

## Data Protection Policy

The practice is committed to complying with the Data Protection Act 1998, the **General Data Protection Regulation (GDPR)**, GDC, and other standards.

The practice only keeps relevant information about patients to provide them with safe and appropriate dental care.

The people responsible for Data Protection are Dr Norton and Linda Warren.

Our legal basis for processing data is:

- **Consent**
- **Processing is necessary for the performance of our care for patients**
- **And the health care data we process is called special data, our legal basis for processing it is:**

*Processing is necessary for the purposes of preventative care or medicine, medical diagnosis, the provision of dental health care and treatment or management of dental health.*

Hard copy and computerised records are stored, reviewed and updated securely and confidentially. Records are sent for scanning and either securely stored or destroyed when no longer required. Confidential information is only seen by personnel who need to see it and the team are trained on our policies and procedures to keep patient information confidential.

To facilitate patients' health care, the personal information may be disclosed to a dentist, doctor, health care professional, hospital, NHS authorities, private dental schemes of which the patient is a member. In all cases only relevant information is shared and with patient consent. In very limited cases, such as for identification purposes, or if required by law, information may have to be shared with a party not involved in the patient's health care. In all other cases, information is **never** disclosed to such a third party without the patient's written authority.

All confidential information is sent via secure methods. Electronic communications and stored data are encrypted. All computerised clinical records are backed up and encrypted copies are kept off-site. No information or comments about patients are posted on social networking or blogging sites.

### **Data Breach**

The practice has appropriate procedures to ensure personal data breaches are detected, reported and investigated effectively, including procedures to assess and then report any breaches to the ICO where the individual is likely to suffer some form of damage, e.g. through identity theft or confidentiality breach.

The practice is registered with ICO and will report serious data breaches to the ICO within 24 hours of becoming aware of the essential facts. The practice will keep a log of all personal data breaches and record the basic facts, effects of the breach and remedial action taken.

### Subject Access Requests

Patients can have access to view the original of their records free of charge. Copies of patient records are provided following a written request to Dr Norton or a patient may challenge information held on record and, following investigation, should the information be inaccurate the practice will correct the records and inform person of the change in writing.

When the practice receives a third-party request for information on someone else's behalf (e.g. from a solicitor) evidence of their permission will be requested, this could be a written authority to make a request or a power of attorney.

When the practice receives a third-party request for information for a patient who lacks the mental capacity to manage their affairs the practice will ask to see evidence of a Lasting Power of Attorney or the evidence of appointment by:

- The Court of Protection in England & Wales;
- The Sheriff Court in Scotland; and
- The High Court (Office of Care and Protection) in Northern Ireland

### Communication Consent

Norton Implants Ltd uses the Royal Mail, Telephone, Email and occasionally Texts to communicate with patients.

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### Consent for Marketing

From time to time we may use cases for marketing for example on our website or practice brochure. Prior consent will be obtained before any patient cases are used. As Dr Norton lectures widely, we include a sentence in the patients consent stating they agree to their cases being used for teaching if appropriate. We also obtain consent from each patient to photograph their cases as this forms a part of their clinical records. When marketing or lecturing the patients name is never revealed.

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