

Privacy Notice



1. Why are you being given this information?

1.1. As from 25 May 2018, the Data Protection Act 1998 will be replaced under the requirements of the EU General Data Protection Regulation (GDPR).

1.2. At Katoomba Dental Practice, we have always regarded your privacy as very important and we would like to assure our patients that any data we hold has always been processed only for the purpose in which it was collected.

1.3. However, the new guidance asks for greater transparency. This **privacy notice** aims to demonstrate our compliance with GDPR by describing what **personal data** we collect, why we collect it, how we will **process*** it and who we might share it with, along with your rights and freedoms under the law.

**by process, we mean obtain, store, update and archive data*

2. Who controls, processes and oversees the security of your information?

2.1. As partners and business owners, Drs Graham Loader, Chih Liu and Naveed Jamil are **data controllers** and have ultimate responsibility for all data processing within Katoomba Dental Practice. They are all individually registered with the Information Commissioner's Office. Dr Chih Liu is the lead partner for data protection.

2.2. Our staff are **data processors**, this includes the practice manager, receptionists, dental nurses and hygienists. All our staff receive the appropriate level of training for their role.

2.3. As we hold an NHS contract, the practice is classed under this legislation as a 'public body' and therefore must appoint a **data protection officer (DPO)**. The practice manager, Claire Beattie, will undertake this role and act independently in overseeing all data processing on a day to day basis and any questions or concerns may be raised directly with her.

3. What is our lawful basis for processing this data?

3.1. Patient data is held for the purpose of providing patients with appropriate, high quality, safe and effective dental care and treatment.

3.2. We hold this data because it is in our **legitimate interest** to do so. Without holding the data we cannot work effectively. Also, we must hold data on NHS care and treatment as it is a **public task** required by law.

4. What information do we collect and what might we hold about you?

4.1. When registering new patients, we request the following information:

- Date of birth, title, full name and a name our patients would prefer to be known by
- Address and contact details including, email addresses and home, mobile and work telephone numbers
- Details of the GP Practice they are registered with
- How they heard about the practice or who they were referred by
- Details of any concerns regarding the functionality or appearance of their teeth
- We also collect some 'sensitive' information such as a full medical history
- We ask to take a small photograph for the record for identification purposes

We do not routinely ask patients for their NHS number or occupation but where this becomes known there is a data field to store this information on the record card.

- 4.2. We have the ability on our computer software to link patient's records into groups for example parents and children, husbands and wives, partnerships etc. This makes it quicker for staff to move between records when booking appointments. This is only visible to staff and each record is maintained individually and our staff take care to ensure the appropriateness of these links.
- 4.3. As our relationship with you builds, you may tell us things about you and where relevant this may be added to your record. Perhaps you are getting married or have a significant wedding anniversary coming up.
- 4.4. You may have chosen to communicate with us in writing either by letter or email. All written correspondence is saved to your record and then immediately shredded or deleted from our email system.
- 4.5. Your clinical notes are a record of your examinations, treatment received and clinical photographs and radiographs. This information is collected electronically and cannot be edited. We will store patient data for as long as we are providing care, treatment or recalling patients for further care. We will archive (that is, store it without further action) for as long as is required for legal purposes as recommended by the NHS or other trusted experts recommend (currently this is around ten years or for children until they reach 25).
- 4.6. To ensure we adhere to our financial responsibilities, we keep a history of all monetary transactions and any additional purchases to provide as a clear audit trail. However, any financial reports that are produced for accounting purposes are anonymised and contain financial information only.

5. Where is your information collected from?

- 5.1. Your care record is built predominantly from information that you have provided to us, either verbally or in writing. However, we may receive information from third parties, such as a letter from another healthcare provider e.g. a specialist hospital or orthodontist.
- 5.2. We may also make a temporary note of something a family member has advised us of on your behalf, an illness for example, but this information is can be deleted easily when no longer relevant.

6. How do we ensure your information is stored securely?

- 6.1. Katoomba Dental Practice has moved to an electronic record keeping system. Personal and sensitive information is saved to an individual care record which has been allocated a unique identifier. These records are saved on to our dental records management system by software provider 'Systems for Dentists'. Access to this system is user restricted and password protected.
- 6.2. All electronic data is saved on a central server which is kept in a locked office.
- 6.3. Information is backed up every evening by our software provider to a secure cloud based platform and weekly to a hard drive which is stored in a safe at the practice.
- 6.4. Where we still need to store paper records, these are archived and stored in either locked filing cabinets or a locked archive room. When the time comes to dispose of them, they will be shredded on-site using an authorised, registered waste provider.

7. How will we use your information?

- 7.1. We will use the information you have provided to us to deliver safe and effective healthcare.
- 7.2. In order to provide an efficient booking service, we will continue to use your email address to send you routine recalls and appointment reminders (telephone reminders can be requested). Where an email address is not present, we will send a recall by post and call you the day before any treatment appointments.

- 7.3. We may use your records to undertake clinical audits to ensure we are reviewing our outcomes and maintaining clinical standards. Once a review of the record has been undertaken, any subsequent reports will be anonymised.
- 7.4. We will not use your information to communicate any marketing messages unless you have opted in to receive this type of communication.

8. Will we share your information with anyone else?

8.1. We may share information with third parties that are related to your healthcare. For example:

- If you have entered into a Denplan payment plan and change your contact details, we may pass this information on to Denplan (Simply Health Professionals) for them to update their records.
- We may also use your information to make a claim on the insurance element of your Denplan policy e.g. if you are seen out of hours.
- You may require a referral to another healthcare provider for specialist treatment (e.g. implants, orthodontics) and your personal information and medical history will need to be shared for continuity of care.
- Should you require work involving a dental laboratory, we will share your name only, this enables the laboratory to provide a named statement for the device that has been made for you.

8.2. On occasion, we may be asked to share your information when being assessed by one of our regulators, e.g. the Care Quality Commission (CQC) and the NHS or during one of our Denplan Excel reaccreditation assessments. The purpose will be to undertake an audit of a random set of records to ensure we are complying with our duty to maintain clear and adequate health records. A member of staff will always be present when the audit is taking place and will ensure that the person requesting the information is suitably authorised and that no personal identifiable information is printed or written down.

8.3. We may ask you if we can use any before and after photographs for the purpose of staff education or for demonstrating/promoting treatment options to the public. All images will be anonymised and not used without your consent.

8.4. We will ask for your specific consent and We will never share your information outside of these parameters and in most circumstances you would be fully aware that this information is being shared and be able to give explicit consent.

9. What are your rights?

9.1. You have the right to:

- be informed about the personal data we hold and why we hold it
- access a copy of your data that we hold (free of charge) by contacting us directly: we will acknowledge your request and supply a response within one month or sooner
- check the information we hold about you is correct and to make corrections if not
- have your data erased in certain circumstances (see 4.5)
- transfer your data to someone else if you tell us to do so and it is safe and legal to do so
- tell us not to actively process your data in certain circumstances

10. Who can you contact if you wish to raise a concern about data processing?

10.1. You can complain in the first instance to our Data Protection Officer, Claire Beattie and we will do our best to resolve the matter (Tel: 01293 782772 Email: contact@katoomba.co.uk). If this fails you can complain to the Information Commissioner at www.ico.org.uk/concerns or by calling 0303 123 1113.