

## DATA PROCESSING ACTIVITY

The following is a log of data processing activities undertaken by Our Lady's Hospice & Care Services  
(Staff – please refer to Our Lady's Hospice & Care Services Intranet)

Data Type	Purpose	Category of data processed	Categories of data subjects	Categories of Recipients	Location held	Accessible by	Retention period Years <i>(Retention period is measured from last entry)</i>	Third Party Access
<b>SERVICE USERS</b>								
Patient Administration System (PAS) (Electronic)	Healthcare administration	Personal	Patients / Residents Clients	OLHCS Healthcare Workers	Electronic database	OLHCS Healthcare workers Administrators as required	Refer to Healthcare Records below	Acute Hospitals with shared services (i.e. but not limited to, healthcare service delivery / laboratory / radiography) St. James's University Hospital St. Vincent's University Hospital St. Columcille's Hospital St. Michael's Hospital Tallaght Hospital (AMNCH)
Healthcare Record /Information (Adult: 16yr+) (paper and electronic)	Healthcare delivery and continuity of care	Personal & Confidential	Patients / Residents	OLHCS Healthcare workers Administration staff, as required	3 on-site 4 – 10 off-site storage	Healthcare Records Officer	3 on-site 4 – 10 off-site storage 11+ destroy	Other healthcare providers for ongoing and continuity of care (i.e., but not limited to GP/Public Health Nurse / Other Hospital Consultants) Community Pharmacists Dentists* Chiropodists* Insurance Companies* Solicitors* Dublin City Council* <b>Department of Health;</b> <b>Health Information &amp; Quality Authority (HIQA);</b> <b>Health &amp; Safety Authority;</b> <b>Irish Cancer Society</b> <b>National Cancer Registry</b>
Healthcare Record / Information (Adult: 16+) Had blood transfusion (Paper and electronic)	S/A	S/A	S/A	S/A	S/A	S/A	20+ destroy	S/A

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Healthcare Record /Information (Children: 1 - 16yr+) (paper and electronic)	Healthcare delivery and continuity of care	Personal & Confidential	Patients	OLHCS Healthcare workers Administration staff, as required	Medical Records Dept	Healthcare Records Officer	Retain until 25th birthday or 26th if person was 17 at the conclusion of treatment, or 8 years post death. If potential relevance to adult conditions or genetic implications, seek clinical advice on whether to retain the records for a longer period.	Other healthcare providers for ongoing and continuity of care (i.e., but not limited to GP/Public Health Nurse / Other Hospital Consultants) Community Pharmacists Dentists* Chiropodists* Insurance Companies* Solicitors* <b>Department of Health;</b> <b>Health Information &amp; Quality Authority (HIQA);</b> <b>Health &amp; Safety Authority;</b> <b>Irish Cancer Society</b> <b>National Cancer Registry</b>
Cliniscript Dispensing Records (Electronic)	Healthcare delivery	Personal & Confidential	Patients / Residents	Pharmacy Staff	Electronic database	Pharmacy staff Medical staff Ward staff	10	Clanwilliam Health Ltd
Haemovigilance Records (records of blood products dispensed) Paper and electronic	Health & Safety	Personal & Confidential	Patients / Residents	Pharmacy staff	Pharmacy Dept	Pharmacy Staff	30	Irish Blood Transfusion Service
Prescription Register Controlled Drugs Register Drug orders / prescriptions / requisitions / repeatable prescriptions (Paper and electronic)	Healthcare delivery	Personal & Confidential	Patients / Residents	Pharmacy staff	Pharmacy Dept	Pharmacy staff	2+	None
Medicines Information Clinical Enquiry Records (Electronic)	Medicines Information Service	Personal	Other healthcare providers	Pharmacy staff	Electronic database	Senior Pharmacy staff	10+ enquirer data	None

