

Data Protection Impact Assessment (DPIA) Template

A DPIA is designed to describe your processing and to help manage any potential harm to individuals' in the use of their information. DPIAs are also important tools for demonstrating accountability, as they help you as a Controller to comply with the requirements of the Data Protection Legislation. Non-compliance with DPIA requirements can lead to fines imposed by the Information Commissioners Office (ICO); this includes not carrying out a DPIA at all, carrying out a DPIA in an incorrect way or failing to consult the ICO where required.

DPIA's are not new; the use of Privacy Impact Assessments has become common practice in the NHS and can provide evidence of compliance within the Data Security and Protection toolkit (DSPT); DPIAs build on that practice.

It is not always clear whether you should do a DPIA or not but there are a number of situations where a DPIA **should** be considered or where a DPIA is a **legal requirement**. If you can tick against the criteria below it is highly recommended that you undertake a DPIA and if you decide not to, ensure that you document the reasons for your decision.

You as Controller **MUST** carry out a DPIA where you plan to:

	Tick or leave blank
Use profiling or automated decision-making to make significant decisions about people or their access to a service, opportunity or benefit;	<input type="checkbox"/>
Process special-category data or criminal-offence data on a large scale ;	<input type="checkbox"/>
Monitor a publicly accessible place on a large scale;	<input type="checkbox"/>
Use innovative technology in combination with any of the criteria in the European guidelines;	<input type="checkbox"/>
Carry out profiling on a large scale;	<input type="checkbox"/>
Process biometric or genetic data in combination with any of the criteria in the European guidelines;	<input type="checkbox"/>
Combine, compare or match data from multiple sources;	<input type="checkbox"/>
Process personal data without providing a privacy notice directly to the individual in combination with any of the criteria in the European guidelines;	<input type="checkbox"/>
Process personal data in a way that involves tracking individuals' online or offline location or behaviour, in combination with any of the criteria in the European guidelines;	<input type="checkbox"/>
Process children's personal data for profiling or automated decision-making or for marketing purposes, or offer online services directly to them;	<input type="checkbox"/>
Process personal data that could result in a risk of physical harm in the event of a security breach.	<input type="checkbox"/>

You as Controller should **consider** carrying out a DPIA where you

	Tick or leave blank
Plan any major project involving the use of personal data;	<input type="checkbox"/>
Plan to do evaluation or scoring;	<input type="checkbox"/>
Want to use systematic monitoring;	<input type="checkbox"/>
Process sensitive data or data of a highly personal nature;	✓
Processing data on a large scale;	✓
Include data concerning vulnerable data subjects;	✓
Plan to use innovative technological or organisational solutions;	✓

A new DPIA should be carried out if you decide that there is a significant enough change to what you originally intended but it is good practice for DPIAs to be kept under review and revisited when necessary.

There is guidance to help you. Your Data Protection Officer (DPO) can be consulted before completing a DPIA in order to provide specialist advice and guidance or simply to talk things through with you.

Background Information	
Date of your DPIA:	16/02/2024
Title of the activity/processing:	Consolidation of Docman Connect Contracts
Who is the person leading this work?	██████████
Who is the Lead Organisation?	BOB ICB
Who has prepared this DPIA?	██████████
Who is your Data Protection Officer (DPO)?	██████████
Describe what you are proposing to do: (Include as much background information as you can about why the new system/change in system/sharing of information/data processing is required).	<p>Docman Connect is a cloud-based document management system solution. It is an enhancement to the existing Docman Hub Network, supporting STPs and providers to achieve their transfer of care requirements. The providers are using Docman Connect to send and receive a variety of clinical and non-clinical documents safely and securely, including electronic discharge summaries, ensuring timely delivery with a full audit trail.</p> <p>Across the BOB health and care locations, currently there are five separate healthcare provider Trusts involved in discussions with the ICB regarding consolidation of their individual Docman Connect contracts into one sole contract with a single renewal / expiry date. These provider Trusts are:</p> <ul style="list-style-type: none"> • Royal Berkshire NHS Foundation Trust • Berkshire Healthcare NHS Foundation Trust • Buckinghamshire Healthcare NHS Trust • Oxford University Hospital NHS Foundation Trust • Oxford Health NHS Trust <p>A new contract is being negotiated between Advanced Business Software and Solutions Limited t/a Advanced, and BOB ICB to identify and consolidate all of the Docman Connect contracts held by the provider organisations, listed above, into a single contract with one expiry date. These contracts would then be held by the ICB.</p> <p>BOB ICB are managing the consolidated contract on behalf of the 5 NHS provider Trusts and will not at any time process, own, receive or require access to any data. The data will remain in the ownership of the individual Trusts during the term of the contract and will be returned to the provider trusts at the end of the contract term if required.</p>
Are there multiple organisations involved? (If yes – you can use this space to name them, and who their key contact for this work is).	<p>There are five NHS Provider Trusts involved in the consolidation, and BOB ICB who will act as Buyer. The Trusts, who will be the service recipient organisations are:</p> <ul style="list-style-type: none"> • Berkshire Healthcare NHS Foundation Trust • Buckinghamshire Healthcare NHS Trust

