



# **Privacy Policy for Patients and Staff**

Written by: Louisa Wood Approved by: Elizabeth Turner Date approved: 8 October 2023 Date of next review: October 2024

This Privacy Notice is written for our patients and staff. At Mereside, we understand how important it is to keep your personal information safe and secure. We take this very seriously. We have taken steps to make sure your personal information is looked after in the best possible way. We review our procedures regularly.

#### Introduction

The General Data Protection Regulation (GDPR) became law on 25 May 2018. This regulation protects the personal and sensitive data of a living individual. It is currently known as the UK GDPR 2021 after the United Kingdom withdrew from the European Union on 31 January 2020.

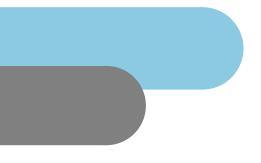
As your registered GP practice, we are the **Data Controller** for any personal and sensitive data we hold about you. This means we are responsible for collecting, storing, and handling personal and healthcare information about you when you register with us as a patient.

There may also be times where we also process information about you. That means we use it for a particular purpose, and, therefore, on those occasions we may also be a **Data Processor**. For example, when you are seen by other healthcare providers, and they add information about your healthcare to your patient record, they are the Data Controllers for that particular information, and we are the Data Processor.

Whether we are acting as Data Controller or Data Processor, we are committed to protecting your privacy and will only use information collected lawfully in accordance with:

- Data Protection Act 2018
- The GDPR 2016 and UK GDPR 2021
- The Human Rights Act 1998
- Common Law Duty of Confidentiality
- Health and Social Care Act 2015
- NHS Codes of Confidentiality, Information Security and Records Management
- The Caldicott Principles
- And all applicable legislation







# Why do we collect or process your information?

Healthcare professionals within the NHS and who provide you with care are required by law to maintain your medical records with details of any care or treatment you received. This information is used by clinicians to provide you with safe and effective care and treatment.

#### Other reasons include:

- Looking after the health of the public.
- Development of future services to better serve the practice population.
- To provide the NHS with access to pseudonymised data showing performance and activity.
- To help us investigate patients' concerns, complaints, or legal claims.
- Allow clinicians or practice staff to review the quality of care that we provide, to ensure it is of the highest standards, and provide a basis for service improvement.
- Patient medication reviews undertaken by a healthcare professional.
- To identify patients who may be at high risk from certain diseases, in order to offer additional care or support as early as possible.
- To identify whether you may be eligible to participate in NHS Health Research Authority Approved Research Studies.

Appendix 1 provides further detail on who we share your information with, why, and under what lawful basis.

## Legal basis for processing your personal data

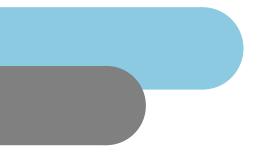
The Law states that personal information about your health falls into a special category of data because it is very sensitive. In order to lawfully process special category data, we must identify a lawful basis under Article 6 of the UK GDPR **and** a separate condition for processing under Article 9. On this basis, we rely upon the following for the vast majority of our data processing:

- 1. **Article 6(1)(e)**: **Public Task** ("performance of a task carried out in the public interest or in the exercise of official authority vested in the controller")
- 2. Article 9(2)(h): Provision of health or social care ("processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Domestic Law or pursuant to contract with a health professional...")

This applies to data processing necessary in order to provide the vast majority of direct health or social care to individual patients, including but not limited to:

• Maintaining your electronic GP record.







- Sharing information from, or allowing access to, your GP record, for healthcare professionals involved in providing you with direct medical care.
- Referrals for specific healthcare purposes.
- NHS data sharing schemes.
- Our data processors.
- Organising your prescriptions, including sending them to your chosen pharmacist.
- Some permissive disclosures of information.

Under exceptional circumstances we may alternatively rely upon:

- Article 6(1)(a): Consent e.g. for certain permissive disclosures of information, i.e. us providing information from your medical record to insurance companies
- Article 6(1)(c): Legal obligation e.g. Mandatory disclosure of information to NHS Digital and Care Quality Commission, the Health Service Ombudsman, etc.
- Article 6(1)(d): Vital interests e.g. to share information with another healthcare
  professionals in a medical emergency, including when you may be incapable of giving
  consent.
- Article 9(2)(j): Research e.g. for your participation in accredited research undertaken in the practice, either at the population level or at the level of individual clinical research trials.

