North Staffordshire Combined Healthcare NHS
NHS Trust

Submitting controller details

Name of controller	North Staffordshire Combined Healthcare
Subject/title of DPO	Synertec Solution/Karen Smith
Name of controller contact /DPO (delete as appropriate)	Karen Smith

Step 1: Identify the need for a DPIA

Explain broadly what project aims to achieve and what type of processing it involves. You may find it helpful to refer or link to other documents, such as a project proposal. Summarise why you identified the need for a DPIA.
The Synertec solution is a system that delivers distribution of service user and other clinical correspondence at competitive rates, with a number of additional benefits. The approach is already being used in 150+ NHS Trusts in England. The system is based on you using PRISM and Pay as You Mail (PAYM) services. PRISM is Synertec's in-house built suite of software which would be installed onto our network as a virtual printer. Once installed, all appointment letters, result letters, clinical correspondence and ANY other relevant data is simply printed to the PRISM print server. Documents will then be formatted to pre-agreed templates depending on your requirements. Once formatted, PRISM will then distribute the documents via pre-defined and agreed methods. Documents that need to be sent via mail will be distributed via our PAYM service, where they will be printed and posted from one of Synertec's production centres. The post solution is business class which offers a cheaper but better service than 2nd class postage used currently as the default postage route. The system offers the opportunity to move towards electronic communication (by email and texting), offering further opportunities for cost reduction and quality enhancement. This DPIA outlines the solution and how it will be managed safely and securely across the Trust.

North Staffordshire Combined Healthcare NHS
NHS Trust

Step 2: Describe the processing

North Staffordshire Combined Healthcare **NHS**

Describe the nature of the processing: how will you collect, use, store and delete data? What is the source of the data? Will you be sharing data with anyone? You might find it useful to refer to a flow diagram or other way of describing data flows. What types of processing identified as likely high risk are involved?

![North Staffordshire Combined Healthcare NHS Trust]

The data is collected via Lorenzo which is the Trust's EPR. The services will produce all the letters, care plans etc. using data that is stored in Lorenzo.

The method that Synertec use is called "pass-through printing".

Pass-through printing is a method used to collect representative sample documents from a customer without affecting their current output. It involves users printing their documents to a printer on the Prism server rather than their current printer. Prism will take a copy of the document, which we can use as sample data, and then pass it on to the user's normal printer.

Synertec PAYM Data Path
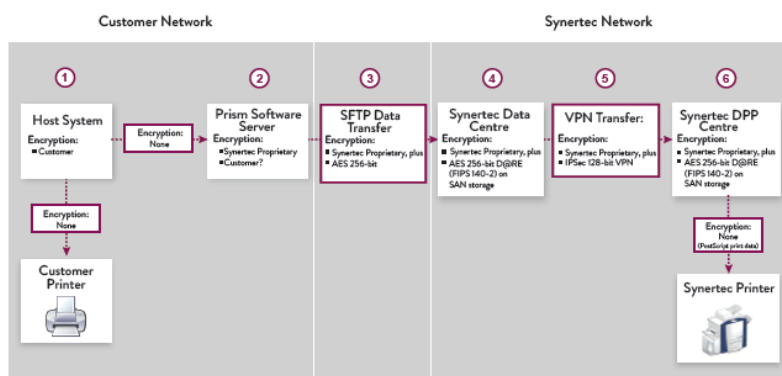
Segregation of customer data is fundamental to all of Synertec's services for our customers. Synertec's bespoke systems segregate all data by owner (i.e. customer A's data will be kept separate from customer B's data) throughout the process of moving data into Production.

Synertec archives customer document data for a period of 90 days as standard on its servers. These servers are secured in such a way as to only allow authorised access, and the documents in this Synertec-side archive are stored in an encrypted form at all times.

This archiving allows full traceability of documents for a reasonable period following dispatch. Customers can request that Synertec varies the retention period for a specific reason, if appropriate.

After the standard 90 day retention period deletion of the document data is then completed, without manual involvement, using a secure deletion algorithm that complies with DoD 5220.22-M media sanitisation standards.

Synertec do not operate an outsourced data centre. Customer data is never stored outside of the U.K, and all Synertec offices, as well as our printing and mailing facilities, are located inside the U.K.

Describe the scope of the processing: what is the nature of the data, and does it include special category or criminal offence data? How much data will you be collecting and using? How often? How long will you keep it? How many individuals are affected? What geographical area does it cover?

The service will still produce their letters in the same way by using Lorenzo to identify the patient information for the letter. Instead of sending their letter to the follow me printer the letter will go to the prism printer. This means that documents will simply no longer be routed to the local printer, Prism will instead process the documents and route them to the agreed output.

The data collected in this process is the patient information from Lorenzo e.g. names, address, patient number, what clinic they are attending/DOB/clinical details summary/history of the patient. Depending on the type of letter sent out this could also include medical information e.g. the care plan information.

The data that is passed through includes sensitive clinical information and may also include criminal offence data.

It will affect all Trust patients including out of area patients.

Describe the context of the processing: what is the nature of your relationship with the individuals? How much control will they have? Would they expect you to use their data in this way? Do they include children or other vulnerable groups? Are there prior concerns over this type of processing or security flaws? Is it novel in any way? What is the current state of technology in this area? Are there any current issues of public concern that you should factor in? Are you signed up to any approved code of conduct or certification scheme (once any have been approved)?

The Synertec solution is a secure printing environment and the printer is installed on the Prism server; end users are connected to this and asked to print their documents to it.

The software then extracts the user information from the print file(s) and routes the documents along with the username back to the 'Follow-me' (local) printer, using LPR print protocol.

The data is for mental health patients including children's data.

