Clapham Family Practice's current systems and services

a. Direct Medical Care and Administration		
Recipients or Categories of recipients of the personal or special categories of personal information	**Purpose of the processing**	**Lawful basis for processing**
NHS Trusts – Hospitals, Community or Mental Health Trusts and **other care providers with NHS contracts** (e.g. services providing ultrasound scans, medical imaging; specialist providers such as those providing day surgery, other direct care tests / services)	Clapham Family Practice shares relevant personal information with NHS Trusts, hospitals, community health services, mental health services and other healthcare providers involved in a patient's care. This may include sharing GP records, referrals, test results and relevant medical history to support diagnosis, treatment, ongoing care and safe transfer between services.	**Personal data – Article 6(1)(e) UK GDPR** Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority, including the provision and management of NHS healthcare services. **Special category data (health information) – Article 9(2)(h) UK GDPR** Processing is necessary for the purposes of preventive or occupational medicine, medical diagnosis, the provision of health or social care or treatment, or the management of health or social care systems and services.
NHS service planning, commissioning, audit and performance monitoring	Patient information may also be shared with relevant NHS bodies, including NHS England and the Integrated Care Board (ICB), where necessary and legally permitted, to plan and commission healthcare services, manage waiting lists, undertake clinical audits, monitor service activity and performance, and support service improvement. Where possible, information will be anonymised or aggregated. Identifiable or pseudonymised information may be used where necessary and permitted by law.	The lawful basis depends on the specific purpose, recipient and dataset. This may include **UK GDPR Article 6(1)(e)** where the relevant public task applies. Where special category health data is involved, an appropriate Article 9 condition and any applicable Data Protection Act 2018 requirements must also be identified. The basis should be confirmed for each specific data flow before publication.
Emergency Services (Ambulance Trusts, Police, Accident & Emergency departments, out of hours services, 111)	In an emergency, Clapham Family Practice may share relevant patient information with emergency healthcare services, and where appropriate other emergency services, when necessary to protect a person's life or prevent serious harm. This may include relevant medical information and Advance Directives where necessary to support emergency care or protect the patient's vital interests. Information will only be shared where there is an appropriate legal basis or ensure you receive appropriate emergency care. You may be unable to communicate or provide consent, for example, if you are unconscious, seriously ill or injured. Where necessary and lawful, we may	**UK GDPR Article 6(1)(d) — Vital interests:** where processing is necessary to protect the vital interests of the patient or another person, generally in life-threatening circumstances. **UK GDPR Article 9(2)(c) — Vital interests (special category data):** where health information must be processed to protect vital interests and the patient is physically or legally incapable of giving consent.

	share relevant information to support emergency treatment and protect your safety or the safety of others. We may also record and share information about your advance decisions or advance care plans, where relevant, to help professionals understand your wishes and make appropriate decisions about your care.	**UK GDPR Article 9(2)(h) — Health or social care:** may apply where the sharing is necessary to provide health or social care and the relevant legal conditions and safeguards are met.
Pharmacists – Medicines Optimisation	Clapham Family Practice shares *relevant* patient information with community pharmacists and other authorised pharmacy professionals, where necessary, to support the safe and effective use of your medicines. This may include reviewing prescribed medicines, identifying potential interactions or side effects, checking that treatment remains appropriate, supporting adherence and helping to prevent medication-related problems. Where authorised NHS systems and services are in place, relevant information may also be used to support electronic prescription requests and the secure exchange of information between the Practice and pharmacy teams. Information is shared only where necessary for the relevant purpose and in accordance with applicable confidentiality, information governance and data protection requirements.	**Personal data – UK GDPR 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 applicable to the Practice's provision and management of NHS healthcare services. **Special category data (health information) – UK GDPR Article 9(2)(h)** Processing is necessary for the provision of health care or treatment, or the management of health care systems and services, subject to the applicable legal requirements and safeguards. **Data Protection Act 2018 – Section 10(1)(c) and Schedule 1, Part 1, paragraph 2** These provisions support the processing of special category data for health or social care purposes, where the relevant statutory conditions are met.
Local Authorities and Social Services	Clapham Family Practice works with local authorities, social services and relevant multidisciplinary teams (MDTs) to support patients who may need social care or additional support. Where necessary and lawful, we may share relevant information from your GP medical record to help assess your needs, coordinate health and social care services, support care planning and ensure appropriate assistance is provided. Information may be shared to support children, adults with care and support needs, older people and individuals who may be vulnerable or at risk. We only share information that is relevant and necessary	**Personal data – Article 6(1)(e) UK GDPR** Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority, where applicable to the provision or coordination of health and social care services. **Special category data (health information) – Article 9(2)(h) UK GDPR** Processing is necessary for the provision of health or social care or treatment, or the management of health or social care systems and services, subject to the applicable legal requirements.

	for the purpose, in accordance with applicable data protection and confidentiality requirements.	**Data Protection Act 2018 – Section 10(1)(c) and Schedule 1, Part 1, paragraph 2** These provisions support the processing of special category data for health or social care purposes, subject to the applicable legal requirements.
Care Homes	If you live in a care home, Clapham Family Practice may share relevant information from your GP medical record with your care home and other authorised healthcare professionals involved in your care. This information helps care staff and healthcare professionals understand your health needs, manage your medicines, coordinate your treatment, monitor changes in your health and provide appropriate ongoing care. We share only information that is relevant and necessary to support your care, in accordance with applicable data protection and confidentiality requirements.	**Personal data – Article 6(1)(e) UK GDPR** Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority, where applicable to the provision and management of NHS healthcare services. **Special category data (health information) – Article 9(2)(h) UK GDPR** Processing is necessary for medical diagnosis, the provision of health or social care or treatment, or the management of health or social care systems and services, subject to the applicable legal requirements. **Data Protection Act 2018 – Section 10(1)(c) and Schedule 1, Part 1, paragraph 2** These provisions support the processing of special category data for health or social care purposes, subject to the applicable legal requirements.
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 information	**Purpose of the processing**	**Lawful basis for processing**
Integrated Urgent Care Service (IUC) – NHS 111 and Out of Hours Services	The Integrated Urgent Care (IUC) Service provides access to urgent healthcare advice, clinical assessment and treatment 24 hours a day, seven days a week. It includes NHS 111 and GP out-of-hours services. When you contact NHS 111 or an out-of-hours service about a health concern, relevant information from your GP medical record may be shared with the healthcare professionals involved in your care. This helps them understand your medical history, assess your	**Personal data** • **UK GDPR 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. **Special category data (health information)** • **UK GDPR Article 9(2)(h):** Processing is necessary for the provision of health or social care, or the management of health or social care systems and

