

Record of Processing Activities

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Introduction

This Record of Processing Activities (Record) describes how BrisDoc Healthcare Services Ltd processes personal data. BrisDoc recognises that Article 30 of the UK General Data Protection Regulation (UKGDPR) imposes documentation requirements on controllers and processors of data. This Record is the organisations confidential information, but BrisDoc will provide it to the appropriate supervisory authority on request as required by Article 30.

Data Controller Details

Name: BrisDoc Healthcare Services Ltd

Address: Unit 21 Osprey Court, Bristol, BS14 0BB

Telephone Number: 0117 937 0900

Website: www.brisdoc.co.uk

Data Protection Officer

Regulatory Solutions Ltd email dpo@brisdoc.org

Categories of Data Subject

BrisDoc collects personal data from the following categories of data subjects:

1. Patients and patient's families.
2. Employees, workers, self-employed workers, independent consultants and job applicants.
3. Providers, suppliers and members of associated healthcare organisations.

Categories of Personal Data

BrisDoc collects the following categories of personal data about patients and patient's families:

1. Personal details including name, gender and contact information.
2. Family, next of kin and lifestyle details.
3. Occupation and work history
4. Family background and history
5. Ethnicity and spoken language.
6. Whether there is a lasting power of attorney and the details of the attorneys.

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7. Special categories of personal data including racial or ethnic origin, religious or philosophical beliefs, genetic data, biometric data, data concerning health or data concerning sex life or sexual orientation.
8. Any proceedings for any offence committed or alleged to have been committed by them, or a family member, the disposal of such proceedings or the sentence of any court in such proceedings.
9. When a child – the school or educational establishment.
10. Entry codes for premises
11. Device details.
12. User activity details and user preferences.
13. Browser history details.
14. Location details.
15. Electronic identification data including IP address and information collected through cookies
16. Photographs
17. Telephone Recordings
18. Voice Recordings
19. Credit card information and payment details.
20. Contractual details including the goods and services provided.

BrisDoc collects the following categories of personal data about employees, self-employed workers, independent consultants and job applicants:

1. Personal details including name and contact information.
2. Date of birth.
3. Gender.
4. Marital status.
5. Beneficiary and emergency contact information.
6. Government identification numbers.
7. Professional registration, education and training details.
8. Bank account details and payroll information.
9. Wage and benefit information.
10. Performance information.
11. Appraisals, learning and development records.
12. Employment details.
13. Photographs

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14. Passport and driving licence and car insurance.
15. Indemnity cover – if self –employed
16. Right to work if immigration status is an issue, including marriage certificate, birth certificate and proof of address.
17. DBS and enhanced checks
18. Information on IT systems including use of telephones, email and the internet.
19. Special categories of personal data, including data relating to an employee's:
 - Racial or ethnic origin.
 - Political opinions.
 - Religious or philosophical beliefs.
 - Trade-union membership.
 - Genetics, biometrics or health; and
 - Sex life or sexual orientation.

BrisDoc collects the following categories of personal data about providers, suppliers and members of associated healthcare organisations:

1. Name and contact information.
2. Financial and payment details.

Purposes of Data Processing

BrisDoc collects and processes personal data about patients and their families for the following reasons:

1. Maintaining and enhancing products and services.
2. Welfare, treatment and health of patients.
3. Preventative and occupational medicine, medical diagnosis and the management of health.
4. To monitor clinical and non-clinical performance.
5. Providing products and services and patient management.
6. Undertaking research and taking part in research trials
7. Sharing with people or organisations in order to comply with legal or regulatory obligations.
8. Account management and keeping records up to date.
9. Supporting network and system security.
10. Auditing.

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11. Detecting and preventing fraud.
12. Complying with legal obligations.
13. Conducting web analytics.

BrisDoc collects and processes personal data about employees, self-employed workers, independent consultants and job applicants for the following purposes:

1. Recruitment and selection of employees.
2. Personnel management.
3. Workplace monitoring.
4. Human resources administration including payroll and benefits.
5. Complying with legal obligations.
6. Education, training, and development activities.

BrisDoc collects and processes personal data about providers, suppliers and members of associated healthcare organisations for the following purposes:

1. To obtain products and services.
2. Vendor administration, order management, and accounts payable.
3. Evaluating potential suppliers.
4. Detecting and preventing fraud.

BrisDoc having considered the lawful basis for processing records:

1. Consent – when requested brought to the attention of the data subject at the time and in our privacy policy.
2. Contract – brought to the attention of the data subject in our privacy policy.
3. Legal obligation – brought to the attention of the data subject in our privacy policy.
4. Vital interests – brought to the attention of the data subject in our privacy policy.
5. Public tasks – brought to the attention of the data subject in our privacy policy.
6. Legitimate interests – brought to the attention of the data subject in our privacy policy.

