Riverside Medical Practice

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Processing Activities: Direct Care and Administration

Recipients or categories of recipients of the personal or special categories of personal data	Purpose of the processing and data retention periods	Lawful basis	Your Rights
NHS Trusts – Hospitals, Community or Mental Health Trusts.	 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. Your personal information may also be processed for local administrative purposes such as: Waiting list management; local clinical audit; Performance against local targets; activity monitoring; production of datasets to submit for commissioning purposes and national collections. The source of the information shared in this way is your electronic GP record. In accordance with DPA Part 1, Schedule 1 (2) health or social care purposes means the purposes of preventive or occupational 	The processing of personal data is permitted under the following GDPR and DPA conditions: <u>GDPR Article 6(1) (e) - public interest or in</u> the exercise of official authority; <u>DPA Section 8 (d) - processing is necessary</u> for the exercise of statutory functions; The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions: <u>GDPR Article 9 (2) (h) - processing is</u> <u>necessary for medical or social care</u> treatment or, the management of health or social care systems and services; <u>DPA Section 10 (1) (c) – processing is</u> <u>necessary for health and social care</u> purposes; <u>In accordance with DPA Schedule 1, Part 1,</u> (2) health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of	 You have the right to: 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: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. Right to object: In line with the GDPR Article 21 and DPA Section 99, 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. 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.

	 medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services. <u>Data Retention Period</u> All records held by the Practice will be kept for the duration specified in the <u>Records</u> <u>Management Codes of Practice for Health and</u> 	social care, or the management of health care systems or services or social care systems or services. Related Legislation: Common Law of Duty of Confidentiality	Right to complain: If you are dissatisfied with the way Riverside Medical 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
	Social Care.		Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: <u>https://ico.org.uk/global/contact-us/</u>
Emergency Services (Ambulance trusts, police, A&E departments, out of hours services, 111)	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. 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. The source of the information shared in this way is your electronic GP record. <u>Data Retention Period</u>	The processing of personal data is permitted under the following GDPR and DPA conditions: <u>GDPR Article 6(1) (e) - public interest or in</u> the exercise of official authority: <u>DPA Section 8 (d) - processing is necessary</u> for the exercise of statutory functions; The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions: <u>GDPR Article 9 (2) (h) - processing is</u> <u>necessary for medical or social care</u> treatment or, the management of health or social care systems and services; <u>Article 9 (2) (C) – the processing is necessary</u> to protect the vital interests of the data <u>subject</u> ;	 You have the right to: 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: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. 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.

	All records held by the Practice will be kept for the duration specified in the <u>Records</u> <u>Management Codes of Practice for Health and</u> <u>Social Care.</u>	DPA Section 10 (1) (c) – processing is necessary for health and social care purposes; In accordance with DPA Schedule 1, Part 1, (2) health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services. In accordance with DPA Schedule 1, Part 3, (30) (b) the conditions for protecting individual's vital interests is met where the data subject is physically or legally incapable of giving consent.	We will notify you at the earliest opportunity where we have shared your personal data in an emergency situation. 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 Riverside Medical 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: <u>https://ico.org.uk/global/contact-us/</u>
GP Federations (groups of GP practices working together)	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. 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 Medway. 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	The processing of personal data is permitted under the following GDPR and DPA conditions: <u>GDPR Article 6(1) (e) - public interest or in</u> the exercise of official authority; <u>DPA Section 8 (d) - processing is necessary</u> for the exercise of statutory functions; The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions: <u>GDPR Article 9 (2) (h) - processing is</u> <u>necessary for medical or social care</u> <u>treatment or, the management of health or</u> <u>social care systems and services;</u>	 You have the right to: 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: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. 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

	(MDT) in order to enable them make the best informed decision about your health/care needs, and provide you with the best possible	DPA Section 10 (1) (c) – processing is necessary for health and social care purposes;	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.
	care. The source of the information shared in this way is your electronic GP record.	In accordance with DPA Schedule 1, Part 1, (2) health or social care purposes means the purposes of preventive or occupational	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.
	Data Retention Period All records held by the Practice will be kept for the duration specified in the <u>Records</u> <u>Management Codes of Practice for Health and</u>	medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services.	Right to complain: If you are dissatisfied with the way Riverside Medical Practice process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at:
	Social Care.	Related Legislation:	Information Commissioner's Office
		Section 251B Health and Social Care (Safety	Wycliffe House
		and Quality Act) 2015 (Duty to Share);	Water Lane
		Common Law of Duty of Confidentiality	Wilmslow
			Cheshire
			Tel: 0303 123 1113 or 01625 545 745
			Email: https://ico.org.uk/global/contact-us/
Pharmacists - Medicines Optimisation	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. 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.	The processing of personal data is permitted under the following GDPR and DPA conditions: <u>GDPR Article 6(1) (e) - public interest or in</u> <u>the exercise of official authority;</u> <u>DPA Section 8 (d) - processing is necessary</u> <u>for the exercise of statutory functions;</u> The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA	 You have the right to: 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: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing.
	The source of the information shared in this way is your electronic GP record.	conditions: <u>GDPR Article 9 (2) (h) - processing is</u> <u>necessary for medical or social care</u> <u>treatment or, the management of health or</u> <u>social care systems and services;</u>	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

	Data Retention Period All records held by the Practice will be kept for the duration specified in the <u>Records</u> <u>Management Codes of Practice for Health and</u> <u>Social Care.</u>	DPA Section 10 (1) (c) – processing is necessary for health and social care purposes; In accordance with DPA Schedule 1, Part 1, (2) health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services. Related Legislation:	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. 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 Riverside Medical 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: <u>https://ico.org.uk/global/contact-us/</u>
Local Authority – Social Services	Riverside Medical Practice works closely with Local Authorities to support and care for people of all ages to deliver the best possible social care. 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. The source of the information shared in this way is your electronic GP record. Data Retention Period All records held by the Practice will be kept for the duration specified in the <u>Records</u>	The processing of personal data is permitted under the following GDPR and DPA conditions: <u>GDPR Article 6(1) (e) - public interest or in</u> the exercise of official authority; <u>DPA Section 8 (d) - processing is necessary</u> for the exercise of statutory functions; The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions: <u>GDPR Article 9 (2) (h) - processing is</u> <u>necessary for medical or social care</u> treatment or, the management of health or <u>social care systems and services;</u>	 You have the right to: 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: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. 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

	Management Codes of Practice for Health and Social Care.	GDPR Article 9(2) (b) - processing necessary in the field of employment, social security and social protection law;In accordance with DPA Schedule 1, Part 1, (2) - health or social care purposes means 	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. 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 Riverside Medical 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
Care Homes	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. The source of the information shared in this way is your electronic GP record. Data Retention Period All records held by the Practice will be kept for the duration specified in the <u>Records</u> <u>Management Codes of Practice for Health and Social Care.</u>	The processing of personal data is permitted under the following GDPR and DPA conditions:GDPR Article 6(1) (e) - public interest or in the exercise of official authority;DPA Section 8 (d) - processing is necessary for the exercise of statutory functions;The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions:GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services;	 Email: <u>https://ico.org.uk/global/contact-us/</u> You have the right to: 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: accuracy of the data is contested, the processing is unlawful or, where we no longer need the data for the purposes of the processing. 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

		DPA Section 10 (1) (c) – processing is necessary for health and social care purposes;	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.
		In accordance with DPA Schedule 1, Part 1, (2) -health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services.	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 Riverside Medical 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/
Community	The NHS Community Pharmacist Consultation	Within the General Data Protection	You have the right to:
Pharmacy BP monitoring	Service (CPCS) is a National Programme and was launched by NHS England and NHS Improvement on the 29 October 2019, to progress the integration of community pharmacy into local NHS urgent care services, providing more convenient treatment closer to patients' homes If a patient presents at a GP Practice with a minor ailment which falls within the criteria for this service, the patient would be offered a GP CPCS referral and would need to consent to the referral. The patient would then state which	Regulation (GDPR), Article 6 sets out the conditions for lawfully processing personal data and Article 9 sets out further conditions for processing special categories of personal data. As personal data concerning health is one of the special categories, organisations that process such data must be able to demonstrate they have met a condition in both Article 6 and Article 9. Under the GDPR, for processing personal data in the delivery of direct care, and for providers' administrative purposes, the most appropriate Article 6 condition that is available to all public funded health and	 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: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. 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

	 Pharmacy they wish the consultation to take place at. The practice care navigator/receptionist/call handler will then generate the referral. <u>The Data Retention Period</u> The Standard Care Records retention period will be applied. All data is held in line with NHSE data retention guidelines 	 social care organisations is Article 6(1)(e): "Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller". For work undertaken the relevant condition to rely on under Article 9 is (2)(h): "processing is necessary for the purposes of preventive or occupational medicine, medical diagnosis, provision of health or social care treatment." (read with Schedule 1 paragraph 2 of the Data Protection Act). There is an obligation in s. 251B of the Health and Social Care Act 2012 to share information amongst relevant commissioners and providers for the purposes of direct care. 	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. 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 Riverside Medical 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: <u>https://ico.org.uk/global/contact-us/</u>
Kent & Medway Healthy.io Adherence as a Service - at home kidney test for patients with diabetes Kent & Medway GP Practices	Kent & Medway Healthy.io Adherence as a Service - at home kidney test for patients at risk of Chronic Kidney Disease. Healthy.io has been contracted by the NHS, via the Accelerated Access Collaborative, to provide an at home kidney test service for participating primary care practices. This project will enable Kent & Medway practices to identify patients at risk of chronic kidney disease through the offer of an at home kidney screening albumin to creatinine urinalysis test. It will also increase practice adherence with the urinary albumin test for diabetic patients, which is one of the 9 NICE recommended annual care processes.	Kent and Medway GP practices will instruct Healthy.io to contact individuals as part of their provision of care. Due to this, the lawful basis is as follows: Article 6(1)(e) – processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; (for processing under a public body contract); or As the Controllers are health and care organisations, the Article 9 exemption applying to the processing of special category data will be: Article 9(2)(h) - processing is necessary for the purposes of preventive or occupational	 You have the right to: 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: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. 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

Updated 22/06/2023

	The Data Retention Period The Standard Care Records retention period will be applied. All data is held in line with NHSE data retention guidelines	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 Schedule 1, Part 1(2) Health and Social Care Purposes, Data Protection Act 201 (2) (d) the provision of health care or treatment It is noted that the transfer of patient information to Healthy.io by the GP practice in order to involve the Albumin: Creatinine Ratio test in their treatment is compatible with the above lawful basis and consent is not required by the patient in order for this information to be shared.	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. 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 Riverside Medical 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/
Community Pharmacy Consultation Service Kent & Medway GP Practices	The NHS Community Pharmacist Consultation Service (CPCS) is a National Programme and was launched by NHS England and NHS Improvement on the 29 October 2019, to progress the integration of community pharmacy into local NHS urgent care services, providing more convenient treatment closer to patients' homes If a patient presents at a GP Practice with a minor ailment which falls within the criteria for this service, the patient would be offered a GP CPCS referral and would need to consent to the referral. The patient would then state which Pharmacy they wish the consultation to take place at.	Within the General Data Protection Regulation (GDPR), Article 6 sets out the conditions for lawfully processing personal data and Article 9 sets out further conditions for processing special categories of personal data. As personal data concerning health is one of the special categories, organisations that process such data must be able to demonstrate they have met a condition in both Article 6 and Article 9. Under the GDPR, for processing personal data in the delivery of direct care, and for providers' administrative purposes, the most appropriate Article 6 condition that is available to all public funded health and social care organisations is Article 6(1)(e): "Processing is necessary for the performance	 You have the right to: 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: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. 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 Updated 22/06/2023

