

Gloucester Health Access Centre, Lydney, & Matson Lane Surgeries

## **G DOC LTD Fair Processing Notice for Patients V6**

G DOC LTD runs a number of different services in Gloucestershire, including:

- GP practices
- Primary care nursing services
- The Covid Virtual Ward
- Primary care for non-registered patients at Gloucester Health Access Centre

This Fair Processing Notice describes how and why G DOC processes your data, and your rights relating to your data. If you are a registered patient at a GP practice we run (e.g. Gloucester Health Access Centre), you can also see a Fair Processing Notice about how the individual practice uses your data on the Practice website.

### **Your information, what you need to know**

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

### **Why we collect information about you**

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

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

### **Our Commitment to Data Privacy and Confidentiality Issues**

As a Health Care Organisation, all of our GPs, staff and associated practitioners are committed to protecting your privacy and will only process data in accordance with the Data Protection Legislation. This includes the General Data Protection Regulation (EU) 2016/679 (GDPR) now known as the UK GDPR, the Data

Protection Act (DPA) 2018, the Law Enforcement Directive (Directive (EU) 2016/680) (LED) and any applicable national Laws implementing them as amended from time to time.

The legislation requires us to process personal data only if there is a legitimate basis for doing so and that any processing must be fair and lawful.

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

### **Details we collect about you**

Records which G DOC LTD will hold or share about you will include the following:

- Personal Data – means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- Special Categories of Personal Data – this term describes personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.
- Confidential Patient Information – this term describes information or data relating to their health and other matters disclosed to another (e.g. patient to clinician) in circumstances where it is reasonable to expect that the information will be held in confidence. Including both information 'given in confidence' and 'that which is owed a duty of confidence'. As described in the Confidentiality: NHS code of Practice: Department of Health guidance on confidentiality 2003.
- Pseudonymised - The process of distinguishing individuals in a dataset by using a unique identifier which does not reveal their 'real world' identity.
- Anonymised – Data in a form that does not identify individuals and where identification through its combination with other data is not likely to take place

- Aggregated - Statistical data about several individuals that has been combined to show general trends or values without identifying individuals within the data.

## **How we use your information**

Improvements in information technology are also making it possible for us to share data with other healthcare organisations for the purpose of providing you, your family and your community with better care. For example it is possible for healthcare professionals in other services to access your record with or without your permission when your practice is closed. Where your record is accessed without permission it is necessary for them to have a legitimate basis in law. This is explained further in the Local Information Sharing at Appendix A.

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

- improving the quality and standards of care provided by the service
- research into the development of new treatments and care pathways
- preventing illness and diseases
- monitoring safety
- planning services
- risk stratification
- Population Health Management

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

Pseudonymised or anonymised data is generally used for research and planning so that you cannot be identified.

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

**How long do we hold information for?**

All records held by G DOC LTD will be kept for the duration specified by national guidance from [NHS Digital, Health and Social Care Records Code of Practice](#). Once information that we hold has been identified for destruction it will be disposed of in the most appropriate way for the type of information it is. Personal confidential and commercially confidential information will be disposed of by approved and secure confidential waste procedures. We keep a record of retention schedules within our information asset registers, in line with the Records Management Code of Practice for Health and Social Care 2016.

## **Individuals Rights under GDPR**

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

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

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

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

### **Type 1 Opt-Out**

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

### **National data opt-out**

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

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

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

On this web page you will:

- See what is meant by confidential patient information
- Find examples of when confidential patient information is used for individual care and examples of when it is used for purposes beyond individual care
- Find out more about the benefits of sharing data
- Understand more about who uses the data
- Find out how your data is protected
- Be able to access the system to view, set or change your opt-out setting
- Find the contact telephone number if you want to know any more or to set/change your opt-out by phone
- See the situations where the opt-out will not apply

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

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

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

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

Where multiple copies of the same information are requested, G DOC LTD may charge a reasonable fee for the extra copies.

You will need to provide proof of identity to receive this information.

If you wish to have online access to your data, you may do this via the [NHS APP](#) or via the practices systems. If you would like to access your GP record online, GHAC

patients should access [GHAC Online](#) and Lydney patients should access [Lydney Online](#).

### **COVID Passport access**

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

### **Change of Details**

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

### **Mobile telephone number**

If you provide us with your mobile phone number, we may use this to send you reminders about your appointments or other health screening information. Please let us know if you do not wish to receive reminders on your mobile.

