



RECORD OF PROCESSING ACTIVITIES UNDER ARTICLE 30 (UK GDPR) POLICY

BADGER GROUP
Badger House
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Birmingham, B9 4EY

Destroy All Previous Issues

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Author	Issue Date	Version	Document Ref	Approved By	Approval Date	Next Review	
S Barnes S Owen	Jan 2021	V1.1	IG-46	Exec Team	Jan 2021	Jan 2024	Page i

Contents

1	INTRODUCTION	1
2	CATEGORIES OF DATA SUBJECTS	1
3	CATEGORIES OF PERSONAL DATA	1
4	PURPOSES OF DATA PROCESSING	2
5	CATEGORIES OF PERSONAL DATA RECIPIENTS	3
6	DATA REGISTERS	4
7	PERSONAL DATA RETENTION PERIODS	5
8	TECHNICAL AND ORGANIZATIONAL SECURITY MEASURES	5
9	CHANGES TO THIS RECORD OF PROCESSING ACTIVITIES	6

DOCUMENT CONTROL

Document Storage

Location: o:\central policies & procedures - development - word docs\ig - igsoc - gdpr policies\ig-46 - record of processing activities under article 30 gdpr policy v1.1.doc

Version Control Log (Only last 3 versions, earlier versions can be found in the appropriate Archive directory for the document)

Version	Date	Author	Description of Changes
1.0	Oct 2018	S Barnes / S Owen	New Policy
1.0	14 Jan 2021	S Owen	Minor Update, adding UK and removing EU

Approval

Version	Name	Position	Signature	Approved Date
V1.0	Badger Executive	Executive Team		25/10/2018

Glossary

Term	Description

1 INTRODUCTION

This Record of Processing Activities (Record) describes how Badger Group process personal data. Badger Group recognises that Article 30 of the UK General Data Protection Regulation (UKGDPR) imposes documentation requirements on controllers and processors of data. This Record is company confidential information but Badger Group will provide it to the appropriate supervisory authority on request as required by Article 30.

Data Controller Details:

Name: Badger Group

Address: Badger House, 121 Glover Street, Birmingham, B9 4EY

Telephone Number: 0121 7662170

Website: www.Badger-Group.com

Data Protection Officer: Affinity Resolutions Ltd
Rowan House North
1 The Professional Quarter
Shrewsbury Business Park
Shrewsbury
SY2 6LG

2 CATEGORIES OF DATA SUBJECTS

Badger Group collects personal data from the following categories of data subjects:

1. Badger Group patients and patient's families.
2. Badger Group employees, workers, self-employed workers, independent consultants and job applicants.
3. Badger Group providers or suppliers.

3 CATEGORIES OF PERSONAL DATA

Badger Group collects the following categories of personal data about patients and patients families:

1. Personal details including name and contact information.
2. Family, next of kin and lifestyle details.
3. Occupation and work history
4. Family background and history
5. Ethnicity and spoken language.
6. Special categories of personal data including racial or ethnic origin, religious or philosophical beliefs, genetic data, biometric data, data concerning health or data concerning sex life or sexual orientation.
7. Entry codes for premises.
8. Device details.
9. User activity details and user preferences.
10. Browser history details.
11. Location details.
12. Electronic identification data including IP address and information collected through cookies
13. Financial details.
14. Payment details.

15. Contractual details including the goods and services provided.
16. Photographs
17. Voice recordings

Badger Group collects the following categories of personal data about, employees, self-employed workers, independent consultants and job applicants:

1. Personal details including name and contact information.
2. Date of birth.
3. Gender.
4. Marital status.
5. Beneficiary and emergency contact information.
6. Government identification numbers.
7. Professional registration, education and training details.
8. Bank account details and payroll information.
9. Wage and benefit information.
10. Performance information.
11. Appraisals, learning and development records.
12. Employment details.
13. Photographs.
14. Passport and driving license and car insurance.
15. Indemnity cover – if self –employed
16. Right to work if immigration status is an issue, including marriage certificate, birth certificate and proof of address.
17. DBS and enhanced checks
18. Information on IT systems including use of telephones, email and the internet.
19. Special categories of personal data, including data relating to an employee's:
 - Racial or ethnic origin;
 - Political opinions;
 - Religious or philosophical beliefs;
 - Trade-union membership;
 - Genetics, biometrics or health; and
 - Sex life or sexual orientation.

Badger Group collects the following categories of personal data about providers and suppliers:

1. Name and contact information.
2. Financial and payment details.

4 PURPOSES OF DATA PROCESSING

Badger Group collects and processes personal data about patients and their families for the following reasons:

1. Maintaining and enhancing Badger Group services.
2. Welfare, treatment and health of patients.
3. Preventative and occupational medicine, medical diagnosis and the management of health.
4. To monitor clinical and non-clinical performance.
5. Providing services and patient management.
6. Sharing with people or organisations in order to comply with legal or regulatory obligations.
7. Account management and keeping records up to date.
8. Surveys

9. Supporting network and system security.
10. Auditing.
11. Detecting and preventing fraud.
12. Complying with legal obligations.
13. Conducting web analytics.

Badger Group collects and processes personal data about, employees, self-employed workers, independent consultants and job applicants for the following purposes:

1. Recruitment and selection of employees.
2. Personnel management.
3. Workplace monitoring.
4. Human resources administration including payroll and benefits.
5. Complying with legal obligations.
6. Education, training, and development activities.

Badger Group collects and processes personal data about providers and suppliers for the following purposes:

1. To obtain products and services.
2. Vendor administration, order management, and accounts payable.
3. Evaluating potential suppliers.
4. Detecting and preventing fraud.

