

Kilcormac Medical Centre

Practice Privacy Statement

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Practice Name	Kilcormac Medical Centre
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Data Controllers	Dr Isabelle Fallon and Dr Aisling McMahon
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Introduction

Kilcormac Medical Centre is committed to providing the highest standard of medical care. We understand that general practice is a trusted community governed by an ethic of privacy and confidentiality. Our approach is consistent with the Medical Council's Guide to Professional Conduct and Ethics for Doctors (9th Edition, 2024) and the data protection principles of the General Data Protection Regulation (GDPR).

It is not possible to undertake medical care without collecting and processing personal data and data concerning health. This statement explains our policies and practices in relation to your medical information.

Legal Basis for Processing Your Data

This practice has voluntarily signed up to the ICGP Data Protection Guideline for GPs (available at www.icgp.ie/data). We process your personal data on the following legal bases:

GDPR Article 6(1)(e)	Processing necessary for the performance of a task in the public interest (provision of GMS-contracted primary care)
GDPR Article 9(2)(h)	Processing necessary for the provision of healthcare, carried out by a health professional subject to professional secrecy
Data Protection Act 2018 (Ireland), Section 36	Conditions for processing special categories of personal data (health data) in an Irish healthcare context
Medical Council Guide (9th Ed., 2024)	All clinical staff are bound by a duty of confidentiality in relation to all patient information

Data Retention

In most circumstances, we retain your records for the duration of your life and for eight years following your death, or eight years from your last contact with the practice, whichever is later. Exceptions to this rule are described in the ICGP Guideline referenced above. Certain categories of records (for example, records relating to children) may be subject to longer retention periods.

Managing Your Information

To provide for your care, we collect and keep information about you and your health. In doing so:

- We retain your information securely using access-controlled electronic systems.

- We will only request and retain information that is necessary for your care. We will attempt to keep it as accurate and up-to-date as possible.
- We ask you to inform us of any relevant changes, including changes to your address, phone number, or any new treatments or investigations being carried out that we are not aware of.
- All staff who are not already subject to a professional confidentiality obligation sign a confidentiality agreement that makes clear their duties and the consequences of breach.
- Access to patient records is restricted to the minimum extent necessary for each staff member's role.

Practice staff may access your records for the following purposes:

1. Identifying and printing repeat prescriptions for review and signing by the GP.
2. Generating sickness certificates for check and sign by the GP.
3. Typing referral letters to hospital consultants or allied health professionals.
4. Opening, scanning and integrating clinical correspondence into the electronic patient record.
5. Downloading laboratory results and Out-of-Hours Co-op reports.
6. Photocopying or printing documents for referral or GP transfer purposes.
7. Checking whether hospital, consultant or laboratory results are available, in order to schedule a GP follow-up.
8. Identifying patients due for preventative services such as vaccinations, cervical screening, or medication reviews.
9. Handling medico-legal and life assurance reports and associated documentation.
10. Sending and receiving information via Healthmail (secure clinical email).
11. Other activities directly related to the support of medical care appropriate for practice support staff.

Use of AI-Assisted Clinical Documentation

Kilcormac Medical Centre uses an AI-assisted clinical documentation tool called Heidi Health. This section explains what this means for your data.

After your consultation, your GP may use Heidi Health to dictate and structure their clinical notes. The AI tool is used by the GP after your appointment — your consultation is not recorded. The tool does not make any clinical decisions; all clinical decisions are made by your GP.

Information processed by Heidi Health may include your name, date of birth, symptoms, examination findings, diagnoses, medications, and referral plans — the same information that would appear in your medical record regardless of how the notes are prepared. This information is encrypted and also anonymised by Heidi Health before processing.

Heidi Health is bound by a formal Data Processing Agreement and is subject to GDPR obligations. Data is encrypted in transit and at rest. Audio and intermediate processing data are deleted after your GP has confirmed the note. Heidi Health holds ISO 27001 certification.

You have the right to object to the use of AI in the preparation of your clinical notes. Please see 'Your Rights' below. A full Patient Privacy Notice specific to Heidi Health use is available at reception and on our website.

Disclosure of Information

To Other Health and Social Care Professionals

We may share relevant parts of your record with other health and social care professionals as necessary to provide your treatment and services. Only the minimum relevant information will be released. These professionals are equally bound by professional confidentiality obligations.

Disclosures Required or Permitted by Law

In certain instances, the law provides that personal information (including health information) may be disclosed without your consent — for example, in the case of notifiable infectious diseases, or where there is a serious risk to the life of the patient or a third party.

To Employers, Insurance Companies and Solicitors

- Work-related medical certificates will generally only confirm unfitness for work and an anticipated return date. Where it is considered necessary to provide additional information, this will be discussed with you. Note that Department of Social Protection sickness certificates must include the medical reason for unfitness to work.
- Records or reports requested by insurance companies or solicitors will only be released with your signed consent.

Use of Information for Training, Teaching and Quality Assurance

It is usual practice for GPs to discuss patient case histories as part of continuing medical education, GP training, and medical student teaching. In these situations, patient identity will not be revealed. This practice is not currently attached to a medical school, but we may resume teaching activities in the future. Medical students working in the practice will always be supervised by a GP, and all clinical decisions will be made by the GP. Medical students also sign a confidentiality agreement before starting their placement with us.

Use of Information for Research and Audit

Patient information may be used for research and audit to improve services and standards of care. GPs on the specialist register of the Medical Council are required to perform annual clinical audits. Any information used for such purposes is anonymised or pseudonymised.

Your Rights

Under the GDPR and the Data Protection Act 2018, you have the following rights:

Right to be Informed	Know what data we hold and how we use it. This statement, together with our Heidi Health Patient Privacy Notice, fulfils that obligation.
Right of Access	Request a copy of your personal data held by the practice. We will provide this within 30 days, free of charge.
Right to Rectification	Ask us to correct inaccurate information in your records.
Right to Erasure	Ask for your data to be deleted in certain circumstances (note this is subject to our legal obligations around medical record retention).
Right to Restrict Processing	Ask us to limit how we use your data in certain circumstances.
Right to Object	Ask us not to use AI in the preparation of your clinical notes. We will always respect this. You may also object to other processing on public interest grounds.
Right to Data Portability	Request your data in a structured, commonly used format for transfer to another controller, where technically feasible.
Right to Complain	Lodge a complaint with the Data Protection Commission (DPC) at any time.

Transferring to Another Practice

If you decide to transfer to another practice, we will facilitate that decision by providing a copy of your records to your new GP on receipt of your signed consent. For medico-legal reasons, we will also retain a copy of your records in this practice for the appropriate retention period.

Complaints and Contact

If you have questions about how your information is handled, please speak to the practice manager or your GP. If you are not satisfied with our response, you have the right to lodge a complaint with the Data Protection Commission:

Data Protection Commission	www.dataprotection.ie
Freephone	1800 437 737
Dublin	01 765 0100
Postal address	21 Fitzwilliam Square South, Dublin 2, D02 RD28