

Greenwich Health Privacy Policy

This policy was last updated on October 14, 2026.

<https://www.greenwich-health.com>

This privacy notice explains why Greenwich Health Ltd (GH) collects information about you, how we keep it safe and confidential and how that information may be used. The first section provides a summary of these issues followed by a section that explains in more detail on why and how we process information in different ways.

Why we collect information about you

Health care professionals who provide you with care are required by law to maintain records about your health and any treatment or care you have received within any NHS organisation. These records help to provide you with the best possible healthcare.

GH is a GP Federation, owned by and working on behalf of the GP practices of the Royal Borough of Greenwich. We collect and hold data for the sole purpose of providing healthcare services to patients, whether through services we deliver directly for anyone attending in person - such as our Urgent Treatment Centre at Queen Elizabeth Hospital, which is located in Greenwich but can be used by any patient regardless of where they live or are registered - through borough-wide services for Greenwich patients (such as our Live Well hubs, Dressing Service, PCN enhanced access hubs, and home visiting services), or through systems and services we provide to member practices. In carrying out this role we may collect information about you, which helps us respond to your queries or secure specialist services. We may keep your information in electronic form (and occasionally in written form). The records may include basic details about you, such as your name and address. They may also contain more sensitive information about your health and information such as outcomes of needs assessments.

Our role: data controller or data processor

Greenwich Health delivers some services in its own right, and delivers or supports other services on behalf of the GP practices of Greenwich. Our legal role under UK GDPR depends on the service.

Where we are the data controller, we determine how and why your information is used, and this privacy notice is the primary explanation of that processing. Where we are the data processor, we act on the written instructions of your registered GP practice, which remains the data controller, and your practice's own privacy notice is the primary explanation of that processing — you should read it alongside this notice.

Our role for each of our main services is:

— Urgent Treatment Centre (Queen Elizabeth Hospital, Woolwich): Greenwich Health is the data controller.

— Dressings Service: Greenwich Health is the data controller. Information is shared with your registered GP practice on a controller-to-controller basis under a data sharing agreement.

— PCN Enhanced Access: Greenwich Health is the data controller for the records we create in delivering the service. Your registered GP practice remains the data controller for your GP record, and information flows between us on a controller-to-controller basis under a data sharing agreement.

— Live Well services (including stop smoking, LARC and NHS Health Checks): Greenwich Health acts as data processor on behalf of participating GP practices, which remain the data controllers, under a data processing agreement reviewed and approved by the South East London ICB GP Data Protection Officer and the Londonwide LMCs Information Governance Lead.

— ARRS staff working in GP practices: Greenwich Health acts as data processor; staff work within your practice's clinical record under the practice's controllership.

— Clinical searches and reporting run on practice records (for example, PCN DES monitoring): Greenwich Health acts as data processor on behalf of the practices.

Each section of the detailed privacy notice below states which role applies to that activity.

Details we collect about you

Where GH provides you with care directly, or provides a system or service used by your registered GP practice to provide your care, we (or the practice, as data controller) may hold records about your health and any treatment or care you have received previously or elsewhere (e.g. NHS Hospital Trust, other GP Surgery, Out of Hours GP Centre, A&E, Walk-in clinic, etc.). These records help to provide you with the best possible healthcare.

Records which we may hold or process about you may include the following:

- Details about you, such as your address and next of kin, emergency contacts and carers
- Your home telephone number, mobile phone number, email address
- Any contact you have had with GH services, such as appointments, clinic visits, immunisations, emergency appointments, etc.
- Notes and reports about your health, treatment and care
- Results of investigations, such as laboratory tests, x-rays, etc.

Relevant information from other health professionals, relatives or those who care for you, or information provided to us by you

How we keep your information confidential and safe

Where GH acts as a data processor for member GP practices (for example, providing IT systems or clinical services on their behalf), the practice's own GP NHS health record — usually held on EMIS Web, provided by EMIS Health Ltd — remains the definitive clinical record. Where GH itself acts as data controller for its own borough-wide services, relevant records are held on the systems described in the detailed privacy notice that follows, including EMIS, EMIS Search & Reporting, Microsoft Azure and Microsoft Sharepoint, CLEO, Quit Manager, AccuRx, Medical Messenger, and other systems. We make sure that data processors that support us are legally and contractually bound to operate and prove security arrangements are in place where data that could or does identify a person are processed. We only use your mobile number or email address to contact you regarding matters of medical care, such as appointment reminders. We maintain our duty of confidentiality to you always. We will only ever use or pass on information about you if others involved in your care have a genuine need for it. We will not disclose your information to any third party without your permission unless there are exceptional circumstances (i.e. life or death situations), or where the law requires information to be passed on.

We are committed to ensuring the security and confidentiality of your information. There are a number of ways in which we do this:

- Staff receive annual training about protecting and using personal data
- IT hardware and software used by GH is provided, configured and maintained with full disk encryption, managed access controls, and regular security updates
- Policies are in place for staff to follow and are regularly reviewed
- We check that only the minimum amount of data is shared or accessed
- We use 'smartcards' to access systems, this helps ensure that the right people are accessing data - people with a 'need to know'

- We use encrypted emails and storage which would make it difficult for someone to 'intercept' your information

We report and manage incidents to make sure we learn from them and improve

How we use information about you

Confidential patient data will be shared within the healthcare team providing your care, including clinical, nursing and admin staff at GH, at your registered GP practice, and with other healthcare professionals to whom a patient is referred. Those individuals have a professional and contractual duty of confidentiality.

Data Processors

GH (as data controller for its own services, and as data processor for a number of services delivered on behalf of member GP practices and Primary Care Networks) uses data processors for various reasons including maintaining electronic patient records, receiving electronic correspondence from other health and social care providers, ensuring correct payments are received, quality monitoring and mandatory data collections, or those providing a clinical service to patients. Details of these data processors can be found in the detailed privacy note later in this document.

Services we deliver as a data processor

For Live Well services, ARRS staff working in member practices, and clinical searches and reporting run on practice records, Greenwich Health acts as a data processor: your registered GP practice remains the data controller, and the practice's own privacy notice is the primary explanation of that processing. These arrangements are governed by written data processing agreements, which for Live Well have been reviewed and approved by the South East London ICB GP Data Protection Officer and the Londonwide LMCs Information Governance Lead and are published on the London Data Console. If you have questions about these services, you can contact Greenwich Health or your registered GP practice.

Referrals for specific health care purposes

We sometimes provide your information to other organisations for them to provide you with medical services. We will always inform you of such a referral and you always have the right not to be referred in this way. These include:

- NHS Hospital Trusts
- Specialist Trusts including Mental Health Services
- Independent Contractors such as dentists, opticians, pharmacists
- Private Sector Providers
- Voluntary Sector Providers
- Ambulance Trusts
- Integrated Care Boards (ICBs)
- Social Care Services
- Local Authorities
- Education Services
- Fire and Rescue Services
- Police
- Other 'data processors' during specific project work, e.g. member GP practices or other GP federations

Data Sharing for Direct care

We share your personal information on national (Summary Care Record) and local (London Care Record) data sharing platforms to create care records that would allow healthcare professionals to see information on your medical history if needed in an urgent clinical situation, with your consent when possible.

Data Sharing for Secondary Uses

Data is also shared with national organisations and data processors based on national guidelines and law. This is for purposes that go beyond direct medical care, and includes healthcare planning, audit, population analytics, research, and commissioning at a local, regional or national level. Often this will include patient identifiable data but sometimes may be anonymised aggregate data.

National Data Opt-Out: You can choose whether your confidential patient information is used for research and planning through the National Data Opt-Out. Where the opt-out applies and GH is responsible for a disclosure, we will check and respect your recorded choice. Where GH acts as a data processor, we will support the relevant GP practice or other data controller to apply the opt-out in accordance with its instructions. The opt-out does not apply to information used for your direct care, to anonymised information, or where a disclosure is required by law or another exemption applies. You can view or change your choice at any time through the NHS App or the [NHS National Data Opt-Out service](#).

YOUR DATA RIGHTS UNDER UK GDPR

Your right to be informed

GH provides fair processing information about all data processing activities concerning your records, by means of posters and detailed privacy notices (such as the one that follows). This can be found on the GH website at <https://www.greenwich-health.com>. You have the right to know what information we hold about you, why we hold it, who we share it with, and how long we keep it. This privacy notice is the main way we provide that information to you.

Your right of access

You have the right to access your own GP record. This is in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Where your registered GP practice holds your clinical record (for example, on EMIS Web), you can access prospective entries through the NHS App, or through third-party patient-facing services such as Patient Access, where these have been enabled by your practice. If you are unable to use the NHS App or Patient Access, you can make a Subject Access Request by contacting your registered GP practice.

Where your request relates to a record that GH holds as data controller (for example, an attendance at our Urgent Treatment Centre), you can make your Subject Access Request to GH directly. We will respond within one calendar month of receiving your request. There is no charge for a Subject Access Request unless the request is manifestly unfounded, excessive, or repetitive.

Your right to rectification

You have the right to have any factual inaccuracies about you corrected. If you believe information held about you is inaccurate or incomplete, please contact GH or your registered GP practice and we will review and correct it where appropriate. Where a clinical opinion has been recorded, it may not be possible to remove or alter that entry, but a note can be added to the record reflecting your view. There is no right to have accurate medical records deleted except when ordered by a court of law.

Your right to erasure

You have the right to request that your personal data is erased in certain circumstances, sometimes referred to as the “right to be forgotten.” However, this right is significantly limited in the context of health records. GH is required by law to retain records in line with the NHS Records Management Code of Practice, and we process your data under Article 6(1)(e) (public task) and Article 9(2)(h) (provision of health care) of UK GDPR. These legal bases mean that, in most cases, we cannot erase your record on request. If you ask us to erase information, we will consider each request on its merits and explain our decision to you.

Your right to restrict processing

You have the right to ask us to restrict the processing of your personal data in limited circumstances, for example where you have contested the accuracy of the data and we are verifying it, or where you have objected to processing and we are considering your objection. Where a restriction applies, we will continue to store the data but will not use it further until the matter is resolved. As with erasure, this right is limited by our legal duty to maintain accurate and complete records for the purposes of providing safe care.

