

General Practice Data Protection Checklist

POLICIES & PROCEDURES

- Register with Data Protection Commissioner
- Identify person responsible for Data Protection in the practice
- Conduct staff training on confidentiality and privacy
- Ensure confidentiality clause is present in staff contracts
- Put in place a confidentiality agreement with your hardware and software support companies and any other entity accessing patient or staff information

OBTAINING INFORMATION

- Give information leaflet on data protection to all patients
- Use agreed data collection form for new patients
- Do not collect PPSN unless required for a specific service

ACCESS CONTROL

- Require password access on all PCs and servers
- Ensