

Data Protection Impact Assessment for the Use of Joy Connect Software at Highfield surgery

Date of Assessment

12/08/2025

Data Protection Officer

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Overview of the Project

This Data Protection Impact Assessment (DPIA) concerns the implementation and use of the "Joy Connect" software at Highfield surgery. The primary purpose of Joy Connect is to facilitate the referral of patients from the general practice to various local community services. This digital platform aims to streamline the referral process, improve efficiency, and ensure patients are directed to appropriate and timely local support services, thereby enhancing patient care and access to a wider range of health and social care provisions.

Description of Data Processing

- **Nature of Processing:** Collection, storage, viewing, and sharing of patient health and demographic data for the purpose of making referrals to external local services. This includes gathering information from patient records, entering it into the Joy Connect system, and transmitting it securely to the relevant external service providers.
- **Scope of Processing:** The processing encompasses data of patients identified by Highfield surgery clinicians as requiring referral to local services via the Joy Connect platform. This will apply to a subset of the practice's registered patients at any given time, based on clinical need.
- **Context of Processing:** Data will be accessed and entered by authorised clinical and administrative staff at Highfield surgery. Once entered, relevant patient data will be transmitted via the Joy Connect platform to specific, authorised personnel within the local services to which the patient is being referred. The platform is intended to be a secure, auditable method for managing these referrals.
- **Purposes of Processing:**
 - To enable efficient and secure referral of patients to appropriate local community health and social care services.
 - To facilitate timely access for patients to a broader range of support and interventions.

- To improve coordination and communication between Highfield surgery and local service providers.
- To maintain an auditable record of patient referrals.

Consultation Process

Consultation has been undertaken with key stakeholders within Highfield surgery, including general practitioners, practice nurses, administrative staff involved in referrals, and the Practice Manager. The Data Protection Officer has been consulted throughout the assessment process. Further consultation will be undertaken with representatives of the local services intending to receive referrals via Joy Connect to establish common understanding of data sharing protocols and responsibilities. Patient groups or representatives will be engaged to provide feedback on the referral process and information provided to patients regarding data sharing.

Necessity and Proportionality

The use of Joy Connect software is considered necessary to modernise and streamline the patient referral pathway from Highfield surgery to local community services. Manual, paper-based, or less secure electronic referral methods are inefficient and pose risks related to data security and accuracy. Joy Connect provides a structured, secure, and auditable means of managing these referrals, ensuring patients receive timely and appropriate care. The processing is proportionate as only the minimum necessary patient data required for a specific referral will be shared, adhering to the principle of data minimisation. The system is designed to only connect with pre-approved and vetted local services, ensuring data is shared only with legitimate and relevant organisations for the express purpose of providing care.

Risk Assessment

The processing of patient data via Joy Connect involves several potential risks:

1. Unauthorised Access/Disclosure:

- **Risk:** Patient sensitive health data could be accessed by unauthorised individuals within Highfield surgery or within the receiving local service, or intercepted during transmission.
- **Impact:** High (Breach of confidentiality, patient distress, reputational damage to practice, regulatory fines).

2. Incorrect Referrals/Data Entry Errors:

- **Risk:** Patient data could be entered inaccurately into the system, or a referral could be sent to the wrong service or for the wrong patient.
- **Impact:** Medium (Patient care implications, delayed treatment, administrative burden, potential for misdiagnosis).

3. Lack of Clear Consent/Lawful Basis:

- **Risk:** Patients may not be fully informed or provide explicit consent for their data to be shared with specific external services via the platform.

- **Impact:** High (Breach of GDPR principles, patient trust erosion, legal challenges).
4. **Data Retention Beyond Necessity:**
 - **Risk:** Patient referral data stored within Joy Connect or by receiving services for longer than legally required or necessary.
 - **Impact:** Low-Medium (Increased risk exposure over time, non-compliance with data retention policies).
 5. **Inadequate Data Sharing Agreements (DSAs):**
 - **Risk:** Lack of formalised agreements between Highfield surgery, Joy Connect as a processor, and receiving local services, leading to unclear responsibilities.
 - **Impact:** High (Lack of legal protection, difficulty in accountability during incidents).
 6. **Vulnerabilities in Software/Platform:**
 - **Risk:** Security flaws or bugs in the Joy Connect software could be exploited by malicious actors.
 - **Impact:** High (Data breach, service disruption).

Measures to Address Risks

To mitigate the identified risks, the following measures and safeguards will be implemented:

1. **Technical Security Measures:**
 - **Encryption:** All data transmitted via Joy Connect will be encrypted both in transit and at rest.
 - **Access Controls:** Robust authentication mechanisms (e.g., multi-factor authentication) and role-based access controls will ensure only authorised personnel can access the system and specific patient data.
 - **Audit Trails:** The system will maintain comprehensive audit logs of all user activities, including data access, modification, and referrals made.
 - **Vulnerability Testing:** Regular penetration testing and vulnerability assessments will be conducted on the Joy Connect platform by the software provider.
 - **Secure Infrastructure:** The software provider must demonstrate adherence to recognised security standards (e.g., ISO 27001, Cyber Essentials Plus).
2. **Organisational and Procedural Measures:**
 - **Staff Training:** All staff using Joy Connect will receive mandatory training on data protection principles, secure data handling, and the specific functionalities and security features of the software.
 - **Data Sharing Agreements (DSAs):** Formal, legally binding Data Sharing Agreements (DSAs) or Information Sharing Agreements (ISAs) will be put

in place with all local services receiving patient referrals via Joy Connect. These agreements will clearly define roles, responsibilities, data protection obligations, and incident response procedures.

