**Magdalen Medical Practice Processing Activities Log**

**Last Reviewed: 5/23/2022 11:09:44 AM**

|  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **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** | Information is collated and shared for research purposes | patients | Varies depending on research programme | 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 |
|
|
|
|
| **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 |
|
|
|
|
| **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 |
|
|
|
|
| **COMMISSIONER REPORTS** | Quality / payment / performance reports are provided to service commissioners | patients | Varies Depending on Report | 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 |
|
|
|
|
| **OUT OF HOURS (OOH)** | Patients are provided to OOH provider | 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 |
|
|
|
|
| **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 |
|
|
|
|
| **DIABETIC EYE SCREENING** | Personal Data is sent to the East Anglian DESP to form a public health register and to allow multi agency working | 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 |
|
|
|
|
| **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** | Personal data is collected and analysed in relation to obligations under Equalities Act 2021 | 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: 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 / AND  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) | Provided by data subject | YES |
| **Evaluation of Healthcare Projects and Initiatives** | Undertaking analysis in relation to a project, system or initiative to understand how safe or effective it is | Patients / Service Users | Name, NHS Number, conditions, symptoms, medication, baseline readings or condition, outcome readings or conditions | 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.** | Using an offsite storage provider for paper medical records. | Patients / Service Users | 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** | Using an offsite scanning provider to create digital copies of medical records and securely destroy the originals | Patients / Service Users | 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 |
| **COVID Outreach Projects** | (CCG / Other providers engaging with patients on organisation’s behalf) | Patients / Service Users | Name, NHS Number, conditions, symptoms, medication, baseline readings or condition, outcome readings or conditions | 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 |
| **Virtual / Remote Pharmacist** | Use of an external third-party provider to support with pharmacy / medication reviews | Patients / Service Users | 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 |
| **Virtual / Remote Clinicians** | Virtual Use of an external third-party provider to support with providing additional remote or face to face consultations | Patients / Service Users | 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 |
| **External Processing of Disclosures** | Virtual Use of external provider to process disclosure requests (Police, SARs, Firearms etc) | Patients / Service Users | 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 |
| **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  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 |
| **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 |
| **Use of external Data Protection Officer** | Personal data may be shared with external Data Protection Officer to provide support towards data protection compliance | Staff, visitors and patients | Contact Details  DOB  Employment History  Health / Disability Information, audio or visual recordings. | 6 (1) (f) Legitimate Interests | Rights of the data subject / Incident investigation | 6 (1) (f) Legitimate Interests | Rights of the data subject / Incident investigation | Case dependant | 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 |