



DPIA Project Information

Title:

LARC in Primary Care

Project ID:

261

Project Timeframe for Data Collection:

In less than 3 months

DPIA Screening Questions

Question Number	Question	Answer
1	I understand that, by selecting Yes, I am confirming I am the project manager for the project or activity for which this DPIA screening tool is being carried out.	Yes
2	I understand that by ticking this box I am confirming that I have undertaken the Data Protection Essentials training module on delta.	Yes
3	Is this project a change to an existing process, or is it a new processing activity?	Change to an existing process
4	Has a DPIA for this been previously submitted?	No
5	If a DPIA was submitted - Was legal advice recommended?	No
6	When did the planning stage of this project begin?	3/1/2023
7	Is this screening tool for the use of a surveillance camera, including CCTV, dash cam and body worn cameras?	No
8	If Yes - Is this DPIA a proposal for a new deployment, or the expansion of an existing surveillance system?	
9	Which data protection regime will you be processing under?	UK GDPR
10	Please outline the project including the types of data, software, processors, and how the data will be used	Commissioning of a Long Acting Reversible Contraception (LARC) service in Primary Care. KCC is contracting with GPs, which provide LARC procedures for contraceptive benefit to their patients. GPs manage their patient database in their clinical records system EMIS, which is used to record activity during procedures for the purposes of direct care of the patient. GP practices are controllers of their patient records.

		KCC receives from GP practices data on procedures undertaken, including age of patients, what procedure was undertaken, what device was used, how, when and where the procedure took place at and by whom, for the purposes of paying the practices for the procedures, monitoring that the procedures are carried out by accredited personnel only, contract management and wider public health intelligence. The data submissions are sent by GP practices via an online form managed by KCC Digital Services, which stores the data in a secure online database hosted by Granicus, which is an independent software company utilised by the Public Sector. Submitted data is used to generate a PDF invoice which is emailed to KCC's Finance Team (Accounts payable) for settlement. The dataset is typically imported to an Excel spreadsheet by Commissioning team for monitoring of performance and trends. Identification of a person would require access to the details in EMIS in addition to the data KCC holds.
11	Within your project are you planning to:	Process special category data or criminal offence data on a large scale?
12	Or are you planning to:	Carry out systematic monitoring? Process sensitive data or data of a highly personal nature? Process personal data on a large scale? Process data concerning vulnerable data subjects?
13	Additional Information	

DPIA Core Questions

Question Number	Question	Answer
1	What is your project aim?	Commissioning Long Acting Reversible Contraception (LARC) services in Primary Care. The service provides Long Acting Reversible Contraception (LARC) fitting and removal procedures to women who opt to use this method to prevent pregnancy.
2	Are all of the categories of personal data identified in the data question necessary for you to achieve this aim?	Yes. KCC requests only limited details required to facilitate payments to the GPs, activity monitoring and wider public health intelligence. Basic Data/ Name: Practitioner name - required for verification of accreditation. Address and postcode are implied by the GP practice identification number. Basic Data/ Other: Identification number of the GP practice where procedure took place (implies location) – required for KCC to pay the GP and performance monitoring. Patient age – required for assessment of appropriateness of the procedure and for public health intelligence. Procedure type and device – required for determining appropriate payment. Further procedure details such as reason of removal and how long device had been in situ when removed – required for assessment of appropriateness of the procedure, and for public health intelligence and contract monitoring. Practitioner role (nurse/GP) – required for contract monitoring. Special Category Data: Being a sexual health service, the data will by its nature concern an individual's health and sexual life. (The actual patient records are controlled by the GPs. The clinical system (EMIS) supplied to GPs by the ICB is designed and operates taking the strict NHSE data management standards into account, and only essential information is collected for documenting a patient's care

		pathway. GPs have their own DPIAs and data protection measures in place.) Women residing in Kent who opt to use Long Acting Reversible Contraception (LARC) to prevent pregnancy. (Service users could be vulnerable.) Practitioners delivering the LARC procedures in scope of the contract (e.g. approved LARC procedures for contraceptive purposes which are conducted by accredited personnel). Other Provision of Contraceptive services Processor Controller
3	What are the categories of data subjects whose data will be processed?	
4	What is the nature of the relationship with the individual?	
5	Are there any other organisations other than KCC who will be involved in this project?	
6	Please name the organisations and their roles.	For KCC's Records relating to the management of Provision of LARC in Primary Care Settings the Processors are: -Granicus provides and hosts the online claims form software and so processes the data KCC receives for financial and contract management through the form. -Microsoft Excel to interrogate the data for contract management and public health intelligence purposes. (For the patient records: Controllers:- Circa 100 Contracted GP practices who provide the LARC service in Kent. Providers are accepted on rolling basis to the Dynamic Purchasing System. The successful providers are listed in the government's Find the Tender service https://www.find-tender.service.gov.uk/Notice/007387-2024? Processor:-EMIS clinical system is used to keep an up to date patient records at the GP practices, including the details of LARC procedures, processed for direct care of the patients.) Article 28 compliant contract Strategic Commissioning's annex 1 Legal advice sought on documentation
7	Tick to confirm which of the following you have in place with the organisations	

