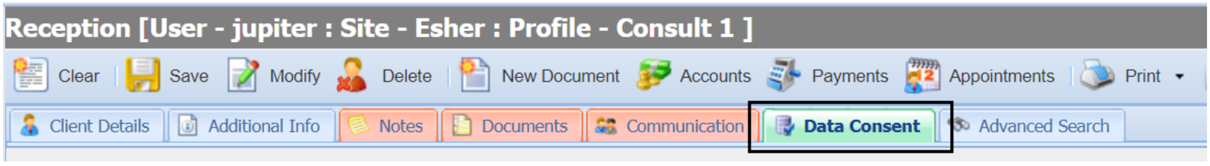
GDPR

New and Current Changes

Merlin 2.3.53

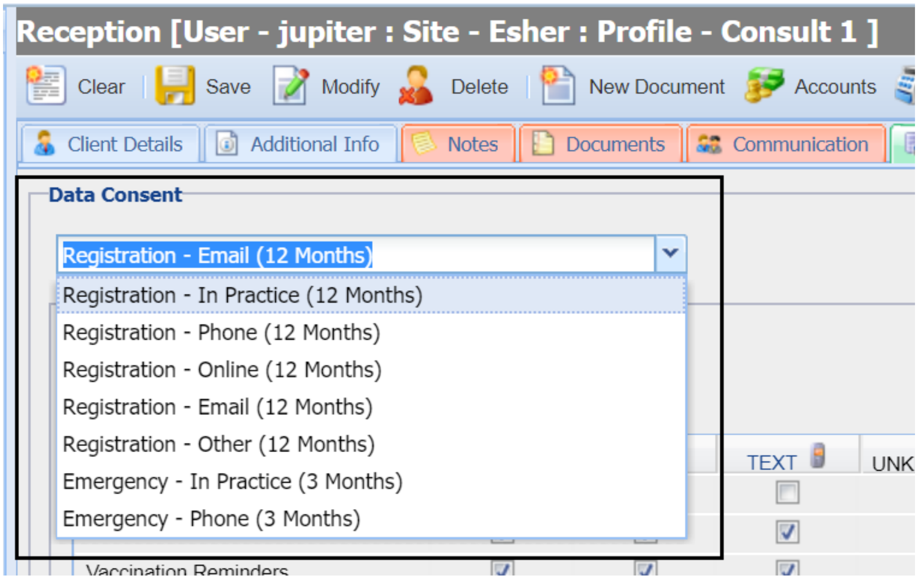
In the latest version of Merlin v2.3.53, we have added several features to assist your practice in GDPR compliance, alongside your own practice policies and procedures.

The workflow has now changed for the Client Registration Process. When registering a new client, once the client's address and contact details are entered, the user is then automatically taken through to the Data Consent tab.



The Data Consent Tab colouring will also now indicate when consent is current (green), due to expire (yellow) or has expired (red).

In this screen the Communication Consent dropdown should be used to select the client's method of registration and the associated length of their data consent.



