

Practice Privacy Statement

We seek your consent to obtain and process personal data for the purpose of providing you with dental treatment safely and to the highest standards. You have the right to withdraw your consent at any time.

This Statement is your guide to the principles of privacy and confidentiality which govern the collection, use, storage, disclosure and destruction of your personal data in this practice.

The ***data controller*** is: Dr Eamon Croke.

Contact: Croke Dental Healthcare, Molesworth House, South Frederick Street, Dublin D02 N820

(01 679 1263)

OR

hello@crokedental.ie

Your personal data is ***processed*** only on a need-to-know basis by members of the dental team, all of whom are trained dental healthcare professionals and are bound by the integrity of their profession and the legal demands of confidentiality.

Obtaining personal information

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

- Personal details such as your name, age, address, telephone numbers, email address
- Your General Medical Practitioner (doctor) and relevant Medical Consultant(s)
- Your past and current medical and dental history
- X-rays, clinical photographs and study models
- Information about proposed treatment, consent to treatment, treatment provided and its cost
- Notes of conversations or incidents that might occur for which a record needs to be kept
- Any correspondence (relating to you) with other healthcare professionals including agreed referrals to other healthcare professionals

Your personal information is stored on computer since 2007 when the practice was computerised and, as such, the practice is registered with the Data Protection Commissioner. Any personal data provided before 2007 is retained in your manual record.

We will regularly update your personal data, including your medical care, to keep it relevant to your care. We ask you to inform us of any significant changes, such as a change of address or other contact details, at your earliest convenience.

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

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 dental care efficiently and safely at all times. Healthcare professionals 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 identify and print a prescription. The prescription will have been generated by Dr Croke and will be signed by him
- To generate a work certificate which is checked and signed by Dr Croke
- To type, if dictated, or print a referral letter to another healthcare professional
- To open correspondence or any other documents from other healthcare professionals. Where possible, after being assessed by Dr Croke, all documentation is then imported into your computer records for storage or is stored in your manual record
- To print or photocopy your records if requested by you to forward them to another healthcare professional
- To collate, print, photocopy and post insurance or medico-legal reports.

Your consent will be sought prior to 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' scheme e.g. State dental schemes (DBTS)
- The transfer of personal data (email/postal) in referring you to another healthcare professional

There are certain activities where patient information may be used but the information is anonymous, thereby, eliminating patient identification:

- Teaching. Dr Croke is a part-time lecturer in Dublin Dental University Hospital and is invited to speak to colleagues nationally and internationally
- Continuing Professional Development. Case studies are a useful learning tool
- Quality Assurance/Internal audit. Audit is a necessary tool underpinning quality assurance in the care of our patients
- Research

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 *General Data Protection Regulation 2016/679 (GDPR)*, 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 being given to a member of our dental team. A guardian or carer may have the right to access your information in the case of vulnerable adults or those with diminished mental capacity but only after consent has been first sought from you as that individual. 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 written request.

If Dr Croke should cease practice or should die, while a practicing dentist, the dental team will be guided by the Dental Council's Code of Practice relating to Professional Behaviour and Ethical Conduct and GDPR in informing patients, safeguarding the release of your personal data and ensuring continuity of care where possible.

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

Personal data is kept safely

Dr Eamon Croke is responsible for data security in this practice.

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

- There is no access of unauthorised persons to manual records, fax machines or 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
- 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
- Encryption of personal data transferred electronically
- All clinical, financial and administrative records are backed up off-site daily by *Carestream Dental Ltd, Elopak House, Rutherford Close, Stevenage, Hertfordshire, SG1 2EF, UK*
- A contract for the security of off-site records is in place between Dr Eamon Croke and *Carestream Dental Ltd, Elopak House, Rutherford Close, Stevenage, Hertfordshire, SG1 2EF, UK.*

Dr Eamon Croke is responsible for dealing with any incident where personal data has been put at risk of unauthorised disclosure or access, loss, destruction or alteration. and The Data Protection Commissioner and you will be notified, within 72 hours of a breach, in compliance with the legislation.

Personal data is kept accurate, complete and up-to-date

A member of the dental team, an authorised data processor, will review your personal information, with you, on a regular basis to ensure we retain accurate, high quality records on you. Any changes to your personal details, your medical or dental status will be noted on your electronic file. We ask you to let us know of any changes in contact details at your earliest convenience.

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 wish to provide you with an efficient service and to care for you safely. We will explain the need for any information we ask for if you are not sure of its purpose.

Personal data is retained for no longer than necessary

Generally, 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.

Information relating to the restoration of implants is kept for 20 years, as clinical evidence indicates the need for retreatment every 15 years on average.

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

Communicating with you

We seek your consent to communicate with you by **telephone** in relation to:

- Confirmation or alteration of pre-arranged appointments
- Address matters that may arise in relation to third party schemes, e.g. dental insurance, DTBS

We seek your consent to communicate with you by **text** in relation to:

- Confirmation of pre-arranged appointments

We seek your consent to communicate with you by **email** in relation to:

- Matters previously agreed with you, such as the forwarding of receipts, radiographs and dental records

We seek your consent to communicate with you by **post** in relation to:

- Notifying you of your annual dental examination
- The provision of requested financial information in relation to treatment, proposed or provided
- The provision of prescriptions

The practice will not communicate with you through social media.

You have the right to withdraw consent at any time. In that case, please advise **Ms Margaret Squires, Practice Administrator**.

Your Rights

You are legally entitled to a copy of your personal data, including your x-rays, upon written request. You will receive this data in a structured, commonly used format.

All written requests should be addressed to:

Ms Margaret Squires, Practice Administrator.
Croke Dental Healthcare, Molesworth House, South Frederick Street, Dublin D02 N820
(01 679 1263)
OR
hello@crokedental.ie

Your request will be dealt with in a timely manner and always within one month of receiving your written request and, in general, without charge.

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 have a right to have your data protected and for it to be used solely for the purposes for which you have consented. You have the right to withdraw that consent at any time.

If you do not wish to have your personal data used or disclosed as described in this Statement please discuss this matter with Dr Croke. However, it is important to remember that the use and disclosure of this data may be crucial to our ability to provide you with the appropriate care safely; without your consent we may be unable 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 **Ms Margaret Squires, Practice Administrator** in the first place. You would still retain the right to make a complaint to the Data Protection Commissioner.

If you have any questions in relation to this Statement or any issue that arises for you from it please speak with **Dr Croke**.

Eamon D. Croke

Data Controller