

a. Direct Medical Care and Administration

Recipients or categories of recipients of the personal or special categories of personal data	Purpose of the processing	Lawful basis UK General Data Protection Regulation (UK GDPR) - Article 6 - - Article 9 - Data Protection Act (DPA) 2018 - Section 10 - - Schedule 1 -
NHS Trusts – Hospitals, Community or Mental Health Trusts.	Personal data concerning your health is shared with NHS Trusts to enable their healthcare professionals make the best-informed decision about your health needs, and to 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. Your electronic GP record is the source of information that is shared.	The processing of personal data is permitted under the following UK GDPR “condition”: • GDPR Article 6(1) (e) – processing is necessary for the performance of a task carried out in the public interest. The processing of special categories of personal data is permitted under the following UK GDPR “condition”, and DPA “provisions”: • 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.

	In accordance with DPA Part 1, Schedule 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.	
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. Make pre-determined decisions about the type and extent of care you will receive in an emergency; these are known as "Advance Directives". Your electronic GP record is the source of information that is shared.	The processing of personal data is permitted under the following UK GDPR "condition", and DPA "provisions": - GDPR Article 6(1) (d) – processing is necessary in order to protect the vital interests of the data subject. The processing of special categories of personal data is permitted under the following UK GDPR "conditions" and DPA "provisions": - Article 9 (2) (C) – the processing is necessary to protect the vital interests of the data subject. - 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

		<u>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>
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 our GP Practice and view relevant information from your GP record in order to provide you with the best medicines. Your electronic GP record is the source of information that is shared.	The processing of personal data is permitted under the following UK GDPR “condition”: • GDPR Article 6(1) (e) – processing is necessary for the performance of a task carried out in the public interest. The processing of special categories of personal data is permitted under the following UK GDPR “condition”, and DPA “provisions”: • 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. • <u>DPA Section 10 (1) (c) – processing is necessary for health and social care purposes.</u> • <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.</u>
Local Authority – Social Services	Operose Health Group 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 to make the best-informed decision about your social care needs if required.	The processing of personal data is permitted under the following UK GDPR “condition”: • GDPR Article 6(1) (e) – processing is necessary for the performance of a task carried out in the public interest. The processing of special categories of personal data is permitted under the following UK GDPR “condition”, and DPA “provisions”:

	Your electronic GP record is the source of information that is shared.	- 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.
Care Homes	If you are a residence of a Care Home, personal data concerning your GP record will be shared with your care provider and other Multidisciplinary Team (MDT) looking after you to enable them to provide you with the best possible care needs. Your electronic GP record is the source of information that is shared.	The processing of personal data is permitted under the following UK GDPR “condition”: - GDPR Article 6(1) (e) – processing is necessary for the performance of a task carried out in the public interest. The processing of special categories of personal data is permitted under the following UK GDPR “condition”, and DPA “provisions”: - 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.

b. Other primary care services delivered for the purposes of direct care

Recipients or categories of recipients of the personal or special categories of personal data	Purpose of the processing	Lawful basis UK General Data Protection Regulation (UK GDPR) - <i>Article 6</i> - - <i>Article 9</i> - Data Protection Act (DPA) 2018 - <i>Section 10</i> - - <i>Schedule 1</i> -
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 England 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 to make the best the best-informed decision about your health needs. Your electronic GP record is the source of information that is shared.	The processing of personal data is permitted under the following UK GDPR “condition”: - GDPR Article 6(1) (e) – processing is necessary for the performance of a task carried out in the public interest. The processing of special categories of personal data is permitted under the following UK GDPR “condition”, and DPA “provisions”: - 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.