	<ul style="list-style-type: none"> • Oxford University Hospital NHS Foundation Trust • Oxford Health NHS Foundation Trust • Royal Berkshire NHS Foundation Trust
Can you think of any other Key Stakeholders that should be consulted or involved in this DPIA? <small>(If so then include the details here).</small>	None
Detail anything similar that has been undertaken before?	<p>Advanced, the Supplier of Docman Connect, is a supplier widely utilised throughout the NHS. They provide secure access to clinical documents stored as part of GP Primary Care records. Current products supplied to BOB ICB by Advanced include Docman Connect, Docman Hub and Docman Share.</p> <p>Nationally, Advanced’s website claims that Docman Connect maintains records for 40 million patients and handles 3 million items of patient correspondence weekly. They work with 120 NHS Trusts, and 6000 GP practices.</p>

1. Categories, Legal Basis, Responsibility, Processing, Confidentiality, Purpose, Collection and Use

1.1.

What data/information will be used? <small>Tick all that apply.</small>	Tick or leave blank	Complete
Personal Data	<input checked="" type="checkbox"/>	1.2
Special Categories of Personal Data	<input checked="" type="checkbox"/>	1.2 AND 1.3
Personal Confidential Data	<input checked="" type="checkbox"/>	1.2 AND 1.3 AND 1.6
Sensitive Data (usually criminal or law enforcement data)	<input type="checkbox"/>	1.2 but speak to your IG advisor first
Pseudonymised Data	<input type="checkbox"/>	1.2 and consider at what point the data is to be pseudonymised
Anonymised Data	<input type="checkbox"/>	Consider at what point the data is to be anonymised
Commercially Confidential Information	<input type="checkbox"/>	Consider if a DPIA is appropriate
Other	<input type="checkbox"/>	Consider if a DPIA is appropriate

1.2.

Processing has to be lawful so identify which of the following you believe justifies what you are proposing to do and include an explanation as to why in the relevant box. You must select at least one from a – f.

Article 6 (1) of the GDPR includes the following:	
a) THE DATA SUBJECT HAS GIVEN CONSENT	<small>Tick or leave blank</small> <input type="checkbox"/>
Why are you relying on consent from the data subject? <small>Click here to enter text.</small>	
What is the process for obtaining and recording consent from the Data Subject? (How, where, when, by whom). <small>Click here to enter text.</small>	
Describe how your consent form is compliant with the Data Protection requirements? (There is a checklist that can be used to assess this). <small>Click here to enter text.</small>	