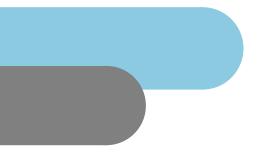
#### What information do we collect?

The healthcare professionals who provide you with care maintain records about your health and any treatment or care you have received previously or elsewhere (e.g., NHS hospital Trust, another GP surgery, Out of Hours service, Accident & Emergency Department, etc). These records help to provide you with the best possible healthcare.

Information we hold about you may include the following:

- Your contact details, including but not limited to: your name, home and/or work address, home and/or work telephone number(s) and email address; next of kin and their contact details; details of those with proxy access and their contact details.
- Your age range, gender, ethnicity, language, disability status, and any other information we need to allow us to provide you with information in a more accessible format to you.
- Contact you have had with the practice, e.g., requests for healthcare support you have made over the phone, in person, or on askmyGP, appointments including what kind of appointment, who it was with, the reasons for it, and what happened during the appointment.
- Details about your medical history, your health, treatment and care.







- Results of investigations, e.g., laboratory test results, x-rays, scan results, etc.
- Relevant information from other health professionals, relatives or those who care for you, or information provided to the surgery by you (including information you provide via our surgery website).

Appendix 1 provides further detail on what information we share with whom, for what purpose, and under what lawful basis.

# What information do we collect about you from others?

We also collect and process personal information about you when it is sent to us from others, including but not limited to those in the list below. This may not all be stored on your patient record, but is always stored securely on Practice systems, and subject to the retention periods as described in this Notice:

- A hospital, a consultant, or any other medical or healthcare professional, or any other
  person involved with your general healthcare. For example, we may receive a letter about
  treatment you receive in hospital, and we will update your patient record with this
  information.
- Insurance companies in respect of requests for medical information, with your prior approval.
- Police service in respect of a Firearms application you are making.
- Social Services.
- Solicitors correspondence from them about you.
- Department for Work and Pensions.
- Driving Vehicle Licensing Authority (DVLA).
- Any other organisation to whom you give permission to ask us for your medical information.

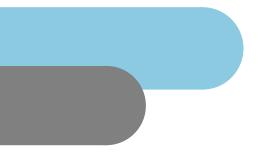
Appendix 1 provides further detail on what information we share with whom, for what purpose, and under what lawful basis.

## **Your Summary Care Record**

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.

Summary Care Records are there to improve the safety and quality of your care. Standard Summary Care Record information comprises your allergies, adverse reactions and medications. Please be aware that if you choose to opt-out of SCR, NHS healthcare staff caring for you outside of your registered GP Practice may not be aware of your current medications or allergies you suffer from







and any bad reactions to medicines you have had, in order to treat you safely in an emergency. Your records will stay as they are now with information being shared by letter, email, or phone. If you wish to opt-out of having a summary care record, please complete the form as per the link below.

Additional information can be added to your Summary Care Record with your consent. This will include reasons for medication, vaccinations, significant diagnoses / problems, significant procedures, anticipatory care information and end of life care information. Additional information can only be added to your SCR with your agreement. To extend your standard summary care record to include additional information, complete the form on the link below.

You have the right to opt out of a Summary Care Record at any time. The link below provides further information including how to opt out of SCR or consent to add additional health information.

https://digital.nhs.uk/services/summary-care-records-scr/additional-information-in-scr#patient-consent-to-include -in-the-scr

**Please Note**: If you are happy with this use of information you do not need to do anything. You may however change your choice at any time. If you do choose to opt out, your confidential patient information will still be used to support your individual care. You can also still consent to your data being used for specific purposes.

# How do we keep your information safe and secure?

The health records we use may be electronic, on paper or a mixture of both, and we use a combination of working practices and technology to ensure that your information is kept confidential and secure. Your records are backed up securely in line with NHS standard procedures. We ensure that the information we hold is kept in secure locations, is protected by appropriate security and access is restricted to authorised personnel. We also make sure external data processors that support us are legally and contractually bound to operate and prove security arrangements are in place where data that could or does identify a person are processed. We are committed to protecting your privacy and will only use information collected lawfully in accordance with all applicable legislation.