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. Your electronic GP record is the source of information that is shared.	The processing of personal data is permitted under the following UK GDPR "condition": - GDPR Article 6(1) (e) – processing is necessary for the performance of a task carried out in the public interest. The processing of special categories of personal data is permitted under the following UK GDPR "condition", and DPA "provisions": - 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.
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c. Statutory Disclosures of Information

Recipients or categories of recipients of the personal or special categories of personal data	Purpose of the processing	Lawful basis UK General Data Protection Regulation (UK GDPR) - Article 6 - - Article 9 - Data Protection Act (DPA) 2018 - Section 10 - - Schedule 1-
Safeguarding Concerns – to prevent an	Some members of public are recognised as needing safeguarding protection, for example children and	The processing of personal data is permitted under the following UK GDPR "condition":

individual, or to prevent a serious crime	vulnerable adults. If an individual is identified as being at risk from harm, we have a duty to do what we can to protect that individual, and we are bound 'Safeguarding' laws to do so. Where there is a suspected or actual safeguarding issue, we will share information that we hold about you with other relevant agencies such as local Ambulance trusts, the police, A&E departments, out of hours services, 111 or social services. The source of the information shared in this way is your electronic GP record. Children Act 1989 requires local authorities to investigate where a child is the subject of an emergency protection order, is in police protection or where there is a reasonable cause to suspect that a child is suffering or is likely to suffer harm. Care Act 2014 (safeguarding adults) sets out a clear legal framework for how local authorities and other parts of the system should protect adults at risk of abuse or neglect. Both Acts for Parliament require local authorities to safeguard and promote the welfare of children and adults who are in need, and to request help from specified authorities including General Practices, NHS Trusts, Integrated Care Boards (ICBs) and NHS England.	- UK GDPR Article 9 (2) (c) – the processing is necessary to protect the vital interests of the data subject. The processing of special categories of personal data is permitted under the following UK GDPR “condition”, and DPA “provisions”: - 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. The processing of special categories of personal data is permitted under the following UK GDPR “condition”, and DPA “provision”: Article 9 (2) (c) – the processing is necessary to protect the vital interests of the data subject. In accordance with DPA Schedule 1, Part 2 (18) (1a) - the condition 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. <u>Related Legislations:</u> Section 47 of The Children Act 1989. Section 45 of Care Act 2014
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<u>The Care Quality 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 purposes of their assessment and investigation of significant safety incident. Your data may be shared with the CQC, its officers and inspection team that visit us from time to time.	The processing of personal data is permitted under the following UK GDPR “condition”: • GDPR Article 6(1) (c) - processing for legal obligation. • GDPR Article 6(1) (e) – processing is necessary for the performance of a task carried out in the public interest. The processing of special categories of personal data is permitted under the following UK GDPR “condition”, and DPA “provisions”: • 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. The processing of special categories of personal data is permitted under the following UK GDPR “condition”, and DPA “provisions”: • 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. • <u>DPA Section 10 (1) (c) – processing is necessary for health and social care purposes.</u> • <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.</u>
Law Enforcement and Regulatory Bodies	In some circumstances we may be legally required to share personal information with law enforcements and regulatory bodies (without the consent of the data subject) such as: the Police; Courts of Justice; HMRC and DVLA for the purposes of prevention or detection of crime; apprehension or prosecution of offenders; the	The processing of personal data is permitted under the following UK GDPR “condition”: • GDPR Article 6(1) (c) - processing is necessary for compliance with a legal obligation.

	assessment or collection of any tax or duty or, of any imposition of a similar nature. Our GPs are obliged to notify the DVLA when fitness to drive requires notification, but an individual cannot or will not notify the DVLA themselves, and if there is concern for road safety, which would be for both the individual and the wider public. We will review each request based on its merits before deciding whether to release information to the relevant authorities. Your electronic GP record is the source of information that is shared.	The processing of special categories of personal data is permitted under the following UK GDPR “condition”, and DPA “provision”: - 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.
Medico-Legal	Medico-Legal - Where a medical professional is holding personal data for the purpose of providing medical reports in connection with legal action. Your electronic GP record is the source of information that is shared.	The processing of personal data is permitted under the following UK GDPR “condition”: - GDPR Article 6(1) (c) - processing is necessary for compliance with a legal obligation. - GDPR Article 6(1) (e) – processing is necessary for the performance of a task carried out in the public interest. The processing of special categories of personal data is permitted under the following UK GDPR “condition”, and DPA “provision”: - GDPR Article 9 (2) (f) – the processing is necessary for the establishment, exercise or defence of legal claims. In accordance with DPA Schedule 1, Part 3, (33) - the conditions for processing for legal claims is met where it is in connection with, any legal proceedings including prospective