8	How will the personal data be collected?	Collected by an external organisation
9	How will the personal data be collected from the individual?	Other During appointment at the GP, practitioner records information about the procedure to EMIS clinical system for the purposes of direct care of the patient. Data relating to the procedures that is necessary for management of the commissioned arrangement is later extracted from the GP's patient records. This data is focused on the procedure rather than patient and the only identifiable detail is the practitioner name.
10	Will the data be shared with:	A different KCC team Your KCC team Other KCC MRX Digital team who maintain the claims submission form, and in a limited extent the KCC Finance team managing the payments. KCC performance analytics team for public health statistics. Other: Granicus providing and hosting the software used to create the online claims form.
11	Do you have a copy of the privacy notice that data subjects will be provided with at the point their data is collected?	No
12	Does the privacy notice state that data will be shared with your team for the purpose you will be using it for?	Yes
13	How will the data be shared with your team securely?	Granicus software uses the data submitted by the medical practice to generate a PDF invoice which is emailed to KCC's Finance Team (Accounts payable) for settlement. The LARC / Public Health team in KCC (specified authorised individuals) can access the data by logging into the Granicus system and can export the data in an Excel format for public health intelligence analysis and service monitoring.

14	What steps will you take to ensure the data you collect and/or use is accurate?	KCC's digital LARC data collection form is designed for accurate data collection. The data fields are descriptive of what data is required and practises are prompted to ensure accuracy. Once a procedure has been reported, it is stored in the Firmstep online portal for access by KCC. The dataset is continually added to when new LARC procedure claims are uploaded by GPs on a month-by-month basis. No adjustments are made to submitted data. Only in case of resubmissions for technical reasons the team will reconcile the data to ensure any duplicates are removed. GPs follow NHS guidelines for accuracy and timeframes for updating of patient clinical records within the EMIS system, where they store their own records for patient care, which are the source of LARC data.
15	In what system(s) will the data be stored?	Other Outlook OneDrive Granicus stores the data collected for management of the commissioning arrangement of LARC in Primary Care services on their servers. A back up data dump is stored within KCC's Azure tenant with very limited access. Data extracts in Excel format for Commissioning purposes are stored in limited access file drives within the KCC network (shared folders). Data (invoices) is emailed from Granicus to the Finance Team's mailbox accessed through Outlook. EMIS clinical system is used to keep an up to date patient records at the GP practices, including the details of LARC procedures, processed for direct care of the patients.
16	Where are the servers for the system(s) located?	UK EU
17	What is the current state of technology in this area?	GPs providing LARC services and collecting, storing and using the information within their

		clinical system is considered to be 'the norm' across England. There is variation in the method in which commissioning Local Authorities collect data on LARC procedures as they are carried out in Primary Care. For instance, some may have a special license to view procedure activity on the clinical system itself whereas others (like KCC) request a direct periodic data report on LARC procedures as they occur. Online form technology is mature and well-established. Granicus services are widely used by UK Local Governments and public sector. EMIS is approved by the GP Systems of Choice and funded by the NHS. EMIS Health software is used by more than half of GP practices across the UK, it is a clinical records systems market leader.
18	How will the security of the data be ensured when it is transferred outside of the UK?	ICT Compliance and Risk have carried out a technical risk assessment There is an Article 28 compliant contract in place with the data processor
19	How will the security of the data be ensured in transit and at rest?	Users will have different levels of access to ensure only people who need to access the data have access to it ICT Compliance and Risk have carried out a technical risk assessment for the software we are using There is an Article 28 compliant contract in place with the data processor Other ICT Compliance and Risk have carried out a technical risk assessment Appropriate security measures are undertaken by Granicus's server providers (AWS Amazon Web Services). Data in transit is protected using TLS (Transport Layer Security version 1.2 or above) and is encrypted using AES-256 encryption (Advanced Encryption Service). All application programming interfaces (API's) are HTTPS (Hypertext Transfer Protocol Secure). File

