor, blood donor and home oxygen.</p> <p>Access to Open Exeter is only possible on the N3 network, and via authorised logons/ passwords provided by NHS Digital.</p> <p>The source of the information shared in this way is your electronic GP record.</p>	<p>Data is viewed on screen. If printed, it is destroyed when no longer required (usually within 24 hrs).</p>	<p>The processing of personal data is permitted under the following paragraph: Article 6(1) (e) - public interest or in the exercise of official authority.</p> <p>The processing of special categories of personal data concerning health is permitted under the following paragraph: Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services</p>	<p>You have the right to:</p> <ul style="list-style-type: none"> To access, view or request copies of your personal information; request rectification of any inaccuracy in your personal information; restrict the processing of your personal information where: <ul style="list-style-type: none"> ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. <p>Right to object: You have a general right to raise an objection to your personal data being shared in Open Exeter.</p> <p>If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.</p> <p>Right to complain: If you are dissatisfied with the way the Practice process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire</p> <p>Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/</p>
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f. Data Processors				
System/ database	Purpose of the processing & Data Retention Period	Data Retention Period	Lawful basis General Data Protection Regulation - <i>Article 6</i> - - <i>Article 9</i> -	Your Rights
Recipients or categories of recipients of the personal or special categories of personal data				

<p>EMIS Health and Egton</p>	<p>EMIS Health and Egton are responsible for the provision of a clinical system, software and IT services used by the Practice to securely store and process your medical record.</p> <p>All information about your personal health records are stored in your GP electronic record. This information is then available to practice staff & external bodies as outlined in this document.</p>	<p>All records held in the Practice EMIS system be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care</p> <p>“GP records should be retained until 10 years after the patient’s death or after the patient has permanently left the country, unless they remain in the European Union.</p> <p>Electronic patient records must not be destroyed or deleted for the foreseeable future.”</p>	<p>The processing of personal data is permitted under the following paragraph: Article 6(1)(e) - public interest or in the exercise of official authority.</p> <p>The processing of special categories of personal data concerning health is permitted under the following paragraph: Article 9(2)(h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services</p>	<p>You have the right to:</p> <ul style="list-style-type: none"> To access, view or request copies of your personal information; request rectification of any inaccuracy in your personal information; restrict the processing of your personal information where: <ul style="list-style-type: none"> ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. <p>Right to object: In line with the GDPR Article 21, you have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject.</p> <p>If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.</p> <p>Right to complain: If you are dissatisfied with the way the Practice process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information</p>
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<p>NHS Camden Clinical Commissioning Group (Camden CCG)</p>	<p>NHS Camden Clinical Commissioning Group (Camden CCG) is responsible for securing, planning, designing and paying for your NHS services, including planned and emergency hospital care, mental health, rehabilitation, community and primary medical care (GP) services, Information Communication Technology (ICT), providing risk stratification services.</p> <p>The CCG act as the Data Processor for Care Integrated Digital Record (CIDR) and EMIS Systems Local Record Sharing and, process personal data from your GP record in accordance with instructions from the Practice.</p> <p>The source of the information shared in this way is your electronic GP record.</p>	<p>All records held in the Practice EMIS system be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care</p> <p>“GP records should be retained until 10 years after the patient’s death or after the patient has permanently left the country, unless they remain in the European Union.</p> <p>Electronic patient records must not be destroyed or deleted for the foreseeable future.”</p>	<p>The processing of personal data is permitted under the following paragraph: Article 6(1)(e) - public interest or in the exercise of official authority.</p> <p>The processing of special categories of personal data concerning health is permitted under the following paragraph: Article 9(2)(h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services</p>	<p>You have the right to:</p> <ul style="list-style-type: none"> To access, view or request copies of your personal information; request rectification of any inaccuracy in your personal information; restrict the processing of your personal information where: <ul style="list-style-type: none"> ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. <p>Right to object: You have a general right to raise an objection to your personal data being shared with CCG.</p> <p>If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.</p> <p>Right to complain: If you are dissatisfied with the way the Practice process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner’s Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/</p>
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<p>North East London Commissioning Support Unit (NEL CSU) - GP Practice Data Extraction Services</p>	<p>The GP Practice Data Extraction Services enables NEL CSU to extract personal data from GP Practice covering all currently registered patients and those ever registered since April 2009 except where patients have explicitly dissented from their information being extracted, for the provision of services back to the practice which may include:</p> <p>Risk stratification; linking data to other data sets; financial reporting; business intelligence; statistical analysis and; information to support delivery of patient care.</p> <p>The source of the information shared in this way is your electronic GP record.</p>	<p>All records held in the Practice EMIS system be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care</p>	<p>The processing of personal data is permitted under the following paragraph: Article 6(1)(e) - public interest or in the exercise of official authority.</p> <p>The processing of special categories of personal data concerning health is permitted under the following paragraph: Article 9(2)(h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services</p>	<p>You have the right to:</p> <ul style="list-style-type: none"> To access, view or request copies of your personal information; request rectification of any inaccuracy in your personal information; restrict the processing of your personal information where: <ul style="list-style-type: none"> ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. <p>Right to object: You have a general right to raise an objection to your personal data being shared with NEL CSU.</p> <p>If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.</p> <p>Right to complain: If you are dissatisfied with the way the Practice process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/</p>
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<p>Health Information Exchange (provided by Cerner)</p>	<p>Cerner is responsible for the provision of IT clinical systems that enables safe, digitised patient care across the healthcare facilities. Cerner is the supplier of Health Information Exchange (HIE) - an Electronic Health Record (EHR) that links system and brings together patient data across the health and care system irrespective of traditional organisational or technological boundaries. This means health and care professionals in North London can access subsets of their patients/service users' medical or social records from a single system in order to provide the best possible care.</p> <p>The source of the information shared in this way is your electronic GP record for the purposes of direct patient care and population health management.</p>	<p>All records held in the Practice EMIS system and the HIE system are kept for the duration specified in the Records Management Codes of Practice for Health and Social Care</p> <p>“GP records should be retained until 10 years after the patient's death or after the patient has permanently left the country, unless they remain in the European Union.</p> <p>Electronic patient records must not be destroyed or deleted for the foreseeable future.”</p>	<p>The processing of personal data is permitted under the following paragraph: Article 6(1)(e) - public interest or in the exercise of official authority.</p> <p>The processing of special categories of personal data concerning health is permitted under the following paragraph: Article 9(2)(h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services</p>	<p>You have the right to:</p> <ul style="list-style-type: none"> To access, view or request copies of your personal information; request rectification of any inaccuracy in your personal information; restrict the processing of your personal information where: <ul style="list-style-type: none"> ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. <p>Right to object: You have a general right to raise an objection to your personal data being in Cerner HIE.</p> <p>If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.</p> <p>Right to complain: If you are dissatisfied with the way the Practice process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/</p>
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<p>Docman and Docmail</p>	<p>Docman Limited act as a data processor and provides cloud-based storage software for electronic patient document. This includes letters that we receive, scan and upload to the patient record, as well as letters that we receive in an electronic format.</p> <p>Generally, Docman enables primary health care organisations capture, file, workflow, view and manage primary care documents efficiently.</p> <p>Docmail enables primary health care organisations send letters, invoices and documents directly from computers and other portable devices.</p> <p>The source of the information shared in this way is your electronic GP record for the purposes of direct administrative patient care.</p>	<p>All records held in the Practice EMIS system and the Docman vault are kept for the duration specified in the Records Management Codes of Practice for Health and Social Care</p> <p>“GP records should be retained until 10 years after the patient’s death or after the patient has permanently left the country, unless they remain in the European Union.</p> <p>Electronic patient records must not be destroyed or deleted for the foreseeable future.”</p>	<p>The processing of personal data is permitted under the following paragraph: Article 6(1) (e) - public interest or in the exercise of official authority.</p> <p>The processing of special categories of personal data concerning health is permitted under the following paragraph: Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services</p>	<p>You have the right to:</p> <ul style="list-style-type: none"> To access, view or request copies of your personal information; request rectification of any inaccuracy in your personal information; restrict the processing of your personal information where: <ul style="list-style-type: none"> ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. <p>Right to object: In line with the GDPR Article 21, you have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject.</p> <p>If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.</p> <p>Right to complain: If you are dissatisfied with the way the Practice process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information</p>
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<p>iPlato</p>	<p>iPlato is cloud-based text messaging service used by GPs to communicate with their patients.</p> <p>The source of the information shared in this way is your electronic GP record for the purposes of direct administrative patient care.</p>	<p>All personal health records held in the Practice EMIS system and the iPlato system are kept for the duration specified in the Records Management Codes of Practice for Health and Social Care</p> <p>“GP records should be retained until 10 years after the patient’s death or after the patient has permanently left the country, unless they remain in the European Union.</p> <p>Electronic patient records must not be destroyed or deleted for the foreseeable future.”</p>	<p>The processing of personal data is permitted under the following paragraph: Article 6(1)(e) - public interest or in the exercise of official authority.</p> <p>The processing of special categories of personal data concerning health is permitted under the following paragraph: Article 9(2)(h) - processing is necessary for medical care treatment or, the management of health or social care systems and services</p>	<p>You have the right to:</p> <ul style="list-style-type: none"> To access, view or request copies of your personal information; request rectification of any inaccuracy in your personal information; restrict the processing of your personal information where: <ul style="list-style-type: none"> ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. <p>Right to object: In line with the GDPR Article 21, you have a general right to raise an objection to the processing of your personal data in some particular circumstances. This right only applies where we cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the purposes of direct provision of care, and compliance with a legal obligation to which we are subject.</p> <p>If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.</p> <p>Right to complain: If you are dissatisfied with the way the Practice process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information</p>
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<p>Quality Medical Solutions UK (QMS-UK):</p>	<p>QMS-UK are commissioned by NHS England to provide secure data processing solutions for two services:</p> <p>Child Health Information Service - information relating to children's vaccinations is shared with North East London Foundation Trust who run one of 4 Child Health Information Services across London.</p> <p>National Diabetic Retinal Screening Service - Diabetic eye screening is carried out in north central London by the North Central London Diabetic Eye Screening Programme (NCL-DESP).</p> <p>NCL-DESP is provided by North Middlesex University Hospital NHS Trust which conducts screening across five London boroughs: Barnet, Camden, Enfield, Haringey and Islington.</p> <p>The source of the information shared in this way is your electronic GP record.</p>	<p>All records held in the Practice EMIS system and the QMS database are kept for the duration specified in the Records Management Codes of Practice for Health and Social Care</p> <p>“GP records should be retained until 10 years after the patient's death or after the patient has permanently left the country, unless they remain in the European Union.</p>	<p>The processing of personal data is permitted under the following paragraph: Article 6(1)(e) - public interest or in the exercise of official authority.</p> <p>The processing of special categories of personal data concerning health is permitted under the following paragraph: Article 9(2)(h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services</p>	<p>You have the right to:</p> <ul style="list-style-type: none"> To access, view or request copies of your personal information; request rectification of any inaccuracy in your personal information; restrict the processing of your personal information where: <ul style="list-style-type: none"> ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. <p>Right to object: You have a general right to raise an objection to your personal data being shared in QMS.</p> <p>If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.</p> <p>Right to complain: If you are dissatisfied with the way the Practice process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire</p> <p>Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/</p>
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<p>NHSE Approved Suppliers</p> <p>Emis</p>	<p>Emis performs computerised searches of some or all of our records to identify individuals who may be at increased risk of certain conditions or diagnoses i.e. Diabetes, heart disease, risk of falling). Your records may be amongst those searched. This is often called “risk stratification” or “case finding”. These searches are sometimes carried out by Data Processors who link our records to other records that they access, such as hospital attendance records. The results of these searches and assessment may then be shared with other healthcare workers, such as specialist, therapists, technicians etc. The information that is shared is to enable the other healthcare workers to provide the most appropriate advice, investigations, treatments, therapies and or care.</p> <p>Risk stratification can be grouped into two purposes namely:</p> <p>Direct Care - ‘Case Finding’ where carried out by a health professional (e.g. GPs and Provider) involved in an individual’s care or by a data processor acting under contract with such a provider, it is treated as direct care.</p> <p>Indirect Care - understand the local population needs and plan for future requirement.</p> <p>The source of the information shared in this way is your electronic GP record.</p>	<p>All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care.</p>	<p>The processing of personal data is permitted under the following paragraph: Article 6(1)(e) - public interest or in the exercise of official authority.</p> <p>The processing of special categories of personal data concerning health is permitted under the following paragraph: Article 9(2)(h) - processing is necessary for medical or social care treatment or the management of health or social care systems and services</p> <p>Related Legislation :</p> <p>Section 251 NHS Act 2006</p>	<p>You have the right to:</p> <ul style="list-style-type: none"> To access, view or request copies of your personal information; request rectification of any inaccuracy in your personal information; restrict the processing of your personal information where: <ul style="list-style-type: none"> ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. <p>Right to object: You have a general right to raise an objection to your personal data being shared for the purpose of risk stratification.</p> <p>If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.</p> <p>Right to complain: If you are dissatisfied with the way the Practice process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner’s Office Wycliffe House Water Lane Wilmslow Cheshire</p> <p>Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/</p>
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<p>Noclor</p>	<p>To enable healthcare professionals working for the Practice to provide information, derived from GP records, about individuals to accredited research organisations.</p> <p>This covers research situations where the data controller (Practice) is approached by research organisations, directly, to recruit patients for studies.</p> <p>Any research proposal will only be agreed with a clearly defined protocol, consent mechanisms, and relevant research ethics committee approval, and in line with the principles of Article 89(1) of the EU GDPR.</p> <p>Research organisations do not approach patients directly, rather Practice will invite appropriate patients directly seeking their wish to take part.</p> <p>This Fair Processing Notice does not cover situations where Practice has been approached by an organisation seeking personal sensitive data to be disclosed in the absence of consent, i.e. via Related Legislation: Section 251 NHS Act 2006 / Health Research Authority (HRA) approval.</p> <p>The source of the information shared in this way is your electronic GP record.</p>	<p>All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care.</p>	<p>The processing of personal data is permitted under the following paragraph: Article 6(1)(e) - public interest or in the exercise of official authority.</p> <p>The processing of special categories of personal data is permitted under the following paragraph: Article 9(2)(j) - for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member State law</p> <p>Related Legislation : Section 251 NHS Act 2006</p>	<p>You have the right to:</p> <ul style="list-style-type: none"> To access, view or request copies of your personal information; request rectification of any inaccuracy in your personal information; restrict the processing of your personal information where: <ul style="list-style-type: none"> ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. <p>Right to object: You have a general right to raise an objection to your personal data being shared for the purpose of risk stratification.</p> <p>If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.</p> <p>Right to complain: If you are dissatisfied with the way the Practice process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire</p> <p>Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/</p>
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<p>Phoenix Data Solutions</p>	<p>To provides solutions for records management, data backup and recovery, document management, secure storage, and accredited data destruction.</p> <p>The source of the information shared in this way is your electronic GP record.</p>	<p>All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care.</p>	<p>The processing of personal data is permitted under the following paragraph: Article 6(1)(e) - public interest or in the exercise of official authority.</p> <p>The processing of special categories of personal data is permitted under the following paragraph: Article 9(2)(j) - for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member State law</p>	<p>You have the right to:</p> <ul style="list-style-type: none"> • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: <ul style="list-style-type: none"> ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. <p>Right to object: You have a general right to raise an objection to your personal data being shared for the purpose of risk stratification.</p> <p>If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.</p> <p>Right to complain: If you are dissatisfied with the way the Practice process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire</p> <p>Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/</p>
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<p>Ramsey Brown</p>	<p>The Ramsey Brown offer a wide range of business assurance services, from internal audit, counter fraud and forensic investigations, risk management and governance.</p>	<p>All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care.</p>	<p>The processing of personal data is permitted under the following paragraph: Article 6(1)(e) - public interest or in the exercise of official authority.</p>	<p>You have the right to:</p> <ul style="list-style-type: none"> • To access, view or request copies of your personal information; • request rectification of any inaccuracy in your personal information; • restrict the processing of your personal information where: <ul style="list-style-type: none"> ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. <p>Right to object: You have a general right to raise an objection to your personal data being shared for the purpose of risk stratification.</p> <p>If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and your request will be carefully considered.</p> <p>Right to complain: If you are dissatisfied with the way the Practice process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire</p> <p>Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/</p>
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	<p>The Bright HR Online provides practices with a software solution to enable the recording of Human Resources related information of its employees' personal data, in particular for the purposes of the recruitment, obligations performance contract of employment, rights and benefits management planning, health and safety, equality and diversity in the workplace, health and safety at work.</p> <p>The Practice ensures that personal data it collects from employees are used only for employment related purposes or where there is a statutory obligation to share the personal information with to regulatory bodies (e.g. courts, police or NHS England).</p>	<p>All records held by the Practice will be kept for the duration specified in the Records Management Codes of Practice for Health and Social Care.</p>	<p>The processing of personal data is permitted under the following paragraph: (e) (public interest or in the exercise of official authority).</p> <p>The processing of special categories of personal data is permitted under the following paragraph: Article 9(2)(b): processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject</p>	<p>Employees have the right to:</p> <ul style="list-style-type: none"> To access, view or request copies of their personal information held by the Practice; request rectification of any inaccuracy to their personal information; restrict the processing of their personal information where: <ul style="list-style-type: none"> ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. <p>Right to object: Employees have a general right to raise an objection to the sharing personal data.</p> <p>If an employee wishes to exercise his/her rights they can contact the Practice (data controller) or the DPO and their request will be carefully considered.</p> <p>Right to complain: If an employee is dissatisfied with the way the Practice process his/her personal data, they have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire</p> <p>Tel: 0303 123 1113 or 01625 545775</p>
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8. What is EMIS Systems Local Record Sharing?

