**Burnham Surgery Processing Activities Log**

**Last Reviewed: 5/26/2023 5:00:25 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 |
|
|
|
|
| **Extended / Out of Hours Services** | 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 |
|
|
|
|
| **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 |
|
|
|
|
| **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 |
|
|
|
|
| **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 |
|
|
|
|
|
|
|
|
| **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 |
|
|
|
|
| **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 |
|
|
|
|
| **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 |
|
|
|
|
| **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 2021 | Patients / service users | Name, agedisabilitygender reassignmentmarriage and civil partnershippregnancy and maternityracereligion or beliefsexsexual 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 / ANDArticle 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) | 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 / ANDArticle 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) | Provided by data subject | YES |
| **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 SCANNING PROVIDER** | 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 |
| **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. | PublicStaff | Contact DetailsDOBEmployment HistoryHealth / 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 |
|
|
|
|
|
| **Personnel File** | Records are compiled to maintain and develop the employment relationship | Staff | Contact DetailsRecruitment informationSalaryPerformance informationSicknessOccupational 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 |
| **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 |