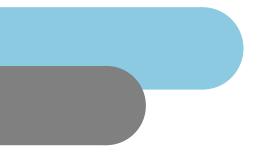
We have a senior person responsible for protecting the confidentiality of patient information and enabling appropriate information sharing. This person is called the Caldicott Guardian. We also have a Senior Information Risk Owner (SIRO) who is responsible for owning the practice's information risk. The Caldicott Guardian and the SIRO for the practice can be found at the end of this document.

All three Mereside Medical practices are registered with the Information Commissioner's Office (ICO) as a data controller, which describes the purposes for which we process personal data. The registration details are as follows:

- Z7263132 (Haddenham)
- Z8406116 (Staploe)

Mereside Medical, Your Local Practice Staploe Medical Centre Cathedral Medical Centre Haddenham Surgery







• ZA127341 (Cathedral)

We keep a Register of all our information processing activities, including those involving the use of personal information. This records lots of data including where we get the information from, with whom we share it, the legal basis allowing us to process personal data and the security arrangements in place.

Confidential patient data will be shared within the healthcare team including nursing staff, administrative staff, secretaries and receptionists, and with other healthcare professionals to whom a patient is referred. Those individuals have a professional and contractual duty of confidentiality. All Mereside Medical employees are subject to strict confidentiality rules as part of their conditions of employment. We maintain our common law duty of confidentiality by conducting annual training and awareness. We ensure that access to personal data is limited to the appropriate staff and information is only shared with organisations and individuals that have a legitimate and legal basis for access.

We will only ever use or pass on information about you if we reasonably believe that others involved in your care have a genuine need for it. We will not disclose your information to any third party without your permission unless there are exceptional circumstances or where the law requires information to be passed on. For example:

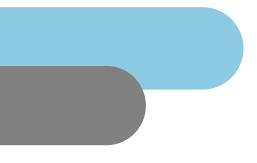
- We believe you are putting yourself at risk of serious harm.
- We believe you are putting a third party (adult or child) at risk of serious harm.
- We have been instructed to do so via court order made against the practice.
- Your information is essential for the investigation of a serious crime.
- You are subject to the Mental Health Act (1983).
- UK Health Security Agency and Office for Health Improvement and Disparities needs to be notified of certain infectious diseases.
- Regulators use their legal powers to request your information as part of an investigation.

We also ensure that data processors who support us are legally and contractually bound to operate and prove security arrangements are in place where data which could or does identify a person are processed. For more information, please see 'Data Processors' below.

# Why we share your information and who we share it with

We will never share your personal or healthcare information with anyone or any organisation who has no lawful right to it, unless you give us clear consent to do so.







Confidential patient data will be shared within the healthcare team at the practice, including nursing staff, administration staff (prescription, secretaries, reception, finance) and with other healthcare professionals to whom a patient is referred.

Whenever you use a health or care service, such as attending Accident & Emergency, using Community Care Services, or other community services such as those provided through Ely Primary Care Networks or East Cambridgeshire Integrated Neighbourhood, important information about you is collected to help ensure you get the best possible care and treatment. This information may be passed to other approved organisations where there is a legal basis, to help with planning services, improving care, research into developing new treatments and preventing illness. All of this helps in providing better care to you and your family and future generations.

We may share your personal information with a range of approved people or organisations, because these organisations may require your information to assist them in the provision of your direct healthcare needs. The data will either be anonymised, such that you are not identifiable; or it will be processed under one of the lawful bases described above, and recorded along with the purpose of the processing in our Record of Processing Activity.

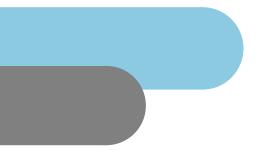
Typically, it will be important for them to be able to access your information in order to:

- ensure they may properly deliver care services to you, including provision of prescriptions.
- facilitate service design, quality improvement and monitoring and evaluation, at both practice and ICB level.
- serve public interest issues.
- enable National Registries.
- Support risk stratification activities (i.e. identifying and managing patients who are at a high risk of emergency hospital admission) or other disease monitoring and health prevention.

