

# Data Protection Impact Assessment for the Use of Docman in Highfield Surgery

## Date of Assessment

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### Data Protection Officer

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### Overview of the Project

This Data Protection Impact Assessment (DPIA) outlines the use of Docman, a cloud-based platform for managing clinical content and document workflows, within Highfield Surgery. The project aims to enhance the efficiency and security of handling patient correspondence and administrative documents, moving towards a paper-light environment. Docman streamlines the process of receiving, processing, and filing patient-related information, integrating seamlessly with existing clinical systems. This initiative is designed to improve overall practice workflow, data accuracy, and compliance with data protection regulations.

### Description of Data Processing

- **Nature of Processing:** Docman facilitates the collection, storage, indexing, workflow management, and secure transfer of digital documents. This includes receiving electronic correspondence from external healthcare providers, scanning and uploading paper documents, and routing them to the appropriate staff members for action, review, and filing.
- **Scope of Processing:** The processing encompasses a wide range of clinical and administrative documents related to all registered patients of Highfield Surgery. This includes, but is not limited to, patient records, referrals, discharge summaries, laboratory results, outpatient letters, and internal practice administrative files.
- **Context of Processing:** Data is accessed and processed by authorised medical, clinical, and administrative staff within the GP practice. Docman integrates with the practice's primary clinical system (e.g., EMIS Web) to ensure documents are filed directly into the patient's electronic health record, enabling comprehensive and up-to-date patient information for direct care.
- **Purposes of Processing:** The primary purposes are to:
  - Efficiently manage and process inbound clinical and administrative correspondence.,
  - Digitise and centralise patient records and related documents, reducing reliance on paper.,
  - Streamline internal practice workflows, automate tasks, and improve staff efficiency.,,
  - Ensure timely and accurate updating of patient medical records.
  - Facilitate secure sharing and access to patient information among authorised healthcare professionals.
  - Maintain compliance with regulatory standards for data management and patient care.

### Consultation Process

Consultations for the implementation and ongoing use of Docman involved key stakeholders within Highfield Surgery, including practice management, GPs, nursing staff, administrative teams, and the Data Protection Officer. Feedback was sought regarding existing paper-based challenges,

workflow improvements, and data security concerns. The practice reviewed existing Docman DPIAs and guidance from other GP practices to inform this assessment.

### **Necessity and Proportionality**

The use of Docman is necessary and proportionate to achieve the practice's objectives of modernising document management and enhancing patient care.

- **Necessity:** Traditional paper-based systems are inefficient, prone to errors, and present security risks. Docman addresses these by providing a secure, centralised, and automated system for handling the large volume of clinical correspondence received daily. It supports the secure transfer of care information, which is critical for continuity of care.,
- **Proportionality:** The processing of patient data via Docman is limited to what is necessary for clinical and administrative purposes. The system's features, such as workflow automation, clinical coding, and integration with clinical systems, ensure that data is processed accurately and efficiently, without excessive collection or retention. Docman is widely used across UK GP practices, with over 6,000 practices utilising it.

### **Risk Assessment**

Potential risks to data subjects' rights and freedoms include:

1. **Unauthorised Access/Disclosure:** Risk of data breaches if access controls are inadequate or if documents are misrouted or viewed by unauthorised individuals.
2. **Data Loss/Corruption:** Risk of documents being lost, incorrectly filed, or corrupted within the system.
3. **Inaccurate Data:** Risk of inaccurate or incomplete patient information being filed, leading to potential clinical risks.
4. **Compliance Failures:** Failure to meet GDPR, DPA 2018, or NHS data security standards.
5. **Loss of Patient Trust:** Any breach or perceived mishandling of data could erode patient confidence.

### **Measures to Address Risks**

Highfield Surgery implements the following measures and safeguards to mitigate identified risks:

- **Robust Security Features:** Docman includes encryption (at rest and in transit), access controls (role-based permissions, advanced permissions), and comprehensive audit trails to protect sensitive patient information.,,,,
- **Secure Infrastructure:** Data is stored in secure, UK-based cloud environments, with Docman itself storing data on its servers.,
- **Secure Document Transfer:** Electronic documents are transferred via secure services (e.g., Docman Connect), with data packaged and encrypted (e.g., JSON file, base 64 encrypted) to ensure confidentiality during transit.
- **Workflow Automation and AI:** Features like Intellisense and workflow automation reduce manual errors, automate patient and filing detail detection, and improve data quality.,,,
- **Staff Training:** Regular and mandatory training for all staff on data protection principles, Docman system usage, and internal security policies.,
- **Auditability:** Docman provides full audit trails for every document, detailing actions such as filing, viewing, and workflow steps, which supports accountability and helps prevent misfiling.,,
- **Data Backup and Recovery:** Automated cloud backups ensure data resilience and recovery capabilities.
- **Integration Checks:** Manual checks by practice staff to ensure correct patient matching and filing, especially for incoming correspondence.

- **Data Processing Agreements (DPAs):** A DPA is in place with the Docman provider (OneAdvanced) to ensure they meet data protection obligations as a data processor.

## **Compliance with Data Protection Principles**

- **Lawfulness, Fairness, and Transparency:** Processing is lawful under Article 6(1)(e) (public interest) and Article 9(2)(h) (health and social care) of the GDPR, as it is necessary for the provision of healthcare. The purpose is transparently defined for efficient patient record management.
- **Purpose Limitation:** Data is collected and processed specifically for the management of clinical content and related administrative tasks within the GP practice, directly supporting patient care.
- **Data Minimisation:** Docman focuses on processing relevant clinical correspondence, utilising features that streamline data entry and minimise redundant information.
- **Accuracy:** Integration with clinical systems, clinical coding features, and the ability to detect patient and filing details automatically (Intellisense) contribute to data accuracy. Staff conduct manual checks to ensure data is correctly linked to patient records.,,
- **Storage Limitation:** Data stored in Docman is retained in accordance with NHS Records Management Code of Practice and other relevant retention policies for healthcare records.
- **Integrity and Confidentiality:** Strong technical and organisational measures, including encryption, access controls, and audit trails, are in place to ensure data integrity and confidentiality, preventing unauthorised access or alteration.,
- **Accountability:** Comprehensive audit trails within Docman allow the practice to demonstrate compliance with data protection obligations.

## **Data Retention**

Patient-related documents and clinical correspondence processed and stored via Docman will be retained in accordance with the NHS Records Management Code of Practice. Typically, adult patient primary care records are retained for 10 years after the patient's death or after the patient has permanently left the country, and for children's records until their 25th or 26th birthday. Administrative documents will be retained according to their specific retention schedules.

## **Data Subjects' Rights**

Highfield Surgery ensures that data subjects can exercise their rights in relation to data processed through Docman:

- **Right to Access:** Patients can request access to their medical records, which include documents processed and stored in Docman. The practice's existing procedures for subject access requests will be followed.
- **Right to Rectification:** Patients can request correction of inaccurate data. Any identified inaccuracies in documents filed via Docman will be rectified according to practice policy.
- **Right to Erasure/Restriction:** While the right to erasure is limited for health records due to public interest and legal obligations, requests will be handled in line with the GDPR and relevant NHS guidance. Restriction of processing will be considered where applicable.
- **Right to Object:** Patients can object to certain types of processing, and their objections will be considered based on the legal grounds for processing.
- **Patient Visibility:** Docman includes features to control the visibility of documents to patients via Patient Facing Services (PFS), aligning with initiatives for patient access to online records.