		legal proceedings or; for the purpose of obtaining a legal advice or; establishing exercising or defending legal rights.
General Medical Council (GMC)	General Medical Council (GMC) is a public body that maintains the official register of medical practitioners in 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 practice. Your electronic GP record is the source of information that is shared.	The processing of personal data is permitted under the following UK GDPR “condition”: • GDPR Article 6(1) (c) - processing is necessary for compliance with a legal obligation. • GDPR Article 6(1) (e) - public interest or in the exercise of official authority; The processing of special categories of personal data is permitted under the following UK GDPR “condition”, and DPA “provisions”: • 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. <u>Related Legislation:</u> The Medical Act 1983
The Parliamentary and Health Service Ombudsman	The Parliamentary and Health Service Ombudsman 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	The processing of personal data is permitted under the following UK GDPR “conditions”:

	government departments, where you believe they have not acted properly or fairly or have provided a poor service. To do this, the Ombudsman will need to collect and use information we hold about you and your complaint. The Parliamentary and Health Service Ombudsman is allowed to use your information for the purpose of handling your complaint under the <u>Parliamentary Commissioner Act 1967</u>. This legislation also protects information obtained for the purposes of investigating your complaint. Your electronic GP record is the source of information that is shared.	- GDPR Article 6(1) (a) - the data subject has given consent to the processing of his or her personal data. - GDPR Article 6(1) (c) - processing is necessary for compliance with a legal obligation. The processing of special categories of personal data is permitted under the following UK GDPR “conditions”: - GDPR Article 9 (2) (a) - the data subject has given explicit consent to the processing of those personal data for one or more specified purposes. You do not have the right to object to the processing of your personal information, but you have the right to withdraw your consent. <u>Related Legislation:</u> <u>Parliamentary Commissioner Act 1967.</u>
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 with the NHS counter fraud team where required. Your electronic GP record is the source of information that is shared.	The processing of personal data is permitted under the following UK GDPR “condition”: - GDPR Article 6(1) (c) - processing is necessary for compliance with a legal obligation. - GDPR Article 6(1) (e) – processing is necessary for the performance of a task carried out in the public interest. The processing of special categories of personal data is permitted under the following UK GDPR “condition”, and DPA “provision”: - Article 9 (2) (G) – the processing is necessary for reasons of substantial public interest.

		In accordance with DPA Schedule 1, Part 2, (14) (1a) – the condition is met where the processing is necessary for the purposes of preventing fraud or a particular kind of fraud. Related Legislation: S10 NHS Act 2006 Serious Crime Act 2007
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 National Data collections/ extraction from the GP clinical system. These include: National Diabetes Audit (NDA) - A national monitoring system, auditing the care of patients with diabetes. The data extracted for the purpose of NDA includes NHS Number, date of birth and postcode, as well as clinical parameters related to diabetes. NDA is a mandatory data extraction under section 259 of the Health and Social Care Act 2012, this means that we are compelled by law to share your data Individual GP Level Data (IGPLD) - A national monitoring system to enable NHS Digital to provide GPs with clinical information on the care provision for their patients. The data extracted includes the NHS number. IGPLD is a mandatory data extraction under 259 of the Health and Social Care Act 2012, this means that we are compelled by law to share your data	The processing of personal data is permitted under the following UK GDPR “condition”: - GDPR Article 6(1) (c) - processing is necessary for compliance with a legal obligation. - GDPR Article 6(1) (e) – processing is necessary for the performance of a task carried out in the public interest. The processing of special categories of personal data is permitted under the following UK GDPR “condition”, and DPA “provision”: 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.