	The practice care navigator/receptionist/call handler will then generate the referral. <u>The Data Retention Period</u> The Standard Care Records retention period will be applied. All data is held in line with NHSE data retention guidelines	of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller". For work undertaken the relevant condition to rely on under Article 9 is (2)(h): "processing is necessary for the purposes of preventive or occupational medicine, medical diagnosis, provision of health or social care treatment." (read with Schedule 1 paragraph 2 of the Data Protection Act). There is an obligation in s. 251B of the Health and Social Care Act 2012 to above	 purposes of direct provision of care, and compliance with a legal obligation to which we are subject. 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 Riverside Medical 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
		and Social Care Act 2012 to share information amongst relevant commissioners and providers for the purposes of direct care.	Wycliffe House Water Lane
			Wilmslow
			Cheshire
			Tel: 0303 123 1113 or 01625 545 745
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Kent & Medway Healthy.io Adherence as a Service - at home kidney test for patients with diabetes Kent & Medway GP Practices	Kent & Medway Healthy.io Adherence as a Service - at home kidney test for patients at risk of Chronic Kidney Disease. Healthy.io has been contracted by the NHS, via the Accelerated Access Collaborative, to provide an at home kidney test service for participating primary care practices. This project will enable Kent & Medway practices to identify patients at risk of chronic kidney disease through the offer of an at home kidney screening albumin to creatinine urinalysis test. It will also increase practice adherence with the urinary albumin test for diabetic patients, which is one of the 9 NICE recommended annual care processes. Healthy.io support Kent and Medway Primary Care Practices to identify and extract a list of	Kent and Medway GP practices will instruct Healthy.io to contact individuals as part of their provision of care. Due to this, the lawful basis is as follows: Article 6(1)(e) – processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; (for processing under a public body contract); or As the Controllers are health and care organisations, the Article 9 exemption applying to the processing of special category data will be: Article 9(2)(h) - processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis,	 You have the right to: 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: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. 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

	patients that have a diagnosis of diabetes Type 1 or 2 or hypertension that have not had their urinary albumin screening test in the last 12 months as required by the practice as part of the patient's care. The list is generated from the reporting functionality within the Practice's own clinical system.	the provision of health or social care or treatment or the management of health or social care systems and services Schedule 1, Part 1(2) Health and Social Care Purposes, Data Protection Act 201 (2) (d) the provision of health care or treatment It is noted that the transfer of patient information to Healthy.io by the GP practice in order to involve the Albumin: Creatinine Ratio test in their treatment is compatible with the above lawful basis and consent is not required by the patient in order for this information to be shared.	 purposes of direct provision of care, and compliance with a legal obligation to which we are subject. 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 Riverside Medical 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/
Post COVID Assessment Service (PCAS) West Kent Federation	 A post Covid assessment service is required for the Kent & Medway Integrated Care System covering a population of 1.9 million and encompassing the following Integrated Care Partnerships: Dartford, Gravesham and Swanley Medway and Swale East Kent West Kent In October 2020 NHSE and NHSI made a commitment to establish Post-Covid Assessment and Rehabilitation Service (PCAS) across England giving patients access to multi- professional advice. The multi-professional team will provide physical, cognitive, psychological and 	Initially, Health Service (Control of Patient Information (COPI)) Regulation 2002 will be relied upon. UK GDPR Article 6(1)(e) and Article 9(2)(b) However, as the Country emerges from lockdown and the service moves into business as usual the following lawful bases will be engaged. Article 6(1)(e) processing is necessary for the performance of a task in the public interest or in the exercise of official authority vested in the controller Access to the information is to provide direct care Article 9 (2) (h) - processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis,	 You have the right to: 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: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. 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

psychiatric assessments, as well as testing functional abilities, of those people experiencing suspected post-COVID syndrome, so that they can be referred to the right specialist help. The Data Retention Period Data Retention and Disposal Guidance is provided in the Information (Data) Governance Policy May 2021. Adult health records are retained for 8 years from the point of last consultation or discharge. Electronic records will be made inaccessible at the end of the retention period and paper records will be shredded and destroyed using confidential records destruction at the end of the retention period.	the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional and subject to the conditions and safeguards Access to the information is to provide direct care The lawfulness of sharing/processing of Shared Personal Data set out in Article 6(1) (e) of the GDPR (as above) is also permitted under Section 8 (d) of DPA 2018: Processing is necessary for the exercise of statutory functions. Access to the information is to provide direct care. The lawfulness of sharing/processing Shared Personal Data set out in Article 9 (2) (h) of the GDPR (as above) is permitted under DPA Section 10 (health and social care purposes) Conditions relied upon for obligations of professional secrecy. For the purpose of Article 9 (2) (h) of the GDPR, Part 2, Schedule 1, DPA 2018(Health and Social Care purposes) is also engaged	purposes of direct provision of care, and compliance with a legal obligation to which we are subject. 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 Riverside Medical 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: <u>https://ico.org.uk/global/contact-us/</u>
	professional secrecy. For the purpose of Article 9 (2) (h) of the GDPR, Part 2, Schedule 1, DPA 2018(Health	
	For the purposes of Article 9(2) (h) of the GDPR, the circumstances in which the processing of Shared Personal Data is carried out is subject to the conditions and safeguards referred to in Article 9(3) of the GDPR (obligation of professional secrecy). Therefore, in accordance with DPA Section 11(1), these include circumstances in which it is carried out –	

Collaborative Practice – Altogether Better Potentially all 196 Kent & Medway GP Practice although initially, the programme has been commissioned for 12 Practices.	Altogether Better are an NHS national network organisation who have developed a nationally recognised, evidence- based approach. They support GP practices to provide better healthcare by inviting patients to work alongside them as volunteer practice health champions to improve the health and well-being of their practice community. Altogether Better support, guide and mentor staff in general practice to invite and support a group of volunteer Practice Health Champions to work with the practice to create new ways for patients to access support that meets their health needs. Altogether Better have found that if practice's reach out to their practice population via the use of their SMS/instant messaging system then the practice is much mere likely to attract potential Practice Health	 (a) by or under the responsibility of a health professional or a social work professional, or by another person who in the circumstances owes a duty of confidentiality under an enactment or rule of law. Under the GDPR, for processing personal data in the delivery of direct care, and for providers' administrative purposes, the most appropriate Article 6 condition that is available to all public funded health and social care organisations is Article 6(1)(e): 'Public Task' "Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller". For work undertaken by the 'health champion' is carried out subject to the conditions and safeguards of Obligation of Professional Secrecy Article 9 (3). There is an obligation in s. 251B of the Health 	 You have the right to: 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: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. 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
	more likely to attract potential Practice Health Champions who do not regularly engage with the practice for their own health needs and who therefore would not be reached via posters in surgery or the practice's social media. The Data Retention Period The data will be retained for the duration of the programme (approx. 1 year) NHS mail and digital files are deleted.	There is an obligation in s. 251B of the Health and Social Care Act 2012 to share information amongst relevant commissioners and providers for the purposes of direct care. In terms of Health Champions providing direct care to the wider Practice patient population - Articles 6(1)(e) and Article and 9(3) together with Part 1(2) Schedule 1 DPA 2018 may apply Health Champions will be working under the direction of a Clinical Lead in each GP Practice.	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. 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 Riverside Medical 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

Proxy Access – Implementation within care homes across Kent & Medway All GP practices across Kent and Medway and all care homes across Kent and Medway	Proxy access is a national directive from NHS England, where the plan is to roll out to all the care homes across England. We have been tasked with rolling it out to care homes across Kent and Medway. https://www.england.nhs.uk/ourwork/clinical- policy/ordering-medication-using-proxy-access/ - More information can be found about the project. This project uses current proxy functionality via GP online available to the general public when acting as proxy for relatives/friends via a website to access the GP clinical system EMIS. GP practices via GP online services can enable care home staff to order medications in the GP record for the resident's care. Proxy access was developed to allow someone other than the patient to access and manage parts of their GP online services account. The proxy is given their own online access to patient medication records on EMIS GP system, which gives authorised access to order repeat medication on behalf of the resident	 Lawfulness of processing- Article 6 (1) (e) for the performance of a public task carried out in the public interest or in the exercise of official authority. Processing of special categories of personal data Article 9 (2) (h) 'medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems'. Sharing Personal Data is carried out subject to the conditions and safeguards of Obligation of Professional Secrecy Article 9 (3). Sharing is done in accordance with DPA 2018 S.11 (1) by: By or under the responsibility of a health professional or a social work professional, or By another person who in the circumstances owes a duty of confidentiality 	 Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/ You have the right to: 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: accuracy of the data is contested, the processing is unlawful or, where we no longer need the data for the purposes of the processing. 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. 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 Riverside Medical 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
	records on EMIS GP system, which gives authorised access to order repeat medication		have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at:
	The Data Retention Period Patient medication records are kept indefinitely in an electronic format in the GP practice. The recommendation is that care homes should		Information Commissioner's Office Wycliffe House Water Lane
	keep medicines administration records for at		Updated 22/06/2023

least 8 years after the person's care ended at the service. After 8 years, review the records. If they are no longer needed, destroy them in line with local policies.WilmslowWest Kent HCP Integrated Neighbourhood Working – Weald PCN – Mental Health MDT Howell Surgery Lamberhurst Surgery Marden Medical Practice/North Ridge Old Parsonage Surgery Old School Surgery Narden Medical CentreThis project is initially a 6-9-month pilot starting 1st January 2023, implementing a mental health whDT across practices that form the Weald PCN for frequent attenders of primary care who's main presenting complaint is related to mental health. This is to provide a more personalised and joined up management of care to this group of patients by developing a multi-agency response informed by both mental health workers but also social care and community-based staff in the form of a Multi- Disciplinary Team meeting. The MDT will consist of core members such as:Lawfulness of processing is based on the fulk Worker, Mental Health Practitioner, Social Prescriber Link Worker, Mental Health Practitioner, Pharmacist, Primary Care Mental Health Team & Frequent Attender TeamLawfulness conflicat care and community-based staff in the form of a Multi- Disciplinary Team meeting. The MDT will consist of core members such as:Lawfulness conflicat care and commissioning. Processing is further carried out under the lawfulness conflicat authority vested in the controller e.g. in order to provide healthcare servicesWilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745Weith Dist control to the personal information;Lawfulness of processing is based on the fulk Workers but also social Care and community-based staff in the form of a Multi- Disciplinary Team meeting.	
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Limited Each GP Practice within The Weald PCN and services on the basis of Union or Riverside Medical Practice process your data,	
Kent and Medway recognises that different record retention Member State law or pursuant to contract have the right to appeal/complain to the Inform	
NHS Care and Social arrangements are needed in respect of with a health professional and subject to the Commissioner (IC). The IC can be contacted and subject to the	:
Partnership Trust retention and disposal schedules of Shared conditions and safeguards. Maidstone and Data. Therefore, each Party shall conditions and safeguards.	
Tunbridge Welle	
Tunbridge Wells NHS Trustensure it has a written policy and procedure for the archiving, retention and disposal ofFor the purpose of Article 9 (2) (h) of GPDR the circumstances in which the processing ofWycliffe House	
Kent Council information in accordance with Records- shared personal data is carried out is subject Water Lane	
Change Grow Live management-code of practice 2021 to the conditions and safeguards referred to	
(CGL) in article 9(3) of the GDPR (obligation of	

Live Well Kent (IAPT) Porchlight Kent Community Health NHS Foundation Trust We are with you	All joint controllers , will store data on their systems and delete/destroy in compliance with the NHS records managements code of practice 2021 Paper records once uploaded to the digital records will be destroyed using a crosscut	professional secrecy) there in accordance with DPA section 11(1) these include circumstances in which it is carried out - by or under the responsibility of a health professional or a social work professional or by another person who in the circumstances	Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: <u>https://ico.org.uk/global/contact-us/</u>
IESO West Kent Mind SECAMB EMIS Clinical Services DOCMAN	shredder or subcontracted to a confidential waste company that complies with European Standard EN15713	owes a duty of confidentiality under an enactment or rule of law. The use is necessary for compliance with a legal obligation to which the WKPC is subject. the use is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the	
Dementia	The Dementia Coordinator programme has	controller e.g. in order to provide healthcare services processing is necessary for reasons of public interest in the area of public health, such as ensuring high standards of quality and safety of health care Article 6(1)(e) processing is necessary for the	You have the right to:
Coordinators Service All GP Practices across Kent and Medway East Kent Age UK Herne Bay West Kent Alzheimer's and Dementia Support Service NHS Social Care Partnership Trust Memory Assessment Service	been jointly commissioned by Kent and Medway ICB and Kent County Council (KCC). Whilst the Service will be made available across Kent and Medway, it should be noted that Medway Council have not commissioned the Service. Principally, the aim is to establish Dementia Coordinators within the Specialist Dementia Support services. This is to create a model of care that proactively responds to ongoing care needs, has no service gaps enabling us to work collaboratively across our local health and care system. There will be added benefit in the model of coordination selected to support people pre and post diagnosis integrating with Primary Care Networks, pursuing a more rapid assessment process and reassuring GPs that there is a full supportive pathway of care for people following diagnosis.	Particle 0(1)(e) processing is necessary for the performance of a task in the public interest or in the exercise of official authority vested in the controller Access to the information is to provide direct care Article 9 (2) (h) - processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional and subject to the conditions and safeguards Access to the information is to provide direct care The lawfulness of sharing/processing of Shared Personal Data set out in Article 6(1)	 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: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. 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