<p>b) IT IS NECESSARY FOR THE PERFORMANCE OF A CONTRACT TO WHICH THE DATA SUBJECT IS PARTY</p> <p>(The contract needs to be between the Controller and the individual and not concern data being processed due to someone else having a contract with the Controller. Processing can happen before the contract is entered into e.g. processing a pre-health assessment for a private or cosmetic procedure that is a paid for service with the delivery of that care done under contract between the Patient and the Practitioner).</p>	<p>Tick or leave blank</p> <input type="checkbox"/>
<p>What contract is being referred to? Click here to enter text.</p>	
<p>c) IT IS NECESSARY UNDER A LEGAL OBLIGATION TO WHICH THE CONTROLLER IS SUBJECT</p> <p>(A legal obligation mandates processing of data as a task in itself where there are likely to be legal measures available if not adhered to e.g. an Employer has a legal obligation to disclose salary information to HMRC).</p>	<p>Tick or leave blank</p> <input type="checkbox"/>
<p>Identify the legislation or legal obligation you believe requires you to undertake this processing. Click here to enter text.</p>	
<p>d) IT IS NECESSARY TO PROTECT THE VITAL INTERESTS OF THE DATA SUBJECT OR ANOTHER NATURAL PERSON</p> <p>(This will apply only when you need to process data to protect someone's life. It must be necessary and does not only relate to the individual whose data is being processed. It can also apply to protect another person's life. Emergency Care is likely to fall into this category but planned care would not. You may need to process a Parent's data to protect the life of a child. The individual concerned is unlikely to be able to provide consent physically or legally; if you are able to gain consent then this legal basis will not apply).</p>	<p>Tick or leave blank</p> <input type="checkbox"/>
<p>How will you protect the vital interests of the data subject or another natural person by undertaking this activity? Click here to enter text.</p>	
<p>e) IT IS NECESSARY FOR THE PERFORMANCE OF A TASK CARRIED OUT IN THE PUBLIC INTEREST OR UNDER OFFICIAL AUTHORITY VESTED IN THE CONTROLLER</p> <p>(This is different to 6 c). If you are processing data using this basis for its lawfulness then you should be able to identify a specific task, function or power that is set out in law. The processing must be necessary, if not then this basis does not apply).</p>	<p>Tick or leave blank</p> <input checked="" type="checkbox"/>
<p>What statutory power or duty does the Controller derive their official authority from? Health and Social Care Act 2012 Section 251B – All health and social care providers are subject to the statutory duty to share information about a patient for their direct care. Note: This applies only to the Data Controllers listed in this DPIA. The ICB is consolidating the contract and not processing any personal data. Therefore the ICB is not a Data Controller.</p>	
<p>f) IT IS NECESSARY FOR THE LEGITIMATE INTERESTS OF THE CONTROLLER OR THIRD PARTY</p> <p>(Public authorities can only rely on legitimate interests if they are processing for a legitimate reason other than performing their tasks as a public authority. See the guidance for more information about the legitimate interest test).</p>	<p>Tick or leave blank</p> <input type="checkbox"/>
<p>What are the legitimate interests you have? Click here to enter text.</p>	
<p>Article 9 (2) conditions are as follows:</p>	
<p>a) THE DATA SUBJECT HAS GIVEN EXPLICIT CONSENT</p> <p>(Requirements for consent are the same as those detailed above in section 1.2, a))</p>	<p>Tick or leave blank</p> <input type="checkbox"/>
<p>b) FOR THE PURPOSES OF EMPLOYMENT, SOCIAL SECURITY OR SOCIAL PROTECTION</p> <p>(Schedule 1, part 1 of the Data Protection Act 2018 gives more detail on when this can apply to processing and further guidance is available).</p>	<p>Tick or leave blank</p> <input type="checkbox"/>
<p>c) IT IS NECESSARY TO PROTECT THE VITAL INTERESTS OF THE DATA SUBJECT OR ANOTHER NATURAL PERSON WHERE THEY ARE PHYSICALLY OR LEGALLY INCAPABLE OF GIVING CONSENT</p>	<p>Tick or leave blank</p> <input type="checkbox"/>