Your right to data portability

The right to data portability allows individuals to obtain and reuse their personal data across different services in a structured, commonly used, and machine-readable format. This right only applies to personal data processed on the lawful bases of consent or contract. As GH processes most records under Article 6(1)(e) (public task) and Article 9(2)(h) (provision of health care), the right to data portability does not generally apply. You can, however, access your record through the NHS App as described above, and you can request a copy of your record through a Subject Access Request.

Your right to object

You have the right to object to the processing of your personal data under Article 21 of UK GDPR. In the context of health records, this right most commonly applies to how your information is shared, both for direct medical care purposes (such as the national Summary Care Record, the London Care Record, point of care referrals, or text messages) and for purposes other than your direct medical care, known as secondary uses. You cannot object to some of the ways by which your information is disclosed, as these are mandated by law or necessary for the provision of safe care. Details of these purposes are outlined in the detailed privacy note that follows.

Your rights related to automated decision-making and profiling

Under Article 22 of UK GDPR, you have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you. GH does not carry out any solely automated decision-making about your care. Where digital tools are used to support clinical decisions, such as risk stratification tools or population health analytics, these are always reviewed and acted upon by a qualified clinician. A human clinician remains responsible for all decisions about your care and treatment.

LAWFUL BASES FOR PROCESSING

Lawful bases for processing and the UK General Data Protection Regulation (UK GDPR)

The UK GDPR is the data protection law that applies in the United Kingdom. It is based on the EU General Data Protection Regulation, retained in UK law following the UK's departure from the European Union, and sits alongside the Data Protection Act 2018. It came into effect in May 2018 and continues to apply in the UK.

You have the right to be informed about the collection and use of your personal data i.e. data processing. This is a key transparency requirement under UK GDPR. (<https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/>)

In common with GP practices and GP federations, Greenwich Health Ltd relies on “Official Authority” to process personal data using Article 6(1)(e) of UK GDPR. The other commonly used Articles of UK GDPR used for the lawful basis of processing data include Article 9(2)(h) and Article 6(1)(c) and Article 6(1)(d) and Article 9(2)(b) and Article 9(2)(i) of UK GDPR:

Article 6(1)(e) Official Authority – “...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...”

Article 9(2)(h) – Provision of Health – “necessary for the purposes of preventative or occupational medicine for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services...”

Article 6(1)(c) – Legal Obligation – “processing is necessary for compliance with a legal obligation to which the controller is subject.”

Article 6(1)(d) Vital Interests – “processing is necessary in order to protect the vital interests of the data subject or of another natural person”

Article 9(2)(b) – Employment & Social Security – “processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security”

Article 9(2)(i) Public Interest – “processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices...”

The detailed privacy note that follows shows the links between these articles and specific data processing areas. This is not an exhaustive list; specific articles may apply to specific situations - see detailed privacy notes for further information.

That 'official authority' derives from NHS England's powers to commission health services under the NHS Act 2006 (as amended by the Health and Care Act 2022), and the delegation of primary care commissioning functions to Integrated Care Boards (ICBs) from 1 April 2023 - [the NHS Act 2006](#)

The “supervisory authority” mentioned in all of the above is the Information Commissioner.

Notification

Under the Data Protection Act 2018 and the Data Protection (Charges and Information) Regulations 2018, organisations that process personal data are required to pay a data protection fee to the Information Commissioner's Office (ICO) and to be listed on the ICO's public register of fee payers, unless exempt.

We are registered as a data controller. Our registration can be searched for on the ICO's public register at <https://ico.org.uk/ESDWebPages/Search>

COMPLAINTS

If you have concerns or are unhappy about any of our services in terms of data processing, please contact our Data Protection Officer:

Robert Sweeney

robert.sweeney@nhs.net
020 8319 5440
Greenwich Health Ltd
25-27 John Wilson St
Woolwich
London SE18 6PZ

If you are still concerned and want to make a formal complaint, please contact the GH senior management team. Details of how to complain are on our website, or available on request.

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

The Information Commissioner

Website: www.ico.org.uk
Wycliffe House, Water Lane
Wilmslow
Cheshire SK9 5AF
Phone: 0303 123 1113 (local rate) or 01625 545 700 (national rate)

The following provides a detailed list about the many data processing activities that GH performs. Our detailed privacy notice (which refers to all these types of data processing) can also be viewed/downloaded from our website. Each heading below corresponds to a section of the detailed privacy notice.

Detailed Privacy Notice

Greenwich Health Ltd

South East London Integrated Care System (SEL ICS) — South East London Data Sharing Framework

The South East London Integrated Care System (SEL ICS) brings together local health and care organisations and local councils to design care and improve population health, through shared leadership and collective action.

The SEL ICS collects information about you mainly to provide you with health and care services. This is in accordance with the statutory obligations under the NHS Act 2006 and the Health and Care Act 2022, which established Integrated Care Boards and Integrated Care Systems as statutory bodies from 1 July 2022 - [NHS Act 2006](#) and [Health and Social Care Act 2012](#).

As a GP Federation delivering services on behalf of Greenwich's GP practices and Primary Care Networks, GH is also a signatory to the South East London Data Sharing Framework, in addition to our own detailed privacy notice set out in the following sections.

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General Information Sharing for Direct Medical Care

Routine information sharing - direct care / referrals

Greenwich Health Ltd holds and processes personal data about patients in order to provide safe, effective and personalised healthcare, whether directly - including at our Urgent Treatment Centre at Queen Elizabeth Hospital, which is open to any patient regardless of where they live or are registered, and at borough-wide services for Greenwich patients such as our Live Well hubs, Dressing Service, PCN enhanced access hubs, and home visiting service - or as a data processor operating systems on behalf of member GP practices. This includes information about identity and contact details, medical history, diagnoses and active problems, medications and allergies, test results and investigation reports, referrals and correspondence, and records of contacts and consultations. Where care requires input from other healthcare professionals, we share the information necessary for those providers to deliver that care safely. Access to information is controlled on a need-to-know basis: administrative staff access only the information required to manage appointments and registration; clinical staff access information relevant to their role. Where GH provides your care directly — for example at the Urgent Treatment Centre, the Dressings Service or Enhanced Access — GH is the data controller for that record. Where GH delivers a service or operates a system on behalf of your registered GP practice — for example Live Well services or ARRS staff working in your practice — the practice remains the data controller and

Data Controller:

Greenwich Health Ltd
25-27 John Wilson St
Woolwich
London SE18 6PZ
020 8319 5440
<https://www.greenwich-health.com>

Data Protection Officer:

Robert Sweeney
robert.sweeney@nhs.net
020 8319 5440

1) Purpose of the processing

Direct care is care delivered to the individual. Where a patient is referred for direct care elsewhere - for example to a specialist or another GH service - necessary and relevant information about the patient will need to be shared with the other healthcare workers involved, to enable them to provide the most appropriate advice, investigations, treatments, therapies or care.

2) Lawful basis for the processing

The processing of personal data in the delivery of direct care and for administrative purposes in support of direct care is supported under the following Article 6 and 9 conditions of the UK GDPR: Article 6(1)(e) Official Authority; Article 9(2)(h) Provision of Health.

3) The recipient(s), or categories of recipients, of your personal data

The data will be shared with health and care professionals and support staff at GH, at your registered GP practice, and at hospitals, diagnostic and treatment centres and community health services who contribute to your personal care.

<i>4) How does this comply with the Common Law Duty of Confidentiality?</i>	Consent (Implied). This means that it would be reasonable to infer that you agree to the use of the information as long as: we are accessing the information to provide or support your direct care, or are satisfied that the person we are sharing the information with is accessing or receiving it for this purpose; information is readily available to you explaining how your information will be used and that you have the right to object; we have no reason to believe that you have objected; we are satisfied that anyone we disclose personal information to understands that we are giving it to them in
<i>5) Is this: Access to your GP record / Extraction of information from your GP record / Access to data held about you by another data controller</i>	Access to your GP record, or extraction of information from your GP record.
<i>6) Right to object</i>	You have the right to object to some or all the information being processed under Article 21. For services where GH is the data controller, please contact us. For services where we are providing services on behalf of your GP practice, please contact your GP practice. You should be aware that this is a right to raise an objection, that is not the same as having an absolute right to have your wishes granted
<i>7) Retention period of the data (or criteria used to determine the retention period)</i>	The data will be retained in line with the law and national guidance (see NHS Records Management Code of Practice for Health and Social Care, linked below).
<i>8) Right to access and correct</i>	You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law.
<i>9) The right to lodge a complaint with a supervisory authority</i>	Yes: You have the right to complain to the Information Commissioner's Office, using the link below, or by calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 700 (national rate). There are National Offices for Scotland, Northern Ireland and Wales (see ICO website).
<i>10) Further information</i>	

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Emergency and Urgent Information Sharing

There are circumstances in which GH is required to share personal information in order to protect a patient's life or prevent serious harm to that patient or others - for example where a patient is unconscious or otherwise unable to communicate during a collapse, a diabetic emergency, or a serious injury while accessing one of our services. In such circumstances GH has an overriding duty to act in the patient's best interests, and will share necessary information with emergency healthcare services, the police, or the fire service as required to enable timely and appropriate

<i>Data Controller:</i> Greenwich Health Ltd 25-27 John Wilson St Woolwich London SE18 6PZ 020 8319 5440 https://www.greenwich-health.com	<i>Data Protection Officer:</i> Robert Sweeney robert.sweeney@nhs.net 020 8319 5440
<i>1) Purpose of the processing</i>	Staff have a professional responsibility to share data in emergencies to protect patients or other persons. Often in emergency situations the patient is unable to provide consent.
<i>2) Lawful basis for the processing</i>	The processing of personal data in the delivery of emergency care is supported under the following Article 6 and 9 conditions of the UK GDPR: Article 6(1) (e) Official Authority; Article 9(2)(h) Provision of Health; Article 9(2)(c) (vital interests).
<i>3) The recipient(s), or categories of recipients, of your personal data</i>	The data will be shared with healthcare professionals and other workers in emergency and out of hours services, and at local hospitals, diagnostic and treatment centres.
<i>4) How does this comply with the Common Law Duty of Confidentiality?</i>	Consent (Implied). This means that it would be reasonable to infer that you agree to the use of the information as long as: we are accessing the information to provide or support your emergency care, or are satisfied that the person we are sharing the information with is accessing or receiving it for this purpose; we have no reason to believe that you have objected; we are satisfied that anyone we disclose personal information to understands that we are giving it to them in confidence, which they must
<i>5) Is this: Access to your GP record / Extraction of information from your GP record / Access to data held about you by another data controller</i>	Access to your GP record.
<i>6) Right to object</i>	You have the right to object to some or all the information being processed under Article 21. Please contact the Data Controller. You should be aware that this is a right to raise an objection, that is not the same as having an absolute right to have your wishes granted in every circumstance. You also have the right to have an "Advance Directive" placed in your records and brought to the attention of relevant healthcare