Typical organisations or individuals who we share your data with:

- Hospital professionals (such as doctors, consultants, nurses, etc).
- Other GPs / Doctors, including those who are part of Ely Primary Care Networks who are not a Mereside Medical Practice (namely, St George's Medical Centre, St Mary's Surgery, Burwell Surgery).
- Ely Primary Care Network employees, including but not limited to Pharmacists, Social Prescribers, Health & Well-being Coaches, First Contact Physiotherapists.
- Community Nurses and other healthcare professionals (e.g. District Nurses, Midwives, Specialist Diabetic Nurses, Podiatry Specialists).
- Dentists.
- Healthcare Commissioners and Integrated Care Systems
- NHS Digital
- Local authorities
- Community health services







- For the purposes of complying with the law, e.g. Care Quality Commission (CQC), The Health Service Ombudsman, General Medical Council, HMRC, Police, The Courts, Solicitors, Insurance Companies, etc.
- Any other person or organisation that is involved in providing services related to your general health care.
- Anyone you have given your explicit consent to, to view or receive all or part of your record.
   Please note, if you give another person or organisation consent to access your record we will need to contact you before we release that record. It is important that you understand how much and what aspects of, your care record you give consent to be disclosed.

Appendix 1 provides further detail on who we share your information with, why, and under what lawful basis.

#### **Data Processors**

Mereside Medical Practices use carefully selected third party service providers to process data on our behalf. If we do this, then we will conduct appropriate due diligence and ensure that appropriate agreements are in place to ensure that they keep the data secure, that they do not use or share information other than in accordance with our instructions and that they are operating appropriately. Examples of functions that may be carried out by third parties includes:

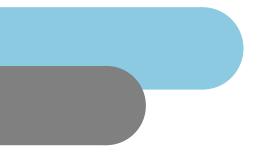
- Companies that provide IT services & support, including our core clinical systems; systems which manage patient facing services (such as our website and service accessible through the same); data hosting service providers; systems which facilitate appointment bookings or electronic prescription services; document management services etc.
- Delivery services (for example if we were to arrange for delivery of any medicines to you).
- Payment providers (if for example you were paying for a prescription or a service such as travel vaccinations).
- Confidential waste disposal providers
- Accredited Research Partners e.g. Sponsors of HRA Approved Medical Research Studies. Please see the section on Use of your data in Medical Research.

Further details regarding specific third party processors can be supplied on request.

## Your data rights as a patient.

The UK GDPR gives you certain rights to your personal and healthcare information that we hold, as set out below:







#### **Right of access**

You have the right to see what information we hold about you and to request a copy of this information. You may request access to view your medical record online by completing the Application for Access to SystmOnline, available at the Practice or at www.meresidemedical.nhs.uk/services/online-services.

If you need to review a complete copy of your historical medical records, you can contact the Practice to make a 'Subject Access Request'. See <a href="https://www.meresidemedical.nhs.uk/about/practice-policies/">https://www.meresidemedical.nhs.uk/about/practice-policies/</a> for the Subject Access Request Policy.

Please note, if you make a Subject Access Request, there may be information that has been hidden ('redacted'). Under UK GDPR, the practice is legally permitted to apply specific restrictions to the released information. The most common restrictions include:

- Information about other people (known as 'third party' data) unless you provided the information, or they have consented to the release of their data held within your medical records.
- Information which may cause serious physical or mental harm to you or another living person. For some Subject Access Request cases, a GP will perform a 'serious harms test'. If the GP has any cause to believe that specific information will cause you or someone else serious harm, it will not be released.

## Right to correction ("rectification")

We want to make sure that your personal information is accurate and up to date. You have the right to have any factual inaccuracies about you in your medical record corrected. Please contact the surgery with your request.

## Right to erasure

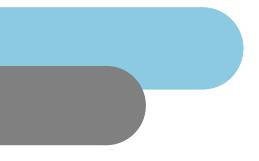
This right is also commonly referred to as the 'right to be forgotten'. You can request that your information be erased, subject to certain exemptions, if it is no longer needed by us for the original purpose we said we would use it for or if you decide to withdraw your consent or if you object to the use of your information. If it transpires that the information was unlawfully used or is found to infringe the law you can ask for it to be erased. We will erase your information if we have a legal obligation to do so. We will communicate any erasure of information to anyone to whom it has been disclosed unless this is not possible or involves disproportionate effort. We will tell you who those recipients are if you ask us.

## Right to object

You have the right to request to object to information being shared between organisations who are providing you with direct care. This may affect the care you receive. Please speak to your Practice if you would like to understand this more.