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Palliative Medicines Information service users database (Electronic)	Medicines Information Service	Personal	Other healthcare providers	Pharmacy staff	Electronic database	Senior Pharmacy staff	Indefinitely with consent (Review every 5 years)	None
Keeping in Touch database (Paper and Electronic)	Wholistic care-follow-up bereavement service to family / friends; Follow-up healthcare audits; Authorisation for inclusion on Fundraising database	Personal	Family / friends of deceased patients	Healthcare staff Administration staff Fundraising staff	Electronic database Hard copy in Admissions Dept	Administration staff Bereavement staff Fundraising staff	Indefinitely with consent	None.
Bereavement Files	Psychosocial Intervention	Personal & Confidential	Family / friends of deceased patients	Bereavement Volunteers Social Workers	Bereavement Office	Bereavement Volunteers Social Workers	8+	None
Child Protection Social Work Files (Paper)	Health & Safety	Personal & Confidential	Children	Social Work OLHCS Healthcare workers	Social Work Office (active) Healthcare Records (inactive)	Social Work Healthcare Records Officer	Held in perpetuity	<b>Gardaí</b> <b>Túsla</b>
Safeguarding Vulnerable Persons at Risk of Abuse files (Paper and electronic)	Health & Safety	Personal & Confidential	Residents / Older persons	Designated Officers Social Work OLHCS Healthcare Workers	Designated Officers x 3 (active) Healthcare Records (inactive)	Social Work Healthcare Records Officer	8+ post subject's death.	<b>Gardaí</b> <b>HSE Safeguarding HIQA</b>
PPS Numbers	Healthcare administration Social Welfare administration Medical card applications Referral for	Personal	Patients / Residents	OLHCS Healthcare Workers	Electronic database (Pas) Healthcare records	OLHCS Healthcare workers Administrators as required	Refer to Healthcare Records below	Dept of Social Welfare Health Services Executive Services referral made to (i.e. Ophthalmology / Dental)

	services							
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CCTV Video Footage	Health & Safety / Security	Video footage of OLHCS campus	All who access the campus	Security	Security	Security. DP & FOI Officer / HR if required	28 days and then recorded over	If required... Gardaí Health & Safety Authority
Complaints / Compliments (Paper and electronic) Patient/Residents Experience surveys	Quality monitoring	Personal	Patients/ Residents/ Family	Complaints Officer Quality & Safety related staff Local management	Complaints Officer's Office	Complaints Officer		None
Freedom of Information / Data Protection: copy of released documentation	Legislation compliance	Personal / Confidential	Patients/ Residents / Contractors	Requestor FOI/DP Officer	Locked Office	FOI / DP Officer	3+ destroy	Requester in line with legislation.
"WhatsApp"	Health & Safety during Pandemic period	Personal / Confidential	Patients / Residents / Families	Healthcare staff	Notes from call recorded in patient clinical notes	Healthcare Records Officer	Refer to Healthcare Records	None.
<b>VOLUNTEERS</b>								
Volunteers Database (Electronic)	Volunteer Administration	Personal	Volunteers	Volunteer Co-Ordinators	Volunteers Office	Volunteer Co-Ordinators	For duration of service	ThankQ (CRM support)
<b>STUDENTS</b>								
PPS Numbers	Education Administration	Personal	Students	E&R Staff	E&R Centre	E&R Staff	1+ post end of studies	Quality & Qualifications Ireland (QQI)
Education Centre Database	Education Administration & Venue Hire	Personal & Confidential	Students Venue Hire Leasees	E&R Staff	E&R Centre	E&R Staff	Indefinite with consent	ThankQ (CRM support) Connolly Partners (web support) Mailchimp (Ezine) Myphoner (Telecommunications) External printing Companies (Mailshots)

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On-line Learning Database	Education Administration	Personal	Students	Education & Research staff / Tutors	Education & Research Centre (E&R)	Education Technician	1+ post end of studies	None
Student files: Exam scripts Grades & Assessments Video recordings Application forms Financial records Garda Clearance Certs	Education Administration	Personal	Students	Education & Research Staff /Tutors	Education & Research Centre (E&R)	Tutors / E&R Staff	Varies on document, from 1+ post end of studies up to 15.	Relevant accreditation body QQI relevant exams scripts, grades and assessments with QQI
Student Database (Paper)	Education Administration	Personal	Students	Education & Research staff	E&R Centre			
Student attendance / course booking	Education Administration	Personal	Students	E&R Staff	E&R Centre	E&R Staff	5+ post end of studies	None
Student Invoicing / Payment info	Education Administration	Personal & Confidential	Students	E&R Staff	E&R Centre	E&R Staff	4 years	None
Research data: Patient data collection forms; Patient data	Research	Personal & Confidential	Patients / Residents	Academic Dept of Palliative Medicine (ADPM) staff	E&R Centre	ADPM staff	5+ from completion of research	Anonymised for publication
Research data: Research proposals	Research	Personal	Patients / Residents / Staff	E&R staff	E&R Centre	E&R staff	1+ completion of research	Anonymised for publication
Student Data: Grades; Course work	Education Administration	Personal	Students	ADPM staff	E&R Centre	ADPM staff	5+ post end of studies	None
Student Data: References	Education Administration	Personal	Students	ADPM staff	E&R Centre	ADPM staff	10+ post end of studies	None
Finance & Marketing Database	Education Administration & Venue Hire	Personal & Confidential	Students Venue Leasees	E&R Staff	E&R Centre	E&R Staff	Indefinite with consent	External printing Companies (Mailshots)
Student attendance / course booking	Education Administration	Personal	Students	E&R Staff	E&R Centre	E&R Staff	5+ post end of studies	None
Student Invoicing / Payment info	Education Administration	Personal &	Students	E&R Staff	E&R Centre	E&R Staff	4 years	None