### **Email address**

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

### **Notification**

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

We are registered as a Data Controller and our registration can be viewed online in the public register at: [http://ico.org.uk/what\\_we\\_cover/register\\_of\\_data\\_controllers](http://ico.org.uk/what_we_cover/register_of_data_controllers)

Any changes to this notice will be published on our website and paper copies will be available where our services operate.

### **Data Protection Officer**

Should you have any data protection questions or concerns, please contact our Data Protection Officer at: [caroline.dominey-strange@nhs.net](mailto:caroline.dominey-strange@nhs.net).

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

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

## **Right to Complain**

If you have concerns or are unhappy about any of our services, please contact [gdoc@nhs.net](mailto:gdoc@nhs.net)

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

The Information Commissioner Wycliffe House  
Water Lane  
Wilmslow  
Cheshire SK9 5AF  
Phone: 0303 123 1113 Website: <https://ico.org.uk/global/contact-us>

## **The NHS Care Record Guarantee**

The NHS Care Record Guarantee for England sets out the rules that govern how patient information is used in the NHS, what control the patient can have over this, the rights individuals have to request copies of their data and how data is protected under the Data Protection Act 1998.

<http://systems.digital.nhs.uk/infogov/links/nhscrg.pdf>

## **The NHS Constitution**

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

<https://www.gov.uk/government/publications/the-nhs-constitution-for-england>

## **Reviews of and Changes to our Fair Processing Notice**

**Appendix A – G DOC LTD will share your information with these organisations where there is a legal basis to do so.**

Activity	Rationale
<p>Commissioning and contractual purposes Invoice Validation Planning Quality and Performance</p>	<p><b>Purpose</b> – Anonymous data is used by the CCG for planning, performance and commissioning purposes, as directed in the practices contract, to provide services as a public authority.</p> <p><b>Legal Basis</b> – UK GDPR 6 1(b) Contractual obligation as set out in the Health and Social Care Act for Quality and Safety 2015</p> <p><b>Processor</b> - Gloucestershire Clinical Commissioning Group</p>
<p>JUYI – Joining Up Your Information</p>	<p><b>Purpose</b> – JUYI is the secure online system for sharing information in Gloucestershire, giving local health and social care professionals directly involved in your care instant access to your health and social care records.</p> <p>Sharing your electronic records with the people who look after you gives them the most up-to-date information about you and makes your care safer and more efficient and cost effective.</p> <p>For information about the county’s JUYI shared care record and fair processing notice please click here.</p> <p><b>Legal Basis</b> – Direct Care</p> <p><b>Processor</b> – NHS England and NHS Digital, Gloucestershire CCG, other clinical care providers</p>



<p>Summary Care Record</p> <p>Including additional information</p>	<p><b>Purpose</b> - The NHS in England uses a national electronic record called the Summary Care Record (SCR) to support patient care. It contains key information from your GP record. Your SCR provides authorised healthcare staff with faster, secure access to essential information about you in an emergency or when you need unplanned care, where such information would otherwise be unavailable.</p> <p><b>Legal Basis</b> – Direct Care under UK GDPR :</p> <ul style="list-style-type: none"> <li>• Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and</li> <li>• Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine</li> </ul> <p>The relevant COPI notice states that its purpose: “...is to require organisations to process confidential patient information for the purposes set out in Regulation 3(1) of COPI to support the Secretary of State’s response to Covid-19 (Covid-19 Purpose). “Processing” for these purposes is defined in Regulation 3(2) and includes dissemination of confidential patient information to persons and organisations permitted to process confidential patient information under Regulation 3(3) of COPI.”</p> <p>Full details of the Summary Care Record supplementary privacy notice can be found <a href="#">here</a></p> <p>Patients have the right to opt out of having their information shared with the SCR by completion of the form which can be downloaded <a href="#">here</a> and returned to the practice. Please note that by opting out of having your information shared with the Summary Care Record could result in a delay to care that may be required in an emergency.</p> <p><b>Processor</b> – NHS England and NHS Digital</p>
<p>Research</p>	<p><b>Purpose</b> – We may share anonymous patient information with research companies for the purpose of exploring new ways of providing healthcare and treatment for patients with certain conditions. This data will not be used for any other purpose.</p>

