

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 checked="" 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;	<input checked="" type="checkbox"/>
Processing data on a large scale;	<input type="checkbox"/>
Include data concerning vulnerable data subjects;	<input checked="" type="checkbox"/>
Plan to use innovative technological or organisational solutions;	<input type="checkbox"/>

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 :	04/04/2024
Title of the activity/processing:	Delivery of Covid vaccinations to housebound patients and care home residents in the practice catchment area.
Who is the person leading this work?	Vaccination Operations Senior Manager, Sussex ICB; Brijesh Thaker for Coldean Pharmacy
Who is the Lead Organisation?	Coldean Pharmacy
Who has prepared this DPIA?	Vaccination Operations Senior Manager Sussex ICB
Who is your Data Protection Officer (DPO)?	Laura Taw – Senior IG Consultant and DPO SCW
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>We want to gain access to patient data from GP practices to enable the vaccination of housebound patients and care home residents registered with practices in areas where there is no covid-19 vaccination delivery provision.</p> <p><u>GP practices:</u></p> <p>Saltdean And Rottingdean Med Practice School House Surgery Ship Street Surgery The Avenue Surgery Arch Healthcare Ardingly Court Surgery Broadway Surgery Park Crescent Health Centre Pavilion Surgery Regency Surgery St. Peter's Medical Centre Wellsbourne Healthcare CIC Woodingdean Medical Centre Brighton Station Health Centre Carden Surgery Montpelier Surgery Seven Dials Medical Centre Beaconsfield Medical Practice Preston Park Surgery Stanford Medical Centre The Haven Practice</p> <p>The practices will prepare a spreadsheet containing all necessary patient data and send directly to the community pharmacist using secure NHSmail to NHSmail.</p> <p>The information to be collected will be: first name last name, Date of Birth, NHS number, address, telephone number,</p>

	<p>mobile number, age.</p> <p>The pharmacist will use the information within the spreadsheet to make contact with the patients, obtain initial consent and to book and date to visit and vaccinate. Consent to vaccinate will also be obtained verbally at the patient's residence before vaccination.</p> <p>The pharmacist has access to Pinnacle which is the approved system for collection, recording and storage of patient information related to vaccinations. The pharmacist has access to this system as an NHSE approved vaccination delivery provider. Following contact with the patient he will then access Pinnacle to record the outcome of the patient visit and vaccination.</p> <p>If patients have contacted their GP regarding vaccination, they will have been told that someone external will contact them shortly to provide the vaccination.</p>
<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>	<p>Yes</p> <p>Coldean Pharmacy</p> <p><u>GP practices:</u></p> <p>Saltdean And Rottingdean Med Practice</p> <p>School House Surgery</p> <p>Ship Street Surgery</p> <p>The Avenue Surgery</p> <p>Arch Healthcare</p> <p>Ardingly Court Surgery</p> <p>Broadway Surgery</p> <p>Park Crescent Health Centre</p> <p>Pavilion Surgery</p> <p>Regency Surgery</p> <p>St. Peter's Medical Centre</p> <p>Wellsbourne Healthcare CIC</p> <p>Woodingdean Medical Centre</p> <p>Brighton Station Health Centre</p> <p>Carden Surgery</p> <p>Montpelier Surgery</p> <p>Seven Dials Medical Centre</p> <p>Beaconsfield Medical Practice</p> <p>Preston Park Surgery</p> <p>Stanford Medical Centre</p> <p>The Haven Practice</p>
<p>Can you think of any other Key Stakeholders that should be consulted or involved in this DPIA? (If so then include the details here).</p>	<p>No</p>
<p>Detail anything similar that has been undertaken before?</p>	<p>Sussex ICB has already supported various Sussex PCN's to set up a similar arrangement with NHSE approved pharmacists.</p>

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

1.1.

