



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

<b>Activity</b>	<b>Rationale</b>
Commissioning and contractual purposes Invoice Validation Planning Quality and Performance	<p><b>Purpose</b> – Anonymous data is used by the CCG for planning, performance and commissioning purposes, as directed in the practices contract, to provide services as a public authority.</p> <p><b>Legal Basis</b> – UK GDPR 6 1(b) Contractual obligation as set out in the Health and Social Care Act for Quality and Safety 2015</p> <p><b>Processor</b> – Frimley and Surrey Heartlands CCG</p>
Safeguarding Adults	<p><b>Purpose</b> – We will share personal confidential information with the safeguarding team where there is a need to assess and evaluate any safeguarding concerns.</p> <p><b>Legal Basis</b> – in some case consent will be required otherwise</p> <ul style="list-style-type: none"> <li>• Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’;</li> <li>and</li> <li>• Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine</li> </ul> <p><b>Data Processor</b> – Surrey County Council , Hampshire County Council, Waverley Borough Council</p>
Safeguarding Children	<p><b>Purpose</b> – We will share children’s personal information where there is a need to assess and evaluate any safeguarding concerns.</p> <p><b>Legal Basis</b> - in some case consent will be required otherwise</p> <ul style="list-style-type: none"> <li>• Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’;</li> <li>and</li> <li>• Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine</li> </ul> <p><b>Data Processor</b> – Surrey County Council, Hampshire County council Waverley Borough Council</p>
Direct Care NHS Trusts Other Care Providers	<p><b>Purpose</b> – Personal information is shared with other secondary care trusts and providers in order to provide you with direct care services. This could be hospitals or community providers for services, including treatment and operations</p> <p><b>Legal Basis</b> - in some case consent will be required otherwise</p> <ul style="list-style-type: none"> <li>• Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’;</li> <li>and</li> <li>• Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine</li> </ul> <p><b>Processors</b> – Secondary care providers</p>



<p>Care Quality Commission</p>	<p><b>Purpose</b> – The CQC is the regulator for the English Health and Social Care services to ensure that safe care is provided. They will inspect and produce reports back to the GP practice on a regular basis. The Law allows the CQC to access identifiable data.</p> <p>More detail on how they ensure compliance with data protection law (including UK GDPR) and their privacy statement is <u>available on our website:</u> <a href="https://www.cqc.org.uk/about-us/our-policies/privacy-statement">https://www.cqc.org.uk/about-us/our-policies/privacy-statement</a></p> <p><b>Legal Basis</b> - Article 6(1)(c) “processing is necessary for compliance with a legal obligation to which the controller is subject.” And Article 9(2) (h) as stated below</p> <p><b>Processors</b> – Care Quality Commission</p>
<p>Payments, Invoice validation</p>	<p><b>Purpose</b> – As part of InsideVue’s financial arrangements identifiable information is included within the invoicing process that is shared with Frimley and Surrey Heartlands Clinical Commissioning Group</p> <p><b>Legal Basis</b> - Article 6(1)(c) “processing is necessary for compliance with a legal obligation to which the controller is subject.” And Article 9(2)(h) ‘as stated below</p> <p><b>Data Processors</b> – NHS England, CCG</p>
<p>Patient Record data base</p>	<p><b>Purpose</b> – Your medical record will be processed in order that a data base can be maintained, this is managed in a secure way and there are robust processes in place to ensure your medical record is kept accurate, and up to date. <del>Your record will follow you as you change surgeries throughout your life.</del>  <del>Closed records will be archived by NHS England</del></p> <p><b>Legal Basis</b> - Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) as stated below</p> <p><b>Processor</b> – E-Clinic</p>
<p>Police</p>	<p><b>Purpose</b> – Personal confidential information may be shared with the Police authority for certain purposes. The level of sharing and purpose for sharing may vary. Where there is a legal basis for this information to be shared no consent will be required.</p> <p>The Police will require the correct documentation in order to make a request. This could be but not limited to, DS 2, Court order, s137, the prevention and detection of a crime.</p> <p>In some cases consent may be required.</p> <p><b>Legal Basis</b> – UK GDPR – Article 6 1 (f) legitimate interest 6 1 (c) Legal Obligation.</p>



	<p>Article 9 2 (f) requests for legal reasons</p> <p><b>Processor</b> – Police Constabulary</p>
Private healthcare providers	<p><b>Purpose</b> – Personal information shared with private health care providers in order to deliver direct care to patients at the patient’s request. Consent from the patient will be required to share data with Private Providers.</p> <p><b>Legal Basis</b> – Consented and under contract between the patient and the provider</p> <p><b>Provider</b> –Spire, Nuffield Health or others as agreed with the individual patient.</p>
Texting Service	<p><b>Purpose</b> – Personal identifiable information shared with the texting service in order that text messages including appointment reminders, campaign messages related to specific patients health needs and direct messages to patients</p> <p><b>Legal Basis</b> – UK GDPR Article 6 1 (b) Contract, Article 6 1 (e) Public task, Article 9 2 (h)</p> <p><b>Provider</b> - e-clinic</p>
Telephony	<p><b>Purpose</b> – InsideVue uses an internet based telephony system. The telephone system has been commissioned to assist with the high volume and management of calls into InsideVue , which in turn will enable a better service to patients.</p> <p><b>Legal Basis</b> – While there is a robust contract in place with the processor, the surgery has undertaken this service to assist with the direct care of patients in a more efficient way. Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below</p> <p><b>Provider</b> – NSL Telecoms</p>

We will keep our Privacy Notice under regular review. This notice was last reviewed on 24<sup>th</sup> August 2021.

### Lawful basis for processing:

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

- Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and



- Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine 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...”