	<p>Where personal confidential data is shared your consent will need to be sought.</p> <p>Where you have opted out of having your identifiable information shared for this Planning or Research your information will not be shared.</p> <p><b>Legal Basis</b> – consent is not required to share anonymous data that does not identify a patient.</p> <p>Where identifiable data is required for research, patient consent will be needed, unless there is a legitimate reason under law to do so or there is support under the Health Service (Control of Patient Information Regulations) 2002 (‘section 251 support’) applying via the Confidentiality Advisory Group in England and Wales</p> <p><b>Processor</b> – Royal College of GPs</p>
Individual Funding Requests	<p><b>Purpose</b> – We may need to process your personal information where we are required to fund specific treatment for you for a particular condition that is not already covered in our standard NHS contract.</p> <p>The clinical professional who first identifies that you may need the treatment will explain to you the information that is needed to be collected and processed in order to assess your needs and commission your care; they will gain your explicit consent to share this. You have the right to withdraw your consent at any time but this may affect the decision to provide individual funding.</p> <p><b>Legal Basis</b> – Under UK GDPR Article 6 1(a) consent is required Article 9 2 (h) health data</p> <p><b>Data processor</b> – Service commissioner (usually Gloucestershire</p>

	Clinical Commissioning Group)
Safeguarding Adults	<p><b>Purpose</b> – We will share personal confidential information with the safeguarding team where there is a need to assess and evaluate any safeguarding concerns.</p> <p><b>Legal Basis</b> - – in some case consent will be required otherwise</p> <ul style="list-style-type: none"> <li>• Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and</li> <li>• Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine</li> </ul> <p><b>Data Processor</b> –Gloucestershire Social Services, the police, NHS England, Gloucestershire Clinical Commissioning Group</p>
Safeguarding Children	<p><b>Purpose</b> – We will share children’s personal information where there is a need to assess and evaluate any safeguarding concerns.</p> <p><b>Legal Basis</b> - – in some case consent will be required otherwise</p> <ul style="list-style-type: none"> <li>• Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and</li> <li>• Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine</li> </ul>

	<b>Data Processor</b> – Gloucestershire Social Services, the police, NHS England, Gloucestershire Clinical Commissioning Group
Risk Stratification – Preventative Care	<p><b>Purpose</b> - ‘Risk stratification for case finding’ is a process for identifying and managing patients who have or may be at-risk of health conditions (such as diabetes) or who are most likely to need healthcare services (such as people with frailty). Risk stratification tools used in the NHS help determine a person’s risk of suffering a particular condition and enable us to focus on preventing ill health before it develops.</p> <p>Information about you is collected from a number of sources including NHS Trusts, GP Federations and your GP Practice. A risk score is then arrived at through an analysis of your de- identified information.</p>

	<p>This can help us identify and offer you additional services to improve your health.</p> <p>If you do not wish information about you to be included in any risk stratification programmes, please let us know. We can add a code to your records that will stop your information from being used for this purpose. Please be aware that this may limit the ability of healthcare professionals to identify if you have or are at risk of developing certain serious health conditions.</p> <p>Type of Data – Identifiable/Pseudonymised/Anonymised/Aggregate Data</p> <p><b>Legal Basis</b></p> <p>UK GDPR Art. 6(1) (e) and Art.9 (2) (h). The use of identifiable data by CCGs and GPs for risk stratification has been approved by the Secretary of State, through the Confidentiality Advisory Group of the Health Research Authority (approval reference (CAG 7-04)(a)/2013)) and this approval has been extended to the end of September 2022 NHS England Risk Stratification which gives us a statutory legal basis under Section 251 of the NHS Act 2006 to process data for risk stratification purposes which sets aside</p>
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	<p>the duty of confidentiality. We are committed to conducting risk stratification effectively, in ways that are consistent with the laws that protect your confidentiality.</p> <p><b>Processors</b> – Gloucestershire Social Services, Gloucestershire Clinical Commissioning Group</p>
<p>Public Health</p> <p>Screening programmes (identifiable)</p> <p>Notifiable disease information (identifiable)</p> <p>Smoking cessation</p>	<p><b>Purpose</b> – Personal identifiable and anonymous data is shared.</p> <p>The NHS provides national screening programmes so that certain diseases can be detected at an early stage. These currently apply to bowel cancer, breast cancer, aortic aneurysms and diabetic retinal screening service. The law allows us to share your contact information with Public Health England so that you can be invited to the relevant screening programme.</p> <p>More information can be found at: <a href="https://www.gov.uk/topic/population-screeningprogrammes">https://www.gov.uk/topic/population-screeningprogrammes</a> [Or insert relevant link] or speak to the practice</p> <p><b>Legal Basis</b> - Article 6(1)(e); “necessary... in the exercise of official</p>

