

Seafield Dental and Aesthetic Data Protection Review and Enhancement Protocol
Document in line with (GDPR 25/05/2018)

Data Protection Officers:

1. Dr Aisling O Mahony
2. Claire Murphy

Inventory of Personal Data held

Name

Address

Date of birth

Email (optional)

Telephone Number

Medical History

Historical: Dental Charting, Procedure Notes and Treatment plans –
computerised since 2017

Radiographs

Dental Models

Clinical Photographs

Why are you holding it?

Routine information for dental practice to provide care, contact the patient, be aware of the medical history. Models necessary to assess patient and generate laboratory work.

How did you obtain it?

Medical history, and patient details are filled out by the patient and scanned into computerised record.

How was it originally gathered?

Directly from the patient

How long will you retain it?

Retained for duration the patient attends the practice and in storage after 5 years

Written records – physically stored in a secure location in the practice

How secure is it, both in terms of encryption and accessibility?

Paper documents stored in a locked cupboard to which only clinicians have access

Do you ever share it with third parties and on what basis might you do this?

Information is only ever shared if referring the patient for

OPG X ray,

Cone B CT radiographs

To another dentist

To a specialist, doctor or other clinician, laboratory with the consent of the patient.

Communicating with Staff and Service Users

All patients are informed of the data that is collected - personal details are provided by the patient.

Minimal information is collected and restricted to use within the dental clinic. It is not shared with any other party unless the patient is referred for x ray, lab work or to another clinician. Patients have to give consent for this. This information is for use within the clinic only and may not be used for any other purpose.

Retention : while the patient is in active treatment

Medical history is scanned and retained in the patients record.

Patients are made aware of their right to complain

There is no automated decision making and all information is kept with the EU.

Personal Privacy Rights

1. Patients can request a copy of their record at any time.
2. Any inaccuracies will be immediately corrected
3. Information will be erased if the patient requests this and the Medical Protection Society agree
4. We are not involved in direct marketing
5. No information is processed
6. Data is emailed if it is an x ray or a referral with the patients informed consent.

Request for Data

Patients will have immediate access

The patient owns their own record

Medical Protection will be contacted if deletion is requested.

Data Portability

You must provide the personal data in a structured, commonly used and machine readable form. The information will be provided free of charge. If the patient requests it, we will transmit the data directly to another organisation if this is technically feasible. The clinic will respond within one month

International Organisation

All data is processed internally. This is a single clinic and not a multinational organisation.

Access Requests

The information will be provided free of charge. If the patient requests it, we will transmit the data directly to another organisation if this is technically feasible. The clinic will respond within one month.

Data retention is in line with medicolegal requirements.

Legal Basis

Processing of Data :

Medicolegal reports – information is shared with the legal team with the consent of the patient.

Health Insurance Companies including Garda Medical Aid require copies of x rays, notes and dental charting. Patients sign consent for this.

Consent

Consent is freely given, specific, informed and unambiguous.

Parental or guardian consent is required up to the age of 16 years

Reporting Data Breaches

DPC is immediately informed of any personal data breach within 72 hours and will also be reported to the individual concerned.

Data Protection Impact Assessment

Any data processing changes will be subject to a DPIA before implementation of any new processes e.g introduction of new software, digitising practices etc.