You are not able to object to your name, address, and other demographic information being sent to, and held by, NHS Digital. This is necessary if you are to be registered to receive NHS care.

We cannot share your information with anyone else for a purpose that is not directly related to your healthcare, e.g. medical research, educational purposes, etc. We would ask you for your consent in order to do this.

Where the practice has obtained your consent to process your personal data, you have the right to withdraw your consent at any time, **provided consent is the legal basis for the processing**. Please contact your GP Practice for further information and to raise your objection.

## Use of your data in Medical Research

Mereside Medical Practices are research active.

All NHS organisations are expected to participate and support health and care research. Conducting high quality clinical research helps us to keep improving NHS care by finding out which treatments work best.

The NHS Health Research Authority and government departments in Northern Ireland, Scotland and Wales set standards for NHS organisations to make sure they protect your privacy and comply with the law when they are involved in research.

Some of the studies we participate in are at the population level and as a result your data may be anonymised, i.e. you are not identifiable from the data that is processed in the course of the research.

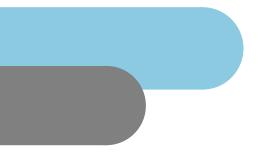
Many of the studies we participate in are Clinical Research Trials, where individual patients are invited to participate in a research study that is relevant to their particular health condition(s). For example, this may be a study to test the effectiveness of a new medication that may improve their health condition.

We only participate in research studies that have HRA Approval (including Research Ethic Committee approval where relevant) and are undertaken in accordance with the UK policy framework for Research in Health and Social Care.

For GDPR purposes therefore, and for the avoidance of doubt, the lawful basis for processing your personal and health data while participating in HRA approved studies is always as follows, whether it is a population-level study or an individual clinical trial:

- 1. **Article 6(1)(e)**: **Public Task** ("performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"); AND
- 2. **Article 9(2)(j): Research** ("processing is necessary for ... scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Domestic Law







which shall be proportionate to the aim pursued, respect the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject")

If you are asked about taking part in research, usually someone in the Practice team will contact you. People in the Practice team may look at your health records to check whether you are suitable to take part in a research study, before asking you whether you are interested or sending you a letter on behalf of the researcher, or study Sponsor. This letter will always have been pre-approved by the HRA Research and Ethics Committee.

If you agree to participate in the study, you will be asked to provide explicit consent to participate in the study. You may opt out of participating in some aspects of the study at any time. However, this consent only relates to your willingness to go through the tests or investigations that make up the research. This consent is separate from the lawful basis for collecting, storing, and processing your personal and health data under GDPR, including the data that are generated during the study.

The data that are generated during your participation in the study (e.g. test results, etc) will be stored and processed on your patient record using the lawful basis under GDPR noted above, for the retention periods noted in this Notice, <u>including if you withdraw consent to participate in the study</u>.

For more information please visit <a href="https://www.hra.nhs.uk/information-about-patients/">https://www.hra.nhs.uk/information-about-patients/</a>

Please see our website, <u>www.meresidemedical.nhs.uk</u> for more information about the research projects we are currently participating in.

## **National Data Opt-Out**

The national data opt-out is a service that allows patients to opt out of their patient and health information being used for research and planning. Many research projects use anonymised data so that you cannot be identified.

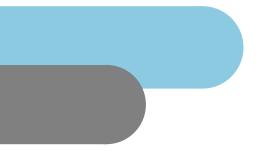
Your practice has systems and processes in place to comply with the National Data Opt-out, and apply your choice to any confidential patient information they use or share for purposes beyond your individual care.

To find out more, or to register your choice to opt out, please visit https://www.nhs.uk/your-nhs-data-matters/ or telephone 0300 3035678.

# Your access to your future (prospective) health records

As your GP practice, we have been asked to provide you (if you don't already have it) with access to your full medical record via the NHS app (and NHS website) if you have a suitable NHS login, from 31 October 2023 onwards. This may include access to free texts, letters, and documents once they have







been reviewed and filed by the GP. There is likely to be sensitive and personal information within your medical record.

We are supportive of providing you with access to your record, but we wish to do this safely and give you the opportunity to opt out, if you wish (you may have personal reasons for doing so).