	The Data Retention Period	(e) of the GDPR (as above) is also permitted	purposes of direct provision of care, and compliance
	Data is stored electronically in clinically systems	under Section 8 (d) of DPA 2018:	with a legal obligation to which we are subject.
	and deleted/destroyed in compliance with the	Processing is necessary for the exercise of	If you wish to everying only of your rights places
	NHS Record Management Code of Practice	statutory functions.	If you wish to exercise any of your rights please
	2021.As Joint Controllers, providers will store	Access to the information is to provide direct	contact the Practice (data controller) or the DPO and
	data on their systems and delete/destroy in	care.	your request will be carefully considered.
	compliance with the NHS Record Management Code of Practice 2021. Paper records will be destroyed using a crosscut shredder or subcontracted to a confidential waste company that complies with European Standard EN15713.		Right to complain: If you are dissatisfied with the way Riverside Medical Practice process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at:
	The Dementia Registers are held on GP EMIS		Information Commissioner's Office
	systems, which will be updated by the Dementia Coordinators.		Wycliffe House
			Water Lane
			Wilmslow
			Cheshire
			Tel: 0303 123 1113 or 01625 545 745
			Email: https://ico.org.uk/global/contact-us/
Targeted Lung	The TLHC programme will identify those eligible	Within the UK General Data Protection	You have the right to:
Health Check	for a Targeted Lung Health Check (55-74 years	Regulation (GDPR), Article 6 sets out the	 To access, view or request copies of your
NHS Kent and	of age who have ever smoked) and invite them	conditions for lawfully processing personal	personal information;
Medway	for a lung health check. This is done via a data	data and Article 9 sets out further conditions	 request rectification of any inaccuracy in your
East Kent Hospitals	extraction from GP Clinical system EMIS by	for processing special categories of personal	personal information;
University NHS	Apollo Extraction to HISBI > EKHUFT extract	data. As personal data concerning health is	 restrict the processing of your personal
Foundation Trust	and link to internal data	one of the special categories, organisations	information where:
St James Surgery	If identified as high risk following the initial lung	that process such data must be able to	\checkmark accuracy of the data is contested,
Church Lane	health check appointment conducted by a	demonstrate they have met a condition in	 ✓ the processing is unlawful or,
Surgery	TLHC nurse, the patients will then be invited for	both Article 6 and Article 9.	 ✓ where we no longer need the data for the
Pencester Surgery	a low dose CT scan. The only patient-level	The lawful basis under the UK General Data	purposes of the processing.
Sun Lane	information that will be made available to East	Protection Regulation will be:	
Balmoral Surgery	Kent Hospitals University NS Foundation Trust	To support health and social care:	Right to object: In line with the GDPR Article 21, you
St Richards Road	(EKHUFT), as lead provider for the programme, will be patient contact and demographic details,	• Article 6(1)(e) 'necessary for the performance of a task carried out in the public	have a general right to raise an objection to the
Surgery White House	patient date of birth, NHS number, and smoking	interest or in the exercise of official	processing of your personal data in some particular
Surgery	status (which is a QOF flag). Only members of	authority'. and	circumstances. This right only applies where we
Orchard House	the EKHUFT TLHC team will be able to access	Article 9(2)(h) 'necessary for the purposes	a b 11
The New Surgery	this patient-level information, and patient details	of preventative or occupational medicine for	cannot demonstrate compelling legitimate grounds for
The New Surgery	will only be used for the purpose of inviting	the assessment of the working capacity of the	continued processing of your personal data for the
	win only be used for the purpose of inviting	I the assessment of the working capacity of the	

Guildhall Street Surgery The Cedars Surgery High Street Surgery Sandgate Road Peter Street Surgery Oak Hall Oaklands Health Centre Hawkinge And Elham Folkestone East Family Practice Aylesham Medical Practice Central Lydden Surgery Manor Clinic Church Road Pencester Health Martello Health Centre New Lyminge Surgery Manor Road Surgery Buckland Medical Practice White Cliffs Medical Centre Park Farm Sandwich Medical practice Harbour Medical Practice	eligible participants to take part in this programme, and for the purpose of administrating the programme and subsequent recall. EKHUFT will also use the information to crosscheck whether the participant has had a CT scan within the previous twelve months, as per national eligibility criteria. Data Retention Period Data is stored electronically in clinically systems used by the Acute trusts including such as infoflex and PAS and deleted/destroyed in compliance with the NHS Record Management Code of Practice 2021.	employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services"; Schedule 1, Part 1 DPA 2018 supplementary condition Health or social care purposes 2(1)This condition is met if the processing is necessary for health or social care purposes. (2)In this paragraph "health or social care purposes" means the purposes of— (a)preventive or occupational medicine, and (d)the provision of health care or treatment,	purposes of direct provision of care, and compliance with a legal obligation to which we are subject. 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 Riverside Medical 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: <u>https://ico.org.uk/global/contact-us/</u>
eHUB Proof of Concept - Pilot Programme – eConsultation Room eHUB Proof of Concept - Pilot Programme – eConsultation Room	eHubs will enable GP practices to come together and create a centralised model for supporting the management of online consultations and remote monitoring at a practice / PCN level, known as a virtual online consultation hub (eHub)	Article 6(1)(e) processing is necessary for the performance of a task in the public interest or in the exercise of official authority vested in the controller Access to the information is to provide direct care	 You have the right to: 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: ✓ accuracy of the data is contested,

The aim for the eHubs will be to enable GP practices and NHS Trusts to come together and create a centralised model for supporting the management of:	Article 9 (2) (h) - processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis,	 ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing.
Online Consultations	the provision of health or social care or treatment or the management of health or	Right to object: In line with the GDPR Article 21, you have a general right to raise an objection to the
COVID Oximetry	social care systems and services on the basis of Union or Member State law or pursuant to	processing of your personal data in some particular circumstances. This right only applies where we
 Acute breathing difficulties: Children with RSV-like illnesses and adults 	contract with a health professional and subject to the conditions and safeguards	cannot demonstrate compelling legitimate grounds for continued processing of your personal data for the
What are eHubs?	Access to the information is to provide direct	purposes of direct provision of care, and compliance with a legal obligation to which we are subject.
 eHubs coordinate remote monitoring services and support clinical decision making. The eHub is a virtual 'house' enabled to 	care The lawfulness of sharing/processing of Shared Personal Data set out in Article 6(1)	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.
support teams/networks of clinicians working in virtual 'rooms' to monitor patients including	(e) of the GDPR (as above) is also permitted under Section 8 (d) of DPA 2018:	Right to complain: If you are dissatisfied with the way
recognition, assessment and out-of-hospital monitoring.	Processing is necessary for the exercise of statutory functions.	Riverside Medical Practice process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at:
	Access to the information is to provide direct care.	Information Commissioner's Office
	The lawfulness of sharing/processing Shared	Wycliffe House
	Personal Data set out in Article 9 (2) (h) of the GDPR (as above) is permitted under DPA	Water Lane
	Section 10 (health and social care purposes)	Wilmslow
	Conditions relied upon for obligations of	Cheshire Tel: 0303 123 1113 or 01625 545 745
	professional secrecy.	
	For the purpose of Article 9 (2) (h) of the GDPR, Part 2, Schedule 1, DPA 2018(Health and Social Care purposes) is also engaged	Email: https://ico.org.uk/global/contact-us/
	For the purposes of Article 9(2) (h) of the GDPR, the circumstances in which the processing of Shared Personal Data is carried out is subject to the conditions and safeguards referred to in Article 9(3) of the GDPR (obligation of professional secrecy).	

The Digitalisation of	This work forms part of a national NHSX	Therefore, in accordance with DPA Section 11(1), these include circumstances in which it is carried out – (a) by or under the responsibility of a health professional or a social work professional, or (b) by another person who in the circumstances owes a duty of confidentiality under an enactment or rule of law 6(1)(e) – Processing is necessary for the	You have the right to:
Lloyd George Records GP Practices Iron Mountain EMIS	This work forms part of a haltonal NHSX acceleration programme to fully digitalise Lloyd George medical records (historic paper records). The provider will be determined through a procurement process supported by the NHSE regional team. The tender process will determine a range of suppliers who meet the minimum criteria to support the digitalisation of Lloyd George Medical Records. This will ensure the procurement is fit for purpose. This work follows an extensive audit of current Lloyd George storage situation across the primary care estate. Significant opportunities for repurposing the use of storage have been identified such as creating additional clinical rooms, admin rooms to support Practice and PCN development. A five-year framework for GP contract reform to implement The NHS Long Term Plan states that all patients will be able to have digital access to their full records from 2020	o(1)(e) – Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. 9(2)(h) – Processing is necessary for the purposes of preventative or occupational medicine, for assessing the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or management of health or social care systems and services on the basis of Union or Member State law or a contract with a health professional.	 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: accuracy of the data is contested, the processing is unlawful or, where we no longer need the data for the purposes of the processing. 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. 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 Riverside Medical Practice process your data, you have the right to appeal/complain to the Information Commissioner's Office