		Confidential						
Data Type	Purpose	Category of data processed	Categories of data subjects	Categories of Recipients	Location held	Accessible by	Retention period Years	Third Party Access
Research data: Patient data collection forms; Patient data	Research	Personal & Confidential	Patients / Residents	Academic Dept of Palliative Medicine (ADPM) staff	E&R Centre	ADPM staff	5+ from completion of research	Anonymised for publication
Research data: Research proposals	Research	Personal	Patients / Residents / Staff	E&R staff	E&R Centre	E&R staff	1+ completion of research	Anonymised for publication
Student Data: Grades; Course work	Education Administration	Personal	Students	ADPM staff	E&R Centre	ADPM staff	5+ post end of studies	None
Student Data: References	Education Administration	Personal	Students	ADPM staff	E&R Centre	ADPM staff	10+ post end of studies	None
CONTRACTORS & SUPPLIERS								
Tender Documentation	Contract selection	Confidential	Contractors	Head of Non-Clinical Services / Procurement Manager / Selection Panel	Non-Clinical Services Dept / Procurement Dept	Head of Non-Clinical / Procurement Manager	4+ post award of contract	None
Tender Documentation Unsuccessful tenderers	Contract selection	Confidential	Contractors	Head of Non-clinical Services / Procurement Manager	Non-clinical Services Dept / Procurement Dept	Head of Non-Clinical / Procurement Manager	6mos post contract award	None.
Contract & Contract Management Files	Contract Monitoring	Confidential	Contractors	Head of Department relevant to where contract service is supplied	Non-Clinical Services Dept	Head of Non-Clinical / Procurement Manager	2+ post completion of contract	None
Past Employees / Employee Applicants / Point of contact								
*Competition Data (See below)	HR & Manpower Administration	Personal & Confidential	Applicants	HR, Manpower Personnel & Managers	HR Department	HR Personnel	2 years	None
Pre-employment fit/unfit confirmation (preferred candidate who did not commence)							3 years	None

Garda Vetting Risk Assessment for preferred candidates which result in offer withdrawal							1 year	National Vetting Bureau
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*Competition Data Includes: (Shortlisting criteria and documentation, Invitation to Interview letters, Reminders, Cancellations, Copy of interview documentation, Regret letters, References, Success letters, Appeals Correspondence, Completed Application Forms and Info relating to Candidates not qualified or short listed, Completed Application Forms and Info relating to Candidates short listed but not successful at interview or are successful but do not accept offer. In the case where a post or job offer is withdrawn from a candidate, the withdrawal letter, and any appeal details/report will also be held on the file)								
Panels	HR & Manpower Administration	Personal & Confidential	Job Panellists	HR, Manpower Personnel & Managers	HR Department	HR Personnel	OLH&CS panels expire after one year	None
Speculative applicants	HR & Manpower Administration	Personal & Confidential	Speculative applicants	HR & Manpower	HR Department	HR Personnel	One year (this period is communicated to applicant)	None
Personnel Files (past)	HR & Manpower Administration	Personal & Confidential	Past Employees	HR Department	HR Department	HR Personnel	Non superannuation data 7 years from date of resignation/retirement  *Superannuation data retained indefinitely. (currently under review)	To relevant superannuation scheme – consent not required as part of HR's purpose to administer employment
*SUPERANNUATION data: The following Superannuation data must be retained within Current and Past Employee files as stated under minimum retention period as it impacts on pension benefits; Retirement Forms, PPS numbers, Birth, Marriage, Cert & Death Certs, Pension Adjustment Order, Divorce Certs, Confirmation of Service, Calculation Sheets (3 in 10), Confirmation of Benefits, HSE Checklist, Probate, Spouse/widows/orphans/children ceasing full time education, Refund File, Letter/Application form requesting refund, Voucher/Cheque prepared for payment of lump sum, Preserved Benefit, Requests & replies re Verification of service, Copies of cheques, Copies of receipts, Request for statement, Change to Employee Terms and Conditions, Temporary Appointment (originally Acting Up), Career Break form Resignation/Leaving form, Pension Dependents Application form/authorisation, Parental Leave Authorisation, Special Unpaid Leave form, any unpaid leave authorisation, Flexible Working Application form & authorisation, Maternity leave, Injury Grant Calculation form if not fully repaid prior to retirement, Temporary Rehabilitation Remuneration (TRR) and Critical Illness Protocol (CIP) authorisation, Information relating to Increment authorisation, Report, Pay Review Request authorisation, Change Of PRSI Class Request & authorisation.								