Please note, in some cases there may be limited legitimate reasons why access to prospective medical records will not be given or will be reduced, based on safeguarding. If the release of information is likely to cause serious harm to the physical or mental health to you or another individual, we may refuse or reduce access to prospective records; third party information may also not be disclosed if deemed necessary.

If you have any queries about this please contact your practice.

## What should you do if your personal information changes?

It is important that you tell the person treating you if any of your details such as your name or address have changed or if any of your details such as date of birth is incorrect for this to be amended. You have a responsibility to inform us as soon as possible of any changes so our records are accurate and up to date for you.

# How long will we store your data?

We carefully consider any personal information that we store about you, and we will not keep your information for longer than is necessary for the purposes as set out in this Privacy Notice. We also ensure to reference the NHS Records Management Code of Practice 2021 retention periods listed in Appendix II: Retention Schedule.

#### **Further information**

## **Queries or complaints**

If you have any queries, concerns, or complaints about how your data is managed, please contact the Practice Manager in the first instance.

Email us at cpicb.mereside-pm@nhs.net

Or write to us at:

The Practice Manager

Cathedral Medical Centre, Princess of Wales Hospital, Lynn Road, Ely, Cambridgeshire CB6 1DN

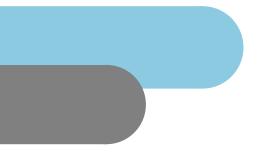
The Practice Manager

Haddenham Surgery, The Green, Haddenham, Ely, Cambridgeshire CB6 3TA

The Practice Manager

Staploe Medical Centre, Brewhouse Lane, Soham, Cambridgeshire, CB7 5JD







#### **Caldicott Guardian**

A Caldicott Guardian is a senior person within a health care organisation who makes sure that the personal information about those who use its services is used legally, ethically and appropriately, and that confidentiality is maintained.

The Caldicott Guardian for Mereside Medical is Dr Elizabeth Turner – <a href="mailto:cpicb.mereside-pm@nhs.net">cpicb.mereside-pm@nhs.net</a>

#### **Senior Information Risk Officer**

The Senior Information Risk Owner (SIRO) who is responsible for owning the practice's information risk. The SIRO for Mereside Medical is Dr James Howard – <a href="mailto:cpicb.mereside-pm@nhs.net">cpicb.mereside-pm@nhs.net</a>

#### **Data Protection Officer**

Mereside Medical has designated the Data Protection Officer role to be provisioned by NHS Arden and Gem Commissioning Support Unit (AGEM CSU)

Any queries about data protection issues should be addressed to <a href="mailto:cpicb.dataprotectionofficer@nhs.net">cpicb.dataprotectionofficer@nhs.net</a>

#### **Information Commissioner**

For independent advice about data protection, privacy and data sharing issues, you can contact The Information Commissioner:

Tel: 0303 123 1113

Web: https://ico.org.uk/global/contact-us/contact-us-public/public-advice/





# Appendix 1: Key examples of who we share your information with, why, and under what lawful basis

Activity	Rationale
Integrated Care Board	Purpose: Anonymous information is shared to plan and design
	care services within the locality
	Legal basis: non-identifiable data only
	Processor: Cambridgeshire and Peterborough Integrated Care
	Board
ICB Medicines Optimisation	Purpose: to provide monitoring and advice in line with the
Team	national directive for prescribing. Anonymised data is collected
	by the ICB.
	Legal basis: non-identifiable data only
	Processor: Cambridgeshire and Peterborough Integrated Care
Cura ma a mu Cana Da a and	Board
Summary Care Record	Purpose: Facilitate emergency care
	Legal basis: Provision of health or social care
	Legal basis. Flovision of fleatin of social care
	Processor: NHSE and NHS Digital via GP connect
Ely Primary Care Network GP	Purpose: We enable other GPs and staff in other GP practices to
Practices	have access to your medical record to allow you to receive
	medical care within PCN-contracted services, e.g. Enhanced
	Access, Covid Vaccinations, etc.
	Legal Basis: Provision of health or social care
	Processor: Your registered practice will continue to be
	responsible for your medical record.
East Cambridgeshire Integrated	Purpose: We share essential data about you with colleagues
Neighbourhood.	from the wider health and social care system to facilitate
Neighbourhood partners might	joined-up care
include CPFT neighbourhood team;	
CUH; PCN staff; voluntary sector	
staff (e.g. age UK; caring together;	



