Privacy Policy for Ravenscourt dental practice for Patient Data

Ravenscourt dental practice takes great care to protect the personal data we hold for our patients in line with the requirements of the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

The purpose of collecting and storing personal data about our patients is to ensure we can:

- Provide, appropriate, safe and effective dental care, treatment and advice for all our patients.
- Fulfil any contracts we hold in relation to their care.
- For business administration of their care.

During the COVID-19 pandemic, we may also collect and store personal data about our patients for the purposes of protecting public health and monitoring and managing the COVID-19 pandemic.

Personal data held for our patients

The personal data we process (processing includes obtaining the information, using it, storing it, securing it, disclosing it, and destroying it) for our patients includes:

- Name, address, date of birth.
- Unique identification number.
- Next of kin.
- Email address.
- Phone numbers.
- GP contact details.
- Occupation.
- Medical history.
- Dental care records.
- Family group.
- Payment plan details.
- Financial information.
- Credit cards receipts.
- Correspondence.
- Details of any complaints received.

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We keep an inventory of personal data we hold on our patients and this is available for patients on request. A list of personal information held is also included in our Privacy Notice that is given to all patients.

National Opt-out Policy

At Ravenscourt dental sensitive personal information relating to our patients is only used to provide dental care for the individual. It is never shared for research purposes or any non-clinical need. The National Opt-out Policy introduced in March 2020 is therefore not operated at our practice on this basis.

Should we change our policy to use information for a non-clinical purpose or a research project, we would then introduce the National Opt-out policy.

Disclosure to third parties

The information we collect, and store will not be disclosed to anyone who does not need to see it.

We will share our patients' personal information with third parties when required by law or to enable us to deliver a service to them or where we have another legitimate reason for doing so. Third parties we may share patients' personal information with may include:

- Regulatory authorities such as the General Dental Council or the Care Quality Commission
- NHS Local Authorities
- Dental payment plan administrators
- Insurance companies
- Loss assessors
- Fraud prevention agencies
- In the event of a possible sale of the practice at some time in the future.

We may also share personal information where we consider it to be in a patient's best interest or if we have reason to believe an individual may be at risk of harm or abuse.

Personal privacy rights

Under the GDPR and the Data Protection Act 2018, all individuals who have personal information held about them have the following personal privacy rights:

- Right to subject access.
- Right to have inaccuracies deleted.
- Right to have information erased.
- Right to object to direct marketing.

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- Right to restrict the processing of their information, including automated decision-making.
- Right to data portability.

Patients who wish to have inaccuracies deleted or to have information erased must speak to the dentist who provided or provides their care.

Legal basis for processing data held about patients

The GDPR requires us to state the legal basis upon which we process all personal data for our patients and it requires us to inform our patients of the legal basis on which we process their personal data. This is clearly stated in our privacy notice that is given to all patients.

The legal bases for recording individual types of data are recorded in our patient personal data inventory. This is available for all patients to see on request.

Automated decision making

All individuals who have personal data held about them have a right to object to their personal data being subjected to automated decision making.

Patients will always be asked to give specific, informed, verifiable, opt in consent for any processes involving automated decision making.

Consent

Ravenscourt dental always obtains specific, unambiguous opt in consent from all patients to whom we send direct marketing information. This is asked as part of their Medical history forms

We also obtain specific, unambiguous, opt in consent from our patients for .For a new patient, we obtain consent for these things when the patient first attends the practice. For an existing patient, we ask the patient for consent when they attend for their recall appointment or for a treatment appointment. We refresh this consent annually when the patient completes a new medical history proforma.

Withdrawal of consent

Patients who have given their opt in consent have a right to withdraw their consent at any time. Patients are advised of their right to withdraw their consent for anything they wish to withdraw from in our privacy notice.

Consent during the COVID-19 pandemic

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The rules on processing and sharing information during the COVID-19 pandemic have been relaxed to allow healthcare providers to protect public health and manage the spread of the virus.

[Insert practice name] may need to contact our patients, their families or third-party organisations regarding patients' appointments, medical histories, and treatment. Where possible, we will obtain prior consent to process and share this information.

Where patients have not previously consented to, or have withdrawn their consent for us to contact or share or process their data, we will assess whether the need for processing is proportionate and necessary in relation to the risk to the individual and/or the public if the information is not shared.

Retention period

This practice retains dental records and orthodontic study models while the patient is a patient of the practice and, after they cease to be a patient, for at least eleven years, or for children until age 25, whichever is the longer.

Complaints

All individuals who have personal data held about them have a right to complain. All complaints concerning personal data should be made in person or in writing to Alice Gibson . All complaints will be dealt with in line with the practice complaints policy and procedures.

Laboratory work sent outside the EU will be labelled with the patient's unique identifying number rather than the patient's name. A record of the unique identifying number will be held at the practice.*:*

Patients' personal data is not transferred outside the EU.

This Policy was reviewed and implemented on: 2.9.23

This policy and relevant procedures will be reviewed annually and are due for review on 2.9.24 or prior to this date in accordance with new guidance or legislative changes.

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Document Change Record
for
Privacy Policy for Patient Data

The table below is used to register all changes to the policy:

Published Date	Document Version Number	Pages affected	Description of revision	Author
22.07.2020	V2.2	Page 1	Purpose for collecting data updated to reflect COVID-19 pandemic	LH
22.07.2020	V2.2	Page 5	Obtaining consent during the COVID-19 pandemic	LH
01.02.2021	V3.1	Page 1	Notes on obtaining evidence of opt-in consent.	PL
01.02.2021	V3.1	Page 3	Information on when the National Opt-out Policy would apply in dental practice	PL

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