	Female genital mutilation (FGM) - NHS Digital collects data on FGM within the NHS in England on behalf of the Department of Health (DH). Data collected is used to produce information that helps improve NHS and local authorities to improve on how they support women and girls who have had or, who are at risk of FGM. FGM Enhanced Dataset is a mandatory data 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. Your electronic GP record is the source of information that is shared. <u>Data Retention Period</u> 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	<u>Related Legislation:</u> S259 of the Health and Social Care Act 2012 The processing is necessary for compliance with a legal and professional obligation to which we are subject therefore, you do not have the right to object to the processing of your personal information.
NHS England	NHS England is responsible for securing, planning, designing and paying for Primary Care & Specialised NHS services not otherwise funded by Clinical Commissioning Groups (CCGs) 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. The processing is necessary for compliance with a legal and professional obligation to which we are subject	The processing of personal data is permitted under the following UK GDPR “condition”: • GDPR Article 6(1) (c) - processing is necessary for compliance with a legal obligation. • GDPR Article 6(1) (e) – processing is necessary for the performance of a task carried out in the public interest. The processing of special categories of personal data is permitted under the following UK GDPR “condition”, and DPA “provision”:

	therefore, you do not have the right to object to the processing of your personal information. Your electronic GP record is the source of information that is shared.	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.
National Cancer Diagnosis Audit (NCDA).	The National Cancer Diagnosis Audit (NCDA) looks at primary and secondary care data relating to patients diagnosed with cancer. It helps to understand pathways to cancer diagnosis, what works well and where improvements could be made. The audit looks specifically at clinical practice in order to understand: • interval length from patient presentation to diagnosis; • use of investigations prior to referral; • what the referral pathways for patients with cancer are and how they compare with those recorded by the cancer registry The processing is necessary for compliance with a legal and professional obligation to which we are subject therefore, you do not have the right to object to the processing of your personal information.	The processing of personal data is permitted under the following UK GDPR “condition”: • GDPR Article 6(1) (c) - processing is necessary for compliance with a legal obligation. • GDPR Article 6(1) (e) – processing is necessary for the performance of a task carried out in the public interest. The processing of special categories of personal data is permitted under the following UK GDPR “condition”, and DPA “provision”: 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.
d. Processing for Commissioning, Planning, Research and Risk Stratification Purposes		
Recipients or categories of recipients of the personal or special categories of personal data	Purpose of the processing	Lawful basis UK General Data Protection Regulation (UK GDPR) - Article 6 - - Article 9 - Data Protection Act (DPA) 2018 - Section 10 – - Schedule 1-
Integrated Care Boards (ICB)	Each ICS has an Integrated Care Board (ICB), a statutory organisation bringing the NHS together locally to improve population health and establish shared strategic priorities within the NHS. When ICBs were legally established, clinical commissioning groups (CCGs) were abolished. ICBs 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’. To enable ICB in our geographical areas carry out their statutory responsibilities effectively, efficiently and safely,	The processing of personal data is permitted under the following UK GDPR “condition”: - GDPR Article 6(1) (e) – processing is necessary for the performance of a task carried out in the public interest. The processing of special categories of personal data is permitted under the following UK GDPR “condition”, and DPA “provisions”: - 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

	we may share personal data about you with them for the following purposes: • Individual Funding Requests. • Continuing Health Care. • Complaints, appeals, queries or, safeguarding concerns. • Commissioning purposes such as payment for target achievement known as Quality and Outcomes Framework (QOF) and where we participate in agreed national or local enhanced services. Your electronic GP record is the source of information that is shared.	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.
"Risk Stratification" (Population Health Management and Case Finding)	At Operose Health, we perform computerised searches of some or all of our records to identify individuals who may be at increased risk of certain conditions or diagnoses such as diabetes, heart disease, risk of falling. Your records may be amongst those searched. This is often called "risk stratification" or "case finding". These searches are sometimes carried out by 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:	The processing of personal data is permitted under the following UK GDPR "condition": • GDPR Article 6(1) (e) – processing is necessary for the performance of a task carried out in the public interest. The processing of special categories of personal data is permitted under the following UK GDPR "condition", and DPA "provisions": • 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