	needs and make informed decisions about the most appropriate care or treatment. **Source of information:** Your electronic GP medical record.	services, subject to the applicable legal conditions and safeguards. • **Data Protection Act 2018, section 10(1)(c), and Schedule 1, Part 1, paragraph 2:** These provisions support processing necessary for health or social care purposes, where the relevant conditions are met.
Continuing Health Care (CHC)	NHS Continuing Healthcare (CHC) is a package of care arranged and funded by the NHS for people aged 18 or over who have significant ongoing healthcare needs. Care may be provided in the person's own home, a care home or another appropriate setting. CHC is different from NHS-funded nursing care, which contributes towards the cost of nursing care for eligible people living in care homes. It is also different from social care arranged by the local authority, which may be subject to a financial assessment and charges. Where you are being assessed for, or receive, CHC, Clapham Family Practice may share relevant information from your GP medical record with the NHS organisation responsible for assessing or arranging your care and with healthcare professionals or care providers involved in your assessment and ongoing care. This information helps assess your healthcare needs, coordinate services and support safe, appropriate care. **Source of information:** Your electronic GP medical record.	**Personal data** • **UK GDPR 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. **Special category data (health information)** • **UK GDPR Article 9(2)(h):** Processing is necessary for the provision of health or social care, or the management of health or social care systems and services, subject to the applicable legal conditions and safeguards. • **Data Protection Act 2018, section 10(1)(c), and Schedule 1, Part 1, paragraph 2:** These provisions support processing necessary for health or social care purposes, where the relevant conditions are met.
c. Statutory Disclosures of Information		
Recipients or Categories of recipients of the personal or special categories of personal information	**Purpose of the processing**	**Lawful basis for processing**
Safeguarding Children and Adults at Risk	Clapham Family Practice has a responsibility to help protect children and adults at risk of abuse, neglect or other harm. Where we identify, or have reasonable concerns about, a safeguarding risk, we may share relevant information from your GP	**Personal data** • **UK GDPR Article 6(1)(e):** Processing is necessary for a task carried out in the public interest or in the exercise of official authority, where this applies to the safeguarding activity.

	medical record with appropriate organisations, such as local authority safeguarding teams, social services, the police, NHS trusts, ambulance services and other healthcare professionals involved in protecting the individual. Information may be shared without your consent where there is a lawful basis to do so, including where seeking consent could place someone at further risk or prejudice safeguarding action. We will share only information that is relevant and necessary for the safeguarding purpose, in accordance with applicable law. **Source of information:** Your electronic GP medical 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 6(1)(c):** Processing is necessary to comply with a legal obligation, where a specific legal obligation applies. **Special category data (health information)** • **UK GDPR Article 9(2)(g):** Processing is necessary for reasons of substantial public interest, where the applicable legal conditions are met. • **Data Protection Act 2018, section 10(3), and Schedule 1, Part 2, paragraph 18:** This condition may apply where processing is necessary to protect children or adults at risk from neglect or physical, mental or emotional harm, or to protect their well-being. The statutory conditions must be met, including the requirements concerning consent and substantial public interest. • **UK GDPR Article 9(2)(h):** May apply where information is processed for the provision of health or social care, subject to the applicable legal conditions and safeguards. • **UK GDPR Article 9(2)(c):** May apply where processing is necessary to protect vital interests and the individual is physically or legally incapable of giving consent. **Relevant legislations:** • Children Act 1989, section 47 – enquiries where a child is suspected to be suffering, or likely to suffer, significant harm. • Care Act 2014, section 42 – local authority enquiries where an adult meets the statutory criteria for a safeguarding enquiry. • Care Act 2014, section 45 – information sharing in relation to adults at risk in specified circumstances.

Care Quality Commission (CQC)	The Care Quality Commission (CQC) is the independent regulator of health and adult social care services in England. It monitors and inspects services to assess whether they meet required standards of safety, quality and effectiveness. During an inspection, assessment or investigation, the CQC may access relevant patient medical records where necessary to carry out its regulatory functions and where its legal powers permit. This may include identifiable information held in Clapham Family Practice's clinical system. Access must be necessary and proportionate to the regulatory purpose. The CQC may also require the Practice to provide relevant information, documents or records under its statutory powers. **Source of information:** Your electronic GP medical record and other relevant Practice records.	**Personal data** • **UK GDPR Article 6(1)(c):** Processing is necessary to comply with a legal obligation, where the Practice is legally required to provide the information. • **UK GDPR Article 6(1)(e):** Processing is necessary for a task carried out in the public interest or in the exercise of official authority, where applicable. **Special category data (health information)** • **UK GDPR Article 9(2)(g):** Processing is necessary for reasons of substantial public interest, where the applicable legal conditions are met. • **Data Protection Act 2018, section 10 and Schedule 1:** The relevant condition under Schedule 1 must be identified for the specific regulatory processing. **Relevant legislation:** Health and Social Care Act 2008, including the CQC's statutory powers to access or require relevant records and information.
Law Enforcement and Regulatory Bodies	In certain circumstances, Clapham Family Practice may be required or legally permitted to share relevant patient information with law enforcement or regulatory bodies, such as the police, courts, HM Revenue and Customs (HMRC) and the Driver and Vehicle Licensing Agency (DVLA). Information may be shared where required by law, in response to a valid court order or statutory request, or where disclosure is otherwise lawful and necessary, for example to prevent or detect crime, assist in the prosecution of offenders, or support the assessment or collection of taxes and duties. **Fitness to drive** Where a patient's medical condition may make them unfit to drive, the GP will advise them of their responsibility to notify the DVLA. If the patient continues to drive despite medical advice and this presents a risk of death or serious harm to others, the GP may	**Personal data** • **UK GDPR Article 6(1)(c):** Processing is necessary to comply with a legal obligation, where the Practice is legally required to disclose the information. • **UK GDPR Article 6(1)(e):** Processing is necessary for a task carried out in the public interest or in the exercise of official authority, where applicable. • Another lawful basis may apply to a particular disclosure, depending on the circumstances. **Special category data (health information)** • **UK GDPR Article 9(2)(g):** Processing is necessary for reasons of substantial public interest, where the applicable legal conditions are met. • **Data Protection Act 2018, Schedule 1, Part 2, paragraph 10:** This condition may apply to disclosures necessary to prevent or detect an unlawful act where