<i>7) Retention period of the data (or criteria used to determine the retention period)</i>	The data will be retained in line with the law and national guidance (see NHS Records Management Code of Practice for Health and Social Care, linked below).
<i>8) Right to access and correct</i>	You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law. If we share or process your data in an emergency when you have not been able to consent, we will notify you at the earliest
<i>9) The right to lodge a complaint with a supervisory authority</i>	Yes: You have the right to complain to the Information Commissioner's Office, using the link below, or by calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 700 (national rate). There are National Offices for Scotland, Northern Ireland and Wales (see ICO website).
<i>10) Further information</i>	

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Systems We Use (Data Processors)

EMIS (core clinical / patient record system)

GH uses EMIS Web, the clinical record system provided by EMIS Health Ltd, both for its own borough-wide services and, where relevant, when supporting member GP practices. EMIS Web is hosted on Amazon Web Services (AWS) UK cloud infrastructure, with all data stored within the United Kingdom. The system is protected by appropriate technical and organisational security measures, and access is restricted to authorised personnel using NHS Smartcards.

<i>Data Controller:</i> Greenwich Health Ltd 25-27 John Wilson St Woolwich London SE18 6PZ 020 8319 5440 https://www.greenwich-health.com	<i>Data Protection Officer:</i> Robert Sweeney robert.sweeney@nhs.net 020 8319 5440
<i>1) Purpose of the processing</i>	To record relevant information about patients within the electronic clinical record, and to enable clinicians and staff to access the record where necessary to provide safe care.
<i>2) Lawful basis for the processing</i>	The processing of personal data via EMIS is supported under the following Article 6 and 9 conditions of the UK GDPR: Article 6(1)(e) Official Authority; Article 9(2)(h) Provision of Health.
<i>3) The recipient(s), or categories of recipients, of your personal data</i>	EMIS Health Ltd (data processor) and Amazon Web Services (sub-processor, cloud hosting).
<i>4) How does this comply with the Common Law Duty of Confidentiality?</i>	Consent (Implied). Where a patient's registered GP practice or GH holds an electronic clinical record of care, it is reasonable to infer consent to that record being maintained, including consultation notes, prescriptions, test results, and other clinical information necessary for safe and effective care.
<i>5) Is this: Access to your GP record / Extraction of information from your GP record / Access to data held about you by another data controller</i>	Access to the GP record, or extraction of information from the GP record.
<i>6) Right to object</i>	You have the right to object to specific data being stored within your record under Article 21 UK GDPR. However, you should be aware that GH and your GP practice have a professional and contractual obligation to maintain accurate and complete clinical records, and the right to object is not absolute. The right to erasure does not apply to clinical records held under official authority and for the provision of health care.
<i>7) Retention period of the data (or criteria used to determine the retention period)</i>	For services where we (GH) are the data controller, records are retained in line with the NHS Records Management Code of Practice for Health and Social Care: which is 8 years after an adults last contact with the service, and longer for children. Where records are written back to your GP practice, these will be retained by your practice inline with GP Practice records retention periods as outlined in the NHS Records Management Code of Practice for Health and Social Care.
<i>8) Right to access and correct</i>	You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law.

9) <i>The right to lodge a complaint with a supervisory authority</i>	Yes: You have the right to complain to the Information Commissioner's Office, using the link below, or by calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 700 (national rate). There are National Offices for Scotland, Northern Ireland and Wales (see ICO website).
10) <i>Further information</i>	

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EMIS Search & Reporting

GH uses EMIS Search & Reporting, a clinical search and reporting tool used alongside EMIS Web, to support activities such as PCN DES monitoring, audit, and quality improvement across the practices and services GH supports. Searches are run against the clinical record to identify cohorts of patients (for example, for recall or monitoring purposes) and to produce anonymised or pseudonymised reports. GH runs these searches as a data processor on behalf of member practices and Primary Care Networks, under written data processing agreements; the practices remain the data controllers for their patients' records. Reports produced for GH's own purposes	
<i>Data Controller:</i> Your registered GP practice (for searches run on practice records) <i>Data Processor:</i> Greenwich Health Ltd 25-27 John Wilson St Woolwich London SE18 6PZ 020 8319 5440	<i>Data Protection Officer:</i> Robert Sweeney robert.sweeney@nhs.net 020 8319 5440
1) <i>Purpose of the processing</i>	To run clinical searches and produce reports across patient records for audit, monitoring, recall, and quality improvement purposes, including monitoring of the PCN Directed Enhanced Service (DES).

<i>2) Lawful basis for the processing</i>	The processing of personal data via EMIS Search & Reporting is supported under the following Article 6 and 9 conditions of the UK GDPR: Article 6(1)(e) Official Authority; Article 9(2)(h) Provision of Health.
<i>3) The recipient(s), or categories of recipients, of your personal data</i>	EMIS Health Ltd (data processor).
<i>4) How does this comply with the Common Law Duty of Confidentiality?</i>	Consent (Implied), on the same basis as the underlying EMIS clinical record. Where reports produced are anonymised or aggregated, this does not identify individual patients.
<i>5) Is this: Access to your GP record / Extraction of information from your GP record / Access to data held about you by another data controller</i>	Extraction of information from the GP record.
<i>6) Right to object</i>	You have the right to object to some or all the information being processed under Article 21. Please contact your GP practice. You should be aware that this is a right to raise an objection, that is not the same as having an absolute right to have your wishes granted in every circumstance.
<i>7) Retention period of the data (or criteria used to determine the retention period)</i>	Records that are processed are held by your GP practice. These will be retained by your practice inline with GP Practice records retention periods as outlined in the NHS Records Management Code of Practice for Health and Social Care.
<i>8) Right to access and correct</i>	You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law.
<i>9) The right to lodge a complaint with a supervisory authority</i>	Yes: You have the right to complain to the Information Commissioner's Office, using the link below, or by calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 700 (national rate). There are National Offices for Scotland, Northern Ireland and Wales (see ICO website).
<i>10) Further information</i>	This is provided under the same service contract as the underlying EMIS Web system.

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Microsoft Azure (cloud hosting infrastructure)

GH uses Microsoft Azure to host a number of its own IT systems and documents, including material relating to Information Governance and DPIAs. Data hosted on Azure is subject to Microsoft's NHS-compliant cloud hosting arrangements.	
<i>Data Controller:</i> Greenwich Health Ltd 25-27 John Wilson St Woolwich London SE18 6PZ 020 8319 5440 https://www.greenwich-health.com	<i>Data Protection Officer:</i> Robert Sweeney robert.sweeney@nhs.net 020 8319 5440
<i>1) Purpose of the processing</i>	To provide secure cloud hosting infrastructure for GH systems and documents.
<i>2) Lawful basis for the processing</i>	The processing of personal data via Microsoft Azure is supported under the following Article 6 and 9 conditions of the UK GDPR: Article 6(1)(e) Official Authority; Article 9(2)(h) Provision of Health.
<i>3) The recipient(s), or categories of recipients, of your personal data</i>	Microsoft (cloud hosting, data processor).
<i>4) How does this comply with the Common Law Duty of Confidentiality?</i>	Consent (Implied), on the basis that hosting infrastructure is necessary to support GH's underlying processing activities and is subject to the same lawful bases as those activities.
<i>5) Is this: Access to your GP record / Extraction of information from your GP record / Access to data held about you by another data controller</i>	Access to your GP record, or extraction of information from your GP record - depending on the system hosted.

<i>6) Right to object</i>	You have the right to object to some or all the information being processed under Article 21. Please contact us. You should be aware that this is a right to raise an objection, that is not the same as having an absolute right to have your wishes granted in every circumstance.
<i>7) Retention period of the data (or criteria used to determine the retention period)</i>	Data hosted on Azure is retained in line with the retention schedule of the underlying system or document; the current Data Sharing Agreement covering this hosting is due for review in September 2025.
<i>8) Right to access and correct</i>	You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law.
<i>9) The right to lodge a complaint with a supervisory authority</i>	Yes: You have the right to complain to the Information Commissioner's Office, using the link below, or by calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 700 (national rate). There are National Offices for Scotland, Northern Ireland and Wales (see ICO website).
<i>10) Further information</i>	Further information about Microsoft's data protection arrangements is available from Microsoft directly.

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Microsoft Sharepoint (document management and file storage)

GH uses Microsoft Sharepoint for document management and file storage, including the storage of policies, DPIAs, and other Information Governance material.	
<i>Data Controller:</i> Greenwich Health Ltd 25-27 John Wilson St Woolwich London SE18 6PZ 020 8319 5440 https://www.greenwich-health.com	<i>Data Protection Officer:</i> Robert Sweeney robert.sweeney@nhs.net 020 8319 5440
<i>1) Purpose of the processing</i>	To store and manage documents and records, which may include patient and staff personal data, in a secure and access-controlled environment.
<i>2) Lawful basis for the processing</i>	The processing of personal data via Microsoft Sharepoint is supported under the following Article 6 and 9 conditions of the UK GDPR: Article 6(1)(e) Official Authority; Article 9(2)(h) Provision of Health.
<i>3) The recipient(s), or categories of recipients, of your personal data</i>	Microsoft (data processor).
<i>4) How does this comply with the Common Law Duty of Confidentiality?</i>	Consent (Implied), on the basis that document storage is necessary to support GH's underlying processing activities.

