



## **PULBOROUGH MEDICAL GROUP**

Pulborough Primary Care Centre, Spiro Close, Pulborough, West Sussex, RH20 1FG

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### **Clinical data Sharing Policy**

Pulborough Medical Group has the following organisations set as 'Allowed' organisations at Practice level which do not need verification to share the clinical record.

OneCall West and ECHO SCFT  
Overnight Service West SCFT  
Community Nursing Chichester Rural SCFT  
Midhurst Macmillan Specialist Palliative Care SCFT  
Minor Injuries Unit Horsham SCFT  
Innovations in Primary Care Ltd MIAMI

This is done under the legal basis that the processing of the GP Medical Record information is necessary to protect the vital interests of the data subject when the above organisations are providing direct care (as authorised in the DPA Sch 2 Art 4 and Sch 3 Art 3. Authorisation will remain in place under GDPR Art 6 Part 1(d) and Art 9 Part 2(h) and Part 3)

In addition, these organisations are trusted organisations who:

- Operate in accordance with the DPA and the Common Law of Confidentiality.
- Operate in accordance with the IG Toolkit.
- Will be required to register the patient in order to gain access to the Shared Record.
- Will obtain explicit consent from the patient before accessing the Shared Record.

It is our view that failing to set the organisational settings as detailed above could impact on patient care and safety, especially when the surgery is closed. It is also our view that this is in line with the intended operation of the new eDSM, the construct of which was agreed by the ICO.

The Sharing In and Out preferences are set to automatic.

Posters are displayed around the surgery and information is available on the website.  
Dissent forms are available for any patients who wish to opt out.

Our Data Protection Officer is Dr Carole Campbell

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**Drs Tim Fooks – Guy Mitchell – Ray Ghazanfar**  
**Nikki Tooley – Carole Campbell**  
**Eloise Scahill – Leigh-Anne Bascombe – David Murphy – Lucy Oxley**  
**Mr Alan Bolt, Managing Partner – Anna Harrison, Nurse Partner**

