

## THE ELMS MEDICAL PRACTICE

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### The data mapping process

| <b>WHY is personal data processed?</b>   |  |
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| Personal data is defined as any information relating to a natural person or “data subject”; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. <sup>1</sup> |  |
| <b>Personal data may be used for the following reasons:</b>  |  |
| <b>Staff administration</b>  | <b>Patient records</b>   |
| <ul style="list-style-type: none"><li>• Contact details</li><li>• NOK details</li><li>• Contracts, DBS applications</li><li>• Pay, tax, pensions etc.</li><li>• Application forms for training etc.</li><li>• Use of IT</li><li>• Minutes of meetings</li><li>•</li></ul>  | <ul style="list-style-type: none"><li>• Contact details</li><li>• Health records</li><li>• NOK details</li><li>• Referrals</li><li>• Prescriptions</li><li>• Online service/practice apps</li><li>• PPG membership, minutes etc.</li><li>•</li></ul> |
| <b>List the reasons why personal data is processed:</b>  |  |
| Collecting of Information<br>Recording Of Data<br>Organising & Structure of Business<br>Organising & Structure of Healthcare<br>Consulting with staff<br>Consulting with patients and external service providers<br>Modifying data<br>To store data<br>Changing of data<br>Distraction of data (retention policy)<br>Communications (Minutes of meetings).   |  |
| <b>WHO – whose personal data is processed?</b>   |  |
| Having identified why personal data is processed, use those reasons to determine whose personal data is processed.   |  |
| <b>Personal data may be processed for the following data subjects:</b>   |  |
| <b>Staff</b>   | <b>Patients</b>  |
| <ul style="list-style-type: none"><li>• Current/former</li><li>• Locums/temps/consultants</li><li>• Potential employees</li><li>• Volunteers</li></ul>   | <ul style="list-style-type: none"><li>• Current/previous</li><li>• Carers/relatives/guardians</li><li>• Third-party representatives</li><li>•</li></ul>  |

<sup>1</sup> [GDPR Article 4 Definitions](#)

|  |   |
|--|---|
| <ul style="list-style-type: none"> <li>• CCG / regional staff</li> <li>•</li> </ul>  |   |
| <b>Contractors/suppliers</b>   | <b>Other</b>  |
| <ul style="list-style-type: none"> <li>• Estates</li> <li>• Gardens</li> <li>• Cleaners</li> <li>• Pharmacies</li> <li>• Equipment servicing/repair</li> <li>•</li> </ul>  | <ul style="list-style-type: none"> <li>• Reps</li> <li>• Guest speakers</li> <li>• Trainers</li> <li>•</li> </ul> |
| <b>List whose personal data is processed:</b>  |   |
| <p>All staff<br/> Cleaners<br/> Third party servicing / repair<br/> Patients / family / carer / third party contacts</p> <p>Not all the above have their personal data processed as not all have contracts. However, this is a useful list for future reference.</p> |   |

**WHAT personal data is processed?**

Having identified why and whose personal data is processed, use those reasons to determine what personal data is processed. The source of the data and the legal basis (why it was provided) must also be recorded.

|  |   |
|--|---|
| <b>Types of personal data that may be processed:</b>   |   |
| <b>Staff</b>   | <b>Patients</b>   |
| <ul style="list-style-type: none"> <li>• Name/address/NOK</li> <li>• Email/phone number etc.</li> <li>• Occupational health information</li> <li>• Training records</li> <li>• Employment information/ appraisals etc.</li> <li>• ID verification (passport/driving licence etc.)</li> <li>• Meetings</li> </ul> | <ul style="list-style-type: none"> <li>• Name/address/NOK</li> <li>• Email / phone number etc.</li> <li>• Healthcare information</li> <li>• ID verification (passport/driving licence utility bills etc.)</li> <li>•</li> </ul> |
| <b>Source</b>  | <b>Legal basis</b>  |
| <ul style="list-style-type: none"> <li>• Data subject</li> <li>• Third party</li> <li>• Other (specify)</li> <li>•</li> </ul>  | <ul style="list-style-type: none"> <li>• Legal obligation/lawful function</li> <li>• Consent</li> <li>• Contract related</li> <li>• Legitimate interest of the data controller</li> <li>•</li> </ul>                            |

|  |                                |  |
|--|--------------------------------|--|
| <b>List what personal data is processed:</b> |                                |  |
| <b>Data type</b>                             | <b>Source</b>                  | <b>Legal basis</b>                         |
| Personal location/contact details            | Data Subject                   | Contract Related                           |
| Third party details                          | Third Party                    | Contract / Invoice related                 |
| Assessments/Appraisals Meetings              | Data Subject/Practice Meetings | Lawful function. Legitimate interest of DC |

