

Third Party Processing Update

A data processor acting on our behalf, EMIS Health, is changing certain technical aspects to the way in which it delivers services to us, due to a requirement within the [GP IT Futures Framework](#) (for all system vendors to adopt a cloud computing policy), part of this transition involves moving the data which it hosts on our behalf from its own data centre to a highly secure third party cloud hosted environment, namely Amazon Web Services (AWS).

Why AWS?

Amazon Web Services (AWS) is one of the world's largest cloud companies, already supporting numerous public sector clients (including the NHS), and it offers the very highest levels of security and support. They have been operating since 2002 and have more than 1 million active customers.

AWS Security:

- The data will remain in the UK at all times
- All data encrypted at rest and whilst in transit
- Encryption keys are only held by EMIS

The exercise will involve a change in the manner in which data is being processed on our behalf. Although this change does not introduce processing that is likely to result in a high risk to individuals (which would necessitate the undertaking of a DPIA), given that the data includes special category data we nevertheless feel that it is important that we undertake a review.

As detailed above, the data (which includes special category data (i.e. health data) is collected via St Thomas Medical Group's clinical IT system and this in turn forms the medical record) will be stored in a third-party data centre (which will act on the instructions of EMIS Health, who in turn will act in accordance with instructions received from (or on behalf of) ourselves).

Aside from the manner in which the data is being hosted, we have not identified, as part of this change, any material change to the manner in which the data is being processed (in terms of data sharing and/or use).

Access to this information for interoperability and reporting does not change and all data remains under the control of St Thomas Medical Group through the Data Sharing Module in EMIS Web.