	Direct Care – ‘Case Finding’ where carried out by a health professional (for example GPs and Provider) involved in an individual’s care or by a Processor acting under contract with such a provider, it is treated as direct care. Indirect Care – to understand the local population needs and plan for future requirement. Your electronic GP record is the source of information that is shared.	management of health care systems or services or social care systems or services. Related Legislation: Section 251 NHS Act 2006
Processing personal data for the purpose of medical research	We only agree to participate in medical research projects if there is an agreed clearly defined reasons for the research, and it is likely to benefit healthcare and patients. Such proposals will have consents of our patients and service users, ethics committee approval, and will be in line with the safeguards and derogations required under the UK GDPR. Research organisations do not usually approach patients directly but will ask us to make contact with our suitable patients to seek their consent. Occasionally research can be authorised under law without the need to obtain consent. We may also use your medical records to carry out medical research within our Surgeries with your explicit consent. We share information with the medical research organisations if you give your explicit consent. Examples of our medical research partners are: • uMed - a technology enabled research network that links health data to real-time patient	The processing of personal data is permitted under the following UK GDPR “conditions”: • GDPR Article 6(1) (a) - the data subject has given consent to the processing of his or her personal data. The processing of special categories of personal data is permitted under the following UK GDPR “conditions” and DPA “provision”: • GDPR Article 9 (2) (a) - the data subject has given explicit consent to the processing of those personal data for one or more specified purposes. • GDPR Article 9 (2) (j) processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) (as supplemented by section 19 of the 2018 Act) based on domestic 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

	engagement. This enables researchers to centrally communicate with targeted patients and access their healthcare records in real time. Your electronic GP record is the source of information that is shared.	GDPR and DPA Section 19, and the processing is in the public interest. You do not have the right to object to the processing of your personal information, but you have the right to withdraw your consent.
De-identifying/anonymising personal data for the purpose of medical research	We are currently involved in a research and patient insights programme called the IQVIA Medical Research Extraction Scheme (MRES) which we provide non-identified/anonymised information from patients' electronic medical records. The data collected is non-identifiable/anonymised which means it DOES NOT include any direct patient identifiers such as names, addresses, NHS numbers, or full dates of birth, nor any direct identifiers of practices participating in this data extraction scheme. Individual patients' records are added into a much larger non-identified database, containing records from millions of patients across the UK and may be linked to other data, such as hospital data. Under the Data Protection Legislation, the principles of data protection do not apply to data that has been rendered anonymous however, if you would like to opt out of the IQVIA MRES data collection scheme, please let us know, and no data from your records will be collected/processed for use in research. This will not affect your care in any way. The source of the information shared in this way is your electronic GP record.	The processing of personal data is permitted under the following UK GDPR "conditions": • GDPR Article 6(1) (e) - public interest or in the exercise of official authority. The processing of special categories of personal data is permitted under the following UK GDPR "conditions" and DPA "provision": • 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 the domestic 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.

De-identifying/anonymising personal data for the purpose of medical research	<u>Clinical Practice Research Datalink (CPRD)</u> is a government organisation that provides anonymised patient data for research to improve patient and public health. You cannot be identified from the information sent to CPRD, and the principles of Data Protection Legislation do not apply to data that has been rendered anonymous however, if you do not want anonymised information from your patient record to be used in research you can opt out by speaking to your doctor.	The processing of personal data is permitted under the following UK GDPR “conditions”: • GDPR Article 6(1) (e) - public interest or in the exercise of official authority. The processing of special categories of personal data is permitted under the following UK GDPR “conditions” and DPA “provision”: • 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 the domestic 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.
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e. Data Sharing Databases

Recipients or categories of recipients of the personal or special categories of personal data	Purpose of the processing	Lawful basis UK General Data Protection Regulation (UK GDPR) - Article 6 - - Article 9 - Data Protection Act (DPA) 2018 - Section 10 - - Schedule 1-
National NHS Digital Services “Spine” including:	Spine supports the IT infrastructure for health and social care in England, joining together over 23,000 healthcare IT systems in 20,500 organisations.	The processing of personal data is permitted under the following UK GDPR condition:

• Patient Demographics Service • e-Referral Service • Electronic Prescription Service • GP2GP • Summary Care Record	It hosts key services to support the delivery of your care, to enable healthcare professionals, authorised with an NHS smartcard, to view relevant information about you as follows: Patient Demographics Service – The Personal Demographics Service (PDS) is the national electronic database of NHS patient details such as name, address, date of birth and NHS Number (known as demographic information). It helps healthcare professionals to identify patients and match them to their health records. It also allows them to contact and communicate with patients. Summary Care Record (SCR) – is an electronic record of important patient information, created from GP medical records. It can be seen and used by authorised staff in other areas of the health and care system involved in the patient's direct care. When your personal health records on your GP Record is uploaded to the spine, NHS Digital becomes the data controller for the uploaded 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 • the name, address, date of birth and NHS number of the patient	• GDPR Article 6(1) (e) - public interest or in the exercise of official authority. The processing of special categories of personal data is permitted under the following UK GDPR “condition” and DPA “provision”: • 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. You have the right to raise an objection or opt-out of out of having an SCR by returning a completed opt-out form to their GP practice. Although we will first need to explain how this may affect the care you receive.
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	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. <u>Electronic Prescription Service</u> - 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. Your electronic GP record is the source of information that is shared in all of the above instances. <u>Data Retention Period:</u> 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	
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<u>NHS Digital – National 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 national data opt-out. 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. 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.	The processing of personal data is permitted under the following UK GDPR condition: • GDPR Article 6(1) (e) - public interest or in the exercise of official authority. The processing of special categories of personal data is permitted under the following UK GDPR “condition” and DPA “provision”: • 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 251 NHS Act 2006 You have the right to opt-out of having your data shared for purposes beyond direct care (research and planning). You can do so via the national opt-out website

	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 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 CCGs. The GP data is linked to other records that they access, such as hospital attendance records to enable CCGs understand the local population needs and plan for future requirement. Your electronic GP record is the source of information that is shared in all of the above instances.	
Open Exeter	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. Access to Open Exeter is only possible on the Health and Social Care Network (HSCN), and via authorised logons/passwords provided by NHS Digital. Your electronic GP record is the source of information that is shared.	The processing of personal data is permitted under the following UK GDPR “condition”: • GDPR Article 6(1) (e) - public interest or in the exercise of official authority; The processing of special categories of personal data is permitted under the following UK GDPR “condition” and DPA “provisions”: • 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;
Dr.iQ Powered by Evergreen askMyGP	Dr. iQ is a free online consultation platform for NHS patients, providing fast, safe and effective online consultations with your GP, reducing the need to book and wait for a face-to-face GP appointment. Dr. iQ enables our GP Practices to improve patient experience by ensuring that the right people deal with requests at the right time. By using the Dr. iQ platform (via our website or app) patients/service users can: • Register with us as their local GP. • Book appointments. • Attend online consultation with their health professional. • View their medical records online. • Order repeat prescriptions for collection at their preferred pharmacy. When you access any of our services (via the Dr. iQ app or our website), we use personal information about you (such as name, date of birth, NHS number) and technical information (such as internet protocol address) to: • Provide you with the best possible healthcare service. • To allow you to participate in interactive features of our service, when you choose to do so. • To administer and maintain our website or app for internal operations, including troubleshooting, statistical and survey purposes.	The processing of personal data is permitted under the following UK GDPR condition: • GDPR Article 6(1) (e) - public interest or in the exercise of official authority. The processing of special categories of personal data is permitted under the following UK GDPR “condition” and DPA “provision”: • 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.

	To improve our site to ensure that content is presented in the most effective manner. Dr iQ enables you to speak directly to your GP or another clinical staff member via video or audio consultations using our integrated third party platform, Zoom. More information can be found on Privacy Zoom.	
Shared Care Record Partners	Shared Care Records are integrated health and care systems that bring together aggregate summary of health and social care information from multiple health and social care organisations across geographical areas which is intended to support optimal care. Shared Care Records enable health and care professionals to see relevant information about the care and treatment you've had across all services to enable health and/or social professionals involved in your care to provide you with the best possible care. The source of your information we share in this way is your electronic GP record. Further information about shared care records can be found on the websites of our shared care record partners: • Bedfordshire, Luton and Milton Keynes Shared Health and Care Record • The Kent and Medway Care Record • Herefordshire and Worcestershire Shared Care Record • Black Country and West Birmingham – One Health and Care Record • Hampshire and Isle of Wight – Care and Health Information Exchange • London Care Record – OneLondon	The processing of personal data is permitted under the following UK GDPR “condition”: • GDPR Article 6(1) (e) – processing is necessary for the performance of a task carried out in the public interest. The processing of special categories of personal data is permitted under the following UK GDPR “condition”, and DPA “provisions”: • 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.