	disclose relevant medical information to the DVLA in confidence, even without the patient's consent, where justified in the public interest. The GP will normally inform the patient before disclosure, where safe and practicable, and record the decision in the patient's medical record. All requests for information are considered individually. The Practice will assess the legal authority, purpose and necessity of the disclosure and share only information that is relevant and proportionate to that purpose. **Source of information:** Your electronic GP medical record and other relevant Practice records.	seeking the individual's consent would prejudice that purpose and the processing is necessary for reasons of substantial public interest. The applicable lawful basis and special category condition will depend on the circumstances of the disclosure. **Relevant guidance:** GMC guidance on patients' fitness to drive and reporting concerns to the DVLA.
Medico-Legal Reports and Legal Proceedings	Clapham Family Practice may be asked to provide medical reports or relevant information from your GP medical record for medico-legal purposes, such as legal proceedings, personal injury claims or requests for legal advice. We will consider each request individually and assess whether there is a lawful basis for disclosure. Where disclosure relies on your consent or authorisation, we will normally obtain this before providing the information. Information may also be disclosed where required or otherwise permitted by law. Only information that is relevant and necessary for the purpose will be disclosed. **Source of information**: Your electronic GP medical record and other relevant Practice records.	**Personal data** • **UK GDPR Article 6(1)(c):** Processing is necessary to comply with a legal obligation, where one applies. • **UK GDPR Article 6(1)(e):** Processing is necessary for a task carried out in the public interest or in the exercise of official authority, where applicable. • **UK GDPR Article 6(1)(a):** Consent may apply where this is the appropriate basis for the disclosure. **Special category data (health information)** • **UK GDPR Article 9(2)(f):** Processing is necessary for the establishment, exercise or defence of legal claims. • **Data Protection Act 2018, Schedule 1, Part 3, paragraph 33:** Provides conditions relating to processing necessary in connection with legal proceedings, obtaining legal advice, or establishing, exercising or defending legal rights. The applicable lawful basis and special category condition depend on the circumstances of the request and the purpose for which the information is required.
General Medical Council (GMC)	The General Medical Council (GMC) is the independent regulator of doctors in the United Kingdom. Its role is to protect the public by	**Personal data**

	maintaining the medical register and investigating concerns about doctors' fitness to practise. Under the Medical Act 1983, the GMC has statutory powers to request relevant information and documents to support fitness-to-practise investigations. Where a lawful request is made, Clapham Family Practice may be required to disclose relevant information from a patient's medical record. The Practice will consider each request in accordance with the GMC's legal powers, data protection requirements and its duty of confidentiality. Only information that is relevant to the request and legally permitted to be disclosed will be shared. **Source of information:** Your electronic GP medical record and other relevant Practice records.	• **UK GDPR Article 6(1)(c):** Processing is necessary to comply with a legal obligation, where disclosure is legally required. • **UK GDPR Article 6(1)(e):** Processing is necessary for a task carried out in the public interest or in the exercise of official authority, where applicable. **Special category data (health information)** • **UK GDPR Article 9(2)(g):** Processing is necessary for reasons of substantial public interest, where the applicable legal conditions are met. • The relevant condition under the **Data Protection Act 2018, Schedule 1**, must be identified for the particular disclosure. **Relevant legislation:** Medical Act 1983, section 35A, which gives the GMC powers to require relevant information or documents for specified fitness-to-practise functions.
Parliamentary and Health Service Ombudsman (PHSO)	The Parliamentary and Health Service Ombudsman (PHSO) provides an independent service for investigating eligible complaints about the NHS in England and UK government departments. It may need to obtain and review information held by Clapham Family Practice to investigate a complaint about the care or service provided. Where a complaint concerns the Practice, we may share relevant information from your GP medical record or other Practice records with the PHSO where you have authorised the disclosure or where disclosure is otherwise legally permitted or required. We will consider each request individually and share only information that is relevant and necessary for the investigation. The PHSO is subject to legal restrictions on the disclosure of information obtained during its investigations. **Source of information:** Your electronic GP medical record and other relevant Practice records.	**Personal data** • **UK GDPR Article 6(1)(c):** Processing is necessary to comply with a legal obligation, where the Practice is legally required to disclose the information. • **UK GDPR Article 6(1)(e):** Processing is necessary for a task carried out in the public interest or in the exercise of official authority, where applicable. **Special category data (health information)** • **UK GDPR Article 9(2)(g):** Processing is necessary for reasons of substantial public interest, where the applicable legal conditions are met. • The relevant condition under the **Data Protection Act 2018, Schedule 1**, must be confirmed for the particular disclosure.

