

# WELTON AND DISTRICT PATIENTS' AND DOCTORS' ASSOCIATION



## Data Protection Policy

### Introduction

The General Data Protection Regulation (GDPR) requires all organisations to process and store personal data in a fair and lawful way. Personal data may only be used for the purpose stated when it was collected; it must be accurate and where necessary kept up to date; made available to the subject (on request) and disposed of when no longer required for the purpose given when it was collected.

### Basis for Processing and Storing Data

A legitimate interests assessment has been completed, which confirms that it is appropriate for the PDA to collect and store data under the "Legitimate Interest" provisions of the GDPR, as it is not feasible to provide a transport service without knowing who to transport & where to take them. Similarly, the driver data is required to facilitate communication & administration. This means that the PDA is not required to obtain specific consent to process and store the data obtained for the purposes of providing the transport service.

### Patient Data

Patient appointment data is collected and stored by the PDA for the purposes of running a transport scheme to enable patients without alternative transport arrangements to attend medical appointments of all types, or to visit family in a hospital, care home, or other similar institution.

The following personal data is collected and held:

- Patient's name, address and telephone number(s)
- Name and address of the institution to be visited, and where appropriate a clinic name or number, to enable the driver to find the correct location.
- Date and time of the appointment or visit.

The Patient data described above is held in a secure database and access to it is limited to the Transport Coordinators, and staff at the Welton Family Health Centre (the Practice) with responsibility for recording transport requests on behalf of patients. The Transport Coordinators and each member of the Health Centre staff have an account for accessing the database.

The Transport Coordinator is responsible for assigning drivers to each transport request. They will do this by sharing general details of the request (date, time, locations and any special conditions) with potential drivers by email or telephone. Only when a driver has agreed to undertake the journey, will they be informed of the patient's name, address and other details necessary to complete the journey. The driver may make a copy of the data in electronic or paper format to help them complete the transport request.

In addition to the above, Practice staff maintain a paper record of patient requests for transport to visit the surgery. A single driver is normally nominated each day to undertake such journeys and Practice staff will telephone that driver and provide them with a list of patients and their appointment times. Again, the driver may make a copy of this data in electronic or paper format.

### Volunteer Driver Data

Driver's name, address, telephone number(s) and email address are held in the secure database to facilitate communication between the Transport Coordinator(s), Practice staff and drivers.

### PDA Executive Committee Members' Data

Executive Committee Members' name, address, telephone number(s) and email address are held on a spreadsheet, which is circulated to all committee members to facilitate communication. Committee Members' names are also displayed on the PDA noticeboard in the Health Centre and also on the PPG section of the practice website..

Committee members may opt to not share their contact details with other members of the committee, but must as a minimum provide one means of contact to the Secretary and Chairman to receive notice of meetings, minutes, etc.

## **Other Personal Data**

If it becomes necessary for the efficient operation of the PDA to hold other personal data then similar protections will be applied.

## **Data Retention And Destruction**

Data will only be retained for as long as is necessary to meet the transport request and to complete the PDA's administrative functions.

## **Patient Data**

Patient data is required up to the time of their appointment, to enable the efficient management of the Transport Scheme, and to ensure that their transport request can be met. The data is also required to process and validate the quarterly mileage and expense claims received from drivers. Once all driver claims have been received and fully processed, the database records will be updated to remove the patient's personal details from the transport record, or the transport record will be deleted.

Cancelled transport requests will be retained on the system until the date of the journey, to guard against erroneous cancellations. Once the journey date has passed the record will be deleted.

Practice staff will inform the Transport Coordinator of Patients that have left the Practice, and the Transport Coordinator will delete the Patient record from the database.

Driver claim forms will be held in a locked cabinet until the PDA accounts for that year have been audited and signed off, after which they will be shredded and disposed of. Drivers will destroy any patient data they hold by deleting electronic copies (and emptying trash) and shredding, incinerating, or otherwise destroying, or redacting (blacking-out) paper records. Redaction should only be used where other methods of destruction are impractical.

## **Volunteer Driver Data**

Driver data will be deleted from the system one month after the last date that they are available to drive for the PDA.

## **Executive Committee Members' Data**

Committee members' data will be retained for as long as they remain a member of the committee or until they inform the Secretary that they no longer wish for their details to be shared with other committee members.

## **Data Protection Lead**

At its first meeting following the Annual General Meeting each year, the Executive Committee will nominate from its members a Data Protection Lead, who's responsibilities will include:

- Keeping this policy up to date.
- Arranging awareness training for new transport Coordinators, and periodic refresher training.
- Auditing compliance with this policy.

## **Awareness Training**

All Transport Coordinators will be provided with training in respect to the PDA's responsibilities and obligations under the Data Protection Act. Such training must be completed before the new coordinators are given access to the system.

Volunteer drivers will be provided with a copy of this policy, the Data Security policy and written guidance setting out their specific responsibilities, and the actions they must take to protect patients' personal data. New drivers will be

taken through the guidance as part of their induction process; and all drivers will be asked to sign a record to confirm receipt of the PDA's policy and guidance documents. Data protection will be included in the agenda of the annual driver meeting, to remind drivers of their responsibilities and duties under the act.

All Practice staff with access to the database or daily transport list will be given appropriate training by the Practice.

Refresher training will be provided on a triennial basis, or when a significant change in the law or this policy occurs.

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