



Support for General Practice(s) as Data Controllers – Legal Responsibilities

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Document Version Control

Version	Date approved	Changes	Approver
1.0	Sep 03, 2025, 13:22	Created 'Support for General Practice(s) as Data Controllers – Legal Responsibilities' which outlines the responsibilities of general practices as data controllers under UK GDPR and Data Protection Act 2018, focusing on data sharing, responding to subject access requests (SARs), and maintaining record access audit logs. Removed the introductory welcome message and a non-relevant document title section. Updated certain sections to include details about NHS-compliant APIs, structured data exports, SAR processing requirements, and security features for audit logs including retention policies and alert configurations.	Silanur Sahin

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Overview

Augmentia is designed to support General Practices in fulfilling their responsibilities as data controllers under the UK GDPR and the Data Protection Act 2018. The product’s technical features and data governance measures enable practices to manage data lawfully, fairly, and transparently.

1. Data Sharing Between Legal Entities

Data sharing is managed exclusively through NHS-compliant APIs and secure interoperability layers.

Augmentia **does not share patient identifiable data with any third party** unless explicitly instructed by the data controller (the GP practice).

Where data transfer is required (e.g. due to GP practice merger or referral), the product enables the **export of structured datasets** in machine-readable formats to facilitate lawful data sharing.

Data flows and transfer logs are fully documented for auditability.

2. Responding to Subject Access Requests (SARs)

The product supports practices by enabling data export in standard formats (CSV, JSON) for inclusion in SAR responses.

SAR processing will be carried out by the data controller (GP practice), and Augmentia will respond to any verified data export request **within 5 working days**.

Requests from patients submitted directly to Augmentia are **referred to the relevant GP practice**, as Augmentia acts as a data processor.

Templates and logs for SAR response fulfilment can be integrated into the system upon request.

3. Record Access Audit Log Maintenance

Every user interaction with patient data is automatically logged in a secure, immutable audit trail.

Logs include:

- User ID
- Date/Time stamp
- Action performed
- Record/Patient ID involved

Audit logs are retained for **7 years**, in line with NHS recordkeeping standards, and are accessible to GP administrators for investigation or reporting purposes.

Alerts can be configured for any unusual or unauthorized access attempts.