

Dunboyne Dental Care

Data Protection Statement

(Updated May 21st 2018)

Dunboyne Dental Care is committed to upholding strict data protection protocols in accordance with the General Data Protection Regulations (2018)

We only process manually maintained data sources in this business. We are not required to register with the Data Protection Commissioners

Any printout of data we need for our records from an online source not held by ourselves, e.g. Welfare Partners (Dental Benefit), DTSS (Medical Card System), will be from a temporarily held source which is deleted after printing and will not be held or stored on computer.

Our responsibilities are listed below

Fair obtaining

- At the time when we collect information about patients, they are made aware of the uses for that information.
- Patients are made aware of any disclosures of their data to third parties if/when this should become necessary.
- Our data-collection practices are open, transparent and up-front.

Purpose specification

- We have a clear purpose (or purposes) for which we keep personal information. **This will involve mainly the creation and maintenance of clinical record cards which will contain amongst other things, Name and Address, phone numbers, PPS numbers/Medical Card numbers with expiry dates, clinical details of each attended appointment, written Medical History Questionnaires. Email addresses are not requested** but patients may contact us by email. Any automatically saved email addresses will not be used for communication with any patient except to reply to a contact by patients requesting information or to make an appointment
- All patients on our "database" are clear about this purpose.
- We are **not required to register** with the Data Protection Commissioner.
- The responsibility has been assigned for maintaining a list of all data sets and the purpose associated with each, the responsible person is **Dr Robin Jones**, who may also give directions to other staff members in the assistance of this maintenance

Use and disclosure of information

- There are defined rules about the use and disclosure of information, the record cards so created will only be used for the use of the practice and all clinical notes will be inserted by the treating dentist at the time treatment is given on each appointment.
- All staff are aware of these rules.
- All patients will be made aware of the uses and possible disclosures of their personal data. Permission to use data can be revoked at any time in writing by any patient.
- The consent of the individuals will be obtained before most disclosures. **It is a legal requirement to disclose clinical records to Professional Indemnity bodies on request in cases of negligence that is being defended by such bodies.**
- We may be required to disclose to the following bodies without reference to any individual, on a legal basis: **The HSE (Medical Card Scheme), Gardai, Court system.**

- All other proposed disclosure only with the individual's knowledge and permission if necessary.

Security

- All record cards are kept away from view by all patients and visitors to the practice.
- The person responsible for the development and review of these provisions is **Dr Robin Jones**.
- As far as possible, these provisions are appropriate to the sensitivity of the personal data we keep.
- Our computer is password-protected but it does not hold any personal details about individuals at all.
- Our computer is turned off at night and is protected by effective anti-virus and firewall software which is automatically updated. Record cards are secured away from unauthorised sight.

Adequate, relevant and not excessive

- We collect all the information we need to serve our purpose effectively, and to deal with patients in a fair and comprehensive manner should the need arise.
- We will have checked and made sure that all the information we collect is relevant, and not excessive, for our specified purpose.
- If a patient asks us to justify every piece of information we hold about him or her, we can do so.

Accurate and up-to-date recording

- We check our data for accuracy at every entry of the information which will contain a verifiable record of each attendance for clinical/non-clinical interaction.

- We will take reasonable steps to ensure updating of patients details such as address, phone numbers and Medical History, (at each examination appointment at 6 monthly/12 monthly intervals)

Retention time

- All items of information are to be retained indefinitely and only updated when information changes.
- We are aware of any legal requirements on us to retain data for a certain period. **No record card is disposed of, even after a patient is deceased.** If this policy should change, then an entry of this will be inserted in this Data Protection Policy before any disposal is made, a record of which will be made.

The Right of Access

- The person responsible for handling access requests is **Dr Robin Jones**.
- **Dr Robin Jones** will determine, for each case of access request, what procedure and what information can/will be released. All requests for access must involve the knowledge of **Dr Robin Jones** who may delegate a course of action to facilitate compliance with GDPR and this Policy. This will guarantee compliance with GDPR. Any requests must be in writing.
- **All patients may rescind their permission for us to record any information about them in writing at any time. It must be understood that we may then be in the position of being unable to verify a patient's right to access the two State Dental schemes or to provide treatment due to a Medical History Questionnaire being withheld.**

Registration

- We **do not** need to register with the Data Protection Commission.

- If registration is required in the future, the registration will be kept up to date. Any registration necessary will accurately reflect our practices for handling personal data.
- **Dr Robin Jones** is the named individual responsible for meeting our registration requirements.

Training & Education

- All members of the practice have good knowledge of what is expected of them in relation to Data Protection.
- All our staff are aware of their data protection responsibilities - including the need for confidentiality which is paramount.
- Data protection included as part of the induction process for our staff

Co-ordination and Compliance

- The data protection Officer and compliance person is **Dr Robin Jones**
- All staff are aware of his role.

There will be a formal review by the data protection officer of activities within our practice which will be performed annually or when any changes are necessary if a shorter period.

Signed **Dr Robin Jones** (Web version, signature on practice copy)

Data Protection Officer for Dunboyne Dental Care