What data/information will be used?	Tick or leave blank	Complete
Tick all that apply.		
Personal Data	<input checked="" type="checkbox"/>	1.2
Special Categories of Personal Data	<input 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	Tick or leave blank <input type="checkbox"/>
Why are you relying on consent from the data subject? The patient has a choice as to whether or not they wish to take up the vaccination	
What is the process for obtaining and recording consent from the Data Subject? (How, where, when, by whom). The Pharmacist will make contact with the patient, book a date to visit to vaccinate and obtain initial consent from the patient to visit and vaccinate. Consent to vaccinate will be obtained verbally at the patient's home before vaccination.	
Describe how your consent form is compliant with the Data Protection requirements? (There is a checklist that can be used to assess this). Verbal consent is recorded on Pinnacle	
b) IT IS NECESSARY FOR THE PERFORMANCE OF A CONTRACT TO WHICH THE DATA SUBJECT IS PARTY	Tick or leave blank <input type="checkbox"/>
(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).	
What contract is being referred to?	
c) IT IS NECESSARY UNDER A LEGAL OBLIGATION TO WHICH THE CONTROLLER IS SUBJECT	Tick or leave blank <input type="checkbox"/>
(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).	
Identify the legislation or legal obligation you believe requires you to undertake this processing.	
d) IT IS NECESSARY TO PROTECT THE VITAL INTERESTS OF THE DATA SUBJECT OR ANOTHER NATURAL PERSON	Tick or leave blank <input type="checkbox"/>
(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).	

How will you protect the vital interests of the data subject or another natural person by undertaking this activity?	
e) IT IS NECESSARY FOR THE PERFORMANCE OF A TASK CARRIED OUT IN THE PUBLIC INTEREST OR UNDER OFFICIAL AUTHORITY VESTED IN THE CONTROLLER (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).	Tick or leave blank <input checked="" type="checkbox"/>
What statutory power or duty does the Controller derive their official authority from?	
f) IT IS NECESSARY FOR THE LEGITIMATE INTERESTS OF THE CONTROLLER OR THIRD PARTY (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).	Tick or leave blank <input type="checkbox"/>
What are the legitimate interests you have?	

Article 9 (2) conditions are as follows:	
a) THE DATA SUBJECT HAS GIVEN EXPLICIT CONSENT (Requirements for consent are the same as those detailed above in section 1.2, a))	Tick or leave blank <input type="checkbox"/>
b) FOR THE PURPOSES OF EMPLOYMENT, SOCIAL SECURITY OR SOCIAL PROTECTION (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).	Tick or leave blank <input type="checkbox"/>
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 (Requirements for this are the same as those detailed above in section 1.2, d))	Tick or leave blank <input type="checkbox"/>
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 (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).	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 (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).	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	Tick or leave blank <input type="checkbox"/>

(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).	
j) PROCESSING IS NECESSARY FOR ARCHIVING PURPOSES IN THE PUBLIC INTEREST, SCIENTIFIC OR HISTORICAL RESEARCH PURPOSES OR STATISTICAL PURPOSES IN ACCORDANCE WITH ARTICLE 89(1) 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.	Tick or leave blank <input type="checkbox"/>
(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).	

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 j). 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 or jointly responsible for any data processed?

(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
GP practices – Saltdean And Rottingdean Med Practice, School House Surgery, Ship Street Surgery, The Avenue Surgery, Arch Healthcare, Ardingly Court Surgery, Broadway Surgery, Park Crescent Health Centre, Pavilion Surgery, Regency Surgery, St. Peter's Medical Centre, Wellsbourne Healthcare CIC, Woodingdean Medical Centre, Brighton Station Health Centre, Carden Surgery, Montpelier Surgery, Seven Dials Medical Centre, Beaconsfield Medical Practice, Preston Park Surgery, Stanford Medical Centre, The Haven Practice	Sole Controller
Coldean Pharmacy	Processor
Pinnacle	Processor
Click here to enter text.	Choose an item.
Click here to enter text.	Choose an item.
Click here to enter text.	Choose an item.
Click here to enter text.	Choose an item.