(Requirements for this are the same as those detailed above in section 1.2, d))	
d) <i>It is necessary for the operations of a not-for-profit organisation such as political, philosophical, trade union and religious body in relation to its members</i>	NA
e) <i>The data has been made public by the data subject</i>	NA
f) <i>For legal claims or courts operating in their judicial category</i>	NA
g) SUBSTANTIAL PUBLIC INTEREST <small>(Schedule 1, part 2 of the Data Protection Act 2018 gives more detail on when this can apply to processing and further guidance is available).</small>	Tick or leave blank <input type="checkbox"/>
h) PROCESSING IS NECESSARY FOR THE PURPOSES OF PREVENTIVE OR OCCUPATIONAL MEDICINE, FOR THE ASSESSMENT OF THE WORKING CAPACITY OF THE EMPLOYEE, MEDICAL DIAGNOSIS, THE PROVISION OF HEALTH OR SOCIAL CARE OR TREATMENT OR THE MANAGEMENT OF HEALTH OR SOCIAL CARE SYSTEMS AND SERVICES ON THE BASIS OF UNION OR MEMBER STATE LAW OR PURSUANT TO CONTRACT WITH A HEALTH PROFESSIONAL AND SUBJECT TO CONDITIONS AND SAFEGUARDS <small>(Schedule 1, part 1 of the Data Protection Act 2018 gives more detail on when this can apply to processing and further guidance is available).</small>	Tick or leave blank <input checked="" type="checkbox"/>
i) PROCESSING IS NECESSARY FOR REASONS OF PUBLIC INTEREST IN THE AREA OF PUBLIC HEALTH, SUCH AS PROTECTING AGAINST SERIOUS CROSS-BORDER THREATS TO HEALTH OR ENSURING HIGH STANDARDS OF QUALITY AND SAFETY OF HEALTH CARE AND OF MEDICINAL PRODUCTS OR MEDICAL DEVICES, ON THE BASIS OF UNION OR MEMBER STATE LAW WHICH PROVIDES FOR SUITABLE AND SPECIFIC MEASURES TO SAFEGUARD THE RIGHTS AND FREEDOMS OF THE DATA SUBJECT, IN PARTICULAR PROFESSIONAL SECRECY <small>(Schedule 1, part 1 of the Data Protection Act 2018 gives more detail on when this can apply to processing and further guidance is available).</small>	Tick or leave blank <input type="checkbox"/>
j) PROCESSING IS NECESSARY FOR ARCHIVING PURPOSES IN THE PUBLIC INTEREST, SCIENTIFIC OR HISTORICAL RESEARCH PURPOSES OR STATISTICAL PURPOSES IN ACCORDANCE WITH <u>ARTICLE 89(1)</u> BASED ON UNION OR MEMBER STATE LAW WHICH SHALL BE PROPORTIONATE TO THE AIM PURSUED, RESPECT THE ESSENCE OF THE RIGHT TO DATA PROTECTION AND PROVIDE FOR SUITABLE AND SPECIFIC MEASURES TO SAFEGUARD THE FUNDAMENTAL RIGHTS AND THE INTERESTS OF THE DATA SUBJECT. <small>(Schedule 1, part 1 of the Data Protection Act 2018 gives more detail on when this can apply to processing and further guidance is available).</small>	Tick or leave blank <input type="checkbox"/>

1.3.

If using special categories of personal data, a condition for processing under Article 9 of the GDPR must be satisfied in addition to a condition under Article 6. You must select at least 1 from a) to c) or g) to i). NOTE: d), e) and f) are not applicable

1.4.

Confirm who the Controller and Processor is/are. Confirm if the Controller/s are solely for jointly responsible for any data processed?

The 5 provider Trusts (as service recipients) are the Data Controllers.

Advanced Business Software and Solutions Limited t/a Advanced, is the Data Processor.

Each Trust shall be the Lead Controller for their specific information asset and be responsible for their own compliance with UK GDPR in respect of that asset. Each Trust provides their own data to the Processor and are the sole recipients of data received from the Processor for their own respective organisations.

Notifications related to Data Protection matters are notified by the Processor to the respective organisations. After expiry or termination of the contract, the Supplier will return all data to the respective organisations if requested in writing. After 90 days of expiry or termination of the Contract the data will be deleted unless agreed otherwise between the parties.

(Identify any other parties who will be included in the agreements and who will have involvement/share responsibility for the data/information involved in this project/activity. Use this space to detail this but you may need to ask your DPO to assist you. Copy and paste the last empty row in the table to add organisations where required (the text has been left unlocked for this purpose on that row only).

Name of Organisation	Role
Advance business Software and Solutions Limited	Processor
BOB ICB	Other
Oxford University Hospitals NHS foundation Trust	Sole Controller
Berkshire Healthcare NHS Foundation Trust	Sole Controller
Buckinghamshire Healthcare NHS Trust	Sole Controller
Oxford Health NHS Foundation Trust	Sole Controller
Royal Berkshire NHS Foundation Trust	Sole Controller

1.5.

Describe exactly what is being processed, why you want to process it and who will do any of the processing?

Clinical and non-clinical information and messages are sent digitally from the Trusts via the Docman Connect portal to the BOB ICB associated GP Practices for action by GPs and other clinical staff to increase the reporting speed for service to patients and effect an efficient transfer of care process. The use of Docman Connect across Primary and Secondary care will reduce the risk of manual error or delays in review as messaging is done in real time. Docman Connect also facilitates efficient and timely filing of reports.