Badger Group having considered the lawful basis for processing records:

1. Consent – this is brought to the attention of the data subject in meetings and in the privacy policy.
2. Contract – this is brought to the attention of the data subject in the privacy policy;
3. Legal obligation – this is brought to the attention of the data subject in the privacy policy.
4. Vital interests – this is brought to the attention of the data subject in the privacy policy.
5. Public tasks – this is brought to the attention of the data subject in the privacy policy.
6. Legitimate interests – this is brought to the attention of the data subject in the privacy policy.

5 CATEGORIES OF PERSONAL DATA RECIPIENTS

Badger Group may be required to disclose personal data of patients to the following categories of recipients:

1. Badger Group, subsidiaries and affiliated entities.
2. Other specialists and experts when required by a patient or if necessary to provide the healthcare of a patient.
3. Data may be shared with ambulance, safe guarding, undertaker, coroner, district nurse, hospital, police, care home, first responders and volunteers, Commissioning body and Regulators. Can be verbal, handwritten, by fax, data transfer system.
4. Prescriptions may be sent to pharmacy or collected by family members.
5. Organisations the data subject belongs to when necessary to confirm entitlement to services.
6. The patients GP.
7. Admin staff who have access to relevant clinical data, in appropriate circumstances such as when there is a complaint received from the patient.
8. Data may be shared with Ombudsman, Attorney under LPA, insurance company, lawyers.
9. With regulatory bodies when complying with health care legislation.
10. Auditors and professional advisors, such as lawyers and consultants.
11. Federal, state, and local law enforcement officials.
12. Third-party service providers, such as providers of:

- IT system management;
- Information security;
- Human resources management;
- Payroll administration; or
- Retirement plan administration.

Badger Group may share data on, employees, self-employed workers, independent consultants and job applicants with:

1. HMRC and other relevant government bodies
2. Electronic accounts package providers.
3. Pension providers
4. Regulatory bodies
5. DBS checking agency and other agencies to make employment checks
6. Previous and future employers
7. Auditors, accountants and other professional suppliers
8. Legal advisors where relevant.
9. External support services e.g. Occupational Health
10. When booking courses, travel and social events
11. IT hosting companies
12. Banks and other financial institutions
13. When arranging rotas and out of hours cover for health professionals
14. External HR support.
15. Business partners when required by a data subject.
16. NHS Commissioning Bodies, such as Clinical Commissioning Groups.

Badger Group may share data on suppliers and providers to:

1. HMRC and other relevant government bodies
2. Electronic accounts package providers
3. Regulatory bodies
4. Auditors, accountants and other professional suppliers
5. Legal advisors where relevant.
6. IT hosting companies
7. Banks and other financial institutions
8. When arranging rotas and out of hours cover for health professionals
9. Other members of the out of hours' organisation
10. Other service providers and suppliers.
11. Patients
12. NHS Commissioning Bodies, such as Clinical Commissioning Groups.

6 DATA REGISTERS

Badger Group retains the following registers:

1. Access request register.
2. Personal data breach register.
3. Data impact assessment register.
4. Register of contracts with processors and copies of contract.
5. Register of assessment and review of data protection policies and procedures.

7 PERSONAL DATA RETENTION PERIODS

Except as otherwise permitted or required by applicable law or regulation, Badger Group only retains personal data for as long as necessary to fulfil the purposes Badger Group collected it for, as required to satisfy any legal, accounting, or reporting obligations, or as necessary to resolve disputes. To determine the appropriate retention period for personal data, Badger Group considers the amount, nature, and sensitivity of personal data, the potential risk of harm from unauthorized use or disclosure of personal data, the purposes for processing the personal data, whether the employer can fulfil the purposes of processing by other means, and any applicable legal requirements.

Badger Group typically retains personal data for the periods set out below, subject to any exceptional circumstances or to comply with laws or regulations that require a specific retention period:

Information about patients:

- Will be retained in accordance with the Information Governance Alliance Records Management Code of Practice for Health and Social Care 2016. <https://digital.nhs.uk/data-and-information/looking-after-information/data-security-and-information-governance/codes-of-practice-for-handling-information-in-health-and-care/records-management-code-of-practice-for-health-and-social-care-2016>

Information about, employees, self-employed workers, independent consultants and job applicants - retention period refers to after contractual relationship as ended:

- personal details including name and contact information: 6 years;
- date of birth: 6 years;
- gender: 6 years;
- marital status: 6 years;
- beneficiary and emergency contact information: 6 years;
- government identification numbers: 6 years;
- education and training details: 6 years;
- bank account details and payroll information: 6 years;
- wage and benefit information: 6 years;
- performance information: 6 years;
- employment details: 6 years;
- special categories of personal data, including information that relates to an employee's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, genetics or health, and sex life or sexual orientation: 6 years.]

Information about providers and suppliers - retention period refers to after the contractual relationship as ended:

- name and contact information: 6 years;
- financial and payment details: 6 years.

8 TECHNICAL AND ORGANIZATIONAL SECURITY MEASURES

Badger Group has implemented the following technical and organisational security measures to protect personal data:

1. Segregation of personal data from other networks.
2. Access control and user authentication.

3. Employee training on information security.
4. Written information security policies and procedures.

9 CHANGES TO THIS RECORD OF PROCESSING ACTIVITIES

Badger Group reserves the right to amend this Record of Processing Activities from time to time consistent with the GDPR and other applicable data protection requirements.