(anonymous) Sexual health (anonymous)	authority vested in the controller”  And Article 9(2)(h) as stated below  <b>Data Processors</b> – Gloucestershire Social Services, Gloucestershire Clinical Commissioning Group, Public Health England, NHS England
Direct Care NHS Trusts Other Care Providers	<b>Purpose</b> – Personal information is shared with other secondary care trusts in order to provide you with direct care services. This could be hospitals or community providers for a range of services, including treatment, operations, physio, and community nursing, ambulance service.  <b>Legal Basis</b> - The processing of personal data in the delivery of direct care and for providers’ administrative purposes in this surgery and in support of direct care elsewhere is supported under the following Article 6 1 (e) direct care and 9 2 (h) to provide health or social care: In some cases patients may be required to consent to having their record opened by the third party provider before patients information is accessed. Where there is an overriding need to access the GP record in order to provide patients with life saving care, their consent will not be required.  <b>Processors</b> – Gloucestershire Hospitals NHS Foundation Trust; Gloucestershire Health and Care NHS Foundation Trust; South Western Ambulance Service NHS Foundation Trust

Care Quality Commission	<b>Purpose</b> – The CQC is the regulator for the English Health and Social Care services to ensure that safe care is provided. They will inspect and produce reports back to the GP practice on a regular basis. The Law allows the CQC to access identifiable data.  More detail on how they ensure compliance with data protection law (including GDPR) and their privacy statement is available on our website: <a href="https://www.cqc.org.uk/about-us/our-policies/privacy-statement">https://www.cqc.org.uk/about-us/our-policies/privacy-statement</a>  <b>Legal Basis</b> - Article 6(1)(c) “processing is necessary for compliance with a legal obligation to which the controller is subject.” And Article 9(2) (h) as stated below  <b>Processors</b> – Care Quality Commission
Population	<b>Purpose</b> – Health and care services work together as ‘Integrated

<p>Health Management</p>	<p>Care Systems' (ICS) and are sharing data in order to:</p> <ul style="list-style-type: none"> <li>• Understand the health and care needs of the care system's population, including health inequalities</li> <li>• Provide support to where it will have the most impact</li> <li>• Identify early actions to keep people well, not only focusing on people in direct contact with services, but looking to join up care across different partners.</li> </ul> <p>(NB this links to the Risk Stratification activity identified above)</p> <p><b>Type of Data</b> – Identifiable/Pseudonymised/Anonymised/Aggregate Data. NB only organisations that provide your care will see your identifiable data.</p> <p><b>Legal Basis</b> - Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) as stated below</p> <p><b>Data Processors</b> - Optum, Cerner</p>
<p>Payments, Invoice validation</p>	<p><b>Purpose</b> - Contract holding GPs in the UK receive payments from their respective governments on a tiered basis. Most of the income is derived from baseline capitation payments made according to the number of patients registered with the practice on quarterly payment days. These amount paid per patient per quarter varies according to the age, sex and other demographic details for each patient. There are also graduated payments made according to the practice's achievement of certain agreed national quality targets known as the Quality and Outcomes Framework (QUOF), for instance the proportion of diabetic patients who have had an annual review. Practices can also receive payments for participating in agreed national or local enhanced services, for instance opening early in the morning or late at night or at the weekends. Practices can also receive payments for certain national initiatives such as immunisation programs and practices may also receive incomes relating to a variety of non patient related elements such as premises. Finally there are short term initiatives and projects that practices can take part in.</p>