The healthcare provider (hospital, specialist, etc) will create an electronic document (e.g. referral letters or discharge summaries, discharge letters, Encounter Reports, Radiology Reports, Outpatient Clinic letters, Out-of-Hours Reports and 111 messages, etc.) in their own systems. Docman Connect converts the document into a standardised format that can be processed by other clinical systems. The document is transferred via an NHS approved secure network which identifies the intended recipient, e.g. GP Practice, and transmits the document to them. The document can then be actioned, processed or filed (attached) to the patient's electronic health record with a full audit trail.

1.6.

Tick here if you owe a duty of confidentiality to any information. ✓

If so, specify what types of information. (e.g. clinical records, occupational health details, payroll information)

Patients' health records are processed in the Docman Connect clinical system. These records could consist of discharge summaries, referral letters, test results or other clinical or non-clinical correspondence.

1.7.

How are you satisfying the common law duty of confidentiality?

Consent - Implied

If you have selected an option which asks for further information please enter it here

Implied consent is assumed in direct care when patients share information with the expectation that it will be used for their healthcare.

1.8.

Are you applying any anonymisation/pseudonymisation technique or encryption to any of the data to preserve the confidentiality of any information?

No

If you are then describe what you are doing.

[Click here to enter text.](#)

If you don't know then please find this information out as there are potential privacy implications with the processing.

1.9.

Tick here if you are intending to use any information for a purpose that isn't considered as direct patient care.

If so describe that purpose.

[Click here to enter text.](#)

1.10.

Approximately how many people will be the subject of the processing?

Unknown - non-specific patient cohort

1.11.

How are you collecting the data? (e.g. verbal, electronic, paper (if you need to add more selections then copy the last 'choose an item' and paste, the text has been left unlocked for you to do this.)

Electronic form

Choose an item.

Choose an item.

Choose an item.

Choose an item.

If you have selected 'other method not listed' describe what that method is.

BOB ICB will not be collecting or processing any data.

1.12.

How will you edit the data?

Docman Connect converts documents to a standard format to be transmitted to different clinical systems so editing of data is not part of this process. Any editing would have to be done at source. Recipients can action or process the request contained in the Docman Connect message.

1.13.

How will you quality check the data?

Docman Connect focuses on automation and standardisation to ensure data quality and do not rely on manual checks. This eliminates inconsistencies and allows automated validation against pre-defined rules. The Docman Connect system can perform checks on the data based on specific rules such as ensuring dates and telephone numbers follow a specific pattern, for example missing data fields and mandatory fields are flagged for correction. There is manual intervention and oversight where needed to track errors and the audit trail ensures data can be traced back to the source.

1.14.

Review your business continuity or contingency plans to include this activity. Have you identified any risks?

No

If yes include in the risk section of this template.

1.15.

What training is planned to support this activity?

Docman Connect is already in the GP Practices and healthcare providers, who have access to in house training, or support from Advanced. This exercise is to consolidate existing contracts and no additional training is required.

2. Linkage, Data flows, Sharing and Data Opt Out, Sharing Agreements, Reports, NHS Digital

2.1.

Are you proposing to combine any data sets?

No

If yes then provide the details here.

There are no plans to combine any data sets. Each organisation will continue to own their own data and will not have access to data owned by the other provider Trusts.

2.2.

What are the Data Flows? (Detail and/or attach a diagram if you have one).

The Data flows are discharge summaries and other transfer of care clinical and non-clinical information flowing between the Docman Connect hubs in Secondary Care and the BOB Associated GP Practices for each service recipient. The data will flow between the locations where the patient is registered, and Advanced Business Solutions. No party will have access to data that is owned by another party, and the ICB will not have access to the Docman Connect system and will not require or seek such access.

2.3.

What data/information are you planning to share?

The only information the ICB will share is financial information for the settlement of invoices, or contract management information, e.g. business addresses or contact names.

2.4.

Is any of the data subject to the National Data Opt Out?

No - it is not subject to the national data opt out

If your organisation has to apply it describe the agreed approach to this

If another organisation has applied it add their details and identify what data it has been applied to

[Click here to enter text.](#)

If you do not know if it applies to any of the data involved then you need to speak to your Data Protection Officer to ensure this is assessed.