	Your Right to Object: You have a general right to raise an objection to having your health and/or social care record integrated by contacting us or the relevant shared care partner in your geographical area.	
Population Health Management	We work closely with Integrated Care Systems (ICSs) to prevent ill-health and address health inequalities across wider population. This is often referred to as Population Health Management (PHM) and aims to improve physical and mental health outcomes, promote wellbeing and reduce health inequalities across an entire population with a specific focus on the wider determinants of health (things like health, housing, employment, education), through targeting interventions at those groups most at risk, supporting health prevention as well as treatment. Activities that contribute to the overall provision of services to a population as a whole or a group of patients with particular conditions can be split along two main paths/purposes namely, PHM stratification and segmentation for “case finding and targeted intervention” purposes (i.e. individual care) and, PHM stratification and segmentation for planning, commissioning, research etc (i.e. purposes beyond individual care). Please read more about PHM here.	The processing of personal data is permitted under the following UK GDPR “condition”: - GDPR Article 6(1) (e) – processing is necessary for the performance of a task carried out in the public interest. The processing of special categories of personal data is permitted under the following UK GDPR “condition”, and DPA “provisions”: - 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.
f. Processors		
Recipients or categories of recipients of the personal or	Purpose of the processing	Lawful basis UK General Data Protection Regulation (UK GDPR) - Article 6 -

special categories of personal data		- Article 9 - Data Protection Act (DPA) 2018 - Section 10 - - Schedule 1-
EMIS Health SystmOne - TPP	EMIS Health and SystmOne – TPP provide clinical systems used by Operose Health Group to securely store and process your medical records. Information about your personal health records is stored in your GP electronic record which is accessed by our registered and regulated health and care professionals to provide you with the very best care. Your electronic GP record is the source of information that is shared.	The processing of personal data is permitted under the following UK GDPR condition: - GDPR Article 6(1) (e) - public interest or in the exercise of official authority. The processing of special categories of personal data is permitted under the following UK GDPR “condition” and DPA “provision”: - 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.
Docman and Docmail	Docman Limited act as a Processor and provides cloud-based storage software for electronic patient document. This includes paper letters that we receive, scan and upload to a patient record, as well as letters that we receive in an electronic format.	The processing of personal data is permitted under the following UK GDPR condition: GDPR Article 6(1) (e) - public interest or in the exercise of official authority. The processing of special categories of personal data is permitted under the following UK GDPR “condition” and DPA “provision”:

	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 portable devices. Your electronic GP record is the source of information that is shared.	- 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.
iPlato	iPlato is cloud-based text messaging service used by GPs to communicate with their patients.	The processing of personal data is permitted under the following UK GDPR condition: - GDPR Article 6(1) (e) - public interest or in the exercise of official authority. The processing of special categories of personal data is permitted under the following UK GDPR “condition” and DPA “provision”: - 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.

