

# Upwell Health Centre Processing Activities Log

Last Reviewed: 7<sup>th</sup> Feb 2023

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
<b>REFERRALS, TEST RESULTS, DISCHARGE NOTICES</b>	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
<b>Extended / Out of Hours Services</b>	External consultants access the practice record and provide details of consultation back to practice	patients	Contact Details, NHS No, DOB, Medication 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

<b>EPS</b>	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
<b>RESEARCH</b>	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
<b>INFORMATION RIGHTS REQUEST</b>	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
<b>MEDICAL REPORTS REQUEST</b>	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

<b>CONFIDENTIAL WASTE DESTRUCTION</b>	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
<b>PATIENT TEXTS</b>	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
<b>PATHOLOGY COURIER</b>	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
<b>PCSE NOTES</b>	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

<b>TELEPHONE RECORDING</b>	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
<b>INVOICING FOR PATIENT NOTES / COPY RECORDS</b>	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
<b>DIGITAL DICTATION</b>	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
<b>PATIENT ACCESS</b>	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
		patients							YES

<b>INCIDENT MANAGEMENT</b>	Clinical, health and safety or information incidents are managed		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	
<b>HOME VISITS</b>	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
<b>REMOTE WORKING</b>	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
<b>SELF CHECK IN SCREENS</b>	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

<b>COMPLAINTS / PALS</b>	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
<b>NHS Health Checks</b>	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
<b>Patient Participation Group</b>	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
<b>Collection of Equality &amp; Diversity Data from Service Users</b>	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	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	Provided by data subject	YES

					Article 9(2)(g), UK GDPR and section 10 and Parts 2 and 4 of Schedule 1, DPA 2018: Equality of opportunity or treatment (paragraph 8)		Article 9(2)(g), UK GDPR and section 10 and Parts 2 and 4 of Schedule 1, DPA 2018: Equality of opportunity or treatment (paragraph 8)		
<b>Use of an External Third Party Provider to support with Pharmacy / Medication Reviews</b>	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
<b>Use of an External Third Party Provider to support with providing additional remote or face to face consultations</b>	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
<b>EVALUATION OF HEALTHCARE PROJECTS AND INITIATIVES</b>	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
<b>SEND AND RECEIVE RECORDS VIA OFFSITE</b>	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

<b>STORAGE PROVIDER</b>									
<b>Managed Disclosure Service</b>	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
<b>Video consultation</b>	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

<b>Name of Processing Activity</b>	<b>Description</b>	<b>Categories of individuals</b>	<b>Categories of personal data</b>	<b>GDPR Lawful Basis - Personal Data</b>	<b>GDPR Lawful Basis - Spec Cat Data</b>	<b>DPA 2018 Exemption (Personal)</b>	<b>DPA 2018 Exemption (Sensitive)</b>	<b>Source of Data</b>	<b>Data includes Sensitive / Special Categories</b>
<b>Recruitment</b>	Applications are received and reviewed for recruitment purposes. Applicants	Public Staff	Contact Details DOB Employment History	6 (1) (b) Contract	9 (2) (a) Employment	Sch 9 (2) (b) Steps towards a contract	Sch 10 (1) Consent	Provided by individual	Possible



	are shortlisted and interviewed.		Health / Disability Information						
<b>Payroll</b>	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
<b>Pension</b>	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
<b>Personnel File</b>	Records are compiled to maintain and develop the employment relationship	Staff	Contact Details Recruitment information Salary Performance information Sickness Occupational health information	6 (1) (b) Contract	9 (2) (a) Employment	Sch 9 (2) (b) contract	Sch 10 (2) Employment	Provided by individual / Generated during employment	Yes
<b>Professional Training</b>	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
<b>Mandatory Training</b>	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
<b>Appraisals</b>	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

<b>DBS Checking</b>	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
<b>References</b>	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
<b>Management of Website</b>	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
<b>Use of External Data Protection Officer</b>	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
<b>CCTV</b>	Surveillance of practice areas to protect staff and visitors	Staff and visitors	audio images	6 (1) (f) Legitimate Interests		Legitimate Interests		Captured automatically	Incidental