		Relevant legislation: Parliamentary Commissioner Act 1967 and Health Service Commissioners Act 1993, as applicable to the investigation.
NHS Counter Fraud	NHS counter-fraud services investigate suspected fraud, bribery and corruption involving NHS services and resources. Clapham Family Practice may be required or legally permitted to share relevant patient information with the NHS counter-fraud team where this is necessary for a lawful investigation. Your electronic GP record may be used as a source of information. We will consider the legal basis for each disclosure and share only information that is relevant and necessary for the purpose.	**Personal data:** • **UK GDPR Article 6(1)(c)** – compliance with a legal obligation, where disclosure is legally required. • **UK GDPR Article 6(1)(e)** – performance of a task carried out in the public interest or in the exercise of official authority, where applicable. **Special category data (including health information):** • **UK GDPR Article 9(2)(g)** – reasons of substantial public interest, where the relevant legal conditions are met. • **Data Protection Act 2018, Schedule 1, Part 2, paragraph 14** – preventing fraud, where the specific statutory conditions apply. **Related legislation** • National Health Service Act 2006 • Serious Crime Act 2007
NHS England Digital – National Data Collections and Statutory Data Requirements	NHS England collects and analyses information from GP practices and other health and care providers to support national clinical audits, monitor healthcare outcomes, improve services and support the planning and delivery of NHS care. NHS Digital merged with NHS England on 1 February 2023, and its relevant data and digital functions transferred to NHS England. Where applicable to Clapham Family Practice, information may be extracted from the GP clinical system for national data collections, including the following: **National Diabetes Audit (NDA)** - The NDA monitors the quality of diabetes care in England. Information about patients with diabetes, including NHS numbers and relevant demographic and clinical information, is collected to assess care and identify opportunities for improvement. NHS England can require relevant organisations to provide information under section 259 of the Health and Social	For the National Diabetes Audit, NHS England identifies the following bases: • **UK GDPR Article 6(1)(e):** processing is necessary for a task carried out in the public interest or in the exercise of official authority.

	Care Act 2012, in accordance with the applicable Data Provision Notice and directions. National Diabetes Audit (England): Transparency Notice - NHS England Digital **Individual GP Level Data (IGPLD)** – This collection uses NHS numbers and relevant clinical information to provide GPs and GP practices with information about the care provided to their patients. NHS England uses the data to support the assessment and improvement of primary care. The collection is described by NHS England as an automated annual extract; practices should confirm the current collection arrangements and requirements before stating that it applies to them. For more information see - Individual GP level data - NHS England Digital **Female Genital Mutilation (FGM) Enhanced Dataset** – NHS England collects information about female genital mutilation from relevant NHS providers, including GP practices, to understand the prevalence of FGM, improve support for women and girls affected or at risk, and inform service planning. The applicable collection requirements and information standards determine what information must be recorded and submitted. Your GP clinical record may be the source of information used for these collections. The information collected, its legal basis and whether identifiable information is required depend on the particular collection and its current requirements. Female Genital Mutilation (FGM) enhanced dataset Data Provision Notice - NHS England Digital **Data Retention Period** Clapham Family Practice retains the records held in its own systems in accordance with the applicable NHS Records Management Code of Practice for Health and Social Care and the Practice's records	• **UK GDPR Article 9(2)(h):** processing is necessary for the provision of health care or treatment, or the management of health care systems or services. For Individual GP Level Data (IGPLD): • **UK GDPR Article 6:** *To be confirmed against the current collection requirements.* • **UK GDPR Article 9**: *To be confirmed against the current special category condition.* • **Statutory authority:** *Confirm the applicable direction or Data Provision Notice under the Health and Social Care Act 2012, if relevant.* For Female Genital Mutilation (FGM) Enhanced Dataset • **UK GDPR Article 6(1)(c):** Legal obligation, where CFP's submission is required by the applicable Data Provision Notice. • **UK GDPR Article 9:** *Confirm the applicable condition for processing special category health data against the current FGM collection documentation before specifying it in the notice.* • **Statutory authority:** Sections 250 and 259 of the Health and Social Care Act 2012, as applicable to the current standard and data submission requirement. **Related Legislation:** • 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

	management arrangements. Retention of data held by NHS England is governed by the applicable arrangements and policies of NHS England.	not have the right to object to the processing of your personal information.
NHS England	NHS England commissions and oversees NHS services in England, including primary care, hospital services, mental health and community services. Clapham Family Practice may share relevant patient information with NHS England where this is necessary for a lawful purpose, such as safeguarding, supporting the delivery of NHS services or meeting a statutory reporting requirement. Where safeguarding concerns need to be escalated beyond the local area, relevant information may be shared with NHS England or other appropriate organisations, where justified. Your electronic GP record may be used as a source of information. We share only information that is relevant and necessary for the specific purpose and consider the applicable legal requirements before disclosure.	**Personal data:** • **UK GDPR Article 6(1)(c)** – compliance with a legal obligation, where disclosure is legally required. • **UK GDPR Article 6(1)(e)** – performance of a task carried out in the public interest or in the exercise of official authority, where applicable. **Special category data (including health information):** • **UK GDPR Article 9(2)(h)** – provision or management of health or social care, where applicable. • **UK GDPR Article 9(2)(g)** – reasons of substantial public interest, where the relevant legal conditions are met. • **Data Protection Act 2018, section 10 and Schedule 1** – the relevant condition must be identified according to the purpose of the disclosure. For health or social care purposes, this may be Schedule 1, Part 1, paragraph 2. **Your right to object** You can raise an objection or concern about how your information is shared. Whether an objection can be upheld depends on the purpose of the sharing and any applicable legal obligations or overriding public-interest considerations.
National Cancer Diagnosis Audit (NCDA)	The National Cancer Diagnosis Audit (NCDA), managed by Cancer Research UK in collaboration with relevant healthcare organisations, examines information about patients diagnosed with cancer to understand how cancer is diagnosed and identify opportunities to improve early diagnosis and patient care. The audit examines aspects of the diagnostic pathway, including the time between a patient's presentation and diagnosis, symptoms and consultations, investigations undertaken before referral, and referral pathways. Participating GP practices may review relevant patient	Where processing is necessary for the Practice's public functions and quality improvement activities, the following may apply: • **UK GDPR 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. • **UK GDPR Article 9(2)(h):** Processing is necessary for the provision of health care or the management of health care systems and services.