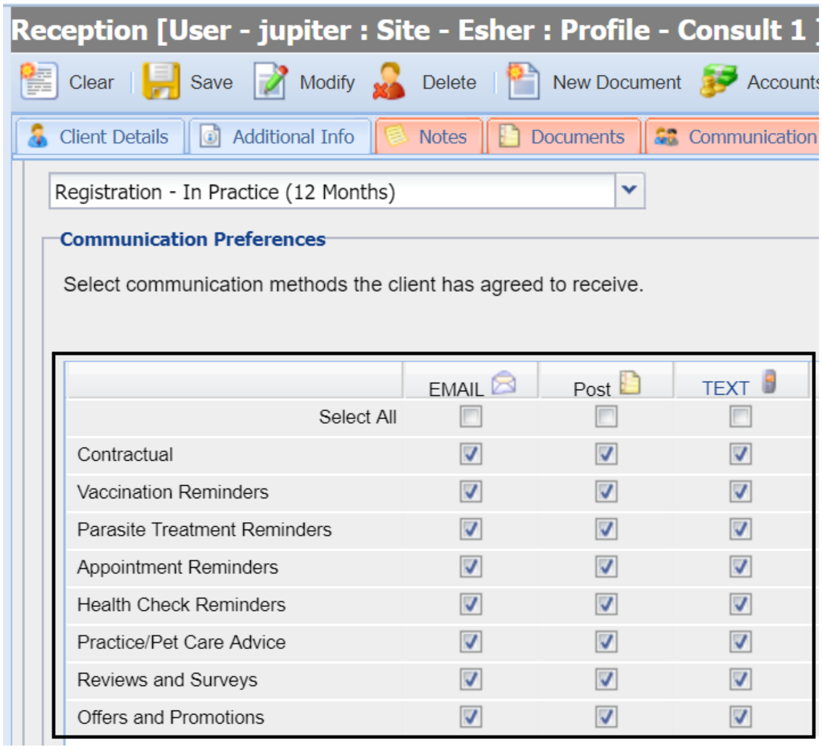
Communication Preferences

Below here the Communication Preferences grid specifies several Communication Types and Channels, allowing the practice to opt the client in for specific communications only.

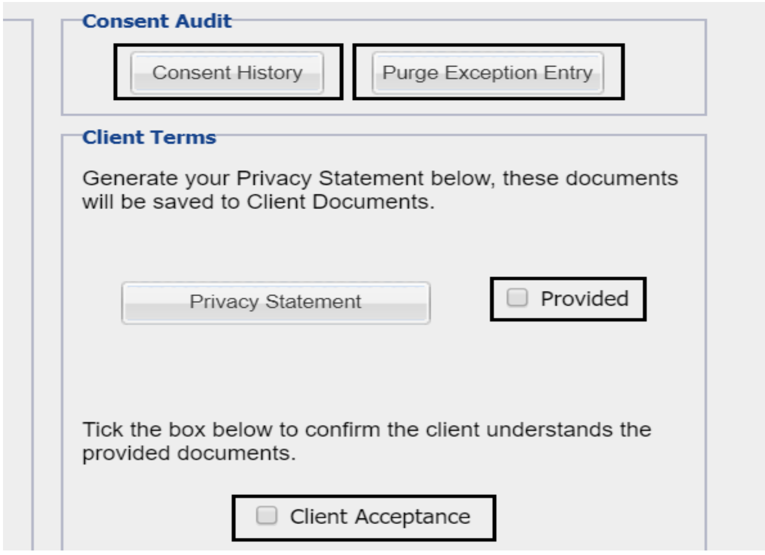
Several entries are listed here as default Communication Types; Contractual, Vaccination Reminders, Parasite Treatment Reminders, Appointment Reminders, Health Check Reminders, Practice/Pet Care Advice, Reviews and Surveys, and Offers and Promotions.

Default Communication Channels available are Email, Post, and Text.

It is possible to amend, hide or add new Communication Types and Channels within the PMS, which is detailed later in this document. Preferences should be selected, initialed and saved here to submit them to the Consent History, which can also be accessed within this screen.



The Practice Privacy Statement will then be generated. Checkboxes on the right-hand side of the screen allow the user to confirm they have provided the document, and convey Client Acceptance, with the user's initials then auto-completed into the confirmation box.



The Purge Exception Entry icon allows the practice to specify a reason for which this client's record should be retained on the PMS in the event of a data Purge. The ability to run a data Purge will be available shortly in a future release of Merlin.

Notes can also be made in the window which follows selecting the Purge Exception Entry icon, enabling the practice to keep a thorough record of their reasons for ensuring data retention. Purge Exception Reasons are manually entered and maintained by the practice. This is detailed later in this document.

With the Data Consent information in place, the patient should then be registered.