|   |  |   |
|---|--|---|
| Patient/Personal Details  | Data subject   | Consent/legal obligation. .<br>Duty of care. Healthcare.  |
| Third party contact   | Data Subject   | Legitimate interest of DC   |
| <b>WHEN is personal data processed?</b>   |  |   |
| Having identified why, whose and what personal data is processed, use those reasons to determine when personal data is processed.   |  |   |
| This includes obtaining, disclosing and deleting data.  |  |   |
| <b>Types of personal data that may be processed:</b>  |  |   |
| <b>Staff</b>  |  | <b>Patients</b>   |
| <b>Receiving, transferring or updating the following:</b>   |  | <b>Receiving, transferring or updating the following:</b>   |
| <ul style="list-style-type: none"> <li>• Name/address/NOK</li> <li>• Email/phone number etc.</li> <li>• Occupational health information</li> <li>• Training records</li> <li>• Employment information/ appraisals etc.</li> <li>• ID verification (passport/driving license etc.)</li> <li>•</li> </ul> |  | <ul style="list-style-type: none"> <li>• Name/address/NOK</li> <li>• Email/phone number etc.</li> <li>• GP2GP/medical records</li> <li>• Results, letters etc.</li> <li>• ID verification (passport/driving license etc.)</li> <li>•</li> </ul> |
| <b>Sharing and disclosure</b>   |  | <b>Sharing and disclosure</b>   |
| <ul style="list-style-type: none"> <li>• Appraisal</li> <li>• References</li> <li>• Awards and recommendations</li> <li>• OH</li> <li>• Incident reports/forms</li> <li>• Business cases</li> <li>• Insurance and banking</li> <li>•</li> </ul>   |  | <ul style="list-style-type: none"> <li>• Referrals</li> <li>• Results</li> <li>• Letters to other service providers</li> <li>•</li> </ul>   |
| <b>Retention</b>  |  | <b>Retention</b>  |
| <ul style="list-style-type: none"> <li>• In accordance with the current retention schedule – see Records Retention Policy</li> </ul>  |  | <ul style="list-style-type: none"> <li>• In accordance with the current retention schedule – see Records Retention Policy</li> </ul>  |
| <b>List when personal data is processed:</b>  |  |   |
| <b>Obtained / updated</b>   | <b>Disclosure (with who &amp; why)</b>   | <b>Retention (how long &amp; IAW retention schedule)</b>  |
| Staff   | Personal Details with DC or PM. Any personal meeting as necessary. Practice staff. | See Retention Policy  |
| Patient Data  | Update of information/requests   |   |
| Referral  | Referrals Practice Staff/Clinicians  |   |

|   |   |   |
|---|---|---|
|   |   |   |
| <b>WHERE is personal data processed?</b>  |   |   |
| Having identified why, whose, what and when personal data is processed, use those reasons to determine where personal data is processed. The source of the data and the legal basis (why was it provided) must also be recorded.  |   |   |
| <b>Types of personal data that may be processed:</b>  |   |   |
| <b>Staff</b>  |   | <b>Patients</b>   |
| <ul style="list-style-type: none"> <li>• Name/address/NOK</li> <li>• Email/phone number etc.</li> <li>• Occupational health information</li> <li>• Training records</li> <li>• Employment information/ appraisals etc.</li> <li>• ID verification (passport/driving licence etc.)</li> <li>•</li> </ul> |   | <ul style="list-style-type: none"> <li>• Name/address/NOK</li> <li>• Email/phone number etc.</li> <li>• Healthcare information</li> <li>• ID verification (passport/driving licence etc.)</li> <li>•</li> </ul> |
| <b>Manual records</b>   | <b>Electronic records</b>   | <b>IT system</b>  |
| <ul style="list-style-type: none"> <li>• Lloyd George</li> <li>• Staff files</li> <li>• Hard copies of prescriptions etc.</li> <li>•</li> </ul>   | <ul style="list-style-type: none"> <li>• Locally established databases</li> <li>• EMIS Web</li> <li>• Docman</li> <li>• Pinnacle (System in use for COVID vaccination recordings)</li> <li>•</li> </ul> | <ul style="list-style-type: none"> <li>• Fixed</li> <li>• Portable (laptops)</li> <li>• Remote servers</li> <li>• Cloud</li> <li>• Intranet</li> <li>•</li> </ul>   |
| <p><b>Manual:</b><br/> Staff – HR contract related<br/> Patient records in Lloyd George format / prescriptions– systems failure or only when needed.</p>  |   |   |
| <p><b>Electronic records:</b><br/> Staff – HR Contract related<br/> Emis – patient data<br/> Docman 10 – patient data<br/> Accurx – patient data (messaging solution / Video Consults)<br/> iPlato – patient data</p>   |   |   |
| <p><b>IT system:</b><br/> Clarity<br/> Emis<br/> Docman 10<br/> Accurx<br/> Pinnacle (In use at Hants Lane vaccination service)<br/> iPlato</p>   |   |   |

| Aligning the data – Use the table below to create a data record |                 |                   |                         |   |                   |   |  |   |
|---|-----------------|-------------------|-------------------------|---|-------------------|---|--|---|
| WHY   | WHO             | WHAT              |                         |   | WHEN              |   |  | WHERE   |
|   |                 | Type              | Source                  | Legal basis   | Obtained/updated  | Disclosure (who & why)  | Retention  |   |
| Patient records   | Current patient | Healthcare record | Individual/ third party | Legitimate interests – provision of healthcare services | Upon registration | Referrals to NHS hospital trusts for specialist care if necessary | 10 years after death (Records Management Code of Practice for Health & Social Care 2016) | Electronic records – EMIS Web Manual record – Lloyd George wallet – Administration office |
|   |                 |                   |                         |   |                   |   |  |   |