Synertec state that as the Data Processor they will undertake all reasonable background checks to ensure the reliability of all employees who are likely to use or have access to Customer Data. The Data Processor will include appropriate confidentiality clauses in employment contracts, including details of sanctions against any employee acting in a deliberate or reckless manner that breaches confidentiality or the non-disclosure provisions of the DPA and GDPR or causes damage to or loss of Customer Data.

This process should reduce the number of incidents including reducing the information security incidents in errors when posting out.

Synertec are compliant with the Data Protection Act 2018/Data Security & Protection Toolkit.

North Staffordshire Combined Healthcare NHS

NHS Trust

Describe the purposes of the processing: what do you want to achieve? What is the intended effect on individuals? What are the benefits of the processing – for you, and more broadly?

The Synertec system will provide a saving to the Trust and its services. It will save both time for individuals that have to print the letters, fold them and put them in envelopes. It will also save money by removing the costs of a franking machine.

The Synertec system comes with a monthly fee for the whole organisation (regardless of how many teams use the system). The system is then charged on a pay as you use basis. These rates are lower than those at which the Trust can deliver the same tasks.

This cost could be recouped (and significantly exceeded) through the eliminating of just one franking machine. The Trust has numerous franking machines (one at most Trust sites) and the need for these would be eliminated with the wide scale introduction of the Synertec system.

Step 3: Consultation process

Consider how to consult with relevant stakeholders: describe when and how you will seek individuals' views – or justify why it's not appropriate to do so. Who else do you need to involve within your organisation? Do you need to ask your processors to assist? Do you plan to consult information security experts, or any other experts?

Stakeholders at the Trust have been consulted. Service leads are very interested in the Synertec solution which has been procured through a framework under the Health System Lead Investment project.

Lead clinicians have been involved in this process/procedures.

The Synertec system has many benefits:

- Realise postage discounts and economies of scale through outsourcing
- Ensure printed and mailed documents are received as quickly as possible
- Provide greater control and traceability over the documents being sent
- Re-design and re-format your documents to allow for clearer communication
- Introduce the facility to distribute documents via email automatically
- Automatically distribute patient correspondence in different formats that

meet NHS England's Accessible Information Standard (AIS) information and communication needs for individual patients and service users
- Allow patients to manage their appointment and communication needs.
- Links with 'Digital by choice' / paperless direction of travel
- Finance strategy (reduced costs)
- Service user strategy (supports improved person-centredness, diversity and inclusion, accessible information standard, improved quality, improved experience)
- Workforce strategy (improved productivity)
- Trust Branding and Quality strategies – supports greater uniformity in use of Trust Branding and latest style, content etc

There is no negative impact on Trust activity envisaged through moving to this system. There are numerous anticipated benefits that support improved activity as below:-

- Clinicians focusing on clinical appointments rather than preparing and printing letters
- Administrative staff able to focus on more value-adding tasks
- Elimination of the need for some administrative staff to finish early to take the post to the nearest letter box (and for clinical staff to then need to 'cover the office/phone'
- Reduction in 'Did Not Attend' wasted appointments (through extension of the project to include 2-way text and email communications)
- Reduction of incidents where documents for other patients get folded into the envelope by mistake

North Staffordshire Combined Healthcare NHS

Step 4: Assess necessity and proportionality

Describe compliance and proportionality measures, in particular: what is your lawful basis for processing? Does the processing actually achieve your purpose? Is there another way to achieve the same outcome? How will you prevent function creep? How will you ensure data quality and data minimisation? What information will you give individuals? How will you help to support their rights? What measures do you take to ensure processors comply? How do you safeguard any international transfers?

The Synertec process does achieve the purpose of saving time and money for the Trust.

The Data Processor shall permit the Data Controller to monitor compliance with the terms of this Agreement, by:

Allowing Data Controller employees or nominated representatives to enter any premises where customer data is held at all reasonable times with prior notice for the purpose of inspection providing such inspection would not (or there is no reasonable belief that it could) result in a breach of the Data Processors own security policies and procedures.

Ensuring there is evidence of an annual self-audit of Information Governance Toolkit performance measures where the Data Processor is required to comply.

There are no international transfers.

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Step 5: Identify and assess risks

Describe source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.	Likelihood of harm	Severity of harm	Overall risk
1. A letter/document is sent to the wrong individual.	Possible	Significant	High
2. The printers at Synertec breakdown.	Possible	Medium	Medium
3. Breakdown of the server.	Possible	Medium	Low
4. Cyber attack	Possible	Significant	High

North Staffordshire Combined Healthcare NHS

NHS Trust

Step 6: Identify measures to reduce risk

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5				
Risk	**Options to reduce or eliminate risk**	**Effect on risk**	**Residual risk**	**Measure approved**
1.	Letter/document sent to the wrong individual – the systems allows you to pull back any documents on the same day by 4.30pm	Reduced	Medium	Yes
2.	The printers at Synertec breakdown – there is other options to send the documents to other production centres.	Reduced	Low	Yes
	Breakdown of the server – information still available in Lorenzo and could be printed locally.	Reduced	Low	Yes
	Cyber attack – still have main data in Lorenzo.	Reduced	Medium	Yes

North Staffordshire Combined Healthcare NHS

Step 7: Sign off and record outcomes

Item	Name/position/date	Notes
Measures approved by:		Integrate actions back into project plan, with date and responsibility for completion
Residual risks approved by:		If accepting any residual high risk, consult the ICO before going ahead
DPO advice provided:		DPO should advise on compliance, step 6 measures and whether processing can proceed
Summary of DPO advice:		
DPO advice accepted or overruled by:		If overruled, you must explain your reasons
Comments:		
Consultation responses reviewed by:		If your decision departs from individuals' views, you must explain your reasons
Comments:		
This DPIA will kept under review by:		The DPO should also review ongoing compliance with DPIA