Administration

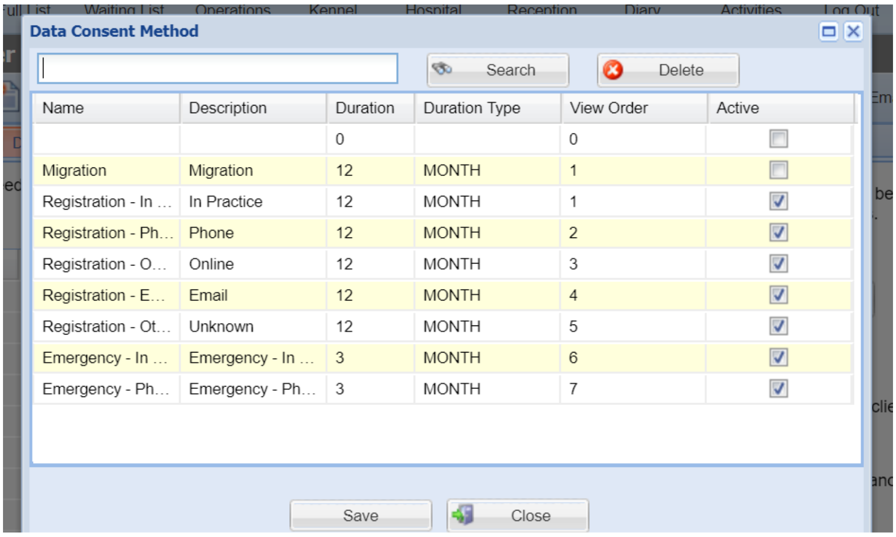
Data Consent Methods

With regards to the administrative set-up of these options, Data Consent Methods can be amended and configured within Administration > Clients > Data Consent Method.

To add a method, tab into the top line, which will turn the line orange, and enter the details of the method you would like to configure.

Tab along to complete all the details required. Finally, enter a number in the View Order column, check the Active box, then select Save to submit the method.

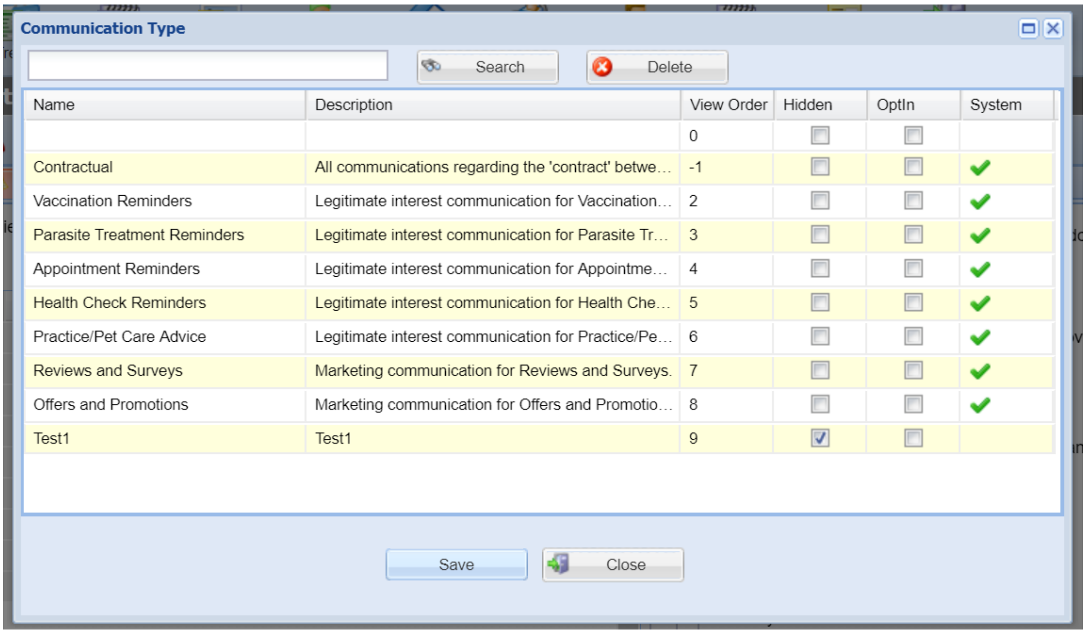
To update an existing method, for instance to extend the consent period, left click the area to amend, make the amendments and then click Save to commit the changes.
Note that updating an existing Data Consent Method here will not update existing client records and data consent preferences.



Name	Description	Duration	Duration Type	View Order	Active
		0		0	☐
Migration	Migration	12	MONTH	1	☐
Registration - In …	In Practice	12	MONTH	1	☑
Registration - Ph…	Phone	12	MONTH	2	☑
Registration - O…	Online	12	MONTH	3	☑
Registration - E…	Email	12	MONTH	4	☑
Registration - Ot…	Unknown	12	MONTH	5	☑
Emergency - In …	Emergency - In …	3	MONTH	6	☑
Emergency - Ph…	Emergency - Ph…	3	MONTH	7	☑

Communication Types

Communication Types can be amended, hidden or added to via Administration > Clients > Communication Type. To amend a Communication Type, left click the information you wish to edit, then make any changes necessary before clicking Save.



In the same screen, check the box within the column labelled Hidden, to hide any unnecessary Communication Types.

To add a Communication Type, tab into the top row to enter a Name, then tab again to enter a Description.