5) <i>Is this: Access to your GP record / Extraction of information from your GP record / Access to data held about you by another data controller</i>	Depends on the documents stored - may include extraction of information from the GP record.
6) <i>Right to object</i>	You have the right to object to some or all the information being processed under Article 21. Please contact us. You should be aware that this is a right to raise an objection, that is not the same as having an absolute right to have your wishes granted in every circumstance.
7) <i>Retention period of the data (or criteria used to determine the retention period)</i>	Documents are retained in line with the retention schedule applicable to the type of document stored.
8) <i>Right to access and correct</i>	You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law.
9) <i>The right to lodge a complaint with a supervisory authority</i>	Yes: You have the right to complain to the Information Commissioner's Office, using the link below, or by calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 700 (national rate). There are National Offices for Scotland, Northern Ireland and Wales (see ICO website).
10) <i>Further information</i>	

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AccuRx (patient messaging)

GH uses AccuRx to communicate with patients by text message and, where relevant, video consultation, in connection with the borough-wide services GH provides directly, such as appointment reminders and service updates. AccuRx Ltd acts as data processor.	
Data Controller: Greenwich Health Ltd 25-27 John Wilson St Woolwich London SE18 6PZ 020 8319 5440 https://www.greenwich-health.com	Data Protection Officer: Robert Sweeney robert.sweeney@nhs.net 020 8319 5440
1) <i>Purpose of the processing</i>	To enable GH staff to communicate with patients about their care by text message.
2) <i>Lawful basis for the processing</i>	The processing of personal data in the delivery of text messaging services is supported under the following Article 6 and 9 conditions of the UK GDPR: Article 6(1) (e) Official Authority; Article 9(2)(h) Provision of
3) <i>The recipient(s), or categories of recipients, of your personal data</i>	AccuRx Ltd (data processor), and the data subject (you).

4) How does this comply with the Common Law Duty of Confidentiality?	Consent (Implied - direct care). Sending text message reminders and other care-related communications is part of your direct care. By providing GH or your GP practice with your mobile number, you implicitly consent to its use for these purposes.
5) Is this: Access to your GP record / Extraction of information from your GP record / Access to data held about you by another data controller	Extraction of information from your GP record, where messages relate to your care.
6) Right to object	You have the right to object to some or all the information being processed under Article 21. Please contact us. You should be aware that this is a right to raise an objection, that is not the same as having an absolute right to have your wishes granted in every circumstance. You can opt out of text messaging at any time by contacting GH or your registered GP
7) Retention period of the data (or criteria used to determine the retention period)	The data will be retained in line with the law and national guidance (see NHS Records Management Code of Practice for Health and Social Care, linked below).
8) Right to access and correct	You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law.
9) The right to lodge a complaint with a supervisory authority	Yes: You have the right to complain to the Information Commissioner's Office, using the link below, or by calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 700 (national rate). There are National Offices for Scotland, Northern Ireland and Wales (see ICO website).
10) Further information	

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CLEO (patient management / urgent care referral and electronic prescribing)

GH uses CLEO, a patient management system, in connection with urgent care and referral pathways, including services such as the Urgent Treatment Centre. CLEO supports the patient's journey from first contact through to discharge or referral, and integrates with the NHS Spine and GP systems.	
Data Controller: Greenwich Health Ltd 25-27 John Wilson St Woolwich London SE18 6PZ 020 8319 5440 https://www.greenwich-health.com	Data Protection Officer: Robert Sweeney robert.sweeney@nhs.net 020 8319 5440

<i>1) Purpose of the processing</i>	To manage the patient journey through urgent care and referral pathways, including electronic prescribing where relevant.
<i>2) Lawful basis for the processing</i>	The processing of personal data via CLEO is supported under the following Article 6 and 9 conditions of the UK GDPR: Article 6(1)(e) Official Authority; Article 9(2)(h) Provision of Health.
<i>3) The recipient(s), or categories of recipients, of your personal data</i>	CLEO Systems (data processor); NHS Spine.
<i>4) How does this comply with the Common Law Duty of Confidentiality?</i>	Consent (Implied - direct care). Where you attend a service using CLEO, it is reasonable to infer that you consent to the processing of your information to support that episode of care.
<i>5) Is this: Access to your GP record / Extraction of information from your GP record / Access to data held about you by another data controller</i>	Access to your GP record, or extraction of information from your GP record.
<i>6) Right to object</i>	You have the right to object to some or all the information being processed under Article 21. Please contact us. You should be aware that this is a right to raise an objection, that is not the same as having an absolute right to have your wishes granted in every circumstance.
<i>7) Retention period of the data (or criteria used to determine the retention period)</i>	Data is retained in line with NHS retention requirements; the current Data Sharing Agreement is due for review in May 2027.
<i>8) Right to access and correct</i>	You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law.
<i>9) The right to lodge a complaint with a supervisory authority</i>	Yes: You have the right to complain to the Information Commissioner's Office, using the link below, or by calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 700 (national rate). There are National Offices for Scotland, Northern Ireland and Wales (see ICO website).
<i>10) Further information</i>	

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Quit Manager (Stop Smoking Service caseload management)

GH uses Quit Manager, supplied by Bionical Solutions Ltd, to manage the caseload of patients using GH's Stop Smoking Service, including the Live Well Targeted Smoking Campaign. The system records referral, appointment, and treatment information, and generates NHS England (formerly NHS Digital) compliant reports.

<i>Data Controller:</i> Greenwich Health Ltd 25-27 John Wilson St Woolwich London SE18 6PZ 020 8319 5440 https://www.greenwich-health.com	<i>Data Protection Officer:</i> Robert Sweeney robert.sweeney@nhs.net 020 8319 5440
1) Purpose of the processing	To manage the care and support provided to patients attempting to quit smoking, including appointment management, treatment records, and mandatory reporting to NHS England.
2) Lawful basis for the processing	The processing of personal data via Quit Manager is supported under the following Article 6 and 9 conditions of the UK GDPR: Article 6(1)(e) Official Authority; Article 9(2)(h) Provision of Health.
3) The recipient(s), or categories of recipients, of your personal data	Bionical Solutions Ltd (data processor).
4) How does this comply with the Common Law Duty of Confidentiality?	Consent (Implied - direct care), supported by explicit consent to enrol in the Stop Smoking Service where required by the service's own referral process.
5) Is this: Access to your GP record / Extraction of information from your GP record / Access to data held about you by another data controller	Extraction of information from the GP record, where the service liaises with the patient's registered GP practice.
6) Right to object	You have the right to object to some or all the information being processed under Article 21. Please contact us. You should be aware that this is a right to raise an objection, that is not the same as having an absolute right to have your wishes granted in every circumstance.
7) Retention period of the data (or criteria used to determine the retention period)	Data is retained in line with Stop Smoking Service retention requirements and NHS England reporting obligations.
8) Right to access and correct	You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law.
9) The right to lodge a complaint with a supervisory authority	Yes: You have the right to complain to the Information Commissioner's Office, using the link below, or by calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 700 (national rate). There are National Offices for Scotland, Northern Ireland and Wales (see ICO website).
10) Further information	Role-based access with multi-factor authentication is used to protect the system, per supplier information.

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Dinner Lady / Swap to Stop scheme

As part of the national “Swap to Stop” scheme, GH's Stop Smoking Service may provide patients attempting to quit smoking with a vaping starter kit, which may be supplied under arrangements involving Dinner Lady, a vape product supplier.	
Data Controller: Greenwich Health Ltd 25-27 John Wilson St Woolwich London SE18 6PZ 020 8319 5440 https://www.greenwich-health.com	Data Protection Officer: Robert Sweeney robert.sweeney@nhs.net 020 8319 5440
1) Purpose of the processing	To support delivery of the national Swap to Stop scheme by providing eligible patients with a vaping starter kit as part of their Stop Smoking Service
2) Lawful basis for the processing	The processing of personal data (name and delivery/ contact details) is supported under the following Article 6 and 9 conditions of the UK GDPR: Article 6(1) (e) Official Authority; Article 9(2)(h) Provision of
3) The recipient(s), or categories of recipients, of your personal data	Dinner Lady (product supplier).
4) How does this comply with the Common Law Duty of Confidentiality?	Consent (Explicit). Patients actively choose to participate in the Swap to Stop scheme and provide their details for product delivery.
5) Is this: Access to your GP record / Extraction of information from your GP record / Access to data held about you by another data controller	Not applicable / not extracted from the GP record - limited to contact and delivery details provided directly by the patient.

<i>6) Right to object</i>	You have the right to object to some or all the information being processed under Article 21. Please contact us. You should be aware that this is a right to raise an objection, that is not the same as having an absolute right to have your wishes granted in every circumstance.
<i>7) Retention period of the data (or criteria used to determine the retention period)</i>	Data held for 6 months and then anonymised for demographic data purposes. This retention period reflects the product warranty period, in case patients need support during that time.
<i>8) Right to access and correct</i>	You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law.
<i>9) The right to lodge a complaint with a supervisory authority</i>	Yes: You have the right to complain to the Information Commissioner's Office, using the link below, or by calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 700 (national rate). There are National Offices for Scotland, Northern Ireland and Wales (see ICO website).
<i>10) Further information</i>	

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Medical Messenger (patient text/SMS messaging system)

GH uses Medical Messenger to send patients text message reminders and updates in connection with GH services, similar in purpose to AccuRx.	
<i>Data Controller:</i> Greenwich Health Ltd 25-27 John Wilson St Woolwich London SE18 6PZ 020 8319 5440 https://www.greenwich-health.com	<i>Data Protection Officer:</i> Robert Sweeney robert.sweeney@nhs.net 020 8319 5440
<i>1) Purpose of the processing</i>	To enable GH staff to communicate with patients about appointments and their care by text message.
<i>2) Lawful basis for the processing</i>	The processing of personal data is supported under the following Article 6 and 9 conditions of the UK GDPR: Article 6(1)(e) Official Authority; Article 9(2)(h) Provision of Health.
<i>3) The recipient(s), or categories of recipients, of your personal data</i>	Medical Messenger (data processor), and the data subject (you).
<i>4) How does this comply with the Common Law Duty of Confidentiality?</i>	Consent (Implied - direct care), on the same basis as other patient messaging services described in this notice.

5) <i>Is this: Access to your GP record / Extraction of information from your GP record / Access to data held about you by another data controller</i>	Extraction of information from your GP record, where messages relate to your care.
6) <i>Right to object</i>	You have the right to object to some or all the information being processed under Article 21. Please contact us. You should be aware that this is a right to raise an objection, that is not the same as having an absolute right to have your wishes granted in every circumstance. You can opt out of text messaging at any time by contacting GH.
7) <i>Retention period of the data (or criteria used to determine the retention period)</i>	The data will be retained in line with the law and national guidance (see NHS Records Management Code of Practice for Health and Social Care, linked below).
8) <i>Right to access and correct</i>	You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law.
9) <i>The right to lodge a complaint with a supervisory authority</i>	Yes: You have the right to complain to the Information Commissioner's Office, using the link below, or by calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 700 (national rate). There are National Offices for Scotland, Northern Ireland and Wales (see ICO website).
10) <i>Further information</i>	Further details of this service are available on request from GH.

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BomBouche (bulk mailing of NHS Health Check invitations)

GH uses BomBouche to send bulk postal invitations to patients for NHS Health Checks. GH provides BomBouche with a spreadsheet containing the names and addresses of patients due an NHS Health Check, and BomBouche prints and posts GH's template invitation letter to each patient on GH's behalf. BomBouche does not carry out any clinical processing and does not receive any health information - only the name and address needed to address and post the letter.

Data Controller: Greenwich Health Ltd 25-27 John Wilson St Woolwich London SE18 6PZ 020 8319 5440 https://www.greenwich-health.com	Data Protection Officer: Robert Sweeney robert.sweeney@nhs.net 020 8319 5440
1) <i>Purpose of the processing</i>	To enable bulk postal invitations for NHS Health Checks to be printed and sent to eligible patients on GH's behalf, using GH's own template letter.

<i>2) Lawful basis for the processing</i>	The processing of personal data is supported under the following Article 6 and 9 conditions of the UK GDPR: Article 6(1)(e) Official Authority; Article 9(2)(i) Public Interest (delivery of the national NHS Health Check public health programme).
<i>3) The recipient(s), or categories of recipients, of your personal data</i>	BomBouche (data processor, engaged solely for mail fulfilment).
<i>4) How does this comply with the Common Law Duty of Confidentiality?</i>	Consent (Implied - direct care/preventative health). Patients registered with a participating GP practice are invited for an NHS Health Check as part of the national programme; it is reasonable to infer that they consent to being contacted by post for this purpose, and to their name and address being used to fulfil that mailing.
<i>5) Is this: Access to your GP record / Extraction of information from your GP record / Access to data held about you by another data controller</i>	Extraction of a limited data set (name and address only) from the GP record, for the sole purpose of mailing.
<i>6) Right to object</i>	You have the right to object to some or all the information being processed under Article 21. Please contact us. You should be aware that this is a right to raise an objection, that is not the same as having an absolute right to have your wishes granted in every circumstance. Patients can also ask their GP practice not to be included in future NHS Health Check mailings.
<i>7) Retention period of the data (or criteria used to determine the retention period)</i>	GH retains the mailing list only for as long as needed to prepare and check the mailing. BomBouche retains the name and address data only for the duration of the mailing exercise, after which it is securely deleted in line with GH's contract with BomBouche.
<i>8) Right to access and correct</i>	You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law.
<i>9) The right to lodge a complaint with a supervisory authority</i>	Yes: You have the right to complain to the Information Commissioner's Office, using the link below, or by calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 700 (national rate). There are National Offices for Scotland, Northern Ireland and Wales (see ICO website).
<i>10) Further information</i>	BomBouche acts strictly as a mail fulfilment processor: it receives name and address details and GH's template letter, and does not access or process any clinical or health information. Further information about the NHS Health Check programme: https://www.nhs.uk/conditions/nhs-health-check/

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SCG (telephone service provider)

GH uses SCG as its telephone service provider, supplying the telephony lines and infrastructure used to handle incoming and outgoing calls from patients and other callers contacting GH's	
Data Controller: Greenwich Health Ltd 25-27 John Wilson St Woolwich London SE18 6PZ 020 8319 5440 https://www.greenwich-health.com	Data Protection Officer: Robert Sweeney robert.sweeney@nhs.net 020 8319 5440
<i>1) Purpose of the processing</i>	To provide the underlying telephone lines and infrastructure used by GH to make and receive calls in connection with GH's services, including calls from patients.
<i>2) Lawful basis for the processing</i>	The processing of personal data is supported under the following Article 6 and 9 conditions of the UK GDPR: Article 6(1)(e) Official Authority; Article 9(2)(h) Provision of Health.
<i>3) The recipient(s), or categories of recipients, of your personal data</i>	SCG (data processor/telephony provider).
<i>4) How does this comply with the Common Law Duty of Confidentiality?</i>	Consent (Implied - direct care), on the basis that telephone contact is a necessary part of accessing GH's services.
<i>5) Is this: Access to your GP record / Extraction of information from your GP record / Access to data held about you by another data controller</i>	Not applicable / limited to caller telephone number and call metadata handled by the telephone line itself; any care-related information discussed on a call is recorded separately in the patient's GP record where
<i>6) Right to object</i>	You have the right to object to some or all the information being processed under Article 21. Please contact us. You should be aware that this is a right to raise an objection, that is not the same as having an absolute right to have your wishes granted in every circumstance.
<i>7) Retention period of the data (or criteria used to determine the retention period)</i>	Call metadata is retained by SCG in line with its standard telecoms retention policy; any call recordings made by GH for training or quality purposes are retained in line with GH's own data retention policy.
<i>8) Right to access and correct</i>	You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law.
<i>9) The right to lodge a complaint with a supervisory authority</i>	Yes: You have the right to complain to the Information Commissioner's Office, using the link below, or by calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 700 (national rate). There are National Offices for Scotland, Northern Ireland and Wales (see ICO website).

10) Further information	Further details of this service are available on request from GH.
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Phonebar (telephony / call handling)

GH uses Phonebar to manage telephone calls from patients and other callers contacting GH's	
Data Controller: Greenwich Health Ltd 25-27 John Wilson St Woolwich London SE18 6PZ 020 8319 5440 https://www.greenwich-health.com	Data Protection Officer: Robert Sweeney robert.sweeney@nhs.net 020 8319 5440
1) Purpose of the processing	To manage incoming and outgoing telephone calls in connection with GH's services, including call routing and, where used, call recording for training and quality purposes.
2) Lawful basis for the processing	The processing of personal data is supported under the following Article 6 and 9 conditions of the UK GDPR: Article 6(1)(e) Official Authority; Article 9(2)(h) Provision of Health.
3) The recipient(s), or categories of recipients, of your personal data	Phonebar (data processor/supplier).
4) How does this comply with the Common Law Duty of Confidentiality?	Consent (Implied - direct care), on the basis that telephone contact is a necessary part of accessing GH's services.
5) Is this: Access to your GP record / Extraction of information from your GP record / Access to data held about you by another data controller	Not applicable / limited to caller telephone number and call metadata, and any care-related information discussed and subsequently recorded in the GP record.
6) Right to object	You have the right to object to some or all the information being processed under Article 21. Please contact us. You should be aware that this is a right to raise an objection, that is not the same as having an absolute right to have your wishes granted in every circumstance.
7) Retention period of the data (or criteria used to determine the retention period)	Call recordings, where made, are retained in line with GH's data retention policy for telephony records.
8) Right to access and correct	You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law.

9) <i>The right to lodge a complaint with a supervisory authority</i>	Yes: You have the right to complain to the Information Commissioner's Office, using the link below, or by calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 700 (national rate). There are National Offices for Scotland, Northern Ireland and Wales (see ICO website).
10) <i>Further information</i>	Further details of this service are available on request from GH.

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Core GH Processing Activities (from the Article 30 Record of Processing Activities)

Direct care, internal

GH holds records for patients receiving services directly from GH (for example, through GH-delivered clinical services). These records may include demographics, address and contact details, medical history, findings of examinations, results and investigation reports, referrals and clinical correspondence, preventive interventions, immunisations, medications, procedures, and records of attendances and contacts elsewhere. We hold these electronic records on secured IT systems with a copy of records written back to your registered GP practice record. Paper records of NHS patients are kept securely in accordance with GDPR and disposed of once turned into an electronic record and filed into the patient's notes.

Data Controller: Greenwich Health Ltd 25-27 John Wilson St Woolwich London SE18 6PZ 020 8319 5440 https://www.greenwich-health.com	Data Protection Officer: Robert Sweeney robert.sweeney@nhs.net 020 8319 5440
1) <i>Purpose of the processing</i>	To record and use information about patients receiving direct care from GH, so that doctors and staff caring for the patient, and administrative staff supporting them, have the information they need to provide safe and effective care.
2) <i>Lawful basis for the processing</i>	The processing of personal data in the delivery of this direct care is supported under the following Article 6 and 9 conditions of the UK GDPR: Article 6(1)(e) Official Authority; Article 9(2)(h) Provision of Health.
3) <i>The recipient(s), or categories of recipients, of your personal data</i>	Doctors and staff within GH who care for patients, and admin staff who support them.
4) <i>How does this comply with the Common Law Duty of Confidentiality?</i>	Consent (Implied - direct care). Where a patient receives care from GH, it is reasonable to infer that they consent to their information being used and shared among the staff caring for them, for the

<i>5) Is this: Access to your GP record / Extraction of information from your GP record / Access to data held about you by another data controller</i>	Access to your GP record, or extraction of information from your GP record.
<i>6) Right to object</i>	You have the right to object to some or all the information being processed under Article 21. Please contact us. You should be aware that this is a right to raise an objection, that is not the same as having an absolute right to have your wishes granted in every circumstance.
<i>7) Retention period of the data (or criteria used to determine the retention period)</i>	For services where we (GH) are the data controller, records are retained in line with the NHS Records Management Code of Practice for Health and Social Care: which is 8 years after an adults last contact with the service, and longer for children. Where records are written back to your GP practice, these will be retained by your practice inline with GP Practice records retention periods as outlined in the NHS Records Management Code of Practice for Health and Social Care.
<i>8) Right to access and correct</i>	You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law.
<i>9) The right to lodge a complaint with a supervisory authority</i>	Yes: You have the right to complain to the Information Commissioner's Office, using the link below, or by calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 700 (national rate). There are National Offices for Scotland, Northern Ireland and Wales (see ICO website).
<i>10) Further information</i>	See GH's Information Governance / GDPR documentation, held centrally by GH.

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Urgent care

GH provides the Urgent Treatment Centre (UTC) at Queen Elizabeth Hospital, Woolwich. Although located in Greenwich, the UTC is a walk-in NHS urgent care service open to any patient, regardless of where they live or which GP practice they are registered with - it is not limited to patients registered with a Greenwich practice. Patients attend in person or are directed there by NHS 111, ambulance services, or A&E. As part of urgent and unscheduled care - whether delivered at GH's Urgent Treatment Centre or elsewhere - basic patient information is shared with Out-of-Hours and urgent care providers when necessary to support safe treatment.

<i>Data Controller:</i> Greenwich Health Ltd 25-27 John Wilson St Woolwich London SE18 6PZ 020 8319 5440 https://www.greenwich-health.com	<i>Data Protection Officer:</i> Robert Sweeney robert.sweeney@nhs.net 020 8319 5440
<i>1) Purpose of the processing</i>	To enable GH to provide urgent and unscheduled care, including at GH's Urgent Treatment Centre at Queen Elizabeth Hospital, Woolwich. Where necessary to support safe treatment, clinicians access the patient's Summary Care Record at the point of care, and relevant information about the attendance is shared with the patient's registered GP practice and, where appropriate, with Out-of-Hours and urgent care
<i>2) Lawful basis for the processing</i>	The processing of personal data in the delivery of urgent care is supported under the following Article 6 and 9 conditions of the UK GDPR: Article 6(1)(e) Official Authority; Article 9(2)(h) Provision of Health; Article 9(2)(c) (vital interests), where relevant to urgent or emergency situations.
<i>3) The recipient(s), or categories of recipients, of your personal data</i>	Clinical and administrative staff at GH's Urgent Treatment Centre; NHS England (which hosts the Summary Care Record); NHS 111; ambulance services; A&E departments; and the patient's registered GP Practice.
<i>4) How does this comply with the Common Law Duty of Confidentiality?</i>	Consent (Implied - direct care). Where possible, consent is sought at the point of access; where the patient cannot be asked (for example, if unconscious), access may be made in the patient's best interests.
<i>5) Is this: Access to your GP record / Extraction of information from your GP record / Access to data held about you by another data controller</i>	Access to your GP record, or access to data held about you by another data controller (NHS England).
<i>6) Right to object</i>	You have the right to object to some or all the information being processed under Article 21. Please contact us. You should be aware that this is a right to raise an objection, that is not the same as having an absolute right to have your wishes granted in every circumstance. Patients may opt out of having a Summary Care Record at any time by contacting their registered GP practice.
<i>7) Retention period of the data (or criteria used to determine the retention period)</i>	The data will be retained in line with the law and national guidance (see NHS Records Management Code of Practice for Health and Social Care, linked below).

8) <i>Right to access and correct</i>	You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law.
9) <i>The right to lodge a complaint with a supervisory authority</i>	Yes: You have the right to complain to the Information Commissioner's Office, using the link below, or by calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 700 (national rate). There are National Offices for Scotland, Northern Ireland and Wales (see ICO website).
10) <i>Further information</i>	

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Care Quality Commission (CQC)

GH is required to provide the Care Quality Commission (CQC) with reports, statistics and case studies concerning all patients and staff, in connection with its regulatory inspection function.	
Data Controller: Greenwich Health Ltd 25-27 John Wilson St Woolwich London SE18 6PZ 020 8319 5440 https://www.greenwich-health.com	Data Protection Officer: Robert Sweeney robert.sweeney@nhs.net 020 8319 5440
1) <i>Purpose of the processing</i>	To enable the CQC to assess the quality and safety of care provided by GH, through review of anonymised reports, statistics and case studies.
2) <i>Lawful basis for the processing</i>	The processing of personal data is supported under the following conditions of the UK GDPR: Article 6(1) (c) Legal Obligation (Health and Social Care Act 2008); Article 9(2)(i) Public Interest.
3) <i>The recipient(s), or categories of recipients, of your personal data</i>	The Care Quality Commission.
4) <i>How does this comply with the Common Law Duty of Confidentiality?</i>	Legal Obligation. GH is required by law to be registered with and inspected by the CQC as a condition of providing regulated activities.
5) <i>Is this: Access to your GP record / Extraction of information from your GP record / Access to data held about you by another data controller</i>	Access to your GP record, generally limited to anonymised reports, statistics and case studies.
6) <i>Right to object</i>	The right to object under Article 21 does not generally apply where processing is necessary for compliance with a legal obligation. Please contact the Data Controller with any concerns.
7) <i>Retention period of the data (or criteria used to determine the retention period)</i>	According to CQC requirements.

8) <i>Right to access and correct</i>	You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law.
9) <i>The right to lodge a complaint with a supervisory authority</i>	Yes: You have the right to complain to the Information Commissioner's Office, using the link below, or by calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 700 (national rate). There are National Offices for Scotland, Northern Ireland and Wales (see ICO website).
10) <i>Further information</i>	See GH's Information Governance / GDPR documentation, held centrally by GH.

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NHS England (formerly NHS Digital)

GH shares statistical and anonymised data relating to all patients and staff with NHS England, which hosts this information in connection with national data collections.	
Data Controller: Greenwich Health Ltd 25-27 John Wilson St Woolwich London SE18 6PZ 020 8319 5440 https://www.greenwich-health.com	Data Protection Officer: Robert Sweeney robert.sweeney@nhs.net 020 8319 5440
1) <i>Purpose of the processing</i>	To comply with mandatory national data collections and reporting requirements, using statistical and anonymised data relating to patients and staff.
2) <i>Lawful basis for the processing</i>	The processing of personal data is supported under the following conditions of the UK GDPR: Article 6(1) (c) Legal Obligation; Article 9(2)(i) Public Interest.
3) <i>The recipient(s), or categories of recipients, of your personal data</i>	NHS England, which hosts this data.
4) <i>How does this comply with the Common Law Duty of Confidentiality?</i>	Legal Obligation, where a mandatory national data collection applies.
5) <i>Is this: Access to your GP record / Extraction of information from your GP record / Access to data held about you by another data controller</i>	Access to your GP record, or extraction of information from your GP record, in anonymised or statistical form.
6) <i>Right to object</i>	The right to object under Article 21 does not generally apply to mandatory national data collections required by law. Please contact the Data Controller with any concerns about discretionary sharing.
7) <i>Retention period of the data (or criteria used to determine the retention period)</i>	Not applicable - the data shared with NHS England is statistical and anonymised.

8) <i>Right to access and correct</i>	You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law.
9) <i>The right to lodge a complaint with a supervisory authority</i>	Yes: You have the right to complain to the Information Commissioner's Office, using the link below, or by calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 700 (national rate). There are National Offices for Scotland, Northern Ireland and Wales (see ICO website).
10) <i>Further information</i>	

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Safeguarding

GH has a duty to protect patients at risk of, or suffering, abuse or neglect. Records for patients at risk of, or suffering, safeguarding issues may include demographics, address and contact details, medical history, findings of examinations, results and investigation reports, referrals and clinical correspondence, preventive interventions, immunisations, medications, procedures, and records of attendances and contacts elsewhere. This information is shared with the patient's registered GP Practice as necessary to protect the patient.	
<i>Data Controller:</i> Greenwich Health Ltd 25-27 John Wilson St Woolwich London SE18 6PZ 020 8319 5440 https://www.greenwich-health.com	<i>Data Protection Officer:</i> Robert Sweeney robert.sweeney@nhs.net 020 8319 5440
1) <i>Purpose of the processing</i>	To protect patients at risk of, or suffering, abuse or neglect, by recording and sharing relevant information with those responsible for safeguarding the patient.
2) <i>Lawful basis for the processing</i>	The processing of personal data is supported under the following Article 6 and 9 conditions of the UK GDPR: Article 6(1)(e) Official Authority; Article 9(2)(h) Provision of Health; and, in serious cases, Article 6(1)(d) and Article 9(2)(c) (vital interests).
3) <i>The recipient(s), or categories of recipients, of your personal data</i>	The patient's registered GP Practice, and other agencies involved in protecting the patient where
4) <i>How does this comply with the Common Law Duty of Confidentiality?</i>	"Overriding public interest" (to safeguard the patient or another person). Safeguarding information is shared on a need-to-know basis with those responsible for protecting the patient.

5) <i>Is this: Access to your GP record / Extraction of information from your GP record / Access to data held about you by another data controller</i>	Access to your GP record, or extraction of information from your GP record.
6) <i>Right to object</i>	The right to object under Article 21 is limited where sharing is necessary to protect the patient or another person from harm. Please contact the Data Controller with any concerns.
7) <i>Retention period of the data (or criteria used to determine the retention period)</i>	We hold these electronic records on secured IT systems, with relevant information shared with the patient's registered GP practice. Records are retained in line with the NHS Records Management Code of Practice for Health and Social Care. Paper records are kept securely and disposed of once turned into an
8) <i>Right to access and correct</i>	You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law.
9) <i>The right to lodge a complaint with a supervisory authority</i>	Yes: You have the right to complain to the Information Commissioner's Office, using the link below, or by calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 700 (national rate). There are National Offices for Scotland, Northern Ireland and Wales (see
10) <i>Further information</i>	Safeguarding referrals are made in line with the Royal Borough of Greenwich Safeguarding Board procedures. See GH's Clinical Governance / Policies & CQC / GDPR / Privacy Notices documentation.

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Acting as employer

GH holds personal data about its employees in order to meet its obligations as an employer. This is a combination of personal data and financial data, and may also include special category data such as some sickness records and identity verification information. GH is required to share certain workforce data with HMRC (for tax purposes), NHS England (for national workforce reporting), and the CQC (for fit and proper persons checks), and to retain this data in line with tax law and the Health and Social Care Act.	
Data Controller: Greenwich Health Ltd 25-27 John Wilson St Woolwich London SE18 6PZ 020 8319 5440 https://www.greenwich-health.com	Data Protection Officer: Robert Sweeney robert.sweeney@nhs.net 020 8319 5440
1) <i>Purpose of the processing</i>	To comply with GH's obligations as an employer, including tax law and the Health and Social Care Act, and to support the management of GH's workforce.

<i>2) Lawful basis for the processing</i>	The processing of personal data in relation to staff members is supported under the following conditions of the UK GDPR: Article 6(1)(c) - compliance with a legal obligation, including taxation law and the Health and Social Care Act. Article 6(1)(b) - performance of an employment contract. Article 9(2)(b) - carrying out obligations in the field of employment, social security and social protection law.
<i>3) The recipient(s), or categories of recipients, of your personal data</i>	HM Revenue and Customs (HMRC), NHS England, and the Care Quality Commission (CQC).
<i>4) How does this comply with the Common Law Duty of Confidentiality?</i>	Legal obligation. GH is compelled by law to process and share staff personal data with HMRC, NHS England, and the CQC.
<i>5) Is this: Access to your GP record / Extraction of information from your GP record / Access to data held about you by another data controller</i>	Not applicable. This row refers to patient GP records and does not apply to staff personal data, which is held in HR records separate from the clinical system.
<i>6) Right to object</i>	You have the right to object under Article 21 UK GDPR to processing where the lawful basis is Article 6(1)(e) (public task) or Article 6(1)(f) (legitimate interests). Most staff data processing here is on the basis of legal obligation or contract, where the right to object does not apply. Where you have concerns about specific data processing, please contact the Data Controller or the DPO.
<i>7) Retention period of the data (or criteria used to determine the retention period)</i>	According to tax laws and the Health and Social Care Act (HSCA).
<i>8) Right to access and correct</i>	You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have records deleted except when ordered by a court of Law.
<i>9) The right to lodge a complaint with a supervisory authority</i>	Yes: You have the right to complain to the Information Commissioner's Office, using the link below, or by calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 700 (national rate). There are National Offices for Scotland, Northern Ireland and Wales (see ICO website).
<i>10) Further information</i>	GH maintains physical and IT security measures (secured premises, access controls, staff confidentiality agreements, CQC-compliant employment procedures, DBS checks, staff training, and NHS smartcard access controls) as set out in GH's internal security policy, held centrally by GH.

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Statutory Disclosures of Information

The Courts / Legal Proceedings

Where GH is required to disclose information in connection with legal proceedings - for example, in response to a court order, or in defence of a claim relating to care provided by GH - relevant information will be disclosed to the extent required.	
Data Controller: Greenwich Health Ltd 25-27 John Wilson St Woolwich London SE18 6PZ 020 8319 5440 https://www.greenwich-health.com	Data Protection Officer: Robert Sweeney robert.sweeney@nhs.net 020 8319 5440
1) Purpose of the processing	To comply with a court order, or to disclose information necessary for the establishment, exercise, or defence of legal claims relating to care provided by GH.
2) Lawful basis for the processing	The processing of personal data is supported under the following conditions of the UK GDPR: Article 6(1)(c) - compliance with a legal obligation. Article 9(2)(f) - establishment, exercise or defence of legal claims. This is supported by the exemption at Schedule 2, Part 1, paragraph 5 of the Data Protection Act 2018.
3) The recipient(s), or categories of recipients, of your personal data	The Courts, and any legal advisers or experts instructed in connection with the proceedings, including, where GH's own clinical negligence indemnity applies, NHS Resolution.
4) How does this comply with the Common Law Duty of Confidentiality?	Legal Obligation, where disclosure is required by a court order or is necessary for the defence of legal proceedings.
5) Is this: Access to your GP record / Extraction of information from your GP record / Access to data held about you by another data controller	Extraction of information from your GP record.
6) Right to object	The right to object under Article 21 UK GDPR does not apply to processing for the establishment, exercise or defence of legal claims. Please contact the Data Controller with any concerns.
7) Retention period of the data (or criteria used to determine the retention period)	Data disclosed in connection with legal proceedings is retained by the recipient in line with their own retention policies, which typically reflect the limitation periods for legal proceedings under the Limitation Act 1980.

8) <i>Right to access and correct</i>	You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law.
9) <i>The right to lodge a complaint with a supervisory authority</i>	Yes: You have the right to complain to the Information Commissioner's Office, using the link below, or by calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 700 (national rate). There are National Offices for Scotland, Northern Ireland and Wales (see ICO website).
10) <i>Further information</i>	

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Driver & Vehicle Licensing Agency (DVLA)

Applicants and licence holders have a legal duty to notify the DVLA of any injury or illness that would have a likely impact on safe driving ability. Where a clinician at GH becomes aware that fitness to drive requires notification, but the individual cannot or will not notify the DVLA themselves, and there is concern for road safety, the clinician may notify the DVLA directly.	
Data Controller: Greenwich Health Ltd 25-27 John Wilson St Woolwich London SE18 6PZ 020 8319 5440 https://www.greenwich-health.com	Data Protection Officer: Robert Sweeney robert.sweeney@nhs.net 020 8319 5440
1) <i>Purpose of the processing</i>	To enable GH to notify the DVLA where a patient has a medical condition that may affect their fitness to drive, and where the patient is unable or unwilling to notify the DVLA themselves, in order to protect the safety of the patient and other road users.
2) <i>Lawful basis for the processing</i>	The processing of personal data in relation to DVLA fitness-to-drive notifications is supported under the following conditions of the UK GDPR: Article 6(1)(e) - performance of a task carried out in the public interest, namely the clinician's professional duty under GMC guidance and DVLA fitness-to-drive standards. Article 9(2)(g) - processing of health data necessary for reasons of substantial public interest, on the basis of the Road Traffic Act 1988 and supporting DVLA
3) <i>The recipient(s), or categories of recipients, of your personal data</i>	The Driver and Vehicle Licensing Agency.
4) <i>How does this comply with the Common Law Duty of Confidentiality?</i>	Legal obligation / overriding public interest (to safeguard the patient or another person), where the patient has not notified the DVLA themselves despite being advised to do so.

5) <i>Is this: Access to your GP record / Extraction of information from your GP record / Access to data held about you by another data controller</i>	Extraction of information from your GP record.
6) <i>Right to object</i>	The right to object under Article 21 is limited where disclosure is necessary to protect road safety. Please contact the Data Controller with any concerns.
7) <i>Retention period of the data (or criteria used to determine the retention period)</i>	The data will be retained in line with the law and national guidance (see NHS Records Management Code of Practice for Health and Social Care, linked below).
8) <i>Right to access and correct</i>	You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law.
9) <i>The right to lodge a complaint with a supervisory authority</i>	Yes: You have the right to complain to the Information Commissioner's Office, using the link below, or by calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 700 (national rate). There are National Offices for Scotland, Northern Ireland and Wales (see ICO website).
10) <i>Further information</i>	

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General Medical Council (GMC)

Where a concern is raised about the fitness to practise of a doctor working for GH, GH may be required to disclose relevant information to the General Medical Council (GMC) in connection with its regulatory investigation.	
Data Controller: Greenwich Health Ltd 25-27 John Wilson St Woolwich London SE18 6PZ 020 8319 5440 https://www.greenwich-health.com	Data Protection Officer: Robert Sweeney robert.sweeney@nhs.net 020 8319 5440
1) <i>Purpose of the processing</i>	To enable the GMC to investigate concerns about the fitness to practise of a doctor, where this is necessary and relevant to that investigation.

<i>2) Lawful basis for the processing</i>	The processing of personal data is supported under the following conditions of the UK GDPR: Article 6(1) (c) - compliance with a legal obligation. Article 9(2)(g) - substantial public interest (regulation of health professionals), supported by Schedule 1, Part 2 of the Data Protection Act 2018.
<i>3) The recipient(s), or categories of recipients, of your personal data</i>	The General Medical Council.
<i>4) How does this comply with the Common Law Duty of Confidentiality?</i>	Legal Obligation / substantial public interest. Disclosure is limited to information that is relevant and necessary for the investigation.
<i>5) Is this: Access to your GP record / Extraction of information from your GP record / Access to data held about you by another data controller</i>	Extraction of information from your GP record, limited to what is relevant to the investigation.
<i>6) Right to object</i>	The right to object under Article 21 is limited where disclosure is necessary for the regulation of health professionals. Please contact the Data Controller with any concerns.
<i>7) Retention period of the data (or criteria used to determine the retention period)</i>	The data will be retained in line with the law and national guidance (see NHS Records Management Code of Practice for Health and Social Care, linked below).
<i>8) Right to access and correct</i>	You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law.
<i>9) The right to lodge a complaint with a supervisory authority</i>	Yes: You have the right to complain to the Information Commissioner's Office, using the link below, or by calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 700 (national rate). There are National Offices for Scotland, Northern Ireland and Wales (see ICO website).
<i>10) Further information</i>	

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Parliamentary and Health Service Ombudsman (PHSO)

The Parliamentary and Health Service Ombudsman (PHSO) was established by Parliament to provide an independent complaint handling service for patient complaints about NHS care that have not been resolved locally. Normally complaints are resolved at GH level or by the relevant Integrated Care Board (for SE London, NHS South East London ICB). If a patient is not satisfied with the outcome of these processes, they can escalate their complaint to the PHSO for an independent review. The PHSO has the power to request access to a patient's medical records for the purposes of an investigation under the Health Service Commissioners Act 1993, section 12.

<i>Data Controller:</i> Greenwich Health Ltd 25-27 John Wilson St Woolwich London SE18 6PZ 020 8319 5440 https://www.greenwich-health.com	<i>Data Protection Officer:</i> Robert Sweeney robert.sweeney@nhs.net 020 8319 5440
<i>1) Purpose of the processing</i>	To enable the Parliamentary and Health Service Ombudsman (PHSO) to access patient information for the purpose of an independent investigation of a complaint about NHS care that has not been resolved at GH level or ICB level. The information shared may include special category data (health information).
<i>2) Lawful basis for the processing</i>	The processing of personal data in relation to a PHSO investigation is supported under the following conditions of the UK GDPR: Article 6(1)(c) Legal Obligation (Health Service Commissioners Act 1993, section 12); and Article 9(2)(g) substantial public interest, supported by Schedule 1, Part 2, paragraph 6 (statutory and government purposes) of the Data Protection Act 2018.
<i>3) The recipient(s), or categories of recipients, of your personal data</i>	The Parliamentary and Health Service Ombudsman.
<i>4) How does this comply with the Common Law Duty of Confidentiality?</i>	Legal obligation. GH is compelled by law to share data in this way under Section 12 of the Health Service Commissioners Act 1993. In most cases the patient will already have made the complaint and referral to the PHSO, so will be aware.
<i>5) Is this: Access to your GP record / Extraction of information from your GP record / Access to data held about you by another data controller</i>	Extraction of information from your GP record.
<i>6) Right to object</i>	You have the right to object to some or all the information being processed under Article 21. Please contact us. You should be aware that this is a right to raise an objection, that is not the same as having an absolute right to have your wishes granted in every circumstance.
<i>7) Retention period of the data (or criteria used to determine the retention period)</i>	Data retained in line with PHSO policies on storing identifiable data.
<i>8) Right to access and correct</i>	You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law.

9) <i>The right to lodge a complaint with a supervisory authority</i>	Yes: You have the right to complain to the Information Commissioner's Office, using the link below, or by calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 700 (national rate). There are National Offices for Scotland, Northern Ireland and Wales (see ICO website).
10) <i>Further information</i>	

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NHS Counter Fraud Authority (NHSCFA)

The NHS Counter Fraud Authority is a special health authority charged with identifying, investigating and preventing fraud and other economic crime within the NHS and the wider health group. As a special health authority focused entirely on counter fraud work, the NHSCFA is independent from other NHS bodies and directly accountable to the Department of Health and Social Care. Investigators have the power to require the disclosure of the relevant parts of a patient's record, should they believe that this is important to the investigation.	
<i>Data Controller:</i> Greenwich Health Ltd 25-27 John Wilson St Woolwich London SE18 6PZ 020 8319 5440 https://www.greenwich-health.com	<i>Data Protection Officer:</i> Robert Sweeney robert.sweeney@nhs.net 020 8319 5440
1) <i>Purpose of the processing</i>	To enable the NHS Counter Fraud Authority (NHSCFA) to access relevant parts of a patient's medical record where this is necessary for the investigation of suspected fraud or other economic crime within the NHS. Investigations may relate to patients, GH

<i>2) Lawful basis for the processing</i>	The processing of personal data in relation to NHSCFA investigations is supported under the following conditions of the UK GDPR: Article 6(1)(c) Legal Obligation; and Article 9(2)(g) substantial public interest, supported by Schedule 1, Part 2, paragraph 10 (preventing or detecting unlawful acts) of the Data Protection Act 2018.
<i>3) The recipient(s), or categories of recipients, of your personal data</i>	The NHS Counter Fraud Authority.
<i>4) How does this comply with the Common Law Duty of Confidentiality?</i>	Legal obligation. GH is compelled by law to disclose the relevant parts of a record where required for an investigation.
<i>5) Is this: Access to your GP record / Extraction of information from your GP record / Access to data held about you by another data controller</i>	Extraction of information from your GP record, limited to the parts relevant to the investigation.
<i>6) Right to object</i>	You have the right to object to some or all the information being processed under Article 21. Please contact us. You should be aware that this is a right to raise an objection, that is not the same as having an absolute right to have your wishes granted in every circumstance.
<i>7) Retention period of the data (or criteria used to determine the retention period)</i>	Data retained in line with NHS Counter Fraud Authority policies on storing identifiable data.
<i>8) Right to access and correct</i>	You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law.
<i>9) The right to lodge a complaint with a supervisory authority</i>	Yes: You have the right to complain to the Information Commissioner's Office, using the link below, or by calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 700 (national rate). There are National Offices for Scotland, Northern Ireland and Wales (see ICO website).
<i>10) Further information</i>	

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Police

GH may share information with the police where there is a legal obligation to do so (for example, in response to a court order or a request made under Schedule 2 of the Data Protection Act 2018 for the prevention or detection of crime), or where there is an overriding public interest to protect a patient or another person from serious harm.

<i>Data Controller:</i> Greenwich Health Ltd 25-27 John Wilson St Woolwich London SE18 6PZ 020 8319 5440 https://www.greenwich-health.com	<i>Data Protection Officer:</i> Robert Sweeney robert.sweeney@nhs.net 020 8319 5440
1) Purpose of the processing	To comply with a legal obligation, or to protect a patient or another person from serious harm, by sharing relevant information with the police.
2) Lawful basis for the processing	The processing of personal data is supported under the following conditions of the UK GDPR: Article 6(1)(c) - legal obligation. Article 9(2)(g) - substantial public interest, including the prevention or detection of unlawful acts (Schedule 1, Part 2, paragraph 10 of the Data Protection Act 2018).
3) The recipient(s), or categories of recipients, of your personal data	The police.
4) How does this comply with the Common Law Duty of Confidentiality?	"Overriding public interest" (to safeguard the patient or another person), or legal obligation (e.g. court order), depending on the circumstances.
5) Is this: Access to your GP record / Extraction of information from your GP record / Access to data held about you by another data controller	Extraction of information from your GP record, limited to what is necessary and relevant to the request.
6) Right to object	The right to object under Article 21 is limited where disclosure is necessary for the prevention or detection of crime, or to protect a person from serious harm. Please contact the Data Controller with any concerns.
7) Retention period of the data (or criteria used to determine the retention period)	The data will be retained in line with the law and national guidance (see NHS Records Management Code of Practice for Health and Social Care, linked below).
8) Right to access and correct	You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law.
9) The right to lodge a complaint with a supervisory authority	Yes: You have the right to complain to the Information Commissioner's Office, using the link below, or by calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 700 (national rate). There are National Offices for Scotland, Northern Ireland and Wales (see ICO website).
10) Further information	Requests from the police are reviewed on a case-by-case basis, and information is only disclosed where a valid legal basis applies.

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Infectious Diseases - Public Health

Public health encompasses everything from national smoking and alcohol policies, the management of epidemics such as flu, the control of large scale infections such as tuberculosis and Hepatitis B, to local outbreaks of food poisoning or measles. Certain illnesses are also notifiable; clinicians treating a patient are required by law to inform the UK Health Security Agency (UKHSA) - for instance, scarlet fever. A full list of notifiable diseases is published by UKHSA. This necessarily means the patient's personal and health information being shared with public health organisations - nationally UKHSA, and locally the relevant local authority.

Data Controller:
Greenwich Health Ltd
25-27 John Wilson St
Woolwich
London SE18 6PZ
020 8319 5440

<https://www.greenwich-health.com>

Data Protection Officer:
Robert Sweeney
robert.sweeney@nhs.net
020 8319 5440

1) Purpose of the processing

To enable clinicians working for GH to provide all necessary information about individuals to UKHSA, when related to specific notifiable infectious diseases. There are occasions when medical data needs to be shared with UKHSA, the Local Authority Director of Public Health, or the Health Protection Agency under a legal obligation.

2) Lawful basis for the processing

The processing of personal data in relation to infectious disease notification is supported under the following conditions of the UK GDPR: Article 6(1)(c) Legal Obligation; Article 9(2)(i) Public Interest.

3) The recipient(s), or categories of recipients, of your personal data

UKHSA (UK Health Security Agency), and, locally, the relevant local authority.

<i>4) How does this comply with the Common Law Duty of Confidentiality?</i>	Legal obligation, or Regulation 3 of COPI 2002, where an application of law exists that allows sharing of data without consent. Relevant legislation includes the Health Protection (Notification) Regulations 2010, the Health Protection (Local Authority Powers) Regulations 2010, the Health Protection (Part 2A Orders) Regulations 2010, the Public Health (Control of Disease) Act 1984, the Public Health (Infectious Diseases) Regulations 1988, and the Health Service (Control of Patient Information) Regulations 2002. It would be best practice to inform the patient of this disclosure and obtain consent; however, the legislation above overrides any patient refusal.
<i>5) Is this: Access to your GP record / Extraction of information from your GP record / Access to data held about you by another data controller</i>	Extraction of information from the GP record.
<i>6) Right to object</i>	You have the right to object to some or all the information being processed under Article 21. Please contact us. You should be aware that this is a right to raise an objection, that is not the same as having an absolute right to have your wishes granted in every circumstance.
<i>7) Retention period of the data (or criteria used to determine the retention period)</i>	The data will be retained for active use during the period of the public interest and according to legal requirements and UKHSA's criteria on storing identifiable data.
<i>8) Right to access and correct</i>	You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law.
<i>9) The right to lodge a complaint with a supervisory authority</i>	Yes: You have the right to complain to the Information Commissioner's Office, using the link below, or by calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 700 (national rate). There are National Offices for Scotland, Northern Ireland and Wales (see ICO website).
<i>10) Further information</i>	

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Other Third Parties (solicitors, employers, insurance companies, DWP etc.)

Third parties involved with patients may contact GH to request medical information related to an ongoing process they are involved in with the patient - for example, solicitors acting on a legal matter, employers requesting information about a patient's fitness for work, insurance companies, or the Department for Work and Pensions. GH will only disclose medical information with the patient's explicit consent, usually obtained by the requesting third party using their own consent form. Where consent is unclear or has not been provided, GH will contact the patient directly to confirm consent before disclosing any information.

Data Controller:
Greenwich Health Ltd
25-27 John Wilson St
Woolwich
London SE18 6PZ
020 8319 5440
<https://www.greenwich-health.com>

Data Protection Officer:
Robert Sweeney
robert.sweeney@nhs.net
020 8319 5440

1) Purpose of the processing

To enable GH to provide information to third parties such as solicitors, insurance companies, employers, or the DWP, on behalf of a patient with their consent.

2) Lawful basis for the processing

The processing of personal data for disclosure to third parties on the basis of patient consent is supported under the following conditions of the UK GDPR: Article 6(1)(a) - the patient has given consent to processing for one or more specific purposes. Article 9(2)(a) - the patient has given explicit consent to the processing of special category data for one or more specified purposes.

3) The recipient(s), or categories of recipients, of your personal data

The requesting organisation.

4) How does this comply with the Common Law Duty of Confidentiality?

Consent (Explicit). We actively seek and record your agreement to the use or disclosure of your information before any such processing takes place.

5) Is this: Access to your GP record / Extraction of information from your GP record / Access to data held about you by another data controller

Extraction of information from the GP record.

6) Right to object

You have the right to withdraw consent at any time, where relevant.

<i>7) Retention period of the data (or criteria used to determine the retention period)</i>	Data retained in line with the third party organisation's own policies on storing identifiable
<i>8) Right to access and correct</i>	You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law.
<i>9) The right to lodge a complaint with a supervisory authority</i>	Yes: You have the right to complain to the Information Commissioner's Office, using the link below, or by calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 700 (national rate). There are National Offices for Scotland, Northern Ireland and Wales (see ICO website).
<i>10) Further information</i>	Disclosure of patient information under a court order is governed by the Common Law Duty of Confidentiality, which permits disclosure where there is a legal duty to do so.

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