

# Citygate Specialist Dental Clinic Privacy Policy Statement

## 1. Obtaining personal information

It is important to obtain, use and store information about you, your general and your dental health in order to provide efficient and safe dental care, reducing the risk of injury or other damage to your health. This personal data includes:

- Personal details such as your name, age, address, telephone numbers, email address, gender, marital status
- Your doctor and relevant Medical Consultant(s), your general dental practitioner (referring dentist)
- Your medical and dental history
- X-rays, clinical photographs and study models (please note that in order to complete some treatments that your study models may need to be sent to an external lab but that your details will be anonymised and remain unidentifiable)
- Information about proposed treatment, options, consent to treatment, consent to records being used, treatment provided and its cost
- Notes of conversations or incidents that might occur for which a record needs to be kept
- Any correspondence with other healthcare professionals relating to you including agreed referrals to other healthcare professionals and bodies with which you have an agreement via a dental or medical insurance policy

Your personal information is stored on computer. Your personal data is retained in your digital record, any hard copy data received relating to you is scanned to your digital chart and disposed of using the appropriate measures.

We will update your personal data regularly, including your medical care, to keep it relevant. We ask that you please inform us of any significant changes, such as a change of address or other contact details, at your earliest convenience. It is important to know that the collection, use or possible disclosure of this data may be crucial to our ability to safely provide you with the care you require; without your agreement to this process it may not be possible to undertake treatment.

You have access to a copy of your personal data upon written request and the right to have data rectified if incorrect.

## 2. Personal data is kept for specified, explicit and lawful purposes

Your personal data is obtained, kept and used primarily for the purpose of providing you with efficient and safe healthcare at all times. Staff within the practice will have access to the data on a 'need-to-know' basis to ensure you receive the highest standard of care. In the course of your care, members of the dental team may access your records:

- To prepare for and to complete your dental care
- To identify and print a prescription
- To generate a work certificate
- To type, if dictated or print a referral letter to another healthcare professional
- To open correspondence or any other documents from other healthcare professionals
- To print or photocopy your records if you instruct us to forward them to another healthcare professional
- To collate, print, photocopy and post insurance or medico-legal reports.

It is practice policy to send you an automated email and / or automated phone call of when your appointment is scheduled. This reminder is sent to you via our autoremind system. This is necessary to ensure the provision of dental treatment.

The autoremind system is in place to: ensure that your Citygate Specialist Dental Clinic experience is both efficient and comfortable. The benefits of this system are that you can expect to receive an email seven days prior to your scheduled appointment(s) to remind you of your appointment time and date, this link confirms your appointment. If you do not confirm via the email link, you will receive an automated voice message asking you to press a number to confirm your appointment. However, if you would like to reschedule your appointment, please let us know a minimum of three working days in advance of your appointment as appointments cannot be cancelled or rescheduled via the auto-remind system. As always, patients are welcome to contact the clinic directly in advance of these reminders to confirm their appointments.

## 3. Personal data is only used and disclosed for the purpose of your care

All members of the dental team adhere to the practice's Code on Confidentiality in compliance with the Data Protection Acts, 1988 and 2003, and the Dental Council's Code of Practice relating to Professional Behaviour and Ethical Conduct, 2012.

Any disclosure of personal data, without your consent, can only be done for specified, legitimate reasons (8 (a-h), Data Protection Act, 1988; Section 10, Dental Council's Code of Practice relating to Professional Behaviour and Ethical Conduct, 2012).

Access to your personal data is on a 'need-to-know' basis. This prohibits the release of your information to a spouse, partner or family member without your explicit consent. A guardian or carer may have the right to access information in the case of vulnerable adults or those with diminished mental capacity. A parent or guardian will have access to your personal information if you are less than 16 years of age.

A copy of your dental records will be transferred to another practice or healthcare professional upon your written request.

Your consent will be sought before the release of any data to other healthcare professionals and then only the relevant part of your records will be released. All healthcare professionals are required to treat your personal data to the same standard of privacy as outlined in this statement.

Your consent will be sought in the case of:

- A report to dental insurance company
- A medico-legal report
- Any documentation relating to a "third party" Dental Scheme (e.g. Company dental benefit forms, Dental or Medical policies relating to your treatment and your health insurance provider)

There are certain activities where patient information may be used but where the

- Information is anonymised, eliminating patient identification:
- Teaching
- Continuing Professional Development. Case studies are a very useful learning tool
- Quality Assurance/Internal audit. Auditing is a necessary tool in assessing and assuring the quality of your care
- Research

If your dentist (Dr Seamus Sharkey, Dr Jennifer Kearney, Dr Micheal McAuliffe, Dr John Browne, Dr Jennifer McCafferty or Dr Siobhan Lucey) should cease practice or should die while still a practicing dentist, the dental team will be guided by the Dental Council's Code of Practice relating to Professional Behaviour and Ethical Conduct in informing you, safeguarding your personal data and ensuring continuity of care where possible.