Use the View Order column to specify where you would like this Communication Type to appear within the Communication Type and Channel grid of the Data Consent tab.

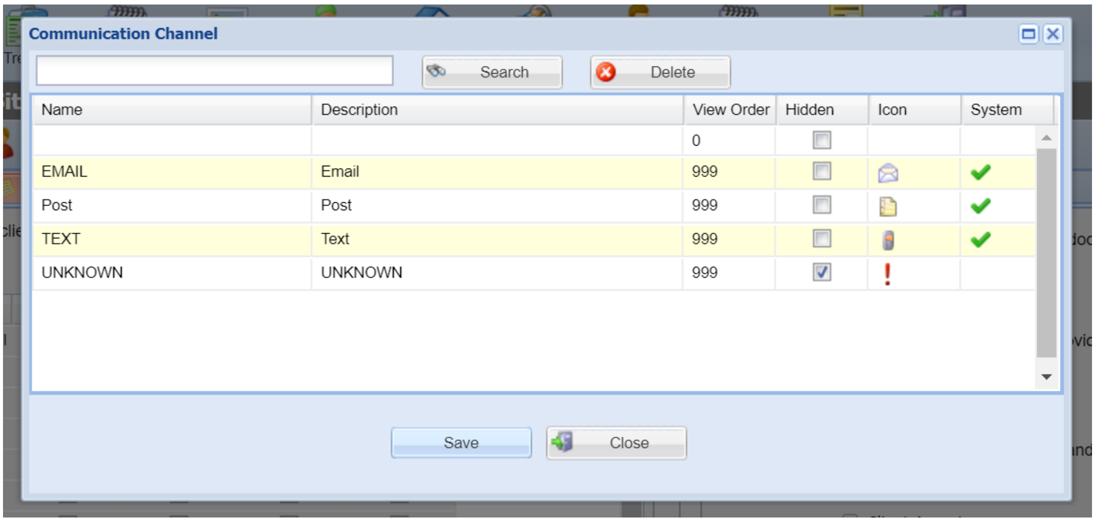
Specifying a lower number will mean the Type is seen higher up the list, with a lower number entering this Type further down the grid.

Finally click Save at the bottom of this window to submit the new information to your PMS.

Communication Channels

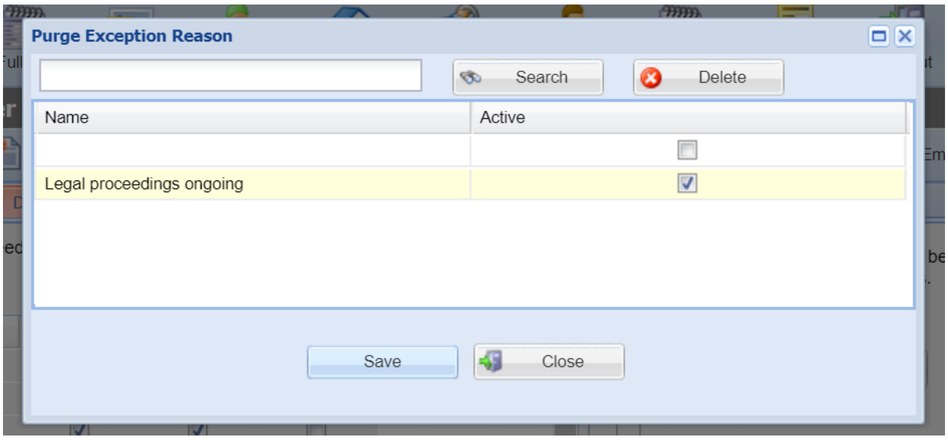
Select Administration > Clients > Communication Channel to amend, hide or add to possible channels of contacting the client.

Use the same process detailed above to make changes here. An Icon column is also available for Communication Channels. Select the appropriate Icon before committing changes to the PMS as above.



Purge Reasons

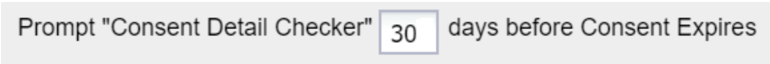
Similarly, Purge Exception Reasons can be maintained via Administration > Clients > Purge Exception Reason. Enter a Name of reason here and ensure the Active box is checked to enable the reason to be used. Click Save to commit the information to the PMS.



Client Detail Check Prompts

Checking and updating Data Consent is now made easier with the addition of the Data Consent check to the existing Details Checker Prompt.