1.5.

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

The information to be collected will be:
 patient first and last name,
 dob,
 NHS number,
 address,
 telephone number,
 mobile number,
 age.

This is being processed to facilitate vaccination of housebound patients and care home residents from within GP practices in areas where there is no covid-19 vaccination delivery provision.

Coldean Pharmacy has been contracted by NHSE to deliver this service as confirmed by Helen Wardle, Programme Manager, Community Pharmacy Covid Vaccination Service, NHSE SE Region



Confirmation of signed ES agreement

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)

Patient information held as part of their clinical records

1.7.

How are you satisfying the common law duty of confidentiality?

Reasonable expectations (please specify)

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

A patient has an expectation that any treatment discussed and given will be recorded within their medical records.

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.

The care is provided as a part of the National Vaccination programme and is preventative rather than direct care but is directed by NHSE and Joint Strategic Needs Assessment (JSNA)

1.10.

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

500 plus

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.

Click here to enter text.

1.12.

How will you edit the data?

Data will not be edited

1.13.

How will you quality check the data?

GP practice will provide the patient information according to the details within their clinical record – this will be quality checked by the practice before sending to the pharmacist.

When the pharmacist enters information into Pinnacle this will automatically update the GP practice clinical system so that the patient's record is kept up to date with their vaccination status.

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?

The pharmacist/community pharmacy has a contract with NHSE to deliver vaccinations to patients and is familiar with the required process

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.

Click here to enter text.

2.2.

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

- Each GP practice prepares the appropriate patient list within an Excel spreadsheet
- GP practice sends password protected spreadsheet to the pharmacist using nhsmail to nhsmail which will be accessed using an NHS approved encrypted laptop
- Pharmacist checks Pinnacle to establish vaccination history and that the recommended period has elapsed before the next vaccination
- Pharmacist contacts patient as stated above to arrange appointment
- Vaccination takes place or is declined
- Pinnacle is updated with the vaccine date, type, batch number – or whether the vaccination is declined
- Excel spreadsheet is held within the pharmacy system until contact with all the patients and updates to Pinnacle and vaccination has been finalised.
- No data is stored on pharmacist/pharmacy computer records after the completion of the vaccinations of these patients.

As an NHSE assured community pharmacist he has undertaken all the mandatory training needed for carrying out his role – handling patient confidential information and appropriate storing/deletion of such information.

2.3.

What data/information are you planning to share?

The information to be shared will be: patient first and last name, dob, nhs number, address, telephone number, mobile number, age.

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

[Click here to enter text.](#)

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?

GP practices will provide the patient information directly to the pharmacist/pharmacy for vaccinations purposes and this will be added to Pinnacle system when vaccination is completed.

2.6.

Why is this data/information being shared?

The information is being shared to enable the vaccination of housebound patients registered with practices in the practice catchment area.

2.7.

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

Each GP practice Manager sends the spreadsheet to Coldean Pharmacy using nhsmail to nhsmail. Coldean Pharmacy email address will be provided prior to this activity taking place

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?

NHSE are the commissioners for community pharmacists and have confirmed this arrangement with the pharmacy in the attached email



Confirmation of signed ES agreemen

Data processing Agreement to be signed by all GP practice Caldicott Guardians as per attached draft



Coldean DPA
SW.docx

2.9.

What reports will be generated from this data/information?

No reports will be generated

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.

Coldean Pharmacy, 16 Beatty Avenue, Coldean, Brighton, BN1 9ED

Pinnacle

[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
Outcomes for Health (Pinnacle)	Yes	Outcomes4Health (EMIS) - NHS Digital EMIS – Z5514037, Tier 3, Expiry 7 Jun 2024
Coldean Pharmacy, 16 Beatty Avenue, Coldean, Brighton, BN1 9ED	Yes	ZB597700, Tier 1, Expiry 16 Sept 2024
Click here to enter text.	Choose an item.	Click here to enter text.
Click here to enter text.	Choose an item.	Click here to enter text.
Click here to enter text.	Choose an item.	Click here to enter text.
Click here to enter text.	Choose an item.	Click here to enter text.