		uploads via SFTP and FTPS. Data is processed and managed in line with the National Cyber Security Centre's Cloud Security Principles.
20	Are there any prior concerns over this type of processing or any security flaws	no
21	Please tick to confirm the following statement is true:	I am assured that the personal data being processed in this project is protected in transit and at rest from unauthorised access and loss.
22	Describe how the personal data will be used to achieve your project aim	At the source, GPs / nurses are collecting to EMIS templates the data that is necessary to support the direct care of the patient, including their contraceptive needs. The contracted GP practices submit the necessary details to KCC via the online form hosted by Granicus, which generates and emails a PDF invoice to KCC's Finance Team (Accounts payable) for settlement (payments per procedure). The LARC / Public Health team in KCC can access the data by logging into the Granicus system and export the data in an Excel format for public health intelligence analysis and service monitoring, which are elements of the commissioning process. Practitioner name - required for verification of accreditation. Identification number of the GP practice where procedure took place (implies location) – required for the payment and performance monitoring. Patient age – required for assessment of appropriateness of the procedure and for public health intelligence. Procedure type and device – required for the payment. Further procedure details such as reason of removal and how long device had been in situ when removed – required for assessment of appropriateness of the procedure, public health intelligence and contract monitoring. Practitioner role (nurse/GP) – required for contract monitoring.
23	How long will the data be retained for?	Records relating to the management of Provision of Long-Acting Reversible Contraception (LARC) in Primary Care Settings are kept by KCC for the current year + 6 years. Retention Period Identifier: AS6.6.4, see KCC

		retention schedule in https://www.kent.gov.uk/about-the-council/information-and-data/access-to-information Data is deleted from the KCC file structures and systems after the retention period stated above. Patient records in EMIS are managed and kept by the GP practices in accordance with the guidance and retention schedule in Records Management Code of Practice from Department of Health and Social Care.
24	Is the same retention period cited in all documentation?	No
25	At the end of the retention period will the data be:	Deleted
26	What processes do you have in place to ensure that the retention period is adhered to?	We will make sure a member of the team has responsibility for the steps to be followed We will have a process in place to ensure we know when the retention period ends
27	Please tick to confirm the following statement is true	I am assured that there are adequate processes in place to ensure retention periods are adhered to, in line with the Article 5 principle of storage limitation in the UK GDPR
28	Is there a KCC privacy notice for this use of personal data?	There is a published KCC privacy notice for this use of personal data
29	Please link to the draft/published privacy notice	KCC Privacy notice for social care and health: https://www.kent.gov.uk/about-the-council/information-and-data/access-to-information/gdpr-privacy-notices/adult-social-care-and-health/general-notice-to-cover-adult-social-care-and-health
30	Is there an easy read privacy notice for this use of personal data?	There is a published easy read privacy notice for this use of personal data
31	How will you ensure data subjects read the privacy notice and understand how their data will be used at the point of data collection?	Other We will link to the privacy notice on our webpages ICB provides Privacy notice templates to the GPs, but each GP practice has their own Privacy notices in reference to the data they collect.

		Kent and Medway ICB advises that, in patient intake or consultation, patients are signposted to the GP practice's website where their privacy notices are hosted. Also physical copies are made available at the practices if required. KCC social care and health privacy notice is available in KCC website.
32	How will you support data subject rights	GP practices manage this. Supporting data subject rights is covered in the GP's Privacy notices or the landing page where they are published. ICB supplies GP practices with a landing page template, generic privacy notice templates, and a Register of Processing Activities (ROPA) table, which ICB updates and sends out to practices every quarter.
33	What measures will you put in place to prevent data being used beyond the purposes outlined in your privacy notice?	Limit access to the storage location to only those who require access for specified purposes Ensure those with access to the data have read the privacy notice and are aware of the purposes it has been collected for
34	Are there any current issues of public concern that you should factor in?	no
35	Consultation: Please summarise the responses of data subjects you have consulted with on the topic of this project.	Consultation with the data subjects is deemed disproportionate and impracticable. All data is captured for the purpose of patient care and GPs share only limited details with KCC, which is necessary for the purposes of paying the service provider per procedure, and for the purpose of monitoring trends, which supports KCC's public health duty. Individual patients are not identifiable from the shared data alone, only in conjunction with further information in EMIS records, which is accessible only by authorised personnel in NHS on needs to know basis (Confidentiality: NHS Code of Practice).
36	Consultation: ICT Compliance and Risk	Recommendations from ICT CART's risk assessment of Granicus system are: • Review any confirmation emails/responses/alerts that are sent out by the Granicus system upon completion of forms to ensure that no personal data are returned to unauthorised recipients. • Ensure LARC/Public Health staff access to the data in Granicus is periodically reviewed and removed if no longer required.