Within Administration > Settings > GDPR, use the Setting labelled ‘Prompt "Consent Detail Checker" x days before Consent Expires’ to input the number of days prior to consent expiring, for the PMS to prompt the user to recheck and confirm data consent.

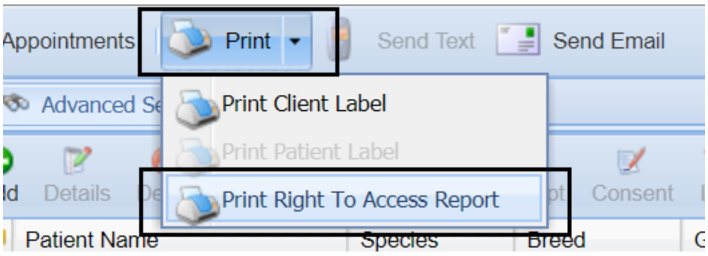


In addition to the Client Detail Checker Actions (Update Details, Confirm Details & Ask Later) listed within the prompt in Merlin 2.3.53, the Client Detail Checker Form Layout has also changed to include details on the Communication Preferences you hold for the client.

Reporting

There are several changes in terms of Reporting functionality. In line with the new regulations, the practice must be able to quickly present the client with details of all the Personally Identifiable Information (PII) they hold for them.

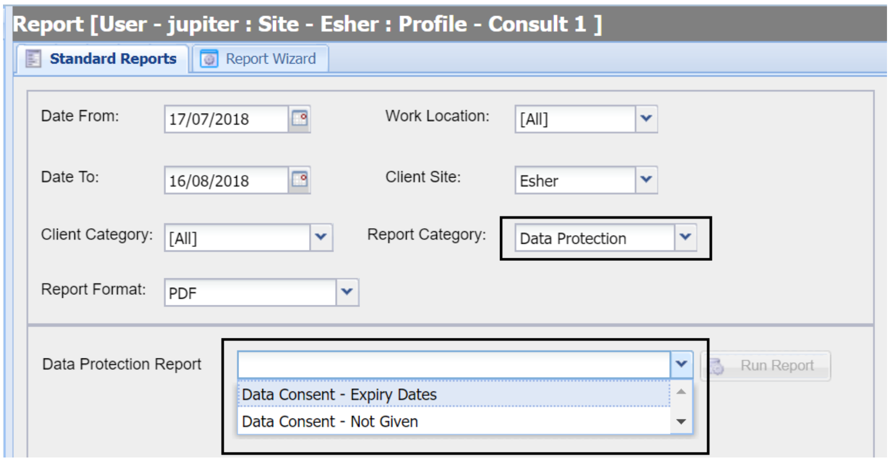
From the client screen, you can now generate a Right to Access Report which displays all this information. In Reception, with the relevant client selected, select Print, then select Print Right to Access Report.



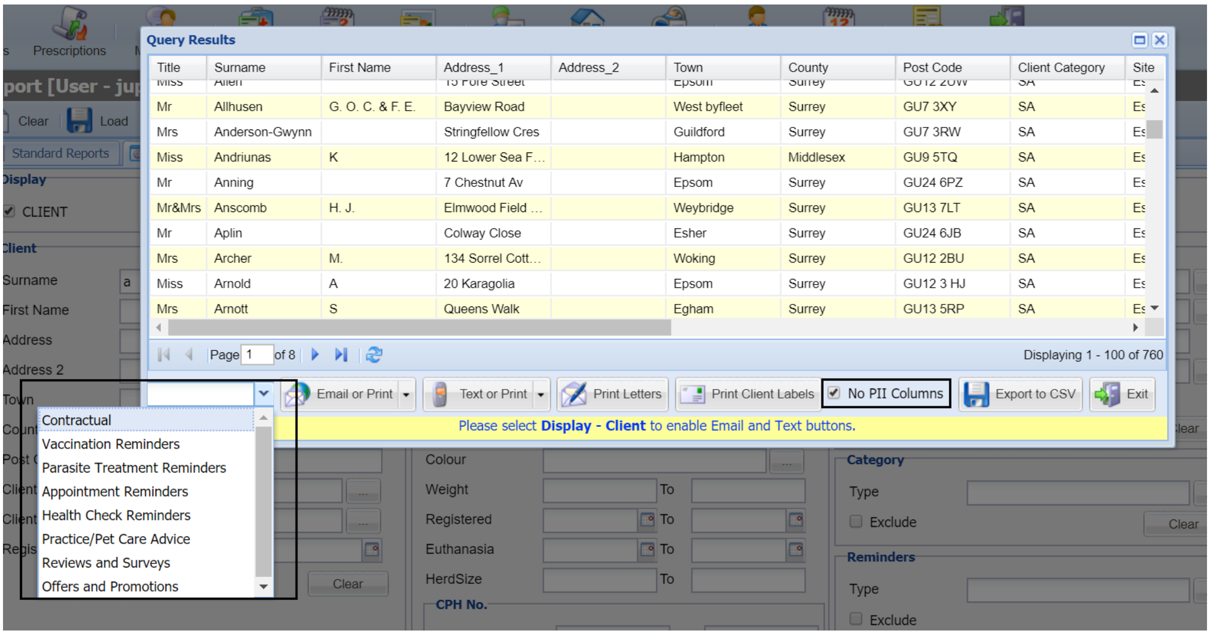
It is important to note here that everything is displayed on this report including client pop-up notes. It is now possible to rectify and amend these notes, in line with the GDPR’s Right to Rectification. Simply enter the client’s Note tab, select the note to edit, make changes and then click Save.

