



Website Privacy Statement

Practice Name: Ayrfield Medical Practice
Practice Address: Granges Road, Kilkenny, Ireland. R95 P2EF
Practice Phone Number: 056 7721320
Data Controller: Dr T Crowley, Dr Seathrun O’Casaide, Dr Claire Cusack, Dr Frank Chambers, Dr Conall MacConmara, Dr Joanne Cuddihy and Dr Marian Walsh.
Lead for Data Protection: Avril Jones

Introduction

Our Practice wants to ensure the highest standard of medical care for its patients. We understand that a General Practice is a trusted organisation governed by an ethic of privacy and confidentiality. Our practices are consistent with the Medical Council of Ireland guidelines and the General Data Protection Regulation.

Our Practice is responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this Website Privacy Statement.

The purpose of this Website Privacy Statement is to outline how we deal with any information you provide to us while visiting our website — www.ampk.ie.

Any external links to other websites are clearly identifiable as such, and we are not responsible for the content or the privacy policies of these other websites.

Data Protection Law

We will comply with data protection law, including the General Data Protection Regulation. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.

4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

Information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

The data we collect depends on the context of your interactions with our Practice, the choices you make, and the services you use. The data we collect, Store, and use can include the following:

- Details about you, such as your address, legal representative, emergency contact details.
- Any contact our Practice has had with you, such as appointments, clinic visits, emergency appointments, etc.
- Notes and reports about your health.
- Details about your treatment and care.
- Prescriptions (including requests) and certificates.
- Results of investigations such as laboratory tests, x-rays etc.
- Relevant information from other health professionals, relatives or those who care for you.

How is your personal information collected?

In order to provide for your care in our Practice, we need to collect and keep information about you and your health in our records. You provide some of this data directly, such as when you attend a consultation or contact us with a query or submit a request for a prescription via our website or otherwise. We may also obtain data from third parties. We protect data obtained from third parties according to the practices described in this statement, plus any additional restrictions imposed by the source of the data.

We will only ask for and keep information that is necessary. We will attempt to keep it as accurate and up to-date as possible. We will explain the need for any information we ask for if you are not sure why it is needed.

You have choices about the data we collect. When you are asked to provide personal data, you may decline. However, if you choose not to provide data that is necessary to provide a service, then you may not be able to use that service.

How we will use information about you

We will only use your personal information when the law allows us to or if we are required to comply with a legal requirement.

The processing of personal information by our Practice is necessary to protect the vital interests of the patient and for the provision of healthcare and also public health. We may also use your personal information in the following circumstances:

1. Where we need to perform a legal contract that we have entered into with you.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

4. Where it is needed in the public interest.

Special categories of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information, including your health information.

Where you have provided consent to specific processing, you have the right to withdraw this consent at any time. To withdraw your consent, please contact our Practice Manager in writing at [insert email].

Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law. If you choose to withdraw your consent for us to process your data for a particular service, then you may not be able to use our service.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Information about criminal convictions

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our data protection policy.

We may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We do not envisage that we will need to hold information relating to criminal convictions about you.

Automated Decision-Making

Automated decision-making takes place When an electronic system uses personal information to make a decision without human intervention. We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

Data Sharing

Health & Social Care Professionals

We may need to pass some of your information to other health and social care professionals in order to provide you with the treatment and services you need. Only the relevant parts of your personal information will be released. These other professionals are also legally bound to treat your information with the same duty of care and confidence that we do.

Use of information for training, teaching and quality assurance

It is usual for GPs to discuss patient case histories as part of their continuing medical education or for the purpose of training GPs and/or medical students. In these situations, the identity of the patient concerned will not be revealed.

In other situations, however, it may be beneficial for other Doctors within our Practice to be aware of patients with certain conditions and in such cases our Practice would only communicate the information necessary to provide the highest level of care to the patient.

Our Practice is or may be involved in the training Of GPs in conjunction with the Irish College of General Practitioners. As part of this programme, GP Registrars will work in our Practice and may be involved in the provision your care.

Use of information for research audit and quality assurance

It is usual for patient information to be used for research, audit and quality assurance purposes to improve services and standards of practice.

GPs on the Specialist GP Register of the Medical Council of Ireland are now required to perform audits. In general, information used for such purposes is done in an anonymous manner with all personal identifying information removed.

If it were proposed to use your information in a way where it would not be anonymous or if our Practice was involved in external research then we would discuss this further with you before proceeding and seek your written informed consent.

Please remember that the quality of the patient service provided can only be maintained and improved by training, teaching, audit and research.

Other parties

We may need to share your data with other third parties, including third-party service providers and other entities in our Practice group. We require third parties to respect the security of your data and to treat it in accordance with the law.

Data Security

We have put in place measures to protect the security Of your information. Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

Patients should understand that our Practice support team may have access to patient records for:

- Identifying and printing repeat prescriptions for patients. These are then reviewed and signed by the GP.
- Generating a social welfare certificate for the patient. This is then checked and signed by the GP. • Typing referral letters to hospital consultants or allied health professionals such as physiotherapists, occupational therapists, psychologists and dieticians.
- Opening letters from hospitals and consultants. The letters could be appended to a patient's paper file or scanned into their electronic patient record.
- Scanning clinical letters, radiology reports and any Other documents not available in electronic format.
- Downloading laboratory results and Out of Hours Co-op reports and performing integration of these results into the electronic patient record.
- Photocopying or printing documents for referral to consultants, attending an ante-natal clinic or when a patient is changing GP.
- Checking for a patient if a hospital or consultant letter is back or if a laboratory or radiology result is back, in order to schedule a conversation with the GP.
- When a patient contacts our Practice, checking if they are due for any preventative services, such as vaccination, ante natal visit, contraceptive pill checks, cervical smear test, etc.

- Handling, printing, photocopying and postage of medico legal and life assurance reports. and Of associated documents.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data Retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

Retention periods differ for different aspects of your personal information. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances, we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a patient of our Practice, we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

Rights of Access, Correction, Erasure and Restriction

Your duty to inform us Of Changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us. We ask you to inform us about any relevant changes that we should know about. This would include such things as any new treatments or investigations being carried out that we are not aware of. Please also inform us of change of address and phone numbers etc.

Your rights in connection with personal information

Under certain circumstances. by law you have the right to:

- Request access to your personal information (commonly known as a "Subject Access Request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request the erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to stop processing personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure Of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact our Practice Manager in writing at Canice@ampk.ie.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it. You will also be required to complete our Practice Subject Access Request Form which is available from our Practice Manager who you can contact in writing at [insert email].

Transferring to another practice

If you decide at any time and for whatever reason to transfer to another practice, we will facilitate that decision by making available to your new GP a copy of your records on receipt of your signed consent from your new GP. For medico-legal reasons we will also retain a copy of your records in our Practice for an appropriate period consistent with our legal obligations.

Queries

We have appointed a Practice Data Protection [Officer/Lead] to oversee compliance with data protection legislation, including this Website Privacy Statement. If you have any questions about this privacy statement or how we handle your personal information, please contact our Practice Manager in writing at [insert email].

You have the right to make a complaint at any time to the Office of the Data Protection Commissioner, the supervisory authority for data protection issues in the Republic of Ireland.

Changes to this Privacy Statement

We reserve the right to update this privacy statement at any time. We may also notify you in other ways from time to time about the processing of your personal information.