

Holt Surgery Processing Activities Log

Last Reviewed: 5/15/2023 12:49:12 PM

| Name of Processing Activity | Description | Categories of individuals | Categories of personal data | GDPR Lawful Basis - Personal Data | GDPR Lawful Basis - Spec Cat Data | DPA 2018 Exemption (Personal) | DPA 2018 Exemption (Sensitive) | Source of Data | Data includes Sensitive / Special Categories |
|---|---|---------------------------|---|-----------------------------------|-----------------------------------|-------------------------------|---------------------------------|---|--|
| REFERRALS, TEST RESULTS, DISCHARGE NOTICES | Exchanging health information across the health and social care network to facilitate care for the individual | Patients | Contact Details, NHS No, DOB, Referral Reason, Supporting Clinical Information i.e. meds, allergies | 6 (1) (e) Public Task | 9 (h) Medicine | Sch 9 (5) (e) Public Task | Sch 10 (8) (1) Medical Purposes | Patient provides, practice generates internally, or other health / care providers provide | YES |
| EPS | Personal Data is used within the Electronic Prescribing System to generate and send prescriptions | patients | Name, Condition, Allergies, NHS Number, Address, Prescription Details | 6 (1) (e) Public Task | 9 (h) Medicine | Sch 9 (5) (e) Public Task | Sch 10 (8) (1) Medical Purposes | Patient provides, generated internally or other health / care providers provide | YES |

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| RESEARCH | Patient Data is used for the Purposes of Research | patients | Full Medical Record Outcome of external consultation | 6 (1) (e) Public Task | 9 (h) Medicine | Sch 9 (5) (e) Public Task | Sch 10 (8) (1) Medical Purposes | Patient provides, generated internally or other health / care providers provide | YES |
| INFORMATION RIGHTS REQUEST | Response to a patient (or representative) request related to access, amendment, restriction, objection re personal data | patients, staff or visitors | Full Medical Record, Employee Record | Article 12 to 23 | Article 12 to 23 | Chapter 3 | Chapter 3 | Patient provides, generated internally or other health / care providers provide | YES |
| MEDICAL REPORTS REQUEST | Response to a commercial / employer / police / request for completion of medical reports | patients | Varies depending on nature of request | Article 6 (1) (a) Consent | Article 9 (2) (a) Consent | Schedule 9 (1) Consent | Schedule 10 (1) Consent | Patient provides, generated internally or other health / care providers provide | YES |
| CONFIDENTIAL WASTE DESTRUCTION | Confidential waste is collected, transferred and destroyed or destroyed on site | staff, public, patients | Any hard copy confidential waste produced by the practice | 6 (1) (e) Public Task | 9 (h) Medicine | Sch 9 (5) (e) Public Task | Sch 10 (8) (1) Medical Purposes | Patient provides, generated internally or other health / care providers provide | YES |

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| PATIENT TEXTS | Texts are sent to patients in relation to healthcare services | staff, public, patients | Contact Details, Appointment Information | 6 (1) (e) Public Task | 9 (h) Medicine | Sch 9 (5) (e) Public Task | Sch 10 (8) (1) Medical Purposes | Patient provides, generated internally or other health / care providers provide | YES |
| PATHOLOGY COURIER | Samples are provided to the courier for delivery to pathology | staff, public, patients | Contact Details, NHS No, DOB, Pathology Request | 6 (1) (e) Public Task | 9 (h) Medicine | Sch 9 (5) (e) Public Task | Sch 10 (8) (1) Medical Purposes | Patient provides, generated internally or other health / care providers provide | YES |
| PCSE NOTES | Movement of Patient records to Primary Care Support England | patients | Full Medical Record | 6 (1) (e) Public Task | 9 (h) Medicine | Sch 9 (5) (e) Public Task | Sch 10 (8) (1) Medical Purposes | Patient provides, generated internally or other health / care providers provide | YES |
| CORONER REPORTS | Reports are provided to the coroner | patients | Contact Details, DOB, Gender, Address, NHS No, Medical Information | 6 (1) (e) Public Task | 9 (h) Medicine | Sch 9 (5) (e) Public Task | Sch 10 (8) (1) Medical Purposes | Patient provides, generated internally or other health / care providers provide | YES |

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| TELEPHONE RECORDING | General calls to the surgery are recorded for training and monitoring purposes | patients, staff | Contact Details, Details of Conversation including health information | 6 (1) (e) Public Task | 9 (h) Medicine | Sch 9 (5) (e) Public Task | Sch 10 (8) (1) Medical Purposes | Those making or receiving calls. | YES |
| INVOICING FOR PATIENT NOTES / COPY RECORDS | Invoices are sent to patients in relation to production of reports or notes | patients | Contact Details, Details of report required, cost | 6 (1) (e) Public Task | 9 (h) Medicine | Sch 9 (5) (e) Public Task | Sch 10 (8) (1) Medical Purposes | Patient provides, generated internally or other health / care providers provide | NO |
| DIGITAL DICTATION | In-house dictation system to refer patient to another health or social care professional or service | patients | Contact Details, Health Information | 6 (1) (e) Public Task | 9 (h) Medicine | Sch 9 (5) (e) Public Task | Sch 10 (8) (1) Medical Purposes | Patient provides, generated internally or other health / care providers provide | YES |
| PATIENT ACCESS | Patient access for online appointment booking, prescription requests and access to medical records | patients | Possibly Full Health Records | 6 (1) (e) Public Task | 9 (h) Medicine | Sch 9 (5) (e) Public Task | Sch 10 (8) (1) Medical Purposes | Patient provides, generated internally or other health / care providers provide | YES |

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| INCIDENT MANAGEMENT | Clinical, health and safety or information incidents are managed | patients | Contact Details, Health Information, Incident Info | 6 (1) (e) Public Task | 9 (h) Medicine | Sch 9 (5) (e) Public Task | Sch 10 (8) (1) Medical Purposes | Patient provides, generated internally or other health / care providers provide | YES |
| HOME VISITS | Information is transported to the patients home to provide consultation or care | patients | Possibly Full Health Records | 6 (1) (e) Public Task | 9 (h) Medicine | Sch 9 (5) (e) Public Task | Sch 10 (8) (1) Medical Purposes | Patient provides, generated internally or other health / care providers provide | YES |
| REMOTE WORKING | Information is accessed remotely | patients | Possibly Full Health Records | 6 (1) (e) Public Task | 9 (h) Medicine | Sch 9 (5) (e) Public Task | Sch 10 (8) (1) Medical Purposes | Patient provides, generated internally or other health / care providers provide | YES |

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| SELF CHECK IN SCREENS | Patients access a digital check in screen to record their attendance at the practice | patients | Contact Details, Health Information | 6 (1) (e) Public Task | 9 (h) Medicine | Sch 9 (5) (e) Public Task | Sch 10 (8) (1) Medical Purposes | Patient provides, generated internally or other health / care providers provide | YES |
| COMPLAINTS / PALS | investigation and resolution of patient complaints | patients | Contact Details, Health Information, complaint information | Article 6 (1) (a) Consent | Article 9 (2) (a) Consent | Schedule 9 (1) Consent | Schedule 10 (1) Consent | Patient provides, generated internally or other health / care providers provide | YES |
| NHS Health Checks | NHS Health Checks | patients | Contact Details, Health Information | 6 (1) (e) Public Task | 9 (h) Medicine | Sch 9 (5) (e) Public Task | Sch 10 (8) (1) Medical Purposes | Patient provides, generated internally or other health / care providers provide | YES |

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| Patient Participation Group | Personal data is processed for the creation and maintenance of the PPG / PEG | patients | Contact Details, Health Information | Article 6 (1) (a) Consent | Article 9 (2) (a) Consent | Schedule 9 (1) Consent | Schedule 10 (1) Consent | Patients | YES |
| Tele-Consultation Service | Personal data is processed for the purposes of remote consultation services | patients | Possibly Full Health Records | 6 (1) (e) Public Task | 9 (h) Medicine | Sch 9 (5) (e) Public Task | Sch 10 (8) (1) Medical Purposes | Patient provides, generated internally or other health / care providers provide | YES |
| Collection of Equality & Diversity Data from Service Users | Personal data is collected and analysed in relation to obligations under Equalities Act 2011 | Patients / service users | Name, age disability gender reassignment marriage and civil partnership pregnancy and maternity race religion or belief sex sexual orientation | The processing is necessary to comply with a legal obligation to which the controller is subject. | Article 9(2)(b), UK GDPR and section 10 and Parts 1 and 4 of Schedule 1, DPA 2018: OR / AND Article 9(2)(g), UK GDPR and section 10 and Parts 2 and 4 of Schedule 1, DPA 2018: | The processing is necessary to comply with a legal obligation to which the controller is subject. | Article 9(2)(b), UK GDPR and section 10 and Parts 1 and 4 of Schedule 1, DPA 2018: OR / AND Article 9(2)(g), UK GDPR and section 10 and Parts 2 and 4 of Schedule 1, DPA 2018: | Provided by data subject | YES |

| | | | | | Equality of opportunity or treatment (paragraph 8) | | Equality of opportunity or treatment (paragraph 8) | | |
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| Use of an External Third Party Provider to support with Pharmacy / Medication Reviews | The clinical system is accessed by a third party provider to perform medication reviews on active patients | Patients / service users | Possibly Full Health Records | 6 (1) (e) Public Task | 9 (h) Medicine | Sch 9 (5) (e) Public Task | Sch 10 (8) (1) Medical Purposes | Patient provides, generated internally or other health / care providers provide | YES |
| Use of an External Third Party Provider to support with providing additional remote or face to face consultations | Data is shared with an external primary care provider who offer supplementary GP appointments | Patients / service users | Possibly Full Health Records | 6 (1) (e) Public Task | 9 (h) Medicine | Sch 9 (5) (e) Public Task | Sch 10 (8) (1) Medical Purposes | Patient provides, generated internally or other health / care providers provide | YES |
| EVALUATION OF HEALTHCARE PROJECTS AND INITIATIVES | De-identified data is used to determine how safe and effective services | Patients / service users | Deidentified data (case dependant) | 6 (1) (e) Public Task | 9 (h) Medicine | Sch 9 (5) (e) Public Task | Sch 10 (8) (1) Medical Purposes | Patient provides, generated internally or other health / care providers provide | YES |
| SEND AND RECEIVE RECORDS VIA OFFSITE STORAGE PROVIDER | Medical records are sent to an offsite location for archive and are retrieved as necessary | Patients / service users | Possibly Full Health Records | 6 (1) (e) Public Task | 9 (h) Medicine | Sch 9 (5) (e) Public Task | Sch 10 (8) (1) Medical Purposes | Patient provides, generated internally or other health / care providers provide | YES |
| SEND AND RECEIVE RECORDS VIA OFFSITE | Medical records are sent to an offsite location for archive and are scanned so that the original may be shredded | Patients / service users | Possibly Full Health Records | 6 (1) (e) Public Task | 9 (h) Medicine | Sch 9 (5) (e) Public Task | Sch 10 (8) (1) Medical Purposes | Patient provides, generated internally or other health / care providers provide | YES |

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| SCANNING PROVIDER | | | | | | | | | |
| Managed Disclosure Service | Records are sent to an offsite provider to fulfil disclosure requests such as SAR, Police, Firearms etc | Patients / service users | Possibly Full Health Records | Information Rights Obligations and other legislation such as AMRA | Information Rights Obligations and other legislation such as AMRA | Information Rights Obligations and other legislation such as AMRA | Information Rights Obligations and other legislation such as AMRA | Patient provides, generated internally or other health / care providers provide | YES |
| Video consultation | Personal data is processed for the purposes of remote consultation services | patients, trainees | Possibly Full Health Records | 6 (1) (e) Public Task | 9 (h) Medicine | Sch 9 (5) (e) Public Task | Sch 10 (8) (1) Medical Purposes | Patient provides, generated internally or other health / care providers provide | YES |

Operational Activities

| Name of Processing Activity | Description | Categories of individuals | Categories of personal data | GDPR Lawful Basis - Personal Data | GDPR Lawful Basis - Spec Cat Data | DPA 2018 Exemption (Personal) | DPA 2018 Exemption (Sensitive) | Source of Data | Data includes Sensitive / Special Categories |
|-----------------------------|--|---------------------------|---|-----------------------------------|-----------------------------------|---|--------------------------------|---|--|
| Recruitment | Applications are received and reviewed for recruitment purposes. Applicants are shortlisted and interviewed. | Public Staff | Contact Details DOB Employment History Health / Disability Information | 6 (1) (b) Contract | 9 (2) (a) Employment | Sch 9 (2) (b) Steps towards a contract | Sch 10 (1) Consent | Provided by individual | Possible |
| Payroll | Employee data is processed to calculate and pay salaries | Staff | Contact Details NI Number Salary Health / Disability Information | 6 (1) (b) Contract | 9 (2) (a) Employment | Sch 9 (2) (b) contract | Sch 10 (2) Employment | Provided by individual / HMRC | Yes |
| Pension | Employee data is processed to calculate and pay pensions | Staff | Contact Details NI Number Salary Health / Disability Information | 6 (1) (b) Contract | 9 (2) (a) Employment | Sch 9 (2) (b) contract | Sch 10 (2) Employment | Provided by individual / HMRC | Yes |
| Personnel File | Records are compiled to maintain and develop the employment relationship | Staff | Contact Details Recruitment information Salary | 6 (1) (b) Contract | 9 (2) (a) Employment | Sch 9 (2) (b) contract | Sch 10 (2) Employment | Provided by individual / Generated during employment | Yes |

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| | | | Performance information Sickness Occupational health information | | | | | | |
| Professional Training | Healthcare professionals are trained and assessed | Staff | contact details, dietary needs, disabilities | 6 (1) (b) Contract | 9 (2) (b) Employment | Sch 9 (2) (a) Contract | Sch 10 (2) Employment | Provided by individual | Yes |
| Mandatory Training | Healthcare professionals are trained and assessed | Staff | contact details, dietary needs, disabilities | 6 (1) (b) Contract | 9 (2) (b) Employment | Sch 9 (2) (a) Contract | Sch 10 (2) Employment | Provided by individual | Yes |
| Appraisals | Staff performance is monitored and appraised | Staff | contact details, occupational health, performance, salary information | 6 (1) (b) Contract | 9 (2) (b) Employment | Sch 9 (2) (a) Contract | Sch 10 (2) Employment | Provided by individual | Yes |
| DBS Checking | Criminal records are checked for new employees | Staff | contact details, criminal record information, addresses, DOB | 6 (1) (b) Contract | 9 (2) (b) Employment | Sch 9 (2) (a) Contract | Sch 10 (2) Employment | Provided by individual | Yes |
| References | References are requested and provided for current and former staff members | Staff | contact details, employment information, salary, DOB | 6 (1) (b) Contract | 9 (2) (b) Employment | Sch 9 (2) (a) Contract | Sch 10 (2) Employment | Provided by individual | Yes |
| Management of Website | Personal data is collected via the organisation website | Customers, patients, public | Name, email address, contact details, free text queries, IP addresses | Consent or Legitimate Interests | Consent or Legitimate Interests | Consent or Legitimate Interests | Consent or Legitimate Interests | Provided by individual or collected automatically | NO |
| Use of External Data Protection Officer | Engagement of external DPO who may process personal data related to information rights requests, training and incidents | Staff, patients and members of the public | Case dependant | Consent or legal requirement | Consent or legal requirement | Consent or legal requirement | Consent or legal requirement | Provided by individual | YES |
| CCTV | Surveillance of practice areas to protect staff and visitors | Staff and visitors | audio images | 6 (1) (f) Legitimate Interests | | Legitimate Interests | | Captured automatically | Incidental |

