

Padre Pio Nursing Home Privacy Statement

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| Nursing Home Name | BMC Nursing Home Ltd t/a Padre Pio Nursing Home |
| Nursing Home Address | Graiguenoe Holycross Thurles, Co Tipperary |
| Nursing Home Phone Number | 0504 43110 |
| Data Controller | Lucie McCormack |

Privacy Statement

Padre Pio Nursing Home strives to ensure the highest standard of medical care for our Residents. Our approach is consistent with the privacy principles of the Data Protection Regulations. It is not possible to undertake medical care without collecting and processing personal data and data concerning health. This statement is about advising you of our policies and practices on dealing with your medical information.

Legal Basis for Processing Your Data

The processing of personal data in a Nursing Home environment is necessary in order to protect the vital interests of the Resident and for the provision of health care and public health. In most circumstances we hold Resident data until 8 years after death or 8 years since the Resident's last contact with the Home.

Managing Your Information

In order to provide adequate care, the Nursing Home collects and keeps information about our Residents and their health on our records.

- We retain the information securely.
- 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.
- 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.
- All persons in the Nursing Home sign a confidentiality agreement that explicitly makes clear their duties in relation to personal health information and the consequences of breaching that duty.
- Access to patient records is regulated to ensure that they are used only to the extent necessary to enable the secretary or manager to perform their tasks for the proper functioning of the Home. In this regard, patients should understand that administration staff may have access to their records for:
 - 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.
- Photocopying or printing documents for referral to consultants or other allied health professionals.
- And other activities related to the support of medical care appropriate for Nursing Home support staff

Disclosure of Information to Other Health and Social Care Professionals

We may need to pass some of this information to other health and social care professionals in order to provide our Resident with the treatment and services they need. Only the relevant part of the medical record will be released. These other professionals are also legally bound to treat your information with the same duty of care and confidentiality that we do.

Disclosures Required or Permitted Under Law

The law provides that in certain instances personal information (including health information) can be disclosed, for example, in the case of infectious diseases.

Disclosure of information to Insurance Companies and Solicitors:

- In the case of disclosures to insurance companies or requests made by solicitors for a Resident's records we

will only release the information with signed consent.

| Categories of Recipient | Description |
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| Health and Social Care Providers | GPs, Health Service Executive, Voluntary Hospitals, Private Hospitals and Clinics, Private Consultants, Physiotherapists, Occupational Therapists, Speech and Language Therapists, Social Workers, Palliative Care Services, Out of Hours Services, Pharmacies, Nursing Homes, Counselling Services, Diagnostic Imaging Services, Hospital Laboratories, Practice Support Staff, GP Locums and other health care providers |
| Legal Arrangements | Coroner, Revenue, Social Protection, Medical Council, |
| Public Health | Infectious disease notifications, influenza surveillance, National Cancer Registry and other National Registries, |
| Third Parties, with explicit patient consent | Solicitors, Insurance Companies, Health Insurance Companies, Banks, |

Use of Information for Research and Audit

On occasion, Resident information may be used for research and audit in order to improve services and standards of practice. Information used for such purposes is done in an anonymised or pseudonymised manner with all personal identifying information removed. If it were proposed to use Resident information in a way where it would not be anonymous or the facility was involved in external research we would discuss this further with the Resident before we proceeded and seek written informed consent.

Right of Access to Health Information

Residents have the right of access to all the personal information held about them by this Nursing Home. If a Resident wishes to see their records, in most cases the quickest way is to discuss this with the Director of Nursing who will review the information in the record with the Resident. Residents can make a formal written access request to the Nursing Home and receive a copy of their medical records. These will be provided within thirty days, without cost.

Transferring to Another Nursing Home

If the Resident decides at any time and for whatever reason to transfer to another facility, we will make available to your new facility a copy of your records on receipt of your signed consent. For medico-legal reasons we will also retain a copy of your records in this facility for an appropriate period of time which may not exceed eight years.

Other Rights

You have other rights under data protection regulations in relation to transfer of data to a third country, the right to rectification or erasure, restriction of processing, objection to processing and data portability. Further information on these rights are available at <http://www.dataprotection.ie>. You also have the right to lodge a complaint with the Data Protection Commissioner at: Data Protection Commissioner,

Canal House, Station Road, Portarlinton, Co. Laois, LoCall:
1890 252 230 or e-mail: info@dataprotection.ie

Appendix 1

| Category of Personal Data | Purpose of Processing | Lawfulness of Processing |
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| Administrative: name, address, contact details (phone, mobile, email), dates of appointments | Necessary to support the administration of patient care in the facility | Article 6.1(d): processing is necessary in order to protect the vital interests of the data subject or of another natural person; |
| Medical Record: Individual Health identifier, GMS number, PPSN, date of birth, religion, sexual orientation, gender, family members, family history, contact details of next of kin, contact details of carers, vaccination details, medication details, allergy details, current and past medical and surgical history, genetic data, laboratory test results, imaging test results, near patient test results, ECGs, Ultrasound scan images, and other data required to provide medical care. | Necessary to provide patient care in the facility The PPS number is needed for specific schemes such as GMS Hardship Application (HSE), Community Optometric Services Scheme (HSE) | Special Categories are processed under the derogations in Articles 9.2(h) and 9.2(i) |
| CCTV Imagery / Photographic Imagery / Audio Recording | CCTV Imagery is collected for health & safety and security of Residents, Staff and Visitors Photographic Imagery may be recorded as part | Article 6.1(d): processing is necessary in order to protect the vital interests of the data subject or of another natural person; |

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| | <p>of medical assessment (i.e. wound assessment)</p> <p>Photographic imagery and audio recordings for non-medical purposes are only collected with explicit consent</p> | <hr/> |
| <p>Account Details: record of billable services provided, patient name, address, contact details, billing and payment records for GMS and private patients</p> | <p>Required for providing a service and billing. Also required for submission of reimbursement claims to the HSE Primary Care Reimbursement Service.</p> | <p>Article 6.1(c): processing is necessary for compliance with a legal obligation to which the controller is subject (Revenue, Medical and Legal Obligations), and Article 6.1(b) in relation to getting paid for providing a service to private patients.</p> |