	<p>Practices or GPs may also receive income for participating in the education of medical students, junior doctors and GPs themselves as well as research. In order to make patient based payments basic and relevant necessary data about you needs to be sent to the various payment services. The release of this data is required by English laws.</p> <p><b>Legal Basis</b> - Article 6(1)(c) “processing is necessary for compliance with a legal obligation to which the controller is subject.” And Article 9(2)(h) ‘as stated below</p> <p><b>Data Processors</b> – NHS England, CCG, Public Health</p>
Patient Record base	<p><b>Purpose</b> – Your medical record will be processed in order that a data base can be maintained, this is managed in a secure way and there are robust processes in place to ensure your medical record is kept accurate, and up to date. Your record will follow you as you change surgeries throughout your life.</p> <p>Closed records will be archived by NHS England</p> <p><b>Legal Basis</b> - Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) as stated below</p> <p><b>Processor</b> – . TPP- SystemOne/Vision, ERS,</p>
Call handling	<p><b>Purpose</b> – support practices with call handling and signposting of patients to clinical services</p> <p><b>Legal Basis</b> - Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) as stated below</p> <p><b>Processor</b> – . O.C.U. (Gloucestershire) Ltd trading as Message-Link</p>
Medical reports Subject Access Request	<p><b>Purpose</b> – Your medical record may be shared in order that solicitors acting on your behalf can conduct certain actions as instructed by you.</p> <p>Your medical record may be shared with partner organisations that assist in producing reports.</p> <p>Insurance companies seeking a medical reports where you have</p>

	<p>applied for services offered by then can have a copy to your medical history for a specific purpose.</p> <p><b>Legal Basis</b> –Your explicit consent will be required before a GP can share your record for any of these purposes.</p> <p><b>Processor</b> – iGPR, EMR, organisations acting for on your behalf e.g. solicitors, insurance companies.</p>
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Texting Service	<p><b>Purpose</b> – Personal identifiable information shared with the texting service in order that text messages including appointment reminders, campaign messages related to specific patients health needs and direct messages to patients</p> <p><b>Legal Basis</b> - GDPR Article 6 1 (b) Contract, Article 6 1 (e) Public task, Article 9 2 (h)</p> <p><b>Processor</b> - AccuRX, Mjog, Iplato</p>
Remote consultation Including – Video Consultation Clinical photography	<p><b>Purpose</b> – Personal information including images may be processed, stored and with the patients consent shared, in order to provide the patient with urgent medical advice during the COVID-19 pandemic.</p> <p><b>Legal Basis</b> – Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below</p> <p>Patients will be asked to provide consent if required to provide photographs of certain areas of concern. There are restrictions on what the practice can accept photographs of. No photographs of the full face, no intimate areas, no pictures of patients who cannot consent to the process. No pictures of children.</p>



	<p><b>Processor</b> – e-Consult, AccuRX</p>
MDT meetings	<p><b>Purpose</b> – For some long term conditions, such as diabetes, the practice participates in meetings with staff from other agencies involved in providing care, to help plan the best way to provide care to patients with these conditions.</p> <p>During COVID 19 the practice may use secure video meeting platform to discuss patient needs.</p> <p><b>Legal Basis</b> – Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below</p> <p><b>Processor</b> – MS Teams</p>
Medicines Management Team	<p><b>Purpose</b> – your medical record is shared with the medicines management team, in order that your medication can be kept up to date and any changes can be implemented.</p> <p><b>Legal Basis</b> - Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) as stated below</p> <p><b>Processor</b> – CCG Medicines Management team</p>
Provision of G DOC clinical services	<p><b>Purpose</b> – Your medical record will be shared with us (G DOC LTD) in order that we can provide direct care services to the patient population. This could be in the form of video consultations, telephone consultations or face-to-face appointments.</p> <p><b>Legal Basis</b> - The processing of personal data in the delivery of direct care and for providers’ administrative purposes in this surgery and in support of direct care elsewhere is supported under the following Article 6 and 9 conditions as stated below</p> <p><b>Processor</b> – Your registered GP practice, Gloucestershire Primary Care Networks, Gloucestershire CCG.</p>
Provision of G	<p><b>Purpose</b> – Your medical record will be shared with your registered</p>