2.5.

Who are you planning to share the data/information with?

BOB ICB will not have access to patient data and will not be sharing. The provider Trusts will process their own data and share with Advanced, GP Practices and any sub-processors they may have. The data controllers are responsible for ensuring the confidentiality and security around their own processing.

2.6.

Why is this data/information being shared?

Patient Data will be shared for the purposes of providing direct care to patients. Documents to be shared may include (but not limited to) personal details used to create discharge summaries, care plans, referrals, and other clinical information.

2.7.

How will you share it? (Consider and detail all means of sharing)

BOB ICB does not have access to patient data and will not be sharing information. The provider Trusts share data by utilising secure protocols to transfer and encrypt data.

Tick if you are planning to use Microsoft Teams or another similar online networking/meeting solution that may have the facility to store or record conversations or related data as part of the sharing arrangements

Provide details of how you have considered any privacy risks of using one of these solutions

[Click here to enter text.](#)

2.8.**What data sharing agreements are or will be in place?**

Data is not being shared by the ICB so there are no Data Sharing Agreements in place for BOB ICB. For the provider Trusts or GP Practices, this is not a new service, Docman Connect already exists in the GP Practices and will be subject to those existing agreements.

2.9.**What reports will be generated from this data/information?**

The GP practices and the Supplier (Advanced) will be able to generate their own management information independently of each service recipient.

2.10.**Are you proposing to use Data that may have come from NHS Digital (e.g. SUS data, HES data etc.)?**

No

If yes, are all the right agreements in place?

Choose an item.

Give details of the agreement that you believe covers the use of the NHSD data

[Click here to enter text.](#)

If no or don't know then you need to speak to your Data Protection Officer to ensure they are put in place if needed.

3. Data Processor, IG Assurances, Storage, Access, Cloud, Security, Non-UK processing, DPA

3.1**Are you proposing to use a third party, a data processor or a commercial system supplier?**

Yes

If yes use these spaces to add their details including their official name and address. If there is more than one then include all organisations. If you don't know then stop and try and find this information before proceeding.

Advanced Business Software and Solutions Limited t/a Advanced, The Mailbox, Level 3, 101 Wharfside Street, Birmingham, B1 1RF

[Click here to enter text.](#)

[Click here to enter text.](#)

[Click here to enter text.](#)

[Click here to enter text.](#)

[Click here to enter text.](#)

3.2

Is each organisation involved registered with the Information Commissioner? Copy and paste the last empty row in the table to add organisations where required (the text has been left unlocked for this purpose on that row only)

Name of organisation	Registered	Registration details or comments if not registered
Advanced Business Solutions and Software t/a Advanced	Yes	ZA770802
BOB ICB	Yes	ZB343068
Oxford University Hospitals NHS Foundation Trust	Yes	ZA152461
Berkshire Healthcare NHS Foundation Trust	Yes	Z6964815
Buckinghamshire Healthcare NHS Trust	Yes	Z7752080
Oxford Health NHS Foundation Trust	Yes	Z1411013

Royal Berkshire NHS Foundation Trust	Yes	Z7044786
--------------------------------------	-----	----------

3.3

What IG assurances have been provided to you and does any contract contain IG clauses that protect you as the Controller? (e.g. in terms and conditions, their contract, their tender submission). Copy and paste the last empty row in the table to add organisations where required (the text has been left unlocked for this purpose on that row only)

Name of organisation	Brief description of assurances obtained
Advanced Business Solutions and Software t/a Advanced	Advanced is a member of the G Cloud framework which is a UK Government initiative providing pre-approved computing services to public sector organisations. Members of the framework are subject to thorough vetting and annual audits by Crown Commercial Services to provide assurance of continued adherence to these standards.
Click here to enter text.	Click here to enter text.
Click here to enter text.	Click here to enter text.
Click here to enter text.	Click here to enter text.
Click here to enter text.	Click here to enter text.
Click here to enter text.	Click here to enter text.

3.4

What is the status of each organisation's Data Security Protection Toolkit?