		Other recommendation from ICT CART Use of OneDrive should comply with KNet - Information-Management-Manual.pdf section SG8.3 • Principal copies of digital information should be stored in formal record keeping systems with appropriate protection and security. Members of staff should not store client information or other personal data in their One Drive account. ICT CART have no objections to processing this data, assuming compliance with the above. We confirm that the teams involved with the dataset are operating with compliance of the above.
37	Consultation: Please summarise the Caldicott Guardian's response and any recommendations	During development of this DPIA the Caldicott Guardian encouraged viewing the arrangement from the perspective of the people who use services to ensure fair data controlling and processing. There was no further comments with the final draft.
38	Consultation : please summarise the responses and recommendations of any other individuals or organisations you have consulted with.	ICB DPO - The Integrated Care Board (ICB) Data Protection Officer (DPO) supports and represents all the GPs with GDPR and Data Protection. This DPIA has been developed in collaboration with her. Their recommendation is that the finalised DPIA will be shared with all the contracted GPs.
39	Are you signed up to any approved code of conduct or certification scheme?	
40	When is the processing of personal data for this project due to begin?	Other

Data Collection

Data Category	Data being Collected
Basic Data	Other
	Name
	Address
	Postcode
Special Category Data	Physical or mental health
	Sexual orientation or sex life
Criminal Offence Data (UK GDPR)	No data is being collected under this category
Criminal Offence Data (DPA Part 3)	No data is being collected under this category
Surveillance Camera	No data is being collected under this category

Data Collection Questions

Data Group	Question Number	Question	Answer
Basic Data	1	The Article 6 lawful basis for this processing activity is:	(e) Necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. Please note you will be required to state the name and section of the legislation which gives you the power.
Basic Data	2	Please outline which element of the project relies on the identified lawful basis	The legal basis for KCC collecting the data is under The Public Task Art 6 (1) performance of tasks carried out in the public interest as set out in the Health and Social Care Act. Local authorities have a duty to improve the health of their population which includes commissioning the delivery of the contraception. The service is required to process this data to enable performance of a task carried out in the public interest. The service may need to pass data onto other agencies such as social services to protect the vital interest of subjects should the need arise. The legal obligation relies on the Health and Social Care Act 2012 s251(b) (as amended by the Health and Social Care (Safety and Quality) Act 2015 which created a statutory 'duty to share').
Special Category Data	1	Please identify the Article 9 basis being relied upon for the processing of special category data	(h) Necessary for the purposes of preventative or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health and social care or treatment or

			the management of health or social care systems and services (subject to a DPA 18 condition) or pursuant to contract with a health professional and subject to the conditions and safeguards in Article 9(3)
Special Category Data	2	If you are relying on condition (a) please state which element of the project relies on explicit consent, and outline the process you have for collecting, recording, and withdrawing consent	This condition is not being relied upon.
Special Category Data	3	If you are relying on condition (b), (h), (i), and/or (j) you must also identify at least one of the additional conditions from Schedule 1, Part 1 of the DPA 2018	(3) Public Health–(2) Health or social care purposes
Special Category Data	4	If you are relying on condition (b), (h), (i) and/or (j) you must outline which element of the project relies on this condition	Provision of the commissioned LARC service in the contracted GP practices and the overall commissioning process rely on the condition (2) health and social care. Commissioning of the service is supported and justified by public health intelligence, relying on the condition (3) Public health. Confidentiality is an obligation for all staff. We recognise patient rights established under UK case law collectively known as the “Common Law Duty of Confidentiality”. Richard Smith, Corporate Director for Adult Social Care & Health and KCC Caldicott Guardian is responsible for protecting the confidentiality of people’s health and care information and making sure it is handled legally, ethically and responsibly.

Special Category Data	5	If you are relying on condition (g) you must identify at least one of the additional conditions from Schedule 1 Part 2 of the DPA 2018	Not applicable to this project
Special Category Data	6	If you are relying on condition (g) (substantial public interest) you must outline which element of the project relies on this condition	Not applicable to this project.
Special Category Data	7	If you are relying on condition (c), (d), (e), and/or (f) you must outline which element of the project relies on this condition	Not applicable to this project.