DOC services	clinical	<p>GP practice, in order that they can provide direct care services to the patient population. This could be in the form of video consultations, telephone consultations or face-to-face appointments.</p> <p><b>Legal Basis</b> - The processing of personal data in the delivery of direct care and for providers' administrative purposes in this surgery and in support of direct care elsewhere is supported under the following Article 6 and 9 conditions as stated below</p> <p><b>Processor</b> – G DOC LTD</p>
Provision of DOC services	G clinical	<p><b>Purpose</b> – Your medical record will be shared with GPs working remotely to support your registered GP practice, in order that they can provide direct care services to the patient population. This could be in the form of video consultations, telephone consultations or to perform clinical administration, for example a prescription..</p> <p><b>Legal Basis</b> - The processing of personal data in the delivery of direct care and for providers' administrative purposes in this surgery and in support of direct care elsewhere is supported under the following Article 6 and 9 conditions as stated below</p> <p><b>Processor</b> – Livi, contractor clinicians.</p>
Covid Ward	Virtual	<p><b>Purpose</b> – Your medical record will be shared with us (G DOC LTD) in order that we can provide direct care services to the patient population. This could be in the form of video consultations, telephone consultations or face-to-face appointments.</p> <p><b>Legal Basis</b> - The processing of personal data in the delivery of direct care and for providers' administrative purposes in this surgery and in support of direct care elsewhere is supported under the following Article 6 and 9 conditions as stated below</p> <p><b>Processor</b> – Your registered GP practice, Baywater Healthcare (provider of the IT platform for the Covid Virtual Ward) , Gloucestershire CCG.</p>
Covid Ward	Virtual	<p><b>Purpose</b> – Your medical record will be shared with your registered GP practice, Baywater Healthcare (provider of the IT platform for the Covid Virtual Ward), Gloucestershire CCG in order that they</p>

	<p>can provide direct care services to the patient population. This could be in the form of video consultations, telephone consultations or face-to-face appointments.</p> <p><b>Legal Basis</b> - The processing of personal data in the delivery of direct care and for providers' administrative purposes in this surgery and in support of direct care elsewhere is supported under the following Article 6 and 9 conditions as stated below</p> <p><b>Processor</b> – G DOC LTD</p>
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<p>COVID-19 Research and Planning</p>	<p><b>Purpose</b> – To understand the risks to public health, trends and prevent the spread of infections such as Covid-19 the government has enabled a number of initiatives which include research and planning during the Covid-19 pandemic which may include the collection of personal confidential data has been necessary. This is to assist with the diagnosis, testing, self-isolating, fitness to work, treatment medical, social interventions and recovery from Covid-19.</p> <p><b>Legal Basis</b> - Notice under Regulation 3(4) of the Health Service (Control of Patient Information) Regulations 2002 (COPI), which were made under sections 60 (now section 251 of the NHS Act 2006) and 64 of the Health and Social Care Act 2001.</p> <p><a href="#">Coronavirus (COVID-19): notice under regulation 3(4) of the Health Service (Control of Patient Information) Regulations 2002, which were made under sections 60 (now section 251 of the NHS Act 2006) and 64 of the Health and Social Care Act 2001 – Biobank - GOV.UK (www.gov.uk)</a></p> <p><a href="#">Coronavirus (COVID-19): notification to organisations to share information - GOV.UK (www.gov.uk)</a></p> <p><b>Provider</b> – BioBank, NHS Digital, NHS England, other organisations included in the roll out of vaccinations, treatment and care of patients</p>
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	suffering with Covid-19
PCN	<p><b>Purpose</b> – Your medical record will be shared with G DOC LTD in order that we can provide direct care services to the patient population.</p> <p><b>Legal Basis</b> - Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below</p> <p><b>Processor</b> – Gloucester Inner City and Forest of Dean Primary Care Networks as appropriate .</p>
Smoking cessation	<p><b>Purpose</b> – personal information is shared in order for the smoking cessation service to be provided.</p> <p>Only those patients who wish to be party to this service will have their data shared</p> <p><b>Legal Basis</b> – consented</p> <p><b>Processor</b> – Gloucestershire Health and Care NHS Foundation Trust;</p>
Social Prescribers	<p><b>Purpose</b> – – Access to medical records is provided to social prescribers to undertake a full service to patients dependent on their social care needs.</p> <p><b>Legal Basis</b> – Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below</p> <p><b>Processor</b> – Gloucestershire Health and Care NHS Foundation Trust or other service provider</p>
Detection and prevention of lung cancer	<p><b>Purpose</b> – G DOC’s practices share your lung health related data with the lung health check service operated by Somerset, Wiltshire, Avon and Gloucestershire (SWAG) Cancer Alliance and InHealth (commissioned by NHS England). This supports your invitation for a lung health check appointment (where you are eligible) and possible CT scan by the lung health check team. This data may be shared with your local hospital trust to support further treatment and with</p>