[DSP Toolkit](#)

Copy and paste the last empty row in the table to add organisations where required (the text has been left unlocked for this purpose on that row only)

Name of organisation	ODS Code	Status	Published date
Advanced Business Solutions and Software t/a Advanced	8HP20	Standards Exceeded	27/06/2023
Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board	QU9	Standards Exceeded	27/06/2023
Oxford University Hospitals NHS Foundation Trust	RTH	Standards Met	30/06/2023
Berkshire Healthcare NHS Foundation Trust	RWX	Standards Exceeded	28/06/2023
Buckinghamshire Healthcare NHS Trust	RXQ	Approaching Standards	18/08/2023
Oxford Health NHS Foundation Trust	RNU	Standards Met	30/06/2023
Royal Berkshire NHS Foundation Trust	RHW	Approaching Standards	14/07/2023

3.5

How and where will the data/information be stored? (Consider your answer to 2.7 and the potential storage of data in any online meeting or networking solution).

The information is received into the Docman Connect portal and stored in the GP Clinical system and linked to the patient record.

3.6

How is the data/information accessed and how will this be controlled?

Source information is input by provider Trusts and routed via the Docman Connect system to the GP Practice. Patient records are accessible for health and care purposes via RBAC for both the GP Practice and the provider Trusts.

3.7

Is there any use of Cloud technology?

Yes

If yes add the details here.

Docman Connect is a Cloud based system

3.8

What security measures will be in place to protect the data/information?

Advanced is a member of the G Cloud framework which is a UK Government initiative providing pre-approved computing services to public sector organisations. Members of the framework are subject to thorough vetting and annual audits by Crown Commercial Services to provide assurance of continued adherence to these standards.

The contract has used the G Cloud standard contract incorporating comprehensive clauses safeguarding the data ownership of the provider Trusts. These clauses empower the Trusts with rights regarding data protection, contract enforcement, contract termination and pursuit of compensation.

Additionally, the contract integrates relevant General Data Protection Regulation (GDPR) clauses to ensure comprehensive data protection for both Advanced and the organisations they serve to ensure all parties are held accountable for compliance with data protection regulations.

Docman Connect ensures all clinical documents are encrypted when sent, in order to maintain a secure electronic transfer of care process.

Within the Practices, role-based access controls allow the organisations to identify the necessary levels of access for users and those users will be assigned a role configured with appropriate permissions to access the data, ensuring users do not have more access privileges than is needed for operational purposes.

Is a specific System Level Security Policy needed?

No

If yes or don't know then you need to speak to your Data Protection Officer to ensure one is put in place if needed.

3.9

Is any data transferring outside of the UK? (you must determine this so only select don't know if you have further investigations to make but the DPIA will not be approved without this information)

No

If yes describe where and what additional measures are or will be in place to protect the data.

[Click here to enter text.](#)

3.10

What Data Processing Agreement is already in place or if none, what agreement will be in place with the organisation and who will be responsible for managing it?

The Data Protection schedule is Schedule 7 in the consolidated contract.



advanced-dp-schedul
e-uk-05122023_final-v

[Click here to enter text.](#)

4. Privacy Notice, Individual Rights, Records Management, Direct Marketing

4.1

Describe any changes you plan or need to make to your Privacy Notice and your proposed completion date?

(There is a checklist that can be used to assess the potential changes required or if you wish for it to be reviewed then add the link below).

No changes required for the ICB Privacy Notice. The Data Controllers may need to update their own notices if not already done.

4.2

How will this activity impact on individual rights under the GDPR? (Consider the right of access, erasure, portability, restriction, profiling, automated decision making).

No impact. Data Controllers will manage individual rights under their own policies and procedures.

4.3

How long is the data/information to be retained?

The data will be retained in line with the Data Controller's Records Management policy.

4.4

How will the data/information be archived?

All information is forwarded from the Provider Trusts to the GP Clinical system to be stored in the patient record.

4.5

What is the process for the destruction of records?

The Data Controllers will destroy records under their own Records Management Policy and procedures.

4.6

What will happen to the data/information if any part of your activity ends?

Once processing is complete at the end / termination of the contract, data will be made available by Advanced, in a machine-readable format, to the respective organisations upon receipt of a documented request from the organisations and / or BOB ICB when acting on behalf of the organisations, such request to be received within 30 days of expiry or termination of the Call-Off Contract. Thereafter, all data will be deleted within 90 days of the confirmation of receipt of the data extract unless otherwise agreed in writing between the parties or to the extent it is required to be retained or deleted under Data Protection Legislation.