HCRG Care Group and GPs EMIS DGS GP Practices The information sharing agreement has been drafted to support clinicians in sharing relevant and apropriate clinical information between the GP practices and Adult Community services within HCRG Care Group for the purposes of Direct Care, using the EMIS Clinical information system. The GPs will sign up to the EMIS Configuration document which will be managed by the HCMG Care Group a GP practices and Adult Community. services within HCRG Care technical information system. The GPs will sign up to the EMIS Configuration delialed in this agreement is: 1. To deliver health care to patients 2. Support services that are managed by the HCRG Care Group & GP practices 3. To allow appropriate data sharing of care records through EMIS to EMIS HCRG Care Ltd Article 6(1)(e) - "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authrity. You have the right to: • To access, view or request personal information social care services the condition is: Article 9(2)(h) - "processing is necessary for the performance of a task carried out in the purposes of preventive or occupational medicine, for medical diagnosis, the provision of health or social care systems and services' HCRG Care Ltd You have the right to: • To access, view or request personal information excline processing of your systems and services' HCRG Care Ltd Data Retention Period with each pattner organisation's retention informed by the Records Management Code of informed by the Records Management Code of informed by the Records Management Code informed by the Records Management Code inf				Wycliffe House
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HCRG Care Group and GPs EMIS DGS GP PracticesThe information sharing agreement has been drafted to support clinicians in sharing relevant and appropriate clinical information between the GP practices and Adult Community services within HCRG Care Group for the purposes of Direct Care, using the EMIS clinical information system. The GPs will sign up to the EMIS clinical information detailed in this agreement is: 1. To delive health care to patients 2. Support services that are managed by the HCRG Care Group & GP practicesArticle 6(1)(e) - 'processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority'.You have the right to: To accuracy of the dati solical care services the condition is: Article 9(2)(h) - 'processing is necessary for the purposes of the sharing of information detailed in this agreement is: 3. To allow appropriate data sharing of care records through EMIS to EMIS HCRG Care LtdArticle 6(1)(e) - 'processing is necessary for the processing is necessary for the purposes of the sharing of information detailed in this agreement is: 3. To allow appropriate data sharing of care records through EMIS to EMIS HCRG Care LtdArticle 6(1)(e) - 'processing is necessary for the purposes of health or social care or treatment or the management of health or social care or treatment or the management of health or social care or treatment or the streatment set or patients? Support services that are managed by HCRG Care Group & GP practices 3. To allow appropriate data sharing of care records through EMIS to EMIS HCRG Care LtdArticle 6(1)(e) and Article 9(2)(h) is the law lausis YesRight to object: In line with the full have a general right to raise and processorid four presonal date circumstances. This				Wilmslow
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 HCRG Care Group and GPs EMIS DGS GP Practices When information sharing agreement has been and appropriate clinical information between the GP practices and Adult Community services within HCRG Care Group for the purposes of Direct Care, using the EMIS clinical information system. The GPs will sign up to the EMIS clinical information document which will be managed by the HCRG Care Group clinical systems team who will then complete the technical information detailed in this agreement is: To deliver health care to patients Support services that are managed by the Care Group & GP practices To allow appropriate data sharing of care records through EMIS to EMIS HCRG Care Ltd Data Retention Period All data, whether held on paper or in electroric format must be stored and disposed of in line with each pather organisation's retention and disposal schedule. Retention periods should be informed by the Records Management Code of Practice published on 4 August 2021 by the 				Tel: 0303 123 1113 or 01625 545 745
 and GPS EMIS DGS GP Practices drafted to support clinicians in sharing relevant and appropriate clinical information between the GP practices and Adult Community services within HCRG Care Group for the purposes of Direct Care, using the EMIS clinical information document which will be managed by the HCRG Care Group clinical systems team who will the complete the technical information detailed in this agreement is: 1. To deliver health care to patients 2. Support services that are managed by HCRG Care Group & GP practices 3. To allow appropriate data sharing of care records through EMIS to EMIS HCRG Care Ltd Data Retention Period All data, whether held on paper or in electronic format must be stored and disposed of in line with each pather croganisation's retention and disposal schedule. Retention periods should be the Records Management Code of Practice published on 4 August 2021 by the process of staguarding Purposes For the purposes of staguarding Purposes For the purposes of saks carried out in the public interest or in the exercise of official authority. To access, view or request personal information; erecurds the technical appropriate data sharing of care records through EMIS to EMIS HCRG Care Ltd; Data Retention Period All data, whether held on paper or in electronic format must be stored and disposed of in line with each partner organisation's retention and disposal schedule. Retention periods should be informed by the Records Management Code of Practice published on 4 August 2021 by the Sharing for Safeguarding Purposes For the purposes of safeguarding Purposes For the purpose of safeguarding Purposes For the purposes of safeguarding Purpos				Email: https://ico.org.uk/global/contact-us/
implied powers for local authorities to share information to safeguard children. Local authorities have a duty to investigate where a	and GPs EMIS DGS GP Practices Swale GP Practices	drafted to support clinicians in sharing relevant and appropriate clinical information between the GP practices and Adult Community services within HCRG Care Group for the purposes of Direct Care, using the EMIS clinical information system. The GPs will sign up to the EMIS Configuration document which will be managed by the HCRG Care Group clinical systems team who will then complete the technical information sharing. The purpose of the sharing of information detailed in this agreement is: 1. To deliver health care to patients 2. Support services that are managed by HCRG Care Group & GP practices 3. To allow appropriate data sharing of care records through EMIS to EMIS HCRG Care Ltd <u>Data Retention Period</u> All data, whether held on paper or in electronic format must be stored and disposed of in line with each partner organisation's retention and disposal schedule. Retention periods should be informed by the Records Management Code of	the performance of a task carried out in the public interest or in the exercise of official authority'. Where special categories personal data is being processed for purposes related to the commissioning and provision of health and social care services the condition is: Article 9(2)(h) – 'processing is necessary for the purposes of preventive or occupational medicine, for medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services' HCRG Care Ltd, company number 5466033 registered in England and Wales at The Heath Business and Technical Park, Runcorn, Cheshire WA7 4QX Send any correspondence to the address at the top of this letter UK GDPR Article 6(1)(e) and Article 9(2)(h) is the lawful basis Yes Sharing for Safeguarding Purposes For the purposes of safeguarding vulnerable patients/service users, the Article 6(1)(e) and 9(2)(b) may apply. The Children Act 1989 (CA) establishes implied powers for local authorities to share information to safeguard children. Local authorities have a duty to investigate where a child is the subject of an emergency protection order, is in police protection or	 You have the right to: 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

	that a child is suffering or is likely to suffer	Wycliffe House
	significant harm. The CA also requires local	
	authorities 'to safeguard and promote the	Water Lane
	welfare of children within their area who are	Wilmslow
	in need' and to request help from specified	WIINSIOW
	authorities including NHS organisation. These	Cheshire
	are required by the CA to comply 'with the	
	request if it is compatible with their own	Tel: 0303 123 1113 or 01625 545 745
	statutory or other duties and obligations and	Email: https://ico.org.uk/global/contact-us/
	does not unduly prejudice the discharge of	
	any of their functions'. Under the Children Act	
	2004 local authorities must make	
	arrangements to promote cooperation with	
	relevant partners and others, to improve well-	
	being.	
	• Article 6(1)e – 'processing is necessary for	
	the performance of a task carried out in the	
	public interest or in the exercise of official	
	authority'.	
	Where special categories personal data is	
	being processed for purposes related to the	
	commissioning and provision of health and	
	social care services the condition is:	
	Article 9(2)(b) – "is necessary for the	
	purposes of carrying out the obligations and	
	exercising the specific rights of the controller	
	or of the data subject in the field ofsocial	
	protection law in so far as it is authorised by	
	Union or Member State law'	
	UK GDPR Article 6(1)(e) and Article 9(2)(b) is	
	the lawful basis	
	Explicit consent is available as a lawful basis	
	for processing special categories of data but	
	is not normally use consent as a legal basis	
	in a healthcare setting.	
	aaano ootangi	

Processing Activities: Other Primary Care Services delivered for the purpose of direct care

Recipients or categories of recipients of the personal or special categories of personal data	Purpose of the processing and data retention periods	Lawful basis	Your Rights
Integrated Urgent Care Service (IUC) - covering Out of Hours and NHS 111 service	Integrated Urgent Care Service (IUC) is an urgent care service delivered across Dartford, Gravesham, Swanley, Medway, Swale, East and West Kent 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. 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. The source of the information shared in this way is your electronic GP record. <u>Data Retention Period</u>	The processing of personal data is permitted under the following GDPR and DPA conditions: <u>GDPR Article 6(1) (e) - public interest or in</u> the exercise of official authority: <u>DPA Section 8 (d) - processing is necessary</u> for the exercise of statutory functions; The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions: <u>GDPR Article 9 (2) (h) - processing is</u> <u>necessary for medical or social care</u> <u>treatment or, the management of health or</u> <u>social care systems and services;</u> <u>DPA Section 10 (1) (c) – processing is</u> <u>necessary for health and social care</u> <u>purposes;</u>	 You have the right to: 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: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. 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.

	All records held by the Practice will be kept for the duration specified in the <u>Records</u> <u>Management Codes of Practice for Health and</u> <u>Social Care.</u>	In accordance with DPA Schedule 1, Part 1, (2) -health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services. Related Legislations: Section 251B Health and Social Care (Safety and Quality Act) 2015 (Duty to Share);	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 Riverside Medical 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/
Continuing Health Care (CHC)	 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. 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. 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. 	The processing of personal data is permitted under the following GDPR and DPA conditions: <u>GDPR Article 6(1) (e) - public interest or in</u> the exercise of official authority; <u>DPA Section 8 (d) - processing is necessary</u> for the exercise of statutory functions; The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions: <u>GDPR Article 9 (2) (h) - processing is</u> <u>necessary for medical or social care</u> <u>treatment or, the management of health or</u> <u>social care systems and services;</u>	 You have the right to: 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: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. 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

	The source of the information shared in this way is your electronic GP record. Data Retention Period All records held by the Practice will be kept for the duration specified in the <u>Records</u> <u>Management Codes of Practice for Health and</u> <u>Social Care.</u>	DPA Section 10 (1) (c) – processing is necessary for health and social care purposes; In accordance with DPA Schedule 1, Part 1, (2) health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services. Related Legislations: Common Law of Duty of Confidentiality; Section 251B Health and Social Care (Safety and Quality Act) 2015 (Duty to Share);	compliance with a legal obligation to which we are subject. 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 Riverside Medical 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/
Evaluation of the Dartford, Gravesham and Swanley (DGS) Health & Care Partnership (HCP) - PCN Integrated Community Frailty Service	As part of DGS HCP's programme to develop a whole system integrated approach to frailty and adult complex care, the DGS system partners have identified the need for a service to support frail and complex patients. The service is part of a collaborative approach to identifying and supporting frail residents in the DGS area, working in particular with Darent Valley Hospital, Primary Care Networks across DGS, HCRG (formally Virgin Care), ellenor hospice, social prescribing services and local care home providers. It will work both in the community and upon discharge, to help maintain people's health, wellbeing and independence, and ensure their carers are referred to any necessary support services, thus helping to prevent unwarranted hospital attendances and admissions. The service will provide two key areas of work – Proactive and Reactive care but will complement existing	The most appropriate legal basis for processing identifiable data in this case is under GDPR – Article 6 (e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; The ICB has both a contract in place with Mede Analytics and a Joint Controllers Agreement in place with Practices that describes that GP data will be pseudonymised at source, extracted and transferred to Mede Analytics by Apollo Medical Software Solutions Ltd (Apollo) where the ICB will be able to access pseudonymised patient records and use this data for the purpose of providing Business Intelligence (BI) and Analytics services.	 You have the right to: 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: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. 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

services by focussing primarily on the pro- active element.	compliance with a legal obligation to which we are subject.
The Retention Period BI team keeps all data in line with the ICB Retention Policy	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 Riverside Medical 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/

Processing Activities: Statutory Disclosures of Information

Recipients or categories of recipients of the personal or special categories of personal data	Purpose of the processing and data retention periods	Lawful basis	Your Rights
Safeguarding Concerns – to prevent an individual, or to prevent a serious crime	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.	The processing of personal data is permitted under the following GDPR and DPA conditions: <u>GDPR Article 6(1) (e) - public interest or in</u> <u>the exercise of official authority;</u>	This sharing is a legal and professional requirement and therefore there is no right to object. <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

	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)	DPA Section 8 (d) - processing is necessary for the exercise of statutory functions; The processing of special categories of personal data concerning health is permitted under the following conditions:	or where there is a reasonable cause to suspect that a child is suffering or is likely to suffer harm. 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
	The source of the information shared in this way is your electronic GP record. Data Retention Period 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.	Article 9 (2) (c) – the processing is necessary to protect the vital interests of the data subject; 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 in the field of employment and social security and social protection law; In accordance with DPA Schedule 1, Part 3,	Right to complain: If you are dissatisfied with the way Riverside Medical 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
		 (30) (b) - the conditions for protecting individual's vital interests is met where the data subject is physically or legally incapable of giving consent. In accordance with DPA Schedule 1, Part 2 (18) (1a) - the conditions is met where the processing is necessary for protecting an individual from neglect or physical, mental or emotional harm, or protecting the physical, mental or emotional well-being of an individual Related Legislations: Section 47 of The Children Act 1989. Section 45 of the Care Act 2014 	Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/
<u>The Care Quality</u> <u>Commission (CQC)</u>	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 processing of personal data is permitted under the following conditions: <u>Article 6(1) (c) - processing for legal</u> <u>obligation;</u>	 You have the right to: 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:

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	the purposes of their assessment and investigation of significant safety incident. 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. The source of the information shared in this way is your electronic GP record. Data Retention Period All records held by the Practice will be kept for the duration specified in the Records	DPA Section 8 (d) - Processing is necessary for the exercise of statutory functions.The processing of special categories of personal data concerning health is permitted under the following conditions:Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and servicesDPA Section 10 (1) (c) - health and social care purposes.	 ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. 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.
	Management Codes of Practice for Health and Social Care.	In accordance with DPA Schedule 1, Part 1 (2) health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services.	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 Riverside Medical 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/
Law Enforcement and Regulatory Bodies	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	The processing of personal data is permitted under the following conditions: <u>Article 6(1) (e) - public interest or in the</u> <u>exercise of official authority;</u>	This sharing is a legal and professional requirement and therefore there is no right to object. Personal data processed for these purposes are exempt for the first data protection principle (processed lawfully, fairly and in a transparent manner).