	<p>other healthcare professionals involved in your care.</p> <p>For further information, look at the full lung health check Privacy Notice: <a href="http://www.swaglunghealthcheck.nhs.uk">www.swaglunghealthcheck.nhs.uk</a></p> <p><b>Legal Basis</b> – Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below</p> <p><b>Processor</b> – Somerset, Wiltshire, Avon and Gloucestershire (SWAG) Cancer Alliance and Inhealth</p>
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<p>Police</p>	<p><b>Purpose</b> – Personal confidential information may be shared with the Police authority for certain purposes. The level of sharing and purpose for sharing may vary. Where there is a legal basis for this information to be shared no consent will be required.</p> <p>The Police will require the correct documentation in order to make a request. This could be but not limited to, DS 2, Court order, s137, the prevention and detection of a crime.</p> <p>In some cases consent may be required.</p> <p><b>Legal Basis</b> –GDPR – Article 6 1 (f) legitimate interest 6 1 (c) Legal Obligation.</p> <p>Article 9 2 (f) requests for legal reasons</p> <p><b>Processor</b> - Police Constabulary</p>
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Coroners	<p><b>Purpose</b> – Personal information relating to a patient may be shared with the coroner upon request.</p> <p><b>Legal Basis</b> – UK GDPR Article 6 1 (c) Legal Obligation 9 2 (h) Health data</p> <p><b>Processor</b> - The Coroner</p>
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<p>General Extraction (GPES)</p> <p>1. At risk patients data collection Version 3</p> <p>2. Covid-19 Planning and Research data</p> <p>3. CVDPREVENT Audit</p> <p>Physical Health Checks for people with Severe Mental Illness</p>	<p>Practice Service</p> <p><b>Purpose</b> – GP practices are required to provide data extraction of their patients personal confidential information for various purposes to NHS Digital. The objective of this data collection is on an ongoing basis to identify patients registered at General Practices who fit within a certain criteria, in order to monitor and either provide direct care, or prevent serious harm to those patients. Below is a list of the purposes for the data extraction, by using the link you can find out the detail behind each data extraction and how your information will be used to inform this essential work:</p> <ol style="list-style-type: none"> <li>1. <a href="#">At risk patients including severely clinically vulnerable</a></li> <li>2. <a href="#">Covid-19 Planning and Research data, to control and prevent the risk of Covid-19</a></li> <li>3. <a href="#">NHS England has directed NHS Digital to collect and analyse data in connection with Cardiovascular Disease Prevention Audit</a></li> <li>4. <a href="#">GPES Physical Health Checks for people with Severe Mental Illness (PHSMI) data collection.</a></li> </ol> <p><b>Legal Basis</b> - All GP Practices in England are legally required to share data with NHS Digital for this purpose under section 259(1)(a) and (5) of the 2012 Act</p>
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	<p>Further detailed legal basis can be found in each link.</p> <p>Any objections to this data collection should be made directly to NHS Digital. <a href="mailto:enquiries@nhsdigital.nhs.uk">enquiries@nhsdigital.nhs.uk</a></p> <p><b>Processor</b> – NHS Digital or NHS X</p>
Medication/Prescribing	<p><b>Purpose:</b> Prescriptions containing personal identifiable and health data will be shared with chemists/pharmacies, in order to provide patients with essential medication or treatment as their health needs dictate. This process is achieved either by face to face contact with the patient or electronically. Where patients have specified a nominated pharmacy they may wish their repeat or acute prescriptions to be ordered and sent directly to the pharmacy making a more efficient process. Arrangements can also be made with the pharmacy to deliver medication</p> <p><b>Legal Basis :</b> Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below</p> <p>Patients will be required to nominate a preferred pharmacy.</p> <p><b>Processor</b> – Pharmacy of choice</p>
Professional Training	<p><b>Purpose</b> – We are a GP training surgery. On occasion you may be asked if you are happy to be seen by one of our GP registrars. You may also be asked if you would be happy to have a consultation recorded for training purposes. These recordings will be shared and discussed with training GPs at the surgery, and also with moderators at the RCGP and HEE.</p>