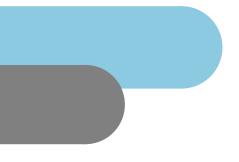




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Acorn project); social workers &	Legal Basis: Provision of health or social care. If sharing
community connectors (employed	individual patient data, we would obtain explicit consent from
by county council)	the patient to their case being discussed.
	Processor: Your registered practice will continue to be
	responsible for your medical record.
Community Nursing – including	Purpose: We will enable the Community Nursing Team to have
but not limited to:	access to your medical record to allow you to receive care from
Complex Care Team	the community nurses for the services listed.
Diabetes Team	
Home Visiting Service	Legal Basis: Provision of health or social care
Leg Ulcer Service	
Heart Failure Service	Processor: Your registered practice will continue to be
District Nurses	responsible for your medical record
Midwives	
MASH – Multi Agency	Purpose: We share information with health and social care
Safeguarding Board	authorities for safeguarding issues.
Safeguarding Adults and	Legal basis: we will rely on a statutory basis for data sharing due
Children	to the public interest I.e. to protect safety and welfare of
erman ern	others.
	others.
	Processor: Multi Agency Safeguarding Authorities
Medication / Prescribing	Purpose: To enable chemists / pharmacies to provide patients
	with essential medication or treatment as necessary.
	with essential medication of deather as necessary.
	Legal basis: Provision of health or social care
	Legal basis. Provision of fleath of social care
	Processor: Pharmacy chosen by patient.
Risk Stratification	Purpose: To identify and manage patients who are at high risk
Nisk Stratification	of emergency hospital admission, in order to offer a
	preventative service to them.
	Risk stratification uses various combinations of historic
	information about patients including age, gender, diagnoses,
	patterns of hospital attendance and admission, and primary
	care data from GP practice records.
	Logal basis, Statutory Dick stratification has been approved by
	Legal basis: Statutory. Risk stratification has been approved by
	the Secretary of State, through the Confidentiality Advisory
	Group of the Health Research Authority (HRA).



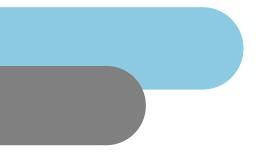






	Processor: Cambridgeshire & Peterborough Integrated Care Board to assist us with Risk Stratification.
Medical Research	Purpose: to further health and care research to improve
	prevention, diagnosis, or treatment of disease.
	Legal basis: Research
	Processor: Your Practice, the research study Sponsor.
Quality monitoring, concerns,	Purpose: to review care records, incidents, and complaints, in
and serious incidents	order to identify lessons learned and opportunities to improve.
and serious incluents	
	This will ensure that the health services you receive are safe,
	effective, and of excellent quality.
	Legal basis: The health care professional reporting or reviewing
	the incident should seek to gain your consent to share
	information and lessons learned from the incident with staff
	who would benefit. We have a statutory duty under the Health
	and Social Care Act to secure continuous improvement in the
	quality of services provided.
	Processor: Your registered practice will continue to be
	responsible for your medical record. Where incidents have
	occurred in other care settings, details of the care you have
	- '
	received and any concerns about that care may be shared with
	us by other providers if it is not adequately captured on your
	patient record.
Commissioning, planning,	Purpose: we share aggregated anonymous, patient data about
contract monitoring and	services we have provided.
evaluation.	
	Legal basis: Statutory. Reporting requirements are set as part of
	NHS contracts and do not typically include identifiable data.
	,
	Processor: ICB, NHSE, CQC, third party organisations
	commissioned by the NHS to perform actuarial services
National Registries	National Registries such as the Learning Disabilities Register
Tadona neglecines	have statutory permission under Section 251 of the NHS Act
	2006, to collect and hold service user identifiable information
	without the need to seek informed consent from each
	individual service user.







Care Quality Commission	CQC has statutory powers under the Health & Social Care Act
	2008 to access and use information where they consider it is
	necessary to carry out their functions as a regulator.
	CQC relies on its legal powers to access information rather than
	consent, therefore may use its powers to access records even in
	cases where objections have been raised.

<sup>\*</sup>Please note this is not an exhaustive list and may be updated from time to time. If you would like any further information please contact your Practice.