	records and submit information through the audit process to support analysis, learning and improvements in cancer diagnosis.	• **Data Protection Act 2018, section 10(1)(c), read with Schedule 1, Part 1, paragraph 2:** The condition for processing special category data for health or social care purposes, subject to the applicable statutory requirements. Where the audit processing qualifies as scientific research or statistical processing, a different or additional legal basis and special category condition may be required, including **UK GDPR Articles 6** and **9(2)(j)** and **Data Protection Act 2018 Schedule 1, Part 1, paragraph 4,** where applicable. Patients' rights, including the right to object, depend on the applicable lawful basis, any relevant statutory requirements and any valid exemption. The Practice will consider requests in accordance with applicable data protection legislation. **Related Legislation:** • Data Protection Act 2018, Schedule 1 • ICO guidance on research provisions
d. Processing for Commissioning, Planning, Research and Risk Stratification Purposes		
Recipients or Categories of recipients of the personal or special categories of personal information	**Purpose of the processing**	**Lawful basis for processing**
Integrated Care Board (ICB)	Integrated Care Boards (ICBs) are statutory NHS organisations responsible for planning and commissioning many local health services. They work with other NHS organisations and local partners to improve health outcomes and coordinate care across their areas. Clapham Family Practice may share relevant patient information with the appropriate ICB where necessary to support its statutory responsibilities. This may include: • **Individual Funding Requests (IFRs):** supporting requests for NHS funding for treatments or services outside routine commissioning arrangements.	The lawful basis depends on the purpose of the disclosure and the relevant legal requirements. **Personal data:** • **UK GDPR Article 6(1)(c)** – compliance with a legal obligation, where sharing is legally required. • **UK GDPR Article 6(1)(e)** – performance of a task carried out in the public interest or in the exercise of official authority, where applicable. **Special category data (including health information):** • **UK GDPR Article 9(2)(h)** – provision or management of health or social care, where applicable.

	• **NHS Continuing Healthcare:** supporting assessment and decisions about eligibility for NHS-funded care. • **Complaints, appeals and queries:** responding to relevant issues involving the Practice or services commissioned by the ICB. • **Safeguarding:** sharing relevant information where necessary to protect a child or adult at risk, in accordance with applicable legal and safeguarding requirements. • **Commissioning and service monitoring:** providing information required for agreed NHS services, contractual reporting, the Quality and Outcomes Framework (QOF), and applicable local or national enhanced services. Your electronic GP record may be used as a source of information. We share only information that is relevant and necessary for the purpose and apply appropriate safeguards. Your electronic GP record is the source of information that is shared.	• **UK GDPR Article 9(2)(g)** – reasons of substantial public interest, where the relevant legal conditions are met. • **Data Protection Act 2018, section 10 and Schedule 1** – the relevant condition must be identified according to the purpose of the disclosure. For health or social care purposes, this may be Schedule 1, Part 1, paragraph 2. Other purposes, such as safeguarding or commissioning-related reporting, may require a different condition.
Risk Stratification (Population Health Management and Case Finding)	Clapham Family Practice uses computerised searches of patient records to help identify people who may be at increased risk of certain health conditions, such as diabetes, heart disease or falls. Your record may be included in these searches. Risk stratification may involve analysing information from GP records alongside information from other sources, such as hospital attendance records. This may be carried out by authorised healthcare organisations or approved data processors working under contract. The purpose and use of the information depend on the type of activity: **Direct care – case finding** Where searches are carried out by CFP or a processor acting on our behalf to identify patients who may benefit from individual clinical care, the results may be reviewed by our healthcare team. Relevant information may then be used to offer appropriate advice, investigations, treatment, referrals or follow-up care.	The lawful basis depends on the purpose of the activity and how the information is used. **Personal data:** • **UK GDPR Article 6(1)(e)** – performance of a task carried out in the public interest or in the exercise of official authority, where applicable. • **UK GDPR Article 6(1)(c)** – compliance with a legal obligation, where processing is legally required. **Special category data (including health information):** • **UK GDPR Article 9(2)(h)** – provision or management of health or social care, where applicable to individual care. • **UK GDPR Article 9(2)(g)** – reasons of substantial public interest, where the relevant legal conditions are met. • **Data Protection Act 2018, section 10 and Schedule 1** – the relevant condition must be identified for the specific processing activity.

	Indirect care – population health management and planning Information may also be analysed to understand the health needs of a wider population, plan services and support decisions about future healthcare provision. These activities are separate from decisions about an individual's care and require an appropriate legal basis and confidentiality safeguards. Your electronic GP record may be used as a source of information. We aim to use only the information necessary for the relevant purpose and apply appropriate safeguards when information is accessed, linked or shared.	Where confidential patient information is used for risk stratification beyond individual care, an appropriate legal basis and a lawful route for using confidential information must be established. This may include support under section 251 of the NHS Act 2006, where applicable. **Related legislation and guidance:** NHS Act 2006, section 251.
e. Data Sharing Databases		
Recipients or Categories of recipients of the personal or special categories of personal information	**Purpose of the processing**	**Lawful basis for processing**
National NHS Digital Services - Spine including: • Personal Demographics Service • Summary Care Record • e-Referral Service • Electronic Prescription Service • GP2GP • GP Connect and the National Care Record Service	The NHS **Spine** supports secure information sharing between healthcare IT systems and provides access to national NHS services used to support patient care. These services enable authorised healthcare professionals and organisations to identify patients, access relevant health information, transfer medical records, manage referrals and transmit prescriptions. Clapham Family Practice (CFP) uses the following services, where applicable, as part of its NHS clinical and administrative activities: **Personal Demographics Service (PDS)**: Maintains demographic information, including the patient's name, address, date of birth, NHS number, registered GP practice and nominated pharmacy, to help identify patients and match them to their records. **Summary Care Record (SCR)**: Shares a summary of relevant information from the GP record, including current medication, allergies and previous adverse reactions to medicines, with authorised health and care professionals involved in the patient's direct care. Additional information may also be included, subject to the patient's recorded preferences and applicable arrangements.	CFP processes patient information to provide healthcare, manage referrals and prescriptions, maintain accurate patient records, and support the safe and effective delivery of NHS services. The applicable lawful bases depend on the specific processing activity: • **UK GDPR 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 the relevant task has a clear basis in law. • **UK GDPR Article 9(2)(h):** Processing is necessary for the provision of health care or treatment, or the management of health care systems and services, subject to the applicable conditions and safeguards. • **Data Protection Act 2018, section 10(1)(c), read with Schedule 1, Part 1, paragraph 2:** Provides the relevant domestic-law condition for processing special category