	<p><b>Legal Basis</b> – 6 1 (a) consent, patients will be asked if they wish to take part in training sessions.</p> <p>9 2 (a) - explicit consent will be required when making recordings of consultations</p> <p>Recordings remain the control of the GP practice and they will delete all recordings from the secure site once they are no longer required.</p> <p><b>Processor</b> – RCGP, HEE, iConnect, Fourteen Fish</p>
Telephony	<p><b>Purpose</b> – The practice use an internet based telephony system that records telephone calls, patients will have the right to decline recordings of calls as is their individual right. The calls will be held on the external server for a duration of 3 years unless requested for them to be removed sooner. The telephone system has been commissioned to assist with the high volume and management of calls into the surgery, which in turn will enable a better service to patients.</p> <p><b>Legal Basis</b> – While there is a robust contract in place with the processor, the surgery has undertaken this service to assist with the direct care of patients in a more efficient way.</p> <p>Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below</p> <p><b>Provider</b> – Surgery Connect – X-ON</p>
Learning Disability Mortality Programme LeDer	<p><b>Purpose</b> - The Learning Disability Mortality Review (LeDeR) programme was commissioned by NHS England to investigate the death of patients with learning difficulties to assist with processes to improve the standard and quality of care for people living with a learning disability.</p>



	<p><b>Legal Basis</b> - It has approval from the Secretary of State under section 251 of the NHS Act 2006 to process patient identifiable information who fit within a certain criteria.</p> <p><b>Processor</b> - CCG, NHS England</p>
<p>Technical Solution Pseudonymisation</p>	<p><b>Purpose</b> - Personal confidential and special category data in the form of medical record, is extracted under contract for the purpose of pseudonymisation. This will allow no patient to be identified within the data set that is created. SCWCSU has been commissioned to provide a data processing service for the GPs, no other processing will be undertaken under this contract.</p> <p><b>Legal Basis</b> - Under GDPR the legitimate purpose for this activity is under contract to provide assistance.</p> <p>Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below</p> <p><b>Processor</b> - SCW CSU</p>
<p>Shared Care Record</p>	<p><b>Purpose</b> - In order for the practice to have access to a shared record, the Integrated Care Service has commissioned a number of systems including GP connect, which is managed by NHS Digital, to enable a shared care record, which will assist in patient information to be used for a number of care related services. These may include Population Health Management, Direct Care, and analytics to assist with planning services for the use of the local health population.</p> <p>Where data is used for secondary uses no personal identifiable data will be used.</p>

	<p>Where personal confidential data is used for Research explicit consent will be required.</p> <p><b>Legal Basis</b> - Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below</p> <p><b>Processor</b> - Plexus, NHS Digital, ESHT, ICS member providers</p>
Anticoagulation Monitoring	<p><b>Purpose</b> - Personal Confidential data is shared with LumiraDX in order to provide an anticoagulation clinic to patients who are on anticoagulation medication. This will only affect patients who are within this criteria.</p> <p><b>Legal Basis</b> - The legal basis for this activity under UK GDPR is</p> <p>Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below</p> <p><b>Processor</b> - LumiraDX INRStar</p>
Technical solutions for analytics	<p><b>Purpose</b> – Analytics support primary care services to improve the quality of care through analytics The data does not include identifiable information.</p> <p><b>Legal Basis</b> – Anonymised Data <b>Processor</b> –service provider</p>

We will keep our Notice under regular review. This notice was last reviewed on 11 April 2022.

### Lawful basis for processing

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

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

## Appendix B: Document Control

### A. CONFIDENTIALITY NOTICE

This document and the information contained therein is the property of G DOC LTD

This document contains information that is privileged, confidential or otherwise protected from disclosure. It must not be used by, or its contents reproduced or otherwise copied or disclosed without the prior consent in writing from G DOC LTD

### B. DOCUMENT DETAILS

<b>Author and Role:</b>	JB, CEO
<b>Organisation:</b>	G DOC LTD
<b>Document Reference:</b>	
<b>Current Version Number:</b>	6
<b>Current Document Approved By:</b>	JB
<b>Date Approved:</b>	

### C. DOCUMENT REVISION AND APPROVAL HISTORY

Version	Date	Version Created By:	Version Approved By:	Comments
2	20/02/20	JB	JB	
3	20/11/20	JB	JB	Updated to be clearer about purpose and to reflect name change of Gloucestershire Health and Care NHS Foundation Trust
4	17/08/21	JB	JB	Updated re current services and new address
5	11/04/22	KF	JB	Updated to reflect service changes

6	9/7/22	JB	JB	Lung cancer surveillance and Message Link added
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