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Categories of Personal Data Recipients

BrisDoc may be required to disclose personal data of patients to the following categories of recipients:

1. BrisDoc's affiliated entities, including branches associated GP Practices and Primary Care Network.
2. Other clinicians, specialists and experts to provide the healthcare of a patient.
3. Other clinicians, specialists and experts for the purpose of training or research or take part in trials.
4. Data may be shared with ambulance, safeguarding, undertaker, coroner, district nurse, hospital, police, care home, first responders and volunteers, Commissioning body and Regulators.
5. Prescriptions may be sent to pharmacy or collected by family members.
6. Organisations the data subject belongs to when necessary to confirm entitlement to services.
7. The patients GP.
8. Admin staff who have access to relevant clinical data, in appropriate circumstances such as when there is a complaint received from the patient.
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9. Data may be shared with Ombudsman, Attorney under LPA, insurance company, lawyers.
10. With regulatory bodies when complying with health care legislation.
11. Auditors and professional advisors, such as lawyers and consultants.
12. Law enforcement officials.
13. Third-party service providers, such as providers of:
 - IT system management.
 - Information security.
 - Human resources management.
 - Payroll administration; or
 - Retirement plan administration.

BrisDoc may share data on employees, self-employed workers, independent consultants and job applicants with:

1. HMRC and other relevant government bodies
2. Electronic accounts package providers.
3. Pension providers
4. Regulatory bodies
5. DBS checking agency and other agencies to make employment checks

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6. Previous and future employers
7. Auditors, accountants and other professional suppliers
8. Legal advisors where relevant.
9. External support services e.g., occupational health and staff wellbeing
10. When booking courses, travel and social events
11. IT hosting companies
12. Banks and other financial institutions
13. When arranging rotas and out of hours cover for health professionals
14. External HR support.
15. Business partners [when required by a data subject]
16. NHS Commissioning Bodies, such as Clinical Commissioning Groups.
17. Associated GP Practices and Primary Care Network.

BrisDoc may share data on suppliers, providers and members of associated healthcare organisations to:

1. HMRC and other relevant government bodies
2. Electronic accounts package providers
3. Regulatory bodies
4. Auditors, accountants and other professional suppliers
5. Legal advisors where relevant.
6. IT hosting companies
7. Banks and other financial institutions
8. When arranging rotas and out of hours cover for health professionals
9. Other members of the out of hours' organisation
10. Other service providers and suppliers.
11. Patients.
12. NHS Commissioning Bodies, such as Clinical Commissioning Groups.
13. Associated GP Practices and Primary Care Network.

Data Registers

BrisDoc retains the following registers:

1. Access request register.
2. Data breach register.
3. Data impact assessments register.
4. Register of contracts with processors and copies of contract.
5. Register of assessment and review of data protection policies and procedures.

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6. Register of data sharing agreements.

Personal Data Retention Periods

Except as otherwise permitted or required by applicable law or regulation, BrisDoc only retains personal data for as long as necessary to fulfil the purposes the personal data collected it for, as required to satisfy any legal, accounting, or reporting obligations, or as necessary to resolve disputes. To determine the appropriate retention period for personal data, the organisation considers the amount, nature, and sensitivity of personal data, the potential risk of harm from unauthorised use or disclosure of personal data, the purposes for processing the personal data, whether the employer can fulfil the purposes of processing by other means, and any applicable legal requirements.

The organisation typically retains personal data for the periods set out below, subject to any exceptional circumstances or to comply with laws or regulations that require a specific retention period:

Information about patients:

- Will be retained in accordance with the NHS X Records Management Code of Practice for Health and Social Care 2021
- https://www.nhsx.nhs.uk/media/documents/NHSX_Records_Management_CoP_V7.pdf
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Information about employees, self-employed workers, independent consultants and job applicants - retention period refers to after contractual relationship as ended:

- personal details including name and contact information: 100 years as part of the GP record
- date of birth: 100 years as part of the GP record
- gender: 100 years as part of the GP record
- marital status: 100 years as part of the GP record
- emergency contact information: 100 years as part of the GP record
- government identification numbers: 100 years as part of the GP record NHS Number
- Education and training details: 75th birthday or 6 years after the staff member leaves
- bank account details and payroll information: [NUMBER] years.
- wage and benefit information: [NUMBER] years.
- performance information: [NUMBER] years.
- employment details: [NUMBER] years.
- special categories of personal data, including information that relates to an employee's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, genetics or health, and sex life or sexual orientation: [NUMBER] years.
- For unsuccessful job applicants the retention period for each of the above shall be 6 months after the job application.

Information about vendors, suppliers and members of associated healthcare organisations - retention period refers to after the contractual relationship as ended:

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- name and contact information: [NUMBER] years.
- financial and payment details: [NUMBER] years.

Technical and Organisational Security Measures

BrisDoc has implemented the following technical and organisational security measures to protect personal data:

1. Pseudonymisation of personal data.
2. Encryption of personal data.
3. Segregation of personal data from other networks.
4. Access control and user authentication.
5. Employee training on information security.
6. Written information security policies and procedures.

Changes to This Record of Processing Activities

BrisDoc reserves the right to amend this Record of Processing Activities from time to time consistent with the GDPR and other applicable data protection requirements.

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Version Control

Date	Version	Author	Change Details
Feb 2022	1.0	DL/DPO	After DPO review of all policies new procedure as drafted by DPO.