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
Coldean Pharmacy	GPhc registration Coldean Pharmacy Limited, Coldean, Brighton, 9010023, Registered
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
Oucomes4Health Emis	YGM06	22/23 standards exceeded	12/06/23
Coldean Pharmacy	FRJ19	23/24 standards met	04/12/23
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.	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.

3.5

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).

Patient information when received by Coldean Pharmacy will be stored on an NHS approved, encrypted laptop

3.6

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

NHSmial is used to transfer the patient data which is held in a password protected spreadsheet from the GP practice to Coldean Pharmacy. He will control which pharmacy staff are permitted to have access to the spreadsheet to enable the vaccination programme to be managed within the agreed timescales.

3.7

Is there any use of Cloud technology?

Yes

If yes add the details here.

This relates only to the Pinnacle process

3.8

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

NHSmial is used to transfer the patient data which is held in a password protected spreadsheet. Patient information when received by Coldean Pharmacy will be stored on an NHS approved, encrypted laptop.

Is a specific System Level Security Policy needed?

Don't know

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.

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?

To be completed and made available when all information has been provided.

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).

Each GP practice will update their Privacy notice to confirm that vaccinations are being provided by a 3rd party

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 on individual rights – Pinnacle already holds patient information

4.3

How long is the data/information to be retained?

All personal data relating to housebound patients and care home residents received in the spreadsheet will be retained by Coldean Pharmacy until vaccination programme is completed by 30th June 2024. The GP practice clinical system will retain data in line with NHS Records Management Code of Practice 2021

4.4

How will the data/information be archived?

All personal data relating to housebound patients received in the spreadsheet will be retained by Coldean Pharmacy until vaccination programme is completed by 30th June 2024 and then destroyed.

4.5

What is the process for the destruction of records?

Patient information when received by Coldean will be stored on an NHS approved, encrypted laptop and this will be deleted from the filing storage system and also from the Recycle bin folder on the laptop desktop on completion of the vaccination programme by 30th June 2024.

4.6

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

The data will be stored on an NHS approved, encrypted laptop and this will be deleted from the filing storage system and also from the Recycle bin folder on the laptop desktop.

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
Patient data may be subject to a data breach if it was printed	Possible	Significant	Medium
Loss of NHS encrypted laptop	Remote	Minimal	Low
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)

Patient data may be subject to a data breach if it was printed	The instruction to pharmacist is not to print out any patient data but to use the NHS approved encrypted laptop	Reduced	Low	Yes
Loss of laptop	NHS approved encrypted laptop	Reduced	Low	Yes
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?

Click here to enter text.

5.4

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

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

The Practice should read and fully understand the DPIA, and risks associated with this process.

They should ensure mitigations are put in place prior to the start of this process.

Practices should update their Data Flow Map, Information Asset Register and Privacy Notice.

Privacy Notice suggested wording:

Vaccinations for Housebound patients	<p>Purpose – To provide data to a vaccination provider to attend and complete the vaccinations for housebound patients</p> <p>Legal Basis – Article 6(1)(e); “necessary... in the exercise of official authority vested in the controller’ And Article 9(2)(h) Health data as stated below</p> <p>Provider – Coldean Pharmacy</p>
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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.

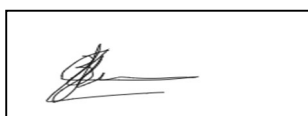
Signed and approved on behalf of Practice

Practice: Park Crescent Health Centre

Name: Bret Stevenson

Job Title: Caldicott Guardian & Senior Partner

Signature:



Date: 16/04/2024

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.](#)