4.7

Will you use any data for direct marketing purposes? (you must determine this so only select don't know if you have further investigations to make but the DPIA will not be approved without this information)

No

If yes please detail.

[Click here to enter text.](#)

5. Risks and Issues

5.1

What risks and issues have you identified? The DPO can provide advice to help complete this section and consider any measures to mitigate potential risks.

Describe the source of risk and nature of potential impact on individuals. (Include associated compliance and corporate risks as necessary and copy and paste the complete bottom row to add more risks (the text has been left unlocked in both tables to enable you to do this)).	Likelihood of harm	Severity of harm	Overall risk
Unauthorised access to data	Possible	Minimal	Low
System Failure	Possible	Minimal	Medium
Click here to enter text.	Choose an item.	Choose an item.	Choose an item.
Click here to enter text.	Choose an item.	Choose an item.	Choose an item.

5.2

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in 5.1

Risk	Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved (SIRO)
System Failure	Advanced have Business recovery measures in place to mitigate risks, and which are set out in the Customer Handbook included in the contract in the Customer Handbook.	Reduced	Low	
Click here to enter text.	Click here to enter text.	Choose an item.	Choose an item.	Choose an item.
Click here to enter text.	Click here to enter text.	Choose an item.	Choose an item.	Choose an item.
Click here to enter text.	Click here to enter text.	Choose an item.	Choose an item.	Choose an item.

5.3

What if anything would affect this piece of work?

N/A

5.4

Please include any additional comments that do not fit elsewhere in the DPIA?

Click here to enter text.

6. Consultation

6.1

Have you consulted with any external organisation about this DPIA?

No

If yes, who and what was the outcome? If no, detail why consultation was not felt necessary.

Click here to enter text.

6.2

Will you need to discuss the DPIA or the processing with the Information Commissioners Office? (You may need the help of your DPO with this)

No

If yes, explain why you have come to this conclusion.

Click here to enter text.

7. Data Protection Officer Comments and Observations

7.1

Comments/observations/specific issues

Click here to enter text.

8. Review and Outcome

Based on the information contained in this DPIA along with any supporting documents, you have determined that the outcome is as follows:

A) There are no further actions needed and we can proceed

If you have selected item B), C) or D) then please add comments as to why you made that selection

Click here to enter text.

We believe there are

Choose an item.

If you have selected item B) or C) then list these in the amber boxes below and then consider additional measures you could take and include these in the green boxes below

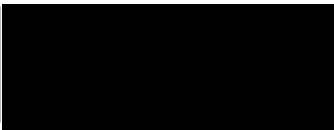
Residual risks and nature of potential impact on individuals. (Include associated compliance and corporate risks as necessary and copy and paste the complete bottom row to add more risks (the text has been left unlocked in both tables to enable you to do this)).	Likelihood of harm	Severity of harm	Overall risk
Click here to enter text.	Choose an item.	Choose an item.	Choose an item.
Click here to enter text.	Choose an item.	Choose an item.	Choose an item.
Click here to enter text.	Choose an item.	Choose an item.	Choose an item.
Click here to enter text.	Choose an item.	Choose an item.	Choose an item.

Additional measures you could take to reduce or eliminate residual risks identified as medium or high risk above (B and C)				
Risk	Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved (SIRO)
Click here to enter text.	Click here to enter text.	Choose an item.	Choose an item.	Choose an item.
Click here to enter text.	Click here to enter text.	Choose an item.	Choose an item.	Choose an item.
Click here to enter text.	Click here to enter text.	Choose an item.	Choose an item.	Choose an item.
Click here to enter text.	Click here to enter text.	Choose an item.	Choose an item.	Choose an item.

Signed and approved on behalf of Buckinghamshire Oxfordshire and Berkshire West Integrated Care Board

Name: 

Job Title: Data Protection Officer

Signature: 

Date: 12/04/2024

Signed and approved on behalf of Click here to enter text.

Name: Click here to enter text.

Job Title: Click here to enter text.

Signature: Click here to enter text. Date: Click here to enter a date.

Please note:

You should ensure that your Information Asset Register and Data Flow Mapping Schedules are updated where this is relevant.

This DPIA can be disclosed if requested under the Freedom of Information Act (2000). If there are any exemptions that should be considered to prevent disclosure detail them here:
[Click here to enter text.](#)