

Lakenham Surgery Processing Activities Log

Last Reviewed: 13 June 2025

| 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 |
| 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, Test Results, Healthcare 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 |
| 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, 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 | 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 |
| 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. | 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 |
| Management of Website | Personal data is collected via the organisation website | Customers, Patients, Public | Name, email address, contact details, free text | Consent or Legitimate Interests | Consent or Legitimate Interests | Consent or Legitimate Interests | Consent or Legitimate Interests | Provided by individual or collected automatically | NO |

| | | | | | | | | | |
|--|---|---|-----------------------|--------------------------------|------------------------------|------------------------------|------------------------------|------------------------|------------|
| | | | queries, IP addresses | | | | | | |
| 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 |