- **Privacy Notices/Transparency:** Patients will be provided with clear and comprehensive privacy notices at the point of referral, explaining what data will be shared, with whom, for what purpose, and how their rights can be exercised. This will be an extension of the practice's main privacy notice.
- **Consent/Lawful Basis Management:** Clear protocols will be established to ensure a lawful basis for sharing data (e.g., consent for direct care, or explicit consent for specific sensitive service referrals, or public task for NHS direct care if appropriate). The patient's understanding and agreement will be documented.
- **Data Minimisation Protocol:** Staff will be trained and instructed to only share the minimum necessary data required for the specific referral.
- **Regular Audits:** Highfield surgery will conduct internal audits of referral practices and data handling within Joy Connect.
- **Incident Response Plan:** The practice's data breach response plan will be updated to include incidents involving the Joy Connect system and interactions with the software provider and receiving services.

Compliance with Data Protection Principles

The use of Joy Connect software at Highfield surgery aligns with the core data protection principles:

- **Lawfulness, Fairness, and Transparency:** Patient data will be processed on a clear lawful basis (e.g., for the provision of direct patient care under a contract with NHS England, or with explicit consent where required). Patients will be informed through updated privacy notices and direct communication about the use of Joy Connect and data sharing practices.
- **Purpose Limitation:** Data collected and processed through Joy Connect will be used solely for the purpose of facilitating patient referrals to local services and improving integrated care, as defined in this DPIA.
- **Data Minimisation:** Only relevant and necessary patient data required for a specific referral will be entered into and shared via the Joy Connect system. Unnecessary or excessive data fields will not be utilised.
- **Accuracy:** Processes will be in place to ensure patient data entered into Joy Connect is accurate and kept up-to-date. Staff training will emphasise the importance of data accuracy.
- **Storage Limitation:** Data within Joy Connect will be retained for a period consistent with NHS record keeping guidelines for patient referrals and health records. This will be agreed upon with the software provider and receiving services.

- **Integrity and Confidentiality (Security):** Robust technical and organisational measures, as detailed in the "Measures to Address Risks" section, will be implemented to ensure the security, integrity, and confidentiality of patient data.
- **Accountability:** This DPIA serves as a record of compliance. Highfield surgery, as the data controller, will maintain records of processing activities, ensure staff training, implement policies, and conduct audits to demonstrate compliance with GDPR and DPA 2018.

Data Retention

Patient referral data processed via Joy Connect will be retained in accordance with the NHS Records Management Code of Practice for Health and Social Care and relevant guidance from NHS England. For general practice records, this typically means a retention period of 10 years after the patient's death or permanent deregistration, or as otherwise specified for specific record types. Specific data within the Joy Connect platform itself may be subject to agreed retention schedules between the practice and the software provider, ensuring consistency with overall patient record retention policies.

Data Subjects' Rights

Patients, as data subjects, can exercise their rights regarding data processed through Joy Connect, consistent with their rights under GDPR and the Data Protection Act 2018:

- **Right to Information:** Patients will be informed about the processing of their data via Joy Connect through practice privacy notices and direct communication during the referral process.
- **Right of Access:** Patients can request access to their personal data processed through Joy Connect by submitting a Subject Access Request (SAR) to Highfield surgery.
- **Right to Rectification:** Patients can request correction of inaccurate or incomplete data held about them within the Joy Connect system.
- **Right to Erasure:** While patient health records generally cannot be erased, patients may have a right to request erasure in certain limited circumstances (e.g., if data is no longer necessary for the purpose it was collected or processed). Any such request will be assessed on a case-by-case basis considering clinical and legal obligations.
- **Right to Restriction of Processing:** Patients may request restriction of processing in certain situations, such as if they contest the accuracy of the data.
- **Right to Object:** Patients have the right to object to processing of their data in certain circumstances, particularly if based on legitimate interests or public task. Any objection will be carefully considered against the necessity of processing for direct patient care.
- **Right to Data Portability:** This right generally applies to data processed by automated means based on consent or contract. Its applicability to clinical referral data will be assessed if a request is made.

Highfield Surgery

Patients can exercise these rights by contacting Highfield surgery, either through the practice reception, in writing, or by emailing the practice's main contact or the DPO (blackpool.highfieldenquiries@nhs.net)

Approval and Sign-Off

- **Approved By:** Practice Manager Heather Wilson
- **Date Approved:** 12th August 2025