	 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. 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</i> if there is concern for road safety, which would be for both the individual and the wider public. Riverside Medical Practice will review each request based on its merits before deciding whether to release information to the 'relevant authorities'. The source of the information shared in this way is your electronic GP record. Data Retention Period All records held by the Practice for Health and Social Care. 	DPA Section 8 (d) - Processing is necessary for the exercise of statutory functions. The processing of special categories of personal data concerning health is permitted under the following conditions: Article 9 (2) (G) – the processing is necessary for reasons of substantial public interest In accordance with DPA Schedule 1, Part 2, (10) (1c) – the condition is met where the processing is necessary for the prevention or detection of an unlawful act	Right to complain: If you are dissatisfied with the way Riverside Medical 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/
Medico-Legal	Medico-Legal - Where a medical professional is holding personal data for the purpose of providing medical reports in connection with legal action. The source of the information shared in this way is your electronic GP record.	The processing of personal data is permitted under the following conditions: <u>GDPR Article 6(1) (c) - processing for legal</u> <u>obligation;</u> The processing of special categories of personal data concerning health is permitted under the following conditions: <u>GDPR Article 9 (2) (f) – the processing is</u> <u>necessary for the establishment, exercise or</u> <u>defence of legal claims;</u> <u>In accordance with DPA Schedule 1, Part 3,</u> (33) - the conditions for processing for legal <u>claims is met where it is in connection with,</u>	This sharing is a legal and professional requirement and therefore there is no right to object. Right to complain: If you are dissatisfied with the way Riverside Medical 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

General Medical	General Medical Council (GMC) is a public	any legal proceedings including prospective legal proceedings or; for the purpose of obtaining a legal advice or; establishing exercising or defending legal rights.	Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/ You have the right to:
<u>Council (GMC)</u>	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. 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. The source of the information shared in this way is your electronic GP record. Data Retention Period All records held by the Practice will be kept for the duration specified in the <u>Records</u> <u>Management Codes of Practice for Health and Social Care.</u>	under the following conditions: <u>Article 6(1) (c) - processing for legal</u> <u>obligation:</u> <u>GDPR Article 6(1) (e) - public interest or in</u> the exercise of official authority; <u>DPA Section 8 (d) - processing is necessary</u> <u>for the exercise of statutory functions;</u> The processing of special categories of personal data concerning health is permitted under the following paragraph: <u>Article 9 (2) (h) - processing is necessary for</u> <u>medical or social care treatment or, the</u> <u>management of health or social care systems</u> <u>and services</u> <u>DPA Section 10 (1) (c) – processing is</u> <u>necessary for health and social care</u> <u>purposes;</u> <u>In accordance with DPA Schedule 1, Part 1,</u> <u>(2) - health or social care purposes means</u> <u>the purposes of preventive or occupational</u> <u>medicine; medical diagnosis; the provision of</u> <u>health care or treatment; the provision of</u> <u>social care, or the management of health</u> <u>care systems or services or social care</u> <u>systems or services.</u> <u>Related Legislation:</u> <u>The Medical Act 1983</u>	 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: accuracy of the data is contested, the processing is unlawful or, where we no longer need the data for the purposes of the processing. 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. Right to complain: If you are dissatisfied with the way Riverside Medical 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/
The Health Service Ombudsman (HSO)	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. The HSO has the power to request access to a patient's medical records for the purpose of an investigation. The source of the information shared in this way is your electronic GP record. Data Retention Period 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.	The processing of personal data is permitted under the following paragraph: Article 6(1) (c) - processing for legal obligation; GDPR 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; DPA Section 10 (1) (c) – processing is necessary for health and social care purposes; In accordance with DPA Schedule 1, Part 1, (2) - health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services. Related Legislation: The Health Services Commissioners Act 1993,s12	 You have the right to: 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: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. 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. Right to complain: If you are dissatisfied with the way Riverside Medical Practice process your data, you have the right to appeal/complain to the Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745

NHS Counter Fraud	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. The source of the information shared in this way is your electronic GP record. Data Retention Period All records held by the Practice will be kept for the duration specified in the <u>Records</u> <u>Management Codes of Practice for Health and</u> <u>Social Care.</u>	The processing of personal data is permitted under the following paragraph: Article 6(1) (c) - processing for legal obligation; 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 In accordance with DPA Schedule 1, Part 1, (2) - health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services. Related Legislation: S10 NHS Act 2006	Right to complain: If you are dissatisfied with the way Riverside Medical 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/
NHS Digital – Statutory Data Collection	NHS Digital 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. NHS Digital carries out <u>National Data</u> <u>collections/ extraction</u> from the GP record. These include: National Diabetes Audit (NDA) - A national	The processing of personal data is permitted under the following condition: <u>Article 6(1) (c) - processing for legal</u> <u>obligation;</u> The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions: <u>GDPR Article 9 (2) (h) - processing is</u>	 You have the right to: 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: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing.
	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	necessary for medical or social care treatment or, the management of health or social care systems and services;	Right to object: You do not have the right to object as the sharing is a legal and professional requirement under the law.

	mandatory data extraction under section 259 of	DPA Section 10 (1) (c) – processing is	Whilst there is no right to object when we are
	the Health and Social Care Act 2012, this	necessary for health and social care	complying with a legal obligation, NHS Digital
	means that we are compelled by law to share your data	purposes;	respects Type 1 objections (9Nu0 read codes) present in the GP record and no data will be
	your data	In accordance with DPA Schedule 1, Part 1,	extracted and uploaded if so.
	Individual GP Level Data (IGPLD) - A national	(2) - health or social care purposes means	extracted and uploaded if so.
	monitoring system to enable NHS Digital to	the purposes of preventive or occupational	Right to complain: If you are dissatisfied with the
	provide GPs with clinical information on the	medicine; medical diagnosis; the provision of	way Riverside Medical Practice process your data,
	care provision for their patients. The data	health care or treatment; the provision of	you have the right to appeal/complain to the
	extracted includes the NHS number. IGPLD is a	social care, or the management of health	Information Commissioner (IC). The IC can be
	mandatory data extraction under 259 of the	care systems or services or social care	contacted at:
	Health and Social Care Act 2012, this means	systems or services.	Information Commissioner's Office
	that we are compelled by law to share your data		
	FGM) - NHS Digital collects data on FGM within	Related Legislation:	Wycliffe House
	the NHS in England on behalf of the		Water Lane
	Department of Health (DH). Data collected is used to produce information that helps improve	S259 of the Health and Social Care Act 2012	Wilmslow
	NHS and local authorities to improve on how		WIIIISIOW
	they support women and girls who have had or,		Cheshire
	who are at risk of FGM.		Tel: 0303 123 1113 or 01625 545 745
			Tel. 0303 123 1113 0I 01625 545 745
	FGM Enhanced Dataset is a mandatory data		Email: https://ico.org.uk/global/contact-us/
	extraction under section 259 of the Health and		
	Social Care Act 2012, this means that we are		
	compelled by law to share your data when		
	required.		
	The source of the information shared in this		
	way is your electronic GP record.		
	Data Retention Period		
	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		
NHS England	NHS England is responsible for securing,	The processing of personal data is permitted	You have the right to:
	planning, designing and paying for Primary	under the following conditions:	
	Care & Specialised NHS services not otherwise		

National Cancer	funded by Kent and Medway ICBs. This includes planned and emergency hospital care, mental health, rehabilitation, community and primary medical care (GP) services. We may often share personal information with NHS England potentially for safeguarding concerns that need escalating beyond our borough. Where required the Practice may also have to share staff personal information with NHS England for the purpose of allegations framework or performers list. The source of the information that may be shared in this instance are in the staff record and patient's electronic GP record. Data Retention Period All records held by the Practice will be kept for the duration specified in the <u>Records</u> Management Codes of Practice for Health and Social Care.	Article 6(1) (c) - processing for legal obligation; DPA Section 8 (d) - processing is necessary for the exercise of statutory functions; 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. In accordance with DPA Schedule 1, Part 1, (2) - health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of social care, or the management of health care systems or services or social care systems or services. The processing of personal data is permitted	 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: accuracy of the data is contested, the processing is unlawful or, where we no longer need the data for the purposes of the processing. Right to object: You do not have the right to object as the sharing is a legal and professional requirement under the law. 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 Riverside Medical Practice process your data, you have the right to appeal/complain to the 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/
<u>Diagnosis Audit</u> (NCDA).	looks at primary and secondary care data relating to patients diagnosed with cancer. It helps to understand pathways to cancer	Article 6(1) (c) - processing for legal obligation;	 To access, view or request copies of your personal information; request rectification of any inaccuracy in your personal information;

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	diagnosis, what works well and where improvements could be made.	DPA Section 8 (d) - processing is necessary for the exercise of statutory functions; The processing of special categories of	 restrict the processing of your personal information where: ✓ accuracy of the data is contested,
	The audit looks specifically at clinical practice in order to understand:	personal data concerning health is permitted under the following paragraph:	 ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing.
	 interval length from patient presentation to diagnosis; use of investigations prior to referral; what the referral pathways for patients 	Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services.	Right to object: You do not have the right to object as the sharing is a legal and professional requirement under the law.
	 what the referral pathways for patients with cancer are and how they compare with those recorded by the cancer registry 	In accordance with DPA Schedule 1, Part 1, (2) - health or social care purposes means the purposes of preventive or occupational	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.
		medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services.	Right to complain: If you are dissatisfied with the way Riverside Medical 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/
Public Health	 Public Health England is an executive agency of the Department of Health and Social Care, and a distinct organisation with operational autonomy. The main purpose of the organisation is to protect and improve the health and wellbeing of 	The processing of personal data is permitted under the following paragraph: <u>Article 6(1) (c) - processing for legal</u> <u>obligation:</u> The processing of special categories of personal data concerning health is	 You have the right to: 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:
	citizens. These include the management of smoking, alcohol and obesity; management of	permitted under the following condition:	 ✓ accuracy of the data is contested, ✓ the processing is unlawful or,

epidemics and infections such as flu, measles, tuberculosis or outbreaks of food poisoning.	<u>GDPR Article 9(2) (i) – processing is</u> necessary for reasons of public interest in the	✓ where we no longer need the data for the purposes of the processing.
The source of the information shared in this way is your electronic GP record. Data Retention Period	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	Right to object: You have a general right to raise an objection to your personal data being shared with the recipient.
All records held by the Practice will be kept for the duration specified in the <u>Records</u> <u>Management Codes of Practice for Health and</u> <u>Social Care.</u>	products or medical devices. In accordance with DPA Schedule 1, Part 1 (3) (a) – the condition is met where the processing is necessary for reasons of public interest in the area of public health, and is carried out by or under the responsibility of a health professional, or by another person who in the circumstances owes a duty of confidentiality under an enactment or rule of law.	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 Riverside Medical 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
	Related Legislations:The Health Protection (Notification)Regulations 2010 (SI 2010/659);The Health Protection (Local AuthorityPowers);Regulations 2010 (SI 2010/657)	Wycliffe House Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/
Processing Activities: Processing for the purposes of commissioning, planning, research and risk stratification

Kent and Medway Kent and Medway ICB are responsible for	The processing of personal data is permitted	You have the right to:
Kent and MedwayKent and Medway ICB 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'.In order to enable Kent and Medway ICB carry out its statutory responsibilities effectively, efficiently and safely, we may share personal data about you with the ICB 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.The source of the information shared in this way is your electronic GP record.Data retention period: All records held by the Practice will be kept for the duration specified in	The processing of personal data is permitted under the following condition: 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	 You have the right to: 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: accuracy of the data is contested, the processing is unlawful or, where we no longer need the data for the purposes of the processing. Right to object: You have a general right to raise an objection to your personal data being shared with the recipient. 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 Riverside Medical 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

	the <u>Records Management Codes of Practice for</u> <u>Health and Social Care.</u> <u>Data Retention Period</u> All records held by the Practice will be kept for the duration specified in the <u>Records</u> <u>Management Codes of Practice for Health and</u> <u>Social Care.</u>		Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/
"Risk Stratification" (Population Health Management and Case Finding)	Riverside Medical 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, cancer, risk of falling). Your records may be amongst	The processing of personal data is permitted under the following GDPR and DPA conditions: <u>GDPR Article 6(1) (e) - public interest or in</u> <u>the exercise of official authority;</u>	 You have the right to: 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
Recipient: Kent and Medway ICB	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,	DPA Section 8 (d) - processing is necessary for the exercise of statutory functions; The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions: <u>GDPR Article 9 (2) (h) - processing is</u> <u>necessary for medical or social care</u> <u>treatment or, the management of health or</u>	 information where: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. Right to object: You have a general right to raise an objection to your personal data being shared with the recipient for the purpose of Indirect Care. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO
	 investigations, treatments, therapies and or care. Risk stratification can be grouped into two purposes namely: 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 	social care systems and services; DPA Section 10 (1) (c) – processing is necessary for health and social care purposes; In accordance with DPA Schedule 1, Part 1,	and your request will be carefully considered. Right to complain: If you are dissatisfied with the way Riverside Medical Practice process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at:
	 data processor acting under contract with such a provider, it is treated as direct care. Indirect Care - understand the local population needs and plan for future requirement. The source of the information shared in this way is your electronic GP record. 	(2) - health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health	Information Commissioner's Office Wycliffe House Water Lane Wilmslow