	NHS e-Referral Service (e-RS): Supports electronic referrals, advice and guidance, and the booking and management of hospital or clinic appointments **Electronic Prescription Service (EPS): Securely transfers electronic prescriptions from prescribing systems to the patient's nominated pharmacy and supports prescription tracking.** **GP2GP:** Enables the secure electronic transfer of a patient's GP medical record when they change practices. **GP Connect and the National Care Records Service (NCRS):** Support the secure sharing or retrieval of relevant GP and care record information by authorised health and care professionals, where the service is available and access is permitted. Information is obtained from or shared through CFP's electronic patient record and the relevant NHS service. Access is restricted to authorised users and is subject to applicable security, confidentiality and access-control requirements. **Data Retention:** CFP retains the GP medical records held in its clinical system in accordance with the applicable NHS Records Management Code of Practice and the Practice's records management requirements. National NHS services may have their own retention arrangements, which are determined by the relevant service and its data controller.	data for health or social care purposes, where the statutory requirements are met. **Patient choices and rights** Patients can request changes to their Summary Care Record preferences, including choosing to share core information only, allowing additional information to be included, or opting out of having an SCR. Patients can contact the Practice to discuss the implications of their choice for care, including care provided in an emergency. SCR patient preference form - NHS England Digital Patients also have data protection rights, subject to applicable legal restrictions and exemptions. The right to object depends on the lawful basis and circumstances of the processing. Opting out of an SCR does not automatically opt a patient out of other NHS information-sharing services.
NHS Digital – National Data Opt-Out	The **NHS National Data Opt-Out** allows you to choose whether your confidential patient information is used or shared for purposes beyond your individual care, such as medical research and the planning and improvement of health and care services. Confidential patient information is information that identifies you, or could identify you, and includes details about your health, care or treatment. Information that has been genuinely anonymised so that	**Your choice** You can set, check or change your National Data Opt-Out at any time through the NHS website: Make your choice about sharing data from your health records Your choice will not affect your individual care and treatment. Information may still be used or shared where the opt-out does

	you can no longer be identified is not covered by the National Data Opt-Out. The opt-out applies to certain uses and disclosures of confidential patient information within the health and adult social care system in England. It does not apply in every circumstance. Exceptions may include where disclosure is required by law, you have given specific consent, there is an overriding public interest, or a specific exemption applies. Your GP record may be a source of information used for eligible research, service planning, audit and other approved purposes. Where the National Data Opt-Out applies, organisations responsible for the relevant data must take the necessary steps to respect your choice. Your electronic GP record is the source of information that is shared in all of the above instances.	not apply, in accordance with the law and applicable confidentiality requirements. **Related Legislation**: • Section 251 NHS Act 2006
National Screening Services • Abdominal Aortic Aneurysm (AAA) screening • Bowel Cancer Screening Services (BCSS) • Breast Screening Services • Cervical Screening Management System (CSMS) • Diabetic eye screening	Clapham Family Practice uses NHS digital services to support national screening programmes, including: Abdominal Aortic Aneurysm (AAA) Screening • Bowel Cancer Screening • Breast Screening • Cervical Screening • Diabetic Eye Screening These services help identify eligible patients, manage screening invitations and appointments, and support the delivery and administration of screening programmes. Screening aims to identify people who may be at increased risk of certain conditions so that they can be offered appropriate screening, further assessment or follow-up where necessary. Relevant patient information may be processed and shared with authorised NHS screening services and other healthcare providers involved in delivering these programmes, where necessary for the screening process and permitted by law.	**Personal data – UK GDPR 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 applicable to the Practice's public healthcare functions. **Special category data (health information) – UK GDPR Article 9(2)(h)** Processing is necessary for the provision of health care or treatment, or the management of health care systems and services, subject to the applicable legal requirements and safeguards. **Data Protection Act 2018 – Section 10(1)(c) and Schedule 1, Part 1, paragraph 2** These provisions support the processing of special category data for health or social care purposes, including preventive medicine and the management of health services, where the statutory requirements are met.