There are also 2 new Standard Reports which can be found under Utilities > Reports > Standard Reports.

Within the new report category of Data Protection, the ‘Data Protection > Data Consent - Expiry Dates’ report will generate a list of all clients with consent due to expire between the reporting dates entered, and ‘Data Consent - Not Given’ will generate a report listing the clients you do not have consent for.



Additional Filters are now present within the Report Wizard tab. For example, you can now filter a report by Communication Type, using the dropdown within the results list. When using the List feature, it is also now possible to run a report without PII which is particularly useful for exporting data out of the PMS.

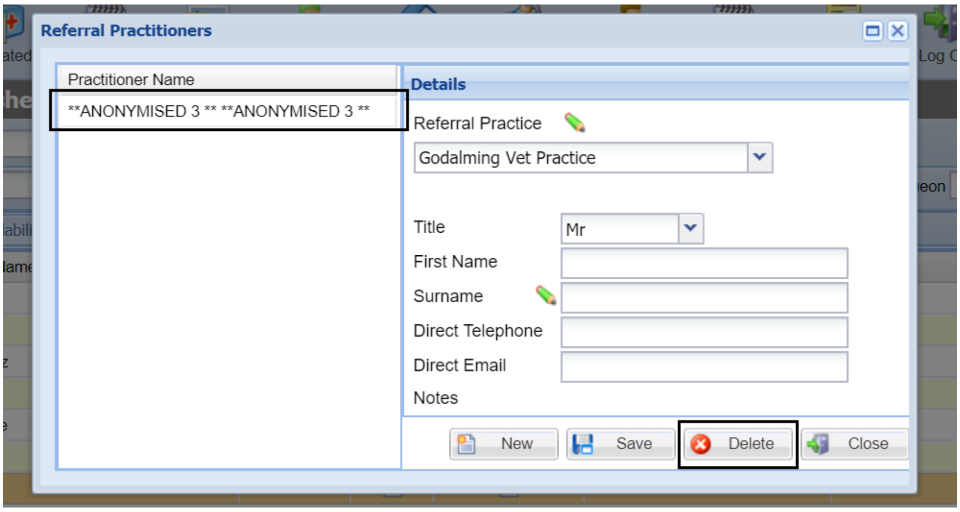


Several smaller system changes have also been implemented in order to support the practice in their GDPR compliance.

The Patient Label generated within the client screen now has the client details removed, as they are not necessary on there. If both the patient and client information is required, then both labels will need to be printed. This assists with the principle of Data Minimisation.