Your GP medical record is held on our secure clinical system called EMIS Web. This clinical system allows for local record sharing with other healthcare providers who are commissioned in your area to provide care (e.g. acute hospitals, mental and community health). Through this record sharing, clinicians are able to see clinical information entered by other organisations who are party to the EMIS local record sharing agreement.

This local sharing is used to provide direct patient care for services such as continued extended access, home visits, universal offers, musculoskeletal service, GP at front door and other neighbourhood services across Camden in line the local Care delivery strategy and the NHS STP.

It also enables specific GPs identify their patients with highly complex, multiple morbidity and/or frailty, who might benefit from targeted multi-disciplinary team support as part of case management and care planning (the "Case Finding Purpose").

How will my information be made available?

The information is accessed in real time and on-demand, meaning that data from your GP record is neither extracted, nor uploaded, nor sent anywhere. The data remains within your GP EMIS database and users are allowed read-view access only. If you have any concerns regarding EMIS local record sharing you can opt out by speaking to your GP Surgery.

9. What do we use anonymised data for?

We use anonymised data to plan health care services. Specifically we use it to:

- check the quality and efficiency of the health services we provide;
- prepare performance reports on the services we provide and,
- review the healthcare we provide in order they are of the highest standard.

10. Details of data linkage with other datasets

Data may be de-identified and linked so that it can be used to improve health care and development and monitor NHS performance. Where data is used for these statistical purposes, stringent measures are taken to ensure individual patients cannot be identified.

When analysing current health services and proposals for developing future services it is sometimes necessary to link separate individual datasets to be able to produce a comprehensive evaluation. This may involve linking primary care GP data with other data such as secondary uses service (SUS) data (inpatient, outpatient and A&E). In some cases there may also be a need to link local datasets which could include a range of acute-based services such as radiology, physiotherapy, audiology etc, as well as mental health and community-based services such as Improving Access to Psychological Therapies (IAPT), community nursing, podiatry etc. When carrying out this analysis, the linkage of these datasets is always done using a unique identifier that does not reveal a person's identity.

The organisation responsible for processing de-identified and linked data under this category, on behalf of the Practice is Camden CCG. We ensure that the data processor is legally and contractually bound to operate and prove security arrangements are in place where data that could or does identify a person are processed.