	Access to screening systems is restricted to authorised personnel and controlled through appropriate access permissions and NHS security arrangements.	
Shared Care Record – London Care Record (LCR)	Clapham Family Practice participates in the **London Care Record (LCR)**, a secure digital shared care record that enables authorised health and care professionals to view relevant information held by participating organisations when providing your care. The London Care Record was formerly known as Connect Care. The service brings together information from existing records rather than creating a separate, complete medical record. Depending on the information available, this may include details of your medications, allergies, medical conditions, treatment, care plans and previous contact with health and care services. Participating organisations include GP practices across South East London, hospitals, community healthcare providers, mental health services, local authority social care teams, urgent care services, hospices and other connected health and care organisations. These include Guy's and St Thomas' NHS Foundation Trust, King's College Hospital NHS Foundation Trust, Lewisham and Greenwich NHS Trust, Oxleas NHS Foundation Trust and South London and Maudsley NHS Foundation Trust. The participating organisations and connections may change as the service develops. Access is restricted to authorised health and care professionals who need relevant information to provide your care. Access is monitored and audited. **Data controllers and responsibility** Clapham Family Practice remains responsible for the patient records it holds and shares. The organisations contributing information to the London Care Record have responsibilities for the information they control. Under the NHS England shared care record framework, participating organisations contributing data are generally treated as joint controllers for the shared care record arrangements, with	**Personal data – UK GDPR 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 applicable to the provision of NHS healthcare and related care services. **Special category data (health information) – UK GDPR Article 9(2)(h)** Processing is necessary for the provision of health care or treatment, or the management of health care systems and services, subject to the applicable legal requirements and safeguards. **Data Protection Act 2018 – Section 10(1)(c) and Schedule 1, Part 1, paragraph 2** These provisions support the processing of special category data for health or social care purposes, where the relevant statutory conditions are met. **Your choices and rights** You can object to your information being shared through the London Care Record by discussing this with your GP or another healthcare professional involved in your care. Your request will be considered in accordance with the applicable arrangements. In some circumstances, information may still need to be shared where necessary and lawful to provide safe care or protect people from serious harm. **Further information** Read the South East London London Care Record privacy notice for more information about the service, participating organisations, lawful bases and how to object to information sharing.

	their respective responsibilities set out in the relevant data-sharing agreements. There is no single contact point for all information held through the London Care Record. For questions about your information, access requests or data protection rights, please contact the organisation responsible for the relevant records or the healthcare provider involved in your care.	You can also view the London Care Record partners list, which is updated as participating organisations and connections change.
Population Health Management	Clapham Family Practice works with relevant NHS organisations and local health and care partners to support Population Health Management (PHM). PHM uses health and care information to understand the needs of a population, improve health outcomes, prevent ill-health and reduce health inequalities. PHM may involve analysing information to identify groups of people with similar health needs, understand which patients may be at greater risk of developing certain conditions, and plan appropriate preventative care and services. This can include considering wider factors that affect health, such as housing, employment and education. Information may be used for two main purposes: **1. Identifying patients who may benefit from care** Information may be analysed to identify patients who could benefit from proactive support, preventative interventions, follow-up or coordinated care. Where this supports an individual's care, relevant findings may be used by healthcare professionals involved in providing that care. **2. Planning and improving health services** Information may also be analysed to understand population health needs, assess health inequalities, plan and commission services, evaluate outcomes and support service improvement. These activities may involve working with Integrated Care Boards (ICBs), Integrated Care Systems (ICSs) and other authorised health and care organisations.	The lawful basis depends on the purpose of the activity and how the information is used. **Personal data:** • **UK GDPR Article 6(1)(e)** – performance of a task carried out in the public interest or in the exercise of official authority, where applicable. • **UK GDPR Article 6(1)(c)** – compliance with a legal obligation, where processing is legally required. **Special category data (including health information):** • **UK GDPR Article 9(2)(h)** – provision or management of health or social care, where applicable to individual care or the management of health services. • **UK GDPR Article 9(2)(g)** – reasons of substantial public interest, where the relevant legal conditions are met. • **Data Protection Act 2018, section 10 and Schedule 1** – the applicable condition must be identified according to the purpose of the processing. Where confidential patient information is used for purposes beyond individual care, the appropriate legal basis and a lawful route for using confidential information must be established. This may require specific information-sharing arrangements or statutory support, depending on the activity.

	Your electronic GP record may be used as a source of information for these activities. Where information is accessed, linked or shared with other organisations, appropriate legal, confidentiality and information-governance arrangements must be in place. The information used and shared will depend on the purpose and the arrangements for the particular activity. For further information, please visit NHS England's Population Health Management guidance.	
f. Data Sharing Databases		
Recipients or Categories of recipients of the personal or special categories of personal information	**Purpose of the processing**	**Lawful basis for processing**
EMIS Health	EMIS Health provides the clinical system used by Clapham Family Practice to maintain and manage your electronic GP record. The system enables authorised members of our healthcare team to access relevant information to support your care and treatment. Your electronic GP record contains personal and confidential health information, which is accessed only by authorised users for legitimate purposes and in accordance with applicable data protection and confidentiality requirements. EMIS Health processes patient information to provide and support the clinical system in accordance with its contractual arrangements with the Practice. Where EMIS acts as a data processor on our behalf, it must process information in accordance with our instructions and applicable data protection law.	**Personal data:** • **UK GDPR 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 applicable to the Practice's provision of NHS healthcare services. **Special category data (including health information):** • **UK GDPR Article 9(2)(h)** – processing is necessary for the provision of health or social care or the management of health or social care systems and services, where applicable. • **Data Protection Act 2018, section 10 and Schedule 1, Part 1, paragraph 2** – provides the relevant condition for processing necessary for health or social care purposes, where its requirements apply. **Data protection responsibilities** Clapham Family Practice is responsible for determining why patient information is processed and ensuring that appropriate lawful bases and safeguards are in place. EMIS Health's responsibilities depend on its role under the relevant contractual and data protection arrangements.