<u>Redcentric</u>	<u>Redcentric</u> is commissioned by Operose Health Group to deliver telephony services to enable our GP Practices to deliver a safe and secure patient service by being more responsive to call demand around appointments, test results and prescription delivery. When you use our services for purposes such as telephone consultation, or you just want to speak to a healthcare professional for advice, your call may be recorded and stored as part of the health record, to enable us to provide you with the best possible care.	The processing of personal data is permitted under the following UK GDPR condition: • GDPR Article 6(1) (e) - public interest or in the exercise of official authority. The processing of special categories of personal data is permitted under the following UK GDPR “condition” and DPA “provision”: • 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. • <u>DPA Section 10 (1) (c) – processing is necessary for health and social care purposes;</u> <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.</u>
<u>X-On Surgery Connect</u>	<u>X-On</u> is a cloud based telephony service commissioned across Operose Health to enable our GP Practices to deliver a safe and secure patient service by being more responsive to call demand around appointments, test results and prescription delivery. When you use our services for purposes such as telephone consultation, or you just want to speak to a healthcare professional for advice, your call may be recorded and stored as part of the health record, to enable us to provide you with the best possible care.	The processing of personal data is permitted under the following UK GDPR condition: • GDPR Article 6(1) (e) - public interest or in the exercise of official authority. The processing of special categories of personal data is permitted under the following UK GDPR “condition” and DPA “provision”: • 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. • <u>DPA Section 10 (1) (c) – processing is necessary for health and social care purposes;</u>

		<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.</u>
<u>Quality Medical Solutions UK (QMS-UK)</u>	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. • National Diabetic Retinal Screening Service. Your electronic GP record is the source of information that is shared.	The processing of personal data is permitted under the following UK GDPR condition: • GDPR Article 6(1) (e) - public interest or in the exercise of official authority. The processing of special categories of personal data is permitted under the following UK GDPR “condition” and DPA “provision”: • 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. • <u>DPA Section 10 (1) (c) – processing is necessary for health and social care purposes;</u> • <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.</u>
<u>AccuRx</u>	<u>AccuRx is an NHS Digital approved platform for web-based video consultation system and messaging system</u> to enable health and social care teams to communicate with each other and with patients. Video consultations allows our healthcare professionals to carry out observations during their consultations in the	The processing of personal data is permitted under the following UK GDPR condition: • GDPR Article 6(1) (e) - public interest or in the exercise of official authority.

	same way they would during a face-to-face appointment, to provide our patients the with the best possible care. In the video consultation, healthcare professionals are able record the observations and outcome of the consultation in the same way as a face-to-face consultation is recorded in the patient's electronic record and any agreed actions are carried out. The connection prioritises 'peer-to-peer' between our registered health professionals and patient's communication device, and follows NHS best practice guidelines on health and social care cloud security. Messaging service allows us to communicate directly to patients via text message or through the NHS app. More on AccuRx can be found on their Privacy Notice - Accurx Privacy Policy NHS App Messaging Privacy Notice - NHS App privacy policy: messaging services - NHS (www.nhs.uk)	The processing of special categories of personal data is permitted under the following UK GDPR "condition" and DPA "provision": • 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.
Healthy.io	NHS has commissioned Healthy.io, as part of a national NHS programme, to deliver a service providing at home urine test kits so patients at risk of chronic kidney disease can conduct this important test at home using a smartphone. The data is being processed for the purpose of delivery of a national programme to monitor urine for indications of chronic kidney disease (CKD) which is recommended to be undertaken annually for patients at risk of chronic kidney disease e.g., patients living with diabetes. The programme enables patients to test their kidney function	The processing of personal data is permitted under the following UK GDPR condition: • GDPR Article 6(1) (e) - public interest or in the exercise of official authority. The processing of special categories of personal data is permitted under the following UK GDPR "condition" and DPA "provision": • 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.

	from home. We will share your contact details with Healthy.io to enable them to contact you and offer to send you a test kit. This will help identify patients at risk of kidney disease and help us agree any early interventions that can be put in place for the benefit of your care. Healthy.io will only use your data for the purposes of delivering this service to you. If you do not wish to receive a home test kit from Healthy.io we will continue to manage your care within the Practice. Healthy.io are required to hold data we send them in line with applicable law. Further information about this is available on Digital home kidney health testing service	• 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.
Healthtech - 1	Operose Health has commissioned Healthtech – 1 to set up an automated process for new registration requests to our practices. The source of data is the information you record on your registration form.	The processing of personal data is permitted under the following UK GDPR condition: • GDPR Article 6(1) (e) - public interest or in the exercise of official authority. The processing of special categories of personal data is permitted under the following UK GDPR “condition” and DPA “provision”: • 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

		<u>management of health care systems or services or social care systems or services.</u>
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