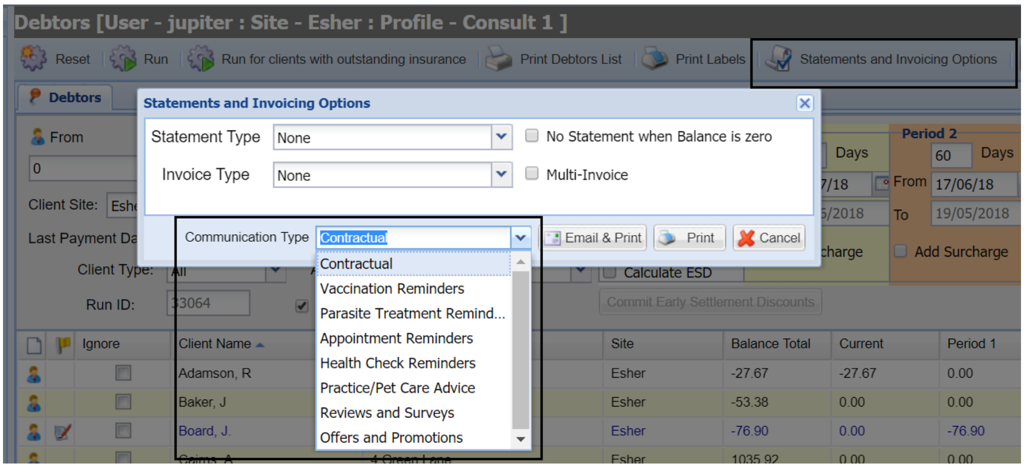
Terminology within the PMS has also changed. Where 'Delete' was present within the system, to clarify that the action being performed is a 'soft delete', delete has now been changed to Deactivate. For instance, within the client's record, above the tabs, you will notice the Deactivate icon, in the place of deletion.

When working with Referral Surgeons, the Delete icon will only perform a soft delete, and anonymise the Surgeon's details if these are in use. Under Administration > Patients > Referrals > Referral Practitioners, Referral Surgeons can be anonymised. If the surgeon is in use, a prompt will display stating 'Practitioner has been anonymised as it was in use'.

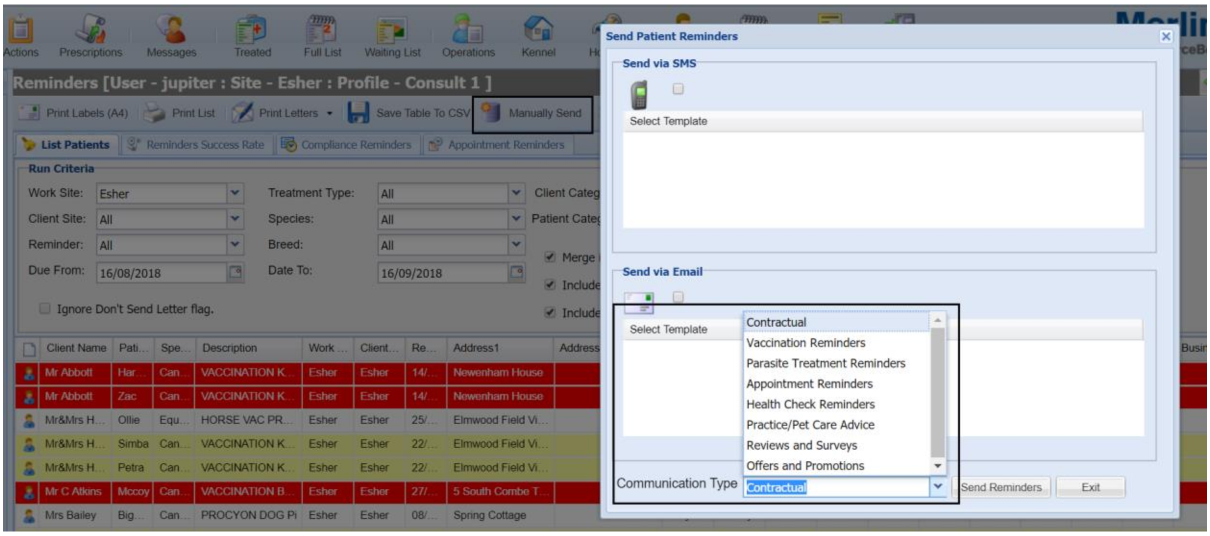


A further change is the ability to filter by Communication Type in several areas of the PMS. A dropdown box has been added from which to select the Communication Type for the clients you would like to view.