**Third Party Access:** Legislation in place to sanction release when necessary (Refer to Appendix 1) / \* Consent of patient required for release.

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SAP Database (Electronic)	HR Management system	Personal / Confidential	Employees	HR Staff/Payroll	OLHCS	All (Password controlled for access levels)	Indefinitely per legislation and superannuation requirements	Hosted by Health Services Executive (Ireland)
Occupational Health Files	Occupational Health & Safety	Personal / Confidential	Employees	Occupational Health staff	OH Department	OH Staff	40 years from date of resignation	None
Incident Report Forms	Health & Safety	Personal / Confidential	Patients / Residents / public / employees / contractors	Risk Manager	Risk Manager's Office	Risk Manager	10 years post Statute of Limitations	OLHCS Insurance Company
First point of Contact	Health & Safety / Legislation	Personal	Employees first point of contact	HR Staff	HR Department	HR Staff	As required under legislation	As required under legislation

### Fundraising:

Our Lady's Hospice & Care Services Fundraising & Communications Department collects information from supporters in a number of ways. We do so on different legal bases to conform with Data Protection legislation.

FUNDRAISING								
Data Type	Purpose / Legal Basis	Category of data processed	Categories of data subjects	Categories of Recipients	Location held	Accessible by	Retention period Years	Third Party Access
Fundraising Database (Electronic / Paper)	Fundraising Administration (Legitimate Interest)	Personal	Donors / Supporters	Fundraising staff	Fundraising Department	Fundraising Staff Volunteers	Indefinite with consent	<ul style="list-style-type: none"> <li>• Printing and Fulfilment</li> <li>• CRM database</li> <li>• Digital services</li> <li>• Software providers</li> <li>• Data analytics</li> </ul>
Processing donations	To enable funds to be transferred from donors to OLHCS	Name – nature of donations; amount; account data (incl credit/debit card details where applicable)	Donors	Fundraising Staff	Fundraising Department	Fundraising staff / Finance staff	6 years after last donation	



	(Legitimate Interest)							
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Recording donations	To maintain records of funds raised directly via Revenue Commissioners (Legitimate Interest / Financial legal obligation)	Name; address & other contact details according to preferences; PPSN; nature of donation/amounts; unique ID (DEN)	Donors	Fundraising Staff	Fundraising Department	Fundraising staff / Finance staff	6 years after last donation	
Donor Affinity Management	To maintain a complete record of donations rec'd from individual campaigns / events planning and strategy (Legitimate Interest)	Name; address & other contact details according to preferences; nature of donation/amounts; DEN	Donors	Fundraising Staff	Fundraising Department	Fundraising Staff	Indefinite with consent	
Postal communications Telephone communications E-mail / Text (SMS)	Legitimate Interest Consent	Name; postal address for dissemination of newsletters / Fundraising Campaigns communication. Mobile / E-mail details	Public	General public	N/A	N/A	N/A	
Donor Participation in Fundraising events	To record donors' participation in fundraising events. (Legitimate Interest)	Signatures; Names	Donors	Fundraising Staff	Fundraising Department	Fundraising Staff / Volunteers	2 years following last participation, or upon request.	

Some of the recipients mentioned above may transfer your personal data outside of the EEA when performing services for us. However, we have taken care to ensure that there are some safeguards in any such instance to protect your data. For example, Mailchimp will store your e-mail address in the USA, but it is a signatory to the Privacy Shield. Equally, Facebook may receive your e-mail address to see if you are a member of that network and use that information to identify others of their members who might be receptive to our advertisements on platform.

All contact details are maintained for the retention periods outlined above, unless you choose to 'unsubscribe'. A certain minimal amount of data may be retained in order to record your 'unsubscribe' request, but it will not be used for whichever communication you indicated you no longer wished to receive.

If you have any queries or concerns regarding the Fundraising of the Data Processing Register, please contact us as follows: Fundraising & Communications Department, Our Lady's Hospice & Care Services, Harold's Cross, Dublin D6W RY72.