Every effort is made to ensure disclosed personal data is accurate and transferred securely.

## 4. Personal data is kept safely (Safeguards)

The senior administrative coordinator is responsible for data security in this practice and will act in a data protection lead capacity and will fulfil any data related requests.

Obtained personal data is accessed on a 'need-to-know' basis and thereafter, is stored securely:

- There is no access for unauthorised persons to manual records, fax machines, computers or computer monitors within the practice.
- The dental team is trained in the secure use of fax machines, email and the internet
- The dental team is compliant with the practice's security measures
- Manual records are stored under lock and key, along with any data being backed up using secure and encrypted drives and being strictly retained by key personnel only
- The practice premises is locked and alarmed when unoccupied
- The practice software is legally owned
- The practice software is updated regularly and password protected
- Software security is audited
- All clinical, financial and administrative records are backed up off-site daily by the clinic manager and by one of the principal dentists
- A contract for the security of off-site records is in place between Uni-tec (our IT company) and MacPractice (our dental software provider)

The data protection lead is responsible for dealing with any incident where personal data has been put at risk of unauthorised disclosure, loss, destruction or alteration. Management of any breach incident will comply with the advice of the Data Protection Commissioner (Personal Data Security Breach Code of Practice).

#### **5. Personal data is kept accurate, complete and up-to-date**

A staff member will review your personal information with you on a regular basis to ensure we hold accurate, high quality records for you. Any changes to your personal details, your medical or dental status will be recorded in your records. We ask you to let us know of any changes in contact details at your earliest convenience.

#### **6. Personal data is adequate, relevant and not excessive**

Every effort is made to ensure that the information we collect and retain for you is in keeping with our aim to provide you with an efficient service and to care for you safely. We will explain the purpose of any information sought if you are not sure why.

#### **7. Personal data is retained for no longer than necessary**

We retain all adult records for 8 years after the last treatment. In the case of children and young adults, the records are kept until the patient's 25th birthday; or their 26th birthday if the young person was 17 when they finished treatment. If a patient dies before their 18th birthday, records are kept for 8 years.

All records are disposed by a secure, certified, method of destruction (Dental Council Code of Practice relating to Professional Behaviour and Ethical Conduct, 2012).

#### **8. Your rights**

You are legally entitled to a photocopy of your personal data upon written request. As well as a right of access you also have the right to have any inaccuracies in your data rectified and to have the data erased. You will be provided with a photocopy of an x-ray in response to an access request. As outlined by the Data Commissioner excessive data requests may have a fee attached, with the fee being dependant on the level of the request.

All written requests should be addressed to:

**The Data Protection Lead,  
Citygate Specialist Dental Clinic,  
Citygate,  
Mahon,  
Cork. T12 T3HC / nuala@citygatedental.ie**

Your request will be dealt with in a timely manner.

It is your right to have your name removed from all practice marketing information including 'maintenance and review' recalls if you do not consider this information to be in your best interest. If you wish to be removed from our appointment emailing/call service or our newsletter/mailling lists please advise a member of our front of house team.

If you do not wish to have your personal data collected, used or disclosed as described in this Statement please discuss this matter with the data protection lead. It is important to know that the collection, use or possible disclosure of this data may be crucial to our ability to safely provide you with the care you require; without your agreement to this process it may not be possible to undertake treatment.

If you have a complaint or concern with any aspect of how we process your personal information we would hope that you would notify the data protection lead in the first place. You retain the right to make a complaint to the Data Protection Commissioner at all times.

If you have any questions in relation to this Statement or any issue that arises from it please do not hesitate to ask to speak with the data protection lead.

Nuala Hegarty -Senior Administrative Coordinator / Data Protection Lead

In order to simplify and expedite patient's initial visit with us we have placed an opt-in tick box system below every medical history where a tick is required to consent. Patients's are welcome to opt-out at any point and can arrange this through a member of our front of house team.



Treatment :

I understand by attending Citygate Specialist Dental Clinic and accepting my proposed treatment and diagnostic investigation that my implied consent is given for treatment.



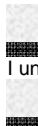
Nominating a person to speak on my behalf :

For data protection reasons the clinic can only discuss treatment with the patient if they are over 16 years of age. However, if

you as the patient wishes to nominate someone who you would like for us to speak with, please name them here along with stating their relationship to you. When they contact us they will have to provide your date of birth and your home address, as you will have to do also when speaking with a member of our team to confirm your identity.

Nominated: \_\_\_\_\_ Relationship to Patient: \_\_\_\_\_

**Communications:**



Newsletter / Mailing List :

I understand that my email will never be intentionally disseminated to a third party.

Correspondence with my referring general dental practitioner / other referring healthcare practitioner :

I understand that by consenting to this that the clinic will discuss my case and / or forward a letter to my referring practitioner updating them on my case.

Patient's / Guardian's Signature to above tick boxes: \_\_\_\_\_ Date: \_\_\_\_\_

We hope that you enjoy your visit(s) to Citygate Specialist Dental Clinic.