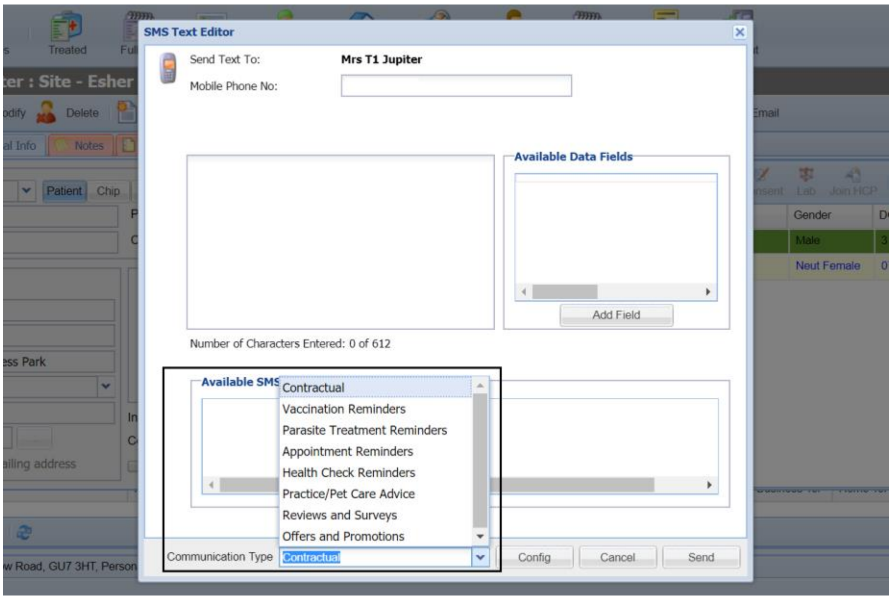
Within the Debtors screen, click Statements and Invoicing Options, to send communication to your Debtors filtered by Communication Type.



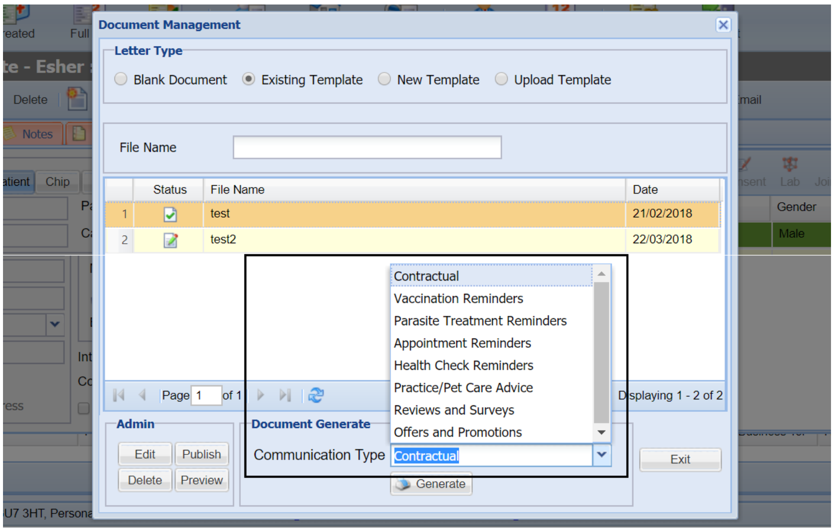
When running Reminders, there is now a dropdown box from which to select the communication type, under the Manually Send icon.



Similarly, when manually sending an SMS/Email directly from the client record, a dropdown box is presented from which to select the Communication Type.



It is now also possible to specify a Communication Type using the dropdown box within the Client Documents area.



The Communication Types displayed in these areas are dependent upon Contact Preferences selected in Reception for the selected client.

With regards to Data Retention, as it is now necessary to delete any unnecessary data from your PMS, several features have been implemented to assist your practice with this. These tools are found under Admin > Settings > GDPR tab.

A set of default time intervals will be pre-set for this category's Settings but can be personalised according to your own practice procedures and policies.

'Clear Audit over x months' will, at the specified interval, clear the Audit Log which records all actions carried out on the system, including actions such as the updating of a client's record. In this area the practice can specify the interval at which to clear these logs.

'Clear Login History over x month' clears the system's audit of log-in records at the specified interval, ensuring no unnecessary data is retained.

The setting labelled 'Clear Error Logs over x months' will delete all error logs from the PMS at the specified interval. This is because PII belonging to your clients could be held within the Error Log, if an error message appeared whilst within a client record.

It is important to note that the setting labelled 'Clear Internal Messages after x months' will also remove internal messages linked to a client, if their client file is then subsequently Purged in future releases of Merlin.

If selected, the checkbox labelled 'Clear "Archived" Referral Surgeon' will clear the Archived Referral Surgeon details held within the system.