11. What safeguards are in place to ensure data that identifies me is secure?

We only use information that may identify you in accordance with the EU General Data Protection Regulation 2016. These Legislation requires us to process personal data only if there is a lawful basis for doing so and that any processing must be fair and lawful.

We also ensure the information we hold is kept in secure locations, restrict access to information to authorised personnel only, protect personal and confidential information held on equipment such as laptops with encryption (which masks data so that unauthorised users cannot see or make sense of it).

Our appropriate technical and security measures include:

- The ability to ensure ongoing confidentiality, integrity, availability and resilience of our systems;
- the ability to quickly restore availability and access to personal information in the event of a physical or technical incident; and
- a process regularly testing, assessing and evaluating the effectiveness of security measures, and ensure they comply with the concept of privacy by design and default.

The [NHS Digital Code of Practice on Confidential Information](#) applies to all of our staff, and they are required to protect your information, inform you of how your information will be used, and allow you to decide if and how your information can be shared. All Practice staff are trained to ensure information is kept confidential.

We are registered with the Information Commissioner's Office (ICO) as a data controller and collects data for a variety of purposes. A copy of the registration is available through the [ICO website](#). You can search by our Practice name or ICO Data Protection Register number Z7278412.

12. What are your rights?

Where information from which you can be identified is held, you have the:

- Right of access to view or request copies of the records
- Right to rectification of inaccurate personal data or special categories of personal data
- Right to restriction of the processing of your data where accuracy of the data is contested, processing is unlawful or where we no longer need the data for the purposes of the processing
- Right to object to any automated individual decision-making
- Right to data portability by requesting the data which you provided to us (not data generated by us) in a structured, commonly used machine readable format. Your right to portability applies only where:
 - data is processed by automated means, and
 - you provided consent to the processing or,
 - the processing is necessary for the fulfilment of a contract

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

Your right to erasure (right to be forgotten) will only apply where you had given 'consent' to process your personal health data and later withdrew the consent, **and does not apply to the extent** where the processing of your personal health data is necessary for:

- [Compliance with a legal obligation which we are subject to, under the UK law or, for the performance of a task carried out in the public interest or, in the exercise of official authority vested on us;](#)
- [medical purposes and/or for reasons of public interest in the area of public health;](#)
[archiving purposes in the public interest, scientific or historical research purposes or statistical purposes;](#)
[the establishment, exercise or defence of legal claims](#)

You can exercise your rights at any time by contacting the Practice (data controller) or the Data Protection Officer (DPO) at the address below, although we will first need to explain how this may affect the care you receive and any overriding legitimate grounds for the processing that may apply.

13. Gaining access to the data we hold about you

You have the right to see or have a copy of personal data we hold that can identify you. You do not need to give a reason to see your data. However, some information may be withheld under some exceptional circumstances.

If you want to access your personal information you must do so in writing by **completing our Access Request (SAR) form** send it to:

Primrose Hill Surgery
97-99 Regents' Park Road
London NW1 8UR

Subject 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.

g. What sort of information can I request?

In theory, you can request any information that the Practice holds that does not fall under an exemption under the FOI Act. You may not ask for information that is covered by the Data Protection Act or EU General Data Protection Regulation (GDPR) under FOIA. However, you can request this under a Subject Access Request - see section above 'Gaining access to the data we hold about you'.

h. How do I make a request for information?

Your request must be in writing and can be either posted or emailed to:

Email: primrosehillsurgery@nhs.net

Post:

Primrose Hill Surgery
97-99 Regents' Park Road
London NW1 8UR

14. Glossary of Terms

[Common Law of Duty of Confidentiality](#) - is not written out in one document like the GDPR or an Act of Parliament. Common Law is also referred to as 'judge-made' or case law. In practice, this means that all patient/client information, whether held on paper, computer, visually or audio recorded, or held in the memory of the professional, must not normally be disclosed without the consent of the patient/client. However, where the disclosure/sharing of the patient/client information is for the purpose of Direct Care consent to such disclosure/sharing may be implied where it is informed, given there is a legitimate relationship between the patient/client and the health professional.

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 - 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 shall be prohibited.