



**SMART DENTAL**  
COMPLIANCE & TRAINING

# **Privacy Notice Policy**



**All in One  
Management Software**

## Practice Details

Name of Practice

New Ash Green Dental & Aesthetics

Name of Manager

**Cara Reilly**

Version

**2.3**

Policy Update Date

**01-01-2022**

*(Date policy was updated by SDC)*

Type of Policy

**Recommended**

*(Mandatory/Recommended)*

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All in one management software

# Privacy Notice Policy

## Purpose

The purpose of this policy is to provide a template privacy impact assessment ("PIA") to be used by New Ash Green Dental & Aesthetics on an ongoing basis, as necessary. That policy also explains when to conduct a PIA.

New Ash Green Dental & Aesthetics will ensure that they will determine when a PIA is required and will complete the PIA, with input as necessary from colleagues and teams.

To meet the legal requirements of the regulated activities that New Ash Green Dental & Aesthetics is registered to provide:

- General Data Protection Regulation 2016
- Data Protection Act 2018

## Scope

The following roles may be affected by this policy:

- All staff

The following people may be affected by this policy:

- Patients

The following stakeholders may be affected by this policy:

- Family
- Advocates
- Representatives
- Commissioners
- External health professionals
- Local Authority
- NHS

## Definitions

### Data Subject

the individual about whom New Ash Green Dental & Aesthetics has collected personal data.

### Data Protection Act 2018

The Data Protection Act 2018 is a United Kingdom Act of Parliament that updates data protection laws in the UK. It follows the General Data Protection Regulation and applies the EU Directive on Enforcement of Laws.

**GDPR General Data Protection Regulation (GDPR)** (EU) 2016/679 is a regulation in EU law on data protection and privacy for all individuals within the European Union. It was adopted on 14 April 2016 and after a two- year transition period became enforceable on 25 May 2018 **ICO** The Information Commissioner's Office

### Personal Data

Any information about a living person including but not limited to names, email addresses, postal addresses, job roles, photographs, CCTV and special categories of data, defined below

### PIA

A Privacy Impact Assessment, also known as a Data Protection Impact Assessment

### Process or Processing

Doing anything with personal data, including but not limited to collecting, storing, holding, using, amending or transferring it. You do not need to be doing anything actively with the personal data – at

the point you collect it, you are processing it

### **Special Categories of Data**

has an equivalent meaning to “Sensitive Personal Data” under the Data Protection Act 2018. Special categories of data include but are not limited to medical and health records (including information collected as a result of providing health care services) and information about a person’s religious beliefs, ethnic origin and race, sexual orientation and political views

## **Policy Procedure**

- New Ash Green Dental & Aesthetics understands that a PIA will enable it to identify and minimize the risks of any project it wishes to carry out.
- New Ash Green Dental & Aesthetics understands that PIAs must be conducted for specified types of processing (listed in the Procedure section below) as well as for processing that may result in a high risk for affected individuals.
- New Ash Green Dental & Aesthetics understands that a PIA should:
  - Describe the processing nature, scope, context and purpose;
  - Assess whether the processing is necessary and proportionate and in compliance with GDPR
  - Identify and assess risks to affected Data Subjects; and New Ash Green Dental & Aesthetics understands that if a PIA identifies that processing may be high risk and it is unable to take steps to mitigate those risks, it should notify the ICO and seek advice from the ICO as to whether it should carry out the processing.
- New Ash Green Dental & Aesthetics will implement a process for deciding whether a PIA is necessary and, if so, the steps that it will take to conduct the PIA. New Ash Green Dental & Aesthetics will use the form attached to this policy when conducting a PIA.
- New Ash Green Dental & Aesthetics will provide training to its employees about when a PIA is necessary and how to conduct a PIA.
- New Ash Green Dental & Aesthetics will conduct PIAs in the following scenarios:
  - Where New Ash Green Dental & Aesthetics intends to use systematic and extensive profiling or automated decision-making to make significant decisions about Data Subjects
  - Where personal data relating to children will be processed for profiling or automated decision making, for marketing to offer online services directly to the children
  - Where New Ash Green Dental & Aesthetics will process special categories of data or criminal offence data on a large scale
  - Where New Ash Green Dental & Aesthetics intends to monitor a publicly accessible place on a large scale
  - Where new technologies are introduced by New Ash Green Dental & Aesthetics that may impact on its processing activities
  - Where New Ash Green Dental & Aesthetics intends to process biometric or genetic data
  - Where New Ash Green Dental & Aesthetics intends to combine, compare or match personal data from multiple sources
  - Where New Ash Green Dental & Aesthetics processes personal data without providing a privacy policy directly to the affected Data Subject
  - Where the processing will involve tracking individuals' behavior (whether online or offline)
  - Where the processing could result in a physical harm if there is a breach of security
- New Ash Green Dental & Aesthetics will consider carrying out PIAs in the following circumstances, as well as in any other circumstances which New Ash Green Dental & Aesthetics considers to be potentially high risk:
  - Where New Ash Green Dental & Aesthetics processes special categories of data or personal data of a highly personal nature
  - Where New Ash Green Dental & Aesthetics conducts large-scale processing; and
  - Where the processing concerns vulnerable Data Subjects
- New Ash Green Dental & Aesthetics acknowledges that because of the types of services it provides, it may need to conduct PIAs on a regular basis to ensure that Data Subjects, including Patients, are protected.

- New Ash Green Dental & Aesthetics will also conduct a PIA if the nature or purpose of the processing it carries out changes.
- New Ash Green Dental & Aesthetics will document the steps taken as part of the PIA and the outcomes in line with the form attached to this policy.
- New Ash Green Dental & Aesthetics will take any steps it identifies as being necessary to mitigate risks associated with the processing and will document the steps taken and the outcome of those steps.

### **Related Documents required to complete**

- No related documents

### **Related CQC Key Line of Enquiry**

This policy reflects following key lines of enquiry:  
Well-Led.



## Our Practice Protocol