Accurx Ltd and Accurx Scribe • **Accurx Ltd –** provides the platform used by Clapham Family Practice for patient communications and other digital services. • **Tandem Health AB –** provides the AI-powered transcription technology used by Accurx Scribe. • **Microsoft Azure –** provides cloud infrastructure for relevant Accurx services. • Other authorised sub-processors may be involved, as specified in the supplier's current documentation. Authorised healthcare professionals involved in your care and authorised personnel supporting the service, where access is necessary and permitted.	Clapham Family Practice uses Accurx to communicate with patients and support healthcare delivery, including through text messages, NHS App messaging and video consultations. The Practice also uses **Accurx Scribe**, an artificial intelligence (AI)-powered Ambient Voice Technology (AVT) tool, to help clinicians document consultations. During a consultation, Scribe processes the conversation to generate a draft clinical note or summary. The clinician reviews and amends the draft as necessary before approving it for inclusion in your GP medical record in EMIS Web. Scribe assists with documentation; it does not replace the clinician's professional judgement or make decisions about your care. Audio is processed to generate the transcript and is deleted after transcription, according to the supplier's published information. Generated outputs may be retained temporarily within the service to allow clinical review, in accordance with the applicable supplier arrangements. The information required for your ongoing care is recorded in your GP medical record. Your clinician will explain the use of Scribe and give you an opportunity to raise concerns. If you are uncomfortable with its use, please tell your clinician so that an alternative method of documenting the consultation can be used. For further information, please read the Accurx Privacy Notice, Accurx Scribe governance information and the NHS App privacy policy for messaging services. **Source of information** Your electronic GP record and information provided during your consultation, including the conversation processed by Scribe.	The lawful basis depends on the service and purpose of processing. **Personal data:** • **UK GDPR Article 6(1)(e)** – processing necessary for a task carried out in the public interest or in the exercise of official authority, where applicable to the Practice's provision of NHS healthcare services. **Special category data (including health information):** • **UK GDPR Article 9(2)(h)** – processing necessary for the provision or management of health or social care, where applicable. • **Data Protection Act 2018, section 10 and Schedule 1, Part 1, paragraph 2** – the relevant condition for health or social care purposes, where its requirements are met. The Practice must also comply with its duty of confidentiality and ensure that appropriate safeguards are in place when using AI-assisted documentation.
Ardens – Clinical Decision Support, Templates and Reporting	Clapham Family Practice uses Ardens clinical templates, decision-support tools and reporting resources integrated with EMIS Web to	**Personal data – UK GDPR 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

	support clinical administration, direct patient care and practice management. Ardens supports consultation documentation, clinical coding, chronic disease management, patient recalls, clinical decision support, searches and reporting. These tools help Practice staff identify patients who may require reviews, apply relevant clinical guidance, monitor care and support the delivery of NHS services. The system may process patient demographic details, administrative information and special category health data held within the clinical record. Information is used to support individual patient care, appropriate follow-up, clinical quality improvement and operational management. Ardens tools support healthcare professionals in their work but do not replace professional judgement. Clinical decisions and responsibility for patient care remain with the relevant healthcare professionals. Access to patient information is restricted to authorised users in accordance with their roles and access permissions.	applicable to the Practice's provision and management of NHS primary healthcare services. **Special category data (health information) – UK GDPR Article 9(2)(h)** Processing is necessary for the provision of health care or treatment, or the management of health care systems and services, subject to the applicable legal requirements and safeguards. **Data Protection Act 2018 – Section 10(1)(c) and Schedule 1, Part 1, paragraph 2** These provisions support the processing of special category data for health or social care purposes, including medical diagnosis, the provision of healthcare and the management of healthcare services, where the relevant statutory conditions are met.
Healthtech - 1	Clapham Family Practice uses **Healthtech-1** to support the processing of new patient registration requests through an automated process. The information processed is taken from the details you provide on your patient registration form. Healthtech-1 processes this information to support the registration process on behalf of the Practice.	**Personal data:** UK GDPR 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 Practice. **Special category data (including health information):** UK GDPR Article 9(2)(h) – processing is necessary for the provision of health care or the management of health care systems and services, where applicable. **Data Protection Act 2018:** Section 10(1)(c), read with Schedule 1, Part 1, paragraph 2, where the processing meets the conditions for health or social care purposes.
Suvera Planner – Long-Term Condition Management	Clapham Family Practice uses Suvera Planner, a population health management platform, to help identify patients who are due or overdue for long-term condition reviews, manage recall	**Personal data – UK GDPR 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

Suvera Planner is provided by Suvera Ltd. Suvera Ltd processes patient information on behalf of Clapham Family Practice as a data processor, in accordance with the agreed data processing arrangements. Any authorised sub-processors may process information where required to provide the service. Access to patient information is restricted to authorised personnel in accordance with their roles, responsibilities and access permissions.	programmes and support the coordination of care. This may include patients with conditions such as diabetes, asthma, chronic obstructive pulmonary disease (COPD) and hypertension. The platform helps Practice staff prioritise patients according to clinical need, monitor completion of reviews, coordinate communications about reviews and appointments where appropriate, and produce reports to support service improvement and applicable NHS contractual requirements. Suvera Planner supports patient identification, recall management and clinical workflows. It does not replace the professional judgement of healthcare staff. Clinical decisions and patient care remain the responsibility of the relevant qualified healthcare professionals. For more information about how Suvera processes personal information, please read Suvera Privacy Notice.	applicable to the Practice's provision and management of NHS primary healthcare services. **Special category data (health information) – UK GDPR Article 9(2)(h)** Processing is necessary for the provision of health care or treatment, or the management of health care systems and services, subject to the applicable legal requirements and safeguards. **Data Protection Act 2018 – Section 10(1)(c) and Schedule 1, Part 1, paragraph 2** These provisions support the processing of special category data for health or social care purposes, including preventive medicine, medical diagnosis, the provision of healthcare and the management of healthcare services, where the relevant statutory conditions are met.
X-On Surgery Connect	Clapham Family Practice uses X-On Surgery Connect, a cloud-based telephony service commissioned across Operose Health, to help manage telephone demand and support patients contacting the Practice about appointments, test results, prescriptions and other healthcare needs. When you contact the Practice by telephone, your call may be recorded and stored where necessary to support the delivery of care, maintain an accurate record of relevant communications, and help the Practice provide a safe and responsive service. Where a call contains information relevant to your care, this information may be added to your health record.	**Personal data: UK GDPR 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 Practice. **Special category data (including health information): UK GDPR Article 9(2)(h)** – processing is necessary for the provision of health care or the management of health care systems and services, where applicable. **Data Protection Act 2018: Section 10(1)(c), read with Schedule 1, Part 1, paragraph 2**, where the processing meets the conditions for health or social care purposes.