	Data Retention Period	care systems or services or social care	Cheshire
	All records held by the Practice will be kept for the duration specified in the Records	systems or services.	Tel: 0303 123 1113 or 01625 545 745
	Management Codes of Practice for Health and Social Care.	Related Legislation:	Email: https://ico.org.uk/global/contact-us/
		Section 251 NHS Act 2006	
Research Partners	The Riverside Medical Practice participates projects ad 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 <u>Article 89(1) of GDPR</u> . 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. We may also use your medical records to carry out research within the practice. The source of the information shared in this way is your electronic GP record. You have the right to object to the sharing of your personal health data concerning your GP medical for research purposes. <u>Data Retention Period</u> All records held by the Practice will be kept for the duration specified in the <u>Records</u> <u>Management Codes of Practice for Health and Social Care.</u>	The processing of personal data is permitted under the following GDPR and DPA conditions: <u>GDPR Article 6(1) (e) - public interest or in</u> the exercise of official authority; <u>DPA Section 8 (d) - processing is necessary</u> for the exercise of statutory functions; The processing of special categories of personal data is permitted under the following GDPR and DPA conditions: Article 9 (2) (i) - 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 In accordance with DPA Schedule 1, Part 1, (4) - The condition for the processing is met where it is necessary for archiving purposes, scientific or historical research purposes or statistical purposes; carried out in accordance with Article 89(1) of the GDPR and DPA Section 19, and the processing is in the public interest.	 You have the right to: 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: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. Right to object: You have a general right to raise an objection to your personal data being shared with the recipient. 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 Riverside Medical 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/
Employment Processing	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. 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). Data Retention Period All records held by the Practice will be kept for the duration specified in the <u>Records</u> Management Codes of Practice for Health and <u>Social Care</u> .	The processing of personal data is permitted under the following GDPR and DPA conditions: <u>GDPR Article 6(1) (e) - public interest or in</u> the exercise of official authority; <u>DPA Section 8 (d) - processing is necessary</u> for the exercise of statutory functions; The processing of special categories of personal data is permitted under the following conditions: (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; In accordance with DPA Schedule 1, Part 1, (1a) - the the processing for employment, social security and social protection is met where it is for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the controller or the data subject in connection with employment, social security or social protection;	
			Water Lane
			Wilmslow
			Cheshire
			Tel: 0303 123 1113 or 01625 545 745

		Email: https://ico.org.uk/global/contact-us/

Processing Activities: Data Sharing Databases

System/database Recipients or categories of recipients of the personal or special categories of	Purpose of the processing and data retention period	Lawful basis	Your Rights
categories of personal data			

The Kent and Medway Care RecordThe Practice are one of the partner organisation's to the Kent and Medway Care Record. The KMCR is an electronic care recordThe processing of personal data is permitted under the following GDPR and DPA conditions:You have the right to:The processing of personal data is permitted under the following GDPR and DPA conditions:You have the right to: • To access, view or request copies of personal information;
• To access, New of request copies of
Record. The NMCR is an electronic care record conditions:
personal montation,
which links your health and social care information held in different provider outcome Article 6(1) (c) - processing for legal • request rectification of any inaccurate • request rectification of any inaccurate
information held in different provider systems, to one platform. This allows health and social <u>obligation:</u> erestrict the processing of your personal information;
to one platform. This allows health and social care professionals who have signed up to the <u>GDPR Article 6(1) (e) - public interest or in</u> • restrict the processing of your perso information where:
KMCR to access the most up to date the exercise of official authority; \checkmark accuracy of the data is contraction of the data is contracting of the data is con
information to ensure you receive the best
DPA Section 8 (d) - processing is necessary
you. To enable this sharing of information,
organisation's who use the KMCR have The processing of special categories of
agreements in place that allow the sharing of personal data concerning health is Right to object or opt-out: You have the
personal and special category data. For further permitted under the following GDPR and DPA raise an objection to your personal data b
information about the KMCR and the ways in conditions:
we will first need to explain how this may
GDPR Article 9 (2) (h) - processing is
necessary for medical or social care
treatment or, the management of health or If you wish to exercise any of your rights
social care systems and services; contact the Practice (data controller) or the
DPA Section 10 (1) (c) – processing is and your request will be carefully consider
necessary for health and social care Right to complain: If you are dissatisfied
<u>purposes;</u> way Riverside Medical Practice process y
In accordance with DPA Schedule 1, Part 1,
(\underline{z}) - health of social care purposes means
the purposes of preventive or occupational
medicine; medical diagnosis; the provision of Information Commissioner's Office
<u>health care or treatment; the provision of</u> social care, or the management of health Wycliffe House
care systems or services or social care Water Lane
systems or services.
Related Legislation: Wilmslow
Section 25 TB Health and Social Cale (Salety
and Quality Act) 2015 (Duty to Share); Tel: 0303 123 1113 or 01625 545 745
Common Law of Duty of Confidentiality Email: https://ico.org.uk/global/contact-us

Shared Health and Care Board (SHaCB)	Your information will be passed, with all identifiers removed, to a collaborative programme called the Kent & Medway Shared Health and Care Analytics Board. It will be used for population health management purposes beyond your individual care, including, for example, planning services, managing	The processing of personal data is permitted under the following GDPR and DPA conditions: <u>Article 6(1) (c) - processing for legal</u> <u>obligation;</u> <u>GDPR Article 6(1) (e) - public interest or in</u> the exercise of official authority;	 You have the right to: 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:
	finances, early treatment of illnesses (known as risk stratification), co-ordinating and improving patient and service user's movement through the health and care system, research, and	DPA Section 8 (d) - processing is necessary for the exercise of statutory functions;	 ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing.
	ne neath and care system, research, and public health enhancement.	The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions: <u>GDPR Article 9 (2) (h) - processing is</u> <u>necessary for medical or social care</u> treatment or, the management of health or social care systems and services; <u>DPA Section 10 (1) (c) – processing is</u> <u>necessary for health and social care</u> <u>purposes;</u> <u>In accordance with DPA Schedule 1, Part 1,</u> (2) - health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services. <u>Related Legislation:</u> Section 251B Health and Social Care (Safety and Quality Act) 2015 (Duty to Share); NHS Act 2006 Health and Social Act 2012	 Right to object or opt-out: You have the right to raise an objection to your personal data being shared in Shared Health and Care Board with your Practice. Although we will first need to explain how this may affect the care you receive. 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 Riverside Medical 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/
		Integrated Care Act 2022	

		Common Law of Duty of Confidentiality	
EMIS Health Systems Local Record Sharing – Integrated Care:	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. 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 Medway. 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. The source of the information shared in this way is your electronic GP record. Data Retention Period: All records held in the Practice EMIS system are kept for the duration specified in the <u>Records Management Codes of Practice for Health and Social Care</u>	The processing of personal data is permitted under the following GDPR and DPA conditions: GDPR Article 6(1) (e) - public interest or in the exercise of official authority: DPA Section 8 (d) - processing is necessary for the exercise of statutory functions; The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions: GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services; DPA Section 10 (1) (c) – processing is necessary for health and social care purposes; In accordance with DPA Schedule 1, Part 1, (2) - health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services. Related Legislation: Common Law of Duty of Confidentiality	 You have the right to: 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: accuracy of the data is contested, the processing is unlawful or, where we no longer need the data for the purposes of the processing. Right to object: You have a general right to raise an objection to your personal data being shared with the recipients. 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 Riverside Medical Practice process your data, you have the right to appeal/complain to the 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/

Vision 360 System - Local Record Sharing – Integrated Care:	Vision 360 Practice Access provides secure, remote access to a patient's clinical data including medical history, therapy and test results. It allows Vision and Emis Web Practices you to share, view, record and edit patient consultation details between the two systems irrespective of technological and organisation boundaries. The Vision 360 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 Medway. 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.	under the following GDPR and DPA conditions: GDPR Article 6(1) (e) - public interest or in the exercise of official authority; DPA Section 8 (d) - processing is necessary for the exercise of statutory functions; The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions: GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services; DPA Section 10 (1) (c) – processing is necessary for health and social care purposes; In accordance with DPA Schedule 1, Part 1, (2) - health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services. Related Legislation: Section 251B Health and Social Care (Safety and Quality Act) 2015 (Duty to Share); Common Law of Duty of Confidentiality	 You have the right to: 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: accuracy of the data is contested, the processing is unlawful or, where we no longer need the data for the purposes of the processing. Right to object: You have a general right to raise an objection to your personal data being shared with the recipients. 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 Riverside Medical 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/
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Healthcare Gateway weight spectra supplier of personal data is permitted under the following GDPR and DPA conditions: You have the right to: Integration of clinician time each day by providing heathcare professionals with instant access to real-time information about a patient. The MIG is a secure middleware technology which enables the two-way exchange of patient information to netwere tool healthcare settings. The processing of personal data is permitted. You have the right to: The processing of personal data is permitted. DPA Section 1 (d) - processing is necessary for the outproves of the processing of special categories of personal data concerning health is perimited under the following GDPR and DPA conditions: GDPR Article 9 (2) (h) - processing is necessary for medical or social care permitted under the following GDPR and DPA conditions: GDPR Article 9 (2) (h) - processing is necessary for medical or social care permitted under the following GDPR and DPA conditions: GDPR Article 9 (2) (h) - processing is necessary for medical or social care permitted under the following our personal information (b) our personal data being shared with erectify to a social care permitted under the following our request will be carefully considered. If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO and pole to the optical and social care purposes means the purposes of pervention unner of the analysion of social care purposes means the purposes of nearther of clinicate at an endical care system considered. In accordance with DPA Schedule 1, Pan 1, beact the concellation of the performation to the information commissioner (C). The IC can be contacted at: Information Commissioner S office Wyeirside				
	Healthcare Gateway	Medical Interoperability Gateway (MIG) that can save hours of clinician time each day by providing healthcare professionals with instant access to real-time information about a patient. The MIG is a secure middleware technology which enables the two-way exchange of patient information between local healthcare settings. This helps the clinicians to make informed treatment decisions faster and improve the efficiency of care by preventing unnecessary hospital admissions/appointments and	under the following GDPR and DPA conditions: GDPR Article 6(1) (e) - public interest or in the exercise of official authority: DPA Section 8 (d) - processing is necessary for the exercise of statutory functions; The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions: GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services; DPA Section 10 (1) (c) – processing is necessary for health and social care purposes; In accordance with DPA Schedule 1, Part 1, (2) - health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services. Related Legislation:	 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: accuracy of the data is contested, the processing is unlawful or, where we no longer need the data for the purposes of the processing. Right to object: You have a general right to raise an objection to your personal data being shared with the recipients. 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 Riverside Medical 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

National NHS Digital Services "Spine" including:Spine supports the IT infrastructure for healt and social care in England, joining together over 23,000 healthcare IT systems in 20,500 organisations.	under the following GDPR and DPA	You have the right to:
 Demographics Service e-Referral Service Electronic Prescription Service GP2GP Summary Care Record Patient Demographics Service – The Person Demographics Service (PDS) is the nationa electronic database of NHS patient details s 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 record it also allows them to contact and communit with patients. Summary Care Record (SCR) – is an electror record of important patient information, creat from GP medical records. It can be seen an used by authorised staff in other areas of the health and care system involved in the patied direct care. When your personal health records on your Record is uploaded to the spine, NHS Digitat becomes the data controller for the uploade information. The source of the information shared in this way is your electronic GP record. At a minimum, the SCR holds important information about; current medication allergies and details of any previous bad reactions to medicines 	GDPR Article 6(1) (e) - public interest or in the exercise of official authority:DPA Section 8 (d) - processing is necessary for the exercise of statutory functions;The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions:alGDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services;ds.DPA Section 10 (1) (c) - processing is necessary for health and social care purposes;nichIn accordance with DPA Schedule 1, Part 1, (2) - health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services.	 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: accuracy of the data is contested, the processing is unlawful or, where we no longer need the data for the purposes of the processing. 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 <u>opt-out form</u> to their GP practice. Although we will first need to explain how this may affect the care you receive. 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 Riverside Medical 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/

 the name, address, date of birth and NHS number of the patient The patient can also choose to include additional information in the SCR, such as details of long-term conditions, significant medical history, or specific communications needs. 	
<u>e-Referral Service</u> - The NHS e-Referral Service (e-RS) combines electronic booking with a choice of place, date and time for first hospital or clinic appointments. Patients can choose their initial hospital or clinic appointment, book it in the GP surgery at the point of referral, or later at home on the phone or online.	
Electronic Prescription Service - The Electronic Prescription Service (EPS) sends electronic prescriptions from GP surgeries to pharmacies. Eventually EPS will remove the need for most paper prescriptions.	
<u>GP2GP</u> - GP2GP allows patients' electronic health records to be transferred directly, securely, and quickly between their old and new practices, when they change GPs. This improves patient care by making full and detailed medical records available to practices, for a new patient's first and later consultations.	
The source of the information shared in all of the instances above in this way is your electronic GP record.	
Data Retention Period:	
All records held in the Practice EMIS system are kept for the duration specified in the <u>Records Management Codes of Practice for</u> <u>Health and Social Care</u>	

<u>NHS Digital – National</u> <u>Data Opt-Out</u>	The national data opt-out applies to the disclosure of confidential patient information for purposes beyond individual care (research and planning) across the health and adult social care system in England. In broad terms the national data opt-out applies unless there is a mandatory legal requirement or an overriding public interest for the data to be shared. The opt-out does not apply when the individual has consented to the sharing of their data or where the data is anonymised. Any person registered on the Personal Demographic Services (PDS) and who consequently has an NHS number allocated to them is able to set a <u>national data opt-out</u> . The opt-out is stored in a central repository against their NHS number on the Spine. The national opt-out applies to a number of datasets including: National Clinical Audit of Rheumatoid and Early Inflammatory - NHS Digital collects this data on behalf of the British Society for Rheumatology to improve the quality of care for patients with Rheumatoid and early.	The processing of personal data is permitted under the following GDPR and DPA conditions: <u>GDPR Article 6(1) (e) - public interest or in</u> the exercise of official authority: <u>DPA Section 8 (d) - processing is necessary</u> for the exercise of statutory functions; The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions: <u>GDPR Article 9 (2) (h) - processing is</u> necessary for medical or social care treatment or, the management of health or social care systems and services; <u>DPA Section 10 (1) (c) – processing is</u> necessary for health and social care purposes; <u>In accordance with DPA Schedule 1, Part 1,</u> (2) - health or social care purposes means the purposes of preventive or occupational medicine; medical diagnosis; the provision of	 You have the right to: 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: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. Right to object or opt-out: You have the right to raise an objection or opt-out of having your data shared for the purposes of indirect care (research and planning). You can do so via the national opt-out website Right to complain: If you are dissatisfied with the way Riverside Medical 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
	National Adult Community Acquired Pneumonia (CAP) Audit - NHS Digital collects this data on behalf of the British Thoracic Society to assess variation in the care of patients hospitalised with pneumonia in the UK. Trauma Audit & Research Network (TARN) - NHS Digital collects this Confidential Patient Information on behalf (CPI) on behalf TARN Invoice Backing Data for Contracted Activity - NHS Digital collects this data to enable Commissioners to determine if they are the responsible commissioner. It is important to point out that the national opt-out applies to	health care or treatment; the provision of social care, or the management of health care systems or services or social care systems or services. Related Legislation: Section 251 NHS Act 2006	Water Lane Wilmslow Cheshire Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/

	contracted activity data that has not been rendered anonymous. Risk Stratification data for Indirect Care - NHS Digital collects this data for data processors working on behalf of GPs and ICBs.		
	The GP data is linked to other records that they access, such as hospital attendance records in order to enable the ICBs (commissioners) understand the local population needs and plan for future requirement.		
	The source of the information shared in this way is your electronic GP record.		
	The source of the information shared in all of the instances above in this way is your electronic GP record.		
	Data Retention Period:		
	All records held in the Practice EMIS system are kept for the duration specified in the <u>Records Management Codes of Practice for</u> <u>Health and Social Care</u>		
<u>Open Exeter</u>	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.	The processing of personal data is permitted under the following GDPR and DPA conditions: <u>GDPR Article 6(1) (e) - public interest or in</u> the exercise of official authority; <u>DPA Section 8 (d) - processing is necessary</u>	 You have the right to: 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:
	Access to Open Exeter is only possible on the N3 network, and via authorised logons/passwords provided by NHS Digital.	for the exercise of statutory functions; The processing of special categories of personal data concerning health is	 ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing.
	The source of the information shared in this way is your electronic GP record.	permitted under the following GDPR and DPA conditions: GDPR Article 9 (2) (h) - processing is	Right to object: You have a general right to raise an objection to your personal data being shared in
	Data Retention Period:	necessary for medical or social care	Open Exeter.
	All records held in the Practice EMIS system are kept for the duration specified in the	treatment or, the management of health or social care systems and services;	

Records Managem Health and Social		n 10 (1) (c) – processing is or health and social care	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.
	(1a) - the the social secur where it is for exercising of imposed or or the data s	ace with DPA Schedule 1, Part 1, the processing for employment, rity and social protection is met or the purposes of performing or obligations or rights which are conferred by law on the controller subject in connection with it, social security or social	Right to complain: If you are dissatisfied with the way Riverside Medical 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/

Processing Activities: Data Processors

System/database Recipients or categories of recipients of the personal or special categories of personal data	Purpose of the processing and data retention periods	Lawful basis	Your Rights
EMIS Health and Egton	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. All information about your personal health records are stored in your GP electronic record.	The processing of personal data is permitted under the following GDPR and DPA conditions: <u>GDPR Article 6(1) (e) - public interest or in</u> <u>the exercise of official authority;</u>	 You have the right to: 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:

Updated 22/06/2023

	This information is then available to practice staff & external bodies as outlined in this document. Data Retention Periods: All records held in the Practice EMIS system are kept for the duration specified in the <u>Records Management Codes of Practice for</u> <u>Health and Social Care</u> "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. Electronic patient records must not be	DPA Section 8 (d) - processing is necessary for the exercise of statutory functions;The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions:GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services;DPA Section 10 (1) (c) - processing is necessary for health and social care purposes;In accordance with DPA Schedule 1, Part 1, (1a) - the the processing for employment, social security and social protection is met	 ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. 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. 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.
	destroyed or deleted for the foreseeable future."	where it is for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the controller or the data subject in connection with employment, social security or social	Right to complain: If you are dissatisfied with the way Riverside Medical Practice process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be contacted at:
		protection;	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/
Healthcare Gateway	Healthcare Gateway is responsible for the provision of IT clinical systems that enables safe, digitised patient care across the healthcare facilities.	The processing of personal data is permitted under the following GDPR and DPA conditions:	 You have the right to: To access, view or request copies of your personal information; request rectification of any inaccuracy in your personal information;

Updated 22/06/2023

	The supplier of Healthcare Gateway - 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 Kent and Medway can access subsets of their patients/service users' medical or social records from a single system in order to provide the best possible care. 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. Data Retention Periods: All records held in the Practice EMIS system are kept for the duration specified in the <u>Records Management Codes of Practice for Health and Social Care</u> "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. Electronic patient records must not be destroyed or deleted for the foreseeable future."	GDPR Article 6(1) (e) - public interest or in the exercise of official authority; DPA Section 8 (d) - processing is necessary for the exercise of statutory functions; The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions: GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services; DPA Section 10 (1) (c) – processing is necessary for health and social care purposes; In accordance with DPA Schedule 1, Part 1, (1a) - the the processing for employment, social security and social protection is met where it is for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the controller or the data subject in connection with employment, social security or social protection;	 restrict the processing of your personal information where: accuracy of the data is contested, the processing is unlawful or, where we no longer need the data for the purposes of the processing. Right to object: You have a general right to raise an objection to your personal data being in Healthcare Gateway. 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 Riverside Medical 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/
Docman and Docmail	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.	The processing of personal data is permitted under the following GDPR and DPA conditions: <u>GDPR Article 6(1) (e) - public interest or in</u> the exercise of official authority;	 You have the right to: 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: ✓ accuracy of the data is contested,

Generally, Docman enables primary health care organisations capture, file, workflow, view and manage primary care documents efficiently. Docmail enables primary health care organisations send letters, invoices and documents directly from computers and other	DPA Section 8 (d) - processing is necessary for the exercise of statutory functions; The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions: GDPR Article 9 (2) (h) - processing is	 ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. 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
portable devices. The source of the information shared in this way is your electronic GP record for the purposes of direct administrative patient care. Data Retention Period:	necessary for medical or social care treatment or, the management of health or social care systems and services; DPA Section 10 (1) (c) – processing is necessary for health and social care purposes;	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.
All records held in the Practice EMIS system are kept for the duration specified in the <u>Records Management Codes of Practice for</u> <u>Health and Social Care</u>	In accordance with DPA Schedule 1, Part 1, (1a) - the the processing for employment,	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.
"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. Electronic patient records must not be destroyed or deleted for the foreseeable future."	social security and social protection is met where it is for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the controller or the data subject in connection with employment, social security or social protection;	Right to complain: If you are dissatisfied with the way Riverside Medical 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/

Plato	iPlato is cloud-based text messaging service	The processing of personal data is permitted	You have the right to:
	used by GPs to communicate with their patients.	under the following GDPR and DPA conditions:	 To access, view or request copies of your personal information;
	The source of the information shared in this way is your electronic GP record for the	GDPR Article 6(1) (e) - public interest or in the exercise of official authority:	 request rectification of any inaccuracy in your personal information; restrict the processing of your personal
	purposes of direct administrative patient care.	DPA Section 8 (d) - processing is necessary	information where:
	Data Retention Period:	for the exercise of statutory functions;	 ✓ accuracy of the data is contested, ✓ the processing is unlawful or,
	All records held in the Practice EMIS system are kept for the duration specified in the <u>Records Management Codes of Practice for</u>	The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA	 where we no longer need the data for the purposes of the processing.
	Health and Social Care	conditions:	Right to object: In line with the GDPR Article 21,
	"GP records should be retained until 10 years after the patient's death or after the patient has	GDPR Article 9 (2) (h) - processing is necessary for medical or social care	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
	permanently left the country, unless they remain in the European Union.	treatment or, the management of health or social care systems and services;	cannot demonstrate compelling legitimate grounds
	Electronic patient records must not be	DPA Section 10 (1) (c) – processing is necessary for health and social care purposes;	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
	destroyed or deleted for the foreseeable future."	In accordance with DPA Schedule 1, Part 1,	subject.
		(1a) - the the processing for employment,	If you wish to exercise any of your rights please contact the Practice (data controller) or the DPO
		social security and social protection is met where it is for the purposes of performing or	and your request will be carefully considered.
		exercising obligations or rights which are	Right to complain: If you are dissatisfied with the
		imposed or conferred by law on the controller or the data subject in connection with	way Riverside Medical Practice process your data,
		employment, social security or social protection;	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

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			Email: https://ico.org.uk/global/contact-us/
Quality Medical Solutions UK (QMS- UK):	QMS-UK are commissioned by NHS England to provide secure data processing solutions for two services: Child Health Information Service – information relating to children's vaccinations is shared with Kent Community Health Immunisation Team who run one of 4 Child Health Information Services across Kent and Medway National Diabetic Retinal Screening Service – Diabetic eye screening is carried out in Kent and Medway by <u>Health Intelligence</u> Data Retention Period: All records held in the Practice EMIS system are kept for the duration specified in the Records Management Codes of Practice for Health and Social Care "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.	The processing of personal data is permitted under the following GDPR and DPA conditions: <u>GDPR Article 6(1) (e) - public interest or in</u> the exercise of official authority; <u>DPA Section 8 (d) - processing is necessary</u> for the exercise of statutory functions; The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions: <u>GDPR Article 9 (2) (h) - processing is</u> <u>necessary for medical or social care</u> treatment or, the management of health or social care systems and services; <u>DPA Section 10 (1) (c) – processing is</u> <u>necessary for health and social care</u> <u>purposes:</u> <u>In accordance with DPA Schedule 1, Part 1,</u> (1a) - the the processing for employment, social security and social protection is met where it is for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the controller or the data subject in connection with employment, social security or social protection;	 You have the right to: 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: accuracy of the data is contested, the processing is unlawful or, where we no longer need the data for the purposes of the processing. Right to object: You have a general right to raise an objection to your personal data being shared in QMS. 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 Riverside Medical 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/

Apollo Medical Systems <u>NHSE Approved</u> <u>Suppliers</u>	Riverside Medical 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, lung cancer, 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. Risk stratification can be grouped into two purposes namely: Direct Care – 'Case Finding' where carried out	The processing of personal data is permitted under the following GDPR and DPA conditions: GDPR Article 6(1) (e) - public interest or in the exercise of official authority: DPA Section 8 (d) - processing is necessary for the exercise of statutory functions; The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions: GDPR Article 9 (2) (h) - processing is necessary for medical or social care treatment or, the management of health or social care systems and services; DPA Section 10 (1) (c) – processing is necessary for health and social care purposes; In accordance with DPA Schedule 1, Part 1, (1a) - the the processing for employment,	 You have the right to: 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: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. Right to object: You have a general right to raise an objection to your personal data being shared for the purpose of risk stratification. 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 Riverside Medical Practice process your data, you have the right to appeal/complain to the Information Commissioner (IC). The IC can be
	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.	social security and social protection is met where it is for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the controller or the data subject in connection with	contacted at: Information Commissioner's Office Wycliffe House
	Indirect Care - understand the local population needs and plan for future requirement. The source of the information shared in this	employment, social security or social protection;	Water Lane Wilmslow
	way is your electronic GP record. <u>Data Retention Period:</u>	Related Legislation: Section 251 NHS Act 2006	Cheshire
	All records held in the Practice EMIS system are kept for the duration specified in the <u>Records Management Codes of Practice for</u> <u>Health and Social Care</u>		Tel: 0303 123 1113 or 01625 545 745 Email: <u>https://ico.org.uk/global/contact-us/</u>
GP Data Flows using Apollo Data	This DPIA relates to a change to the management of the transfer of General Practice	Within the UK General Data Protection Regulation (UK GDPR), Article 6 sets out the	You have the right to:

 Reporting Services NHS Kent and Loptum Health Solutions (UK) metadecoming to an end on 31st January 2022. The data is already flowing under the current solution managed by Optum Health Solutions (UK) Limited which involves Apollo Medical Software Solutions Limited, part of the Solutions (UK) Limited which involves Apollo Medical Software Solutions Currents and Citadel Group, running Apollo Medical Software Solutions Limited, part of the Solutions Limited transfering (P data to the CBP data to the circumstances and needs the time the service is deployed with the General Practice, Apollo uses two types of technology Data Extraction & Reporting Sortware Solutions Limited data, the service is deployed with the General Practice, Apollo uses two types of technology Data Extraction & Reporting Sortware Solutions Limited to the relative Solutions the improvement of quality of ref (HSb). Medehanlytics international Limited Medevaluy Limited which the event of system failure of the processing general Practice, Apollo uses two types of the data service is no derthiftabel data, it is pseudonymised at source before leaving the processing the top romose integration. Structured Query Language (SQL) Suite Data Retention Period The Medeval from Practice systems. However, to support the processing the relation of the processing of your rights please top relative the practice of the processing system and data in the delivery of direct care, and for processing favor of the Data Dractice from compliant. If you are dissatified with the exercise of official authority vested in the low of the processing there is a backup programme in place for the CDs with the severase of official authority vested in the leaver of out the processing the receasers for the puropresse in the revent of system failure of the purposes of the				
and Social Care Act 2012 to share	NHS Kent and Medway GP Practices NHS Kent and Medway Clinical Commissioning Group Apollo Medical Software Solutions Limited (transferring GP data to the ICB) Maidstone and Tunbridge Wells NHS Trust as host for (HISbi) MedeAnalytics	contract with Optum Health Solutions (UK) Limited coming to an end on 31st January 2022. The data is already flowing under the current solution managed by Optum Health Solutions (UK) Limited which involves Apollo Medical Software Solutions Limited, part of the Wellbeing Software and Citadel Group, running a bespoke SQL Query from within the SQL Suite software and creating a standardised output. Depending on the circumstances and needs at the time the service is deployed with the General Practice, Apollo use two types of technology Data Extraction & Reporting Services, both of these are utilised by the General Practices in Kent and Medway: • Amazon Web Services (AWS) Cloud Hosted • Structured Query Language (SQL) Suite Data Retention Period There is no identifiable data, it is pseudonymised at source before leaving the Practices. Individual back-up of local systems and data is not required as in the event of system failure data will be re-bulked from Practice systems. However, to support the processing, there is a backup programme in place for the ICB via NEL IT, MedeAlanytics and HISbi. All ICB retention policies are guided by the Records Management Code of Practice for	data and Article 9 sets out further conditions for processing special categories of personal data. As personal data concerning health is one of the special categories, organisations that process such data must be able to demonstrate they have met a condition in both Article 6 and Article 9. GDPR Article 6(1)(c) Legal obligation - the processing is necessary to comply with the law - Section 14R NHS Act 2006 – ICBs have a legal duty as to the improvement of quality of services. - Section 14Z1 NHS Act 2006 – ICBs have a legal duty to promote integration Under the UK GDPR, for processing personal data in the delivery of direct care, and for providers' administrative purposes, the most appropriate Article 6 condition that is available to all public funded health and social care organisations is Article 6(1)(e): "Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller". For work undertaken the relevant condition to rely on under Article 9 is: Article 9 (2)(h): "Processing is necessary for the purposes of preventive or occupational medicine, medical diagnosis, provision of health or social care treatment." (read with Schedule 1 paragraph 2 of the Data Protection Act). There is an obligation in s. 251B of the Health	 personal information; request rectification of any inaccuracy in your personal information; restrict the processing of your personal information where: accuracy of the data is contested, the processing is unlawful or, where we no longer need the data for the purposes of the processing. Right to object: You have a general right to raise an objection to your personal data being shared for the purpose of risk stratification. 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 Riverside Medical 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

		information amongst relevant commissioners and providers for the purposes of direct care.	
Optum ScriptSwitch NHS Kent and Medway ICB Optum Health Solutions (UK) Ltd Kent and Medway ICB GP's	Optum ScriptSwitch is a prescribing decision support product installed on GP desktops which has optional add on features to provide more specific patient advice by processing additional information from the clinical system patient record via the published APIs. This prescribing decision support software supports the Medicines Optimisation team by creating recommendations to prescribers when a medication is issued. Recommendations would be about a switch from the medication originally prescribed to an alternate product in line with the ICBs formulary. Data Retention Period Retention period is two years maximum from last entry. The data will be erased at the end of the retention period as required by the NHS Records Management Code of Practice for Health and Social Care 2021 29/03/22 - Patient ID data is held for 12 months only, to support the With-holding feature and automatically deleted by the ScriptSwitch Prescribing code	Within the General Data Protection Regulation (GDPR), Article 6 sets out the conditions for lawfully processing personal data and Article 9 sets out further conditions for processing special categories of personal data. As personal data concerning health is one of the special categories, organisations that process such data must be able to demonstrate they have met a condition in both Article 6 and Article 9. Under the GDPR, for processing personal data in the delivery of direct care, and for providers' administrative purposes, the most appropriate Article 6 condition that is available to all public funded health and social care organisations is Article 6(1) (e): "Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller". For work undertaken the relevant condition to rely on under Article 9 is (2) (h): "processing is necessary for the purposes of preventive or occupational medicine" (read with Schedule 1 paragraph 2 of the Data Protection Act). There is an obligation in s. 251B of the Health and Social Care Act 2012 to share information amongst relevant agencies	 You have the right to: 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: ✓ accuracy of the data is contested, ✓ the processing is unlawful or, ✓ where we no longer need the data for the purposes of the processing. Right to object: You have a general right to raise an objection to your personal data being shared for the purpose of risk stratification. 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 Riverside Medical 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
Kent and Medway Data Warehousing	As part of Kent and Medway ICB's (KMICB) information and reporting functions, the third-	The pseudonymised data can be exported and linked with other datasets outside of the	You have the right to:

Service delivered by MedeAnalytics	party company Optum have been contracted since February 2018 to supply various data management and business intelligence services including the supply of data for reporting to the third-party company MedeAnalytics, the manipulation of data for various internal reporting and the receipt of data from a number of provider organisations for onward transmission. In essence, MedeAnalytics provide data warehousing and reporting capability using a self-service approach. KMICB have made the decision to terminate the contract with Optum at the end of January 2022 and engage HISbi, a semi-autonomous department hosted by Maidstone and Tunbridge Wells NHS Trust (MTW), to deliver an alternative service, replacing data warehousing aspects of the Optum contract. Whilst ICB take steps to in-house data management and business intelligence services delivered by Optum, the ICB do not have an infrastructure to support its data warehousing needs. This is why an ICS partner was sought to deliver this critical activity. <u>Data Retention Period</u> The data is pseudonymised and not readily re- identifiable. All data held by KMICB as the data controller will be reviewed and destroyed in line with ICB data retention policies, based on the Records Management Code of Practice for Health and Social Care 2021 and relevant Data Sharing Agreements.	MedeWorks platform, for example, in the KMICB sandbox in Kent and Medway Data Warehouse to perform further analysis, for example, for Population Health Management, providing that the data has a common pseudonym. Privacy Notices will be updated to reflect this. The lawful basis for linking the data held from multiple systems to each individual data subject for secondary uses under the UK General Data Protection Regulation will be: To support health and social care: • 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"; Or For supporting public health:	 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: accuracy of the data is contested, the processing is unlawful or, where we no longer need the data for the purposes of the processing. Right to object: You have a general right to raise an objection to your personal data being shared for the purpose of risk stratification. 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 Riverside Medical 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/
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Paper Mountains / NEL CSU	To provides solutions for records management, data backup and recovery, document management, secure storage, and accredited data destruction. The source of the information shared in this way is your electronic GP record. Data Retention Period: All records held in the Practice EMIS system are kept for the duration specified in the <u>Records Management Codes of Practice for</u> <u>Health and Social Care</u>	The processing of personal data is permitted under the following GDPR and DPA conditions: <u>GDPR Article 6(1) (e) - public interest or in</u> the exercise of official authority; <u>DPA Section 8 (d) - processing is necessary</u> for the exercise of statutory functions; The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions: <u>Article 9 (2) (i) - for archiving purposes in the</u> public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member State law <u>In accordance with DPA Schedule 1, Part 1,</u> (4) - The condition for the processing is met where it is necessary for archiving purposes or statistical purposes; carried out in accordance with Article 89(1) of the GDPR and DPA Section 19, and the processing is in the public interest.	 You have the right to: 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: accuracy of the data is contested, the processing is unlawful or, where we no longer need the data for the purposes of the processing. Right to object: You have a general right to raise an objection to your personal data being shared for the purpose of risk stratification. 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 Riverside Medical 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
Burgess Hodgson	The supplier Burgess Hodgson offer a wide range of business assurance services, from internal audit, counter fraud and forensic	The processing of personal data is permitted under the following GDPR and DPA conditions:	 You have the right to: To access, view or request copies of your personal information;

	 investigations, risk management and governance. Data Retention Period: All records held in the Practice EMIS system are kept for the duration specified in the 	<u>GDPR Article 6(1) (e) - public interest or in</u> <u>the exercise of official authority;</u> <u>DPA Section 8 (d) - processing is necessary</u> <u>for the exercise of statutory functions;</u>	 request rectification of any inaccuracy in your personal information; restrict the processing of your personal information where: accuracy of the data is contested, the processing is unlawful or, where we no longer need the data for
	Records Management Codes of Practice for Health and Social Care		 Right to object: You have a general right to raise an objection to your personal data being shared for the purpose of risk stratification. 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 Riverside Medical 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: <u>https://ico.org.uk/global/contact-us/</u>
Burgess Hodgson	The supplier Burgess Hodgson 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	The processing of personal data is permitted under the following GDPR and DPA conditions: <u>GDPR Article 6(1) (e) - public interest or in</u> <u>the exercise of official authority;</u>	 Employees have the right to: 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:

 planning, health and safety, equality and diversity in the workplace, health and safety at work. 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). Data Retention Period: All records held in the Practice EMIS system are kept for the duration specified in the Records Management Codes of Practice for Health and Social Care 	DPA Section 8 (d) - processing is necessary for the exercise of statutory functions; The processing of special categories of personal data concerning health is permitted under the following GDPR and DPA conditions: 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 in the field of employment and social security and social protection law; In accordance with DPA Schedule 1, Part 1, (1a) - the processing for employment, social security and social protection is met where it is for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the controller or the data subject in connection with employment, social security or social protection;	 accuracy of the data is contested, the processing is unlawful or, where we no longer need the data for the purposes of the processing. Right to object: Employees have a general right to raise an objection to the sharing personal data. 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. Right to complain: If an employee is dissatisfied with the way Riverside Medical 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 Tel: 0303 123 1113 or 01625 545 745 Email: https://ico.org.uk/global/contact-us/
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