

Privacy Notice – GP Automate and Hero Health

GP Automate uses Robotic Process Automation (RPA) technology to automate and process certain lab reports by mimicking human actions. Lab reports automation developed by GP Automate interacts with EMIS and Microsoft 365. It interacts with Hero Health in workflows initiated by GP Automate, but Hero Health connects directly to the GP practice's EMIS system and acts as an independent processor to the GP practices to send messages for certain results workflows.

a) Normal Test Results - Normal test results for all registered patients are processed using RPA. These reports are authorised by each practice to automate.

b) Enhanced Features – More complex flows using RPA to automate more than just simple reports.

c) Abnormal Test Results – Results that are considered Abnormal are work flowed accordingly to different members of the practice teams with more complex flows to ensure that reports are not filed away but highlighted to practices streamlining the process and removing working load from clinicians.

Abnormal Reports Automation Process:

1. Prediabetic HbA1c (42-47 mmol/mol) - NDH (Non-Diabetic Hyperglycaemia)

- Newly Diagnosed NDH:
 - Bot sends an SMS with the HbA1c value.
 - Codes NDH into the patient's care history and adds the patient to the NDH QOF register.
- Pre-existing NDH:
 - Bot sends SMS with HbA1c value and includes an invitation to the National Diabetes Prevention Programme (NDPP).

1. Good Diabetic Control (HbA1c: 46-58 mmol/mol, typically <54 mmol/mol)

- a. Bot sends SMS confirming good control and provides recommendations for a low-carb diet and healthy lifestyle.
- b. Excludes patients on insulin, sulphonylureas, those with severe frailty, or over 80 years old, as these require clinical review rather than automated messaging.

2. Poor Diabetic Control (HbA1c: 59-110 mmol/mol, typically >65 mmol/mol)

- a. Bot sends an SMS inviting patients to book an appointment for sugar control, with self-booking links to prevent double-booking.
- b. A task is generated for the relevant team to ensure the patient gets booked for review.

3. Vitamin D Insufficiency

- a. When SMS can be sent:
 - i. Bot codes the patient as "Vitamin D Insufficient" and sends an SMS with recommendations for over-the-counter (OTC) medication.
 - ii. The report is filed as usual.
- b. When SMS cannot be sent:
 - i. The bot does not file the report but adds a sticky note stating: "Patient is Vitamin D insufficient. SMS couldn't be sent due to either:
 - 1. No phone number

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2. No consent for receiving messages

4. Lipid Reports

- a. The bot checks for heart conditions, primary or secondary prevention status, statin use, and calculates QRISK scores.
- b. If the result is abnormal or needs review, a task is generated for the team, and an SMS is sent if consented, with a self-booking link for an appointment.
- c. Follows NICE guidelines and NHSE Lipid Pathway Management.

If automation fails mid-run, the affected record remains in the EMIS inbox with an automation flag/sticky note so clinical staff can act manually. RPA bot runs are monitored daily, with failed runs investigated immediately by the support team. Daily audit logs show all processed and unprocessed items for assurance. No patient data is lost because all source data remains in EMIS; GP Automate does not delete or overwrite original records

1) Controller contact details	Blackheath Standard Surgery 11-13 Charlton Road London SE3 7HB https://www.blackheathstandardsurgery.com/
2) Data Protection Officer contact details	gpdpo@selondonics.nhs.uk
3) Purpose of the processing	Blackheath Standard Surgery will be utilising Automated Lab Reporting and Hero Health. Lab Reporting Automation involves the automated results filing of reports that have been expressly authorised by the practice to be filed by GP Automate software. Hero Health sends messages to patients for certain test results processed by GP automate.
4) Lawful basis for processing	The legal basis will be <i>Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’;</i> And <i>Article 9(2)(h) ‘necessary for the purposes of preventative or occupational medicine’</i>
5) Recipient or categories of recipients of the shared data	For pathology product, data is accessed from the GP Practice system. Personal data collected and processed as part of the GP Automate will be processed securely via Azure held in the UK Cloud.
6) Rights to object	You have the right under Article 21 of the UK GDPR to object to your personal information being processed. Please contact the Practice if you wish to object to the processing of your data. You should be aware that this is a right to raise an objection which is

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	<p>not the same as having an absolute right to have your wishes granted in every circumstance.</p> <p>GP Practices process personal data under Article 6(1)(c) on a lawful and legitimate basis where the organisation is obliged under law to comply with</p> <ul style="list-style-type: none">• The UK General Data Protection Regulations (GDPR)• The Data Protection Act 2018• The Freedom of Information Act• The NHS Constitution• The Local Authority Social Services and National Health Service Complaints (England) Regulations 2009 <p>By complying with these laws, the Practice has compelling legitimate grounds for the processing which override the interests, rights and freedoms in the right to object.</p>
7) Right to access and correct	<p>You have the right to access the data that is being shared and have any inaccuracies corrected.</p> <p>There is no right to have accurate medical records deleted except when ordered by a court of Law.</p>
8) Retention period	<p>In lab reports product, a unique identifier is collected from each report for auditing purposes, this is purged after 30 days automatically from the server.</p>
9) Right to Complain.	<p>You have the right to complain to the Information Commissioner's Office, you can use this link https://ico.org.uk/make-a-complaint/data-protection-complaints/</p> <p>or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)</p> <p>There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website).</p>