



Data Protection Impact Assessment Form

Question	Response																														
Will this project/system/process/change contain any person identifiable data? If the answer is NO, then a Privacy Impact Assessment is not required.	No <input type="checkbox"/> Patient <input checked="" type="checkbox"/> Staff <input checked="" type="checkbox"/> Other <input type="checkbox"/>																														
The purpose for the collection of data	If other, please specify; To be able to provide treatment, look at medical history and for audit purposes.																														
Does the new project/system/process/change include security to protect privacy of data?	Computers desktops and Emis both require passwords/username to enable access. <u>Clinical system is hosted to HSCIC standards</u>																														
What data information will be held on the system(s)? <i>Tick all that apply</i>	<table border="1"> <thead> <tr> <th colspan="2">Sensitive</th> <th colspan="2">Personal</th> </tr> </thead> <tbody> <tr> <td>Name <input checked="" type="checkbox"/></td> <td>Next of kin <input checked="" type="checkbox"/></td> <td>Sex <input checked="" type="checkbox"/></td> <td>Medical History <input checked="" type="checkbox"/></td> </tr> <tr> <td>Address <input checked="" type="checkbox"/></td> <td>Hospital No. <input type="checkbox"/></td> <td>Religion <input checked="" type="checkbox"/></td> <td>Treatment <input checked="" type="checkbox"/></td> </tr> <tr> <td>Postcode <input checked="" type="checkbox"/></td> <td>NHS No. <input checked="" type="checkbox"/></td> <td>Occupation <input checked="" type="checkbox"/></td> <td>Ethnicity <input checked="" type="checkbox"/></td> </tr> <tr> <td>DOB <input checked="" type="checkbox"/></td> <td>Nat Ins No. <input type="checkbox"/></td> <td>Diagnosis <input checked="" type="checkbox"/></td> <td>Staff data <input checked="" type="checkbox"/></td> </tr> <tr> <td>Sex <input checked="" type="checkbox"/></td> <td>Consultant <input checked="" type="checkbox"/></td> <td colspan="2" rowspan="2"> Other: Religion and occupation data will only be recorded where clinically relevant (eg Jehovah's Witness in the case of bleeding etc) </td> </tr> <tr> <td>GP <input checked="" type="checkbox"/></td> <td></td> </tr> <tr> <td colspan="4"> Other: Usual GP Practice </td> </tr> </tbody> </table>	Sensitive		Personal		Name <input checked="" type="checkbox"/>	Next of kin <input checked="" type="checkbox"/>	Sex <input checked="" type="checkbox"/>	Medical History <input checked="" type="checkbox"/>	Address <input checked="" type="checkbox"/>	Hospital No. <input type="checkbox"/>	Religion <input checked="" type="checkbox"/>	Treatment <input checked="" type="checkbox"/>	Postcode <input checked="" type="checkbox"/>	NHS No. <input checked="" type="checkbox"/>	Occupation <input checked="" type="checkbox"/>	Ethnicity <input checked="" type="checkbox"/>	DOB <input checked="" type="checkbox"/>	Nat Ins No. <input type="checkbox"/>	Diagnosis <input checked="" type="checkbox"/>	Staff data <input checked="" type="checkbox"/>	Sex <input checked="" type="checkbox"/>	Consultant <input checked="" type="checkbox"/>	Other: Religion and occupation data will only be recorded where clinically relevant (eg Jehovah's Witness in the case of bleeding etc)		GP <input checked="" type="checkbox"/>		Other: Usual GP Practice			
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Will this project/system/process/change collect any new personal data that has not been collected before?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Diagnostic results, medical history that wouldn't normally be disclosed.																														
What checks have been made regarding the reasons for collecting the data?	All information collected will be needed by the consultants for them to be able to carry out a safe consult/treatment/procedure.																														

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Does this project/system/process/change involve new or adapted data collection protocols that do not clarify the reasons or methods of collection?	No
Is the third party contract/supplier of the system registered with the information commissioner?	Yes Hosted to HSCIC standards
Has the third party supplier completed an IG Toolkit?	Yes
Does the contract with the third party contain all the necessary IG clauses (including DPA and Fol)?	Yes
Does this project/system/process/change comply with the privacy laws?	Yes
Who will be providing the information?	We will have access to patient records through a HSCIC Approved electronic patient record system (Emis).
Do you need consent from the above to enable you to lawfully process person identifiable data? If so, how will you obtain consent?	We will need consent from the patient which will be obtained verbally at the point of a consultation.
Have individuals been informed of and given consent to processing their data?	Patients will be informed on the day of their first appointment and will be asked to give verbal consent.
How will you keep the information current and up to date?	NHS Spine.
Who will have access to the data?	Consultants and Administration, everything done on Emis is audited and accessible.
Will there be an audit trail in place for this project/system/process/change?	Yes with the use of clinical systems and smartcard access. A spreadsheet/tracker will also be used to record and transmit pseudonymised activity data only .
What assessment has been done to ensure processing sensitive data will not cause harm or damage to the individual concerned?	
What are the retention periods for this data?	In line with GDPR exemptions applicable to data retention for health records, the data will be permanently retained in a locked format after the episode of care has ended. Subsequent access (eg for investigation of complaints or safety recalls on devices

	<u>used etc) will need recorded and auditable justification. 8 Years</u>									
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How will the data be destroyed when it reaches the end of its retention period?	Confidential paper shredding/recycling. <u>Archiving and locking</u> Deletion of electronic files.									
Will this information be shared with anyone else? Will it involve more than one organisation?	Yes, Pennine Acute, Inhealth, BMI Highfield. Data will be sent across via NHS mail with patient identifiable data taken out.									
Where will the information be stored or accessed in the practice? Tick or state in 'other' section	On Paper	<input checked="" type="checkbox"/>	Database saved on network drive	<input checked="" type="checkbox"/>	Website	<input type="checkbox"/>	Dedicated IT system (secured)	<input checked="" type="checkbox"/>		
	Other:									
How will the information be transported?	NHS Mail	<input checked="" type="checkbox"/>	3 rd Party Email	<input checked="" type="checkbox"/>	Website	<input type="checkbox"/>	Fax	<input type="checkbox"/>		
	Telephone	<input checked="" type="checkbox"/>	Courier	<input type="checkbox"/>	Hand delivered	<input checked="" type="checkbox"/>	Post (internal)	<input checked="" type="checkbox"/>		
	Post	<input checked="" type="checkbox"/>	Other: ERS							
Are there safeguards and/or procedures in place to recover data which may be damaged through the following;	Human error	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Cyber-attack/Virus	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
	Network failure	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Theft	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
	Fire/water damage	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Other damage	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
	Provide a copy of policies or procedures for the above									
 Computer Data & Security Protocol.doc										
Do you have a continuity plan/contingency for any unforeseen events?	Yes	<input checked="" type="checkbox"/>	 Business Continuity Plan.docx							
	No	<input type="checkbox"/>								
Is there an Information Security management process/policy in place?	Yes	<input type="checkbox"/>	Provide a copy of your Business Continuity Plan: Provide the policy titles of the related documents: See Computer Data & Security Protocol.							

Comment [SA1]: By 3rd party Email, I assume you mean PAHT/BMI etc? Will any PID be transmitted via these routes?

	No <input type="checkbox"/>	
Question	Response	
Will you be transferring any data outside the European Economic Area (EEA)?	Yes <input type="checkbox"/>	If yes, please state the destination below;
	No <input checked="" type="checkbox"/>	
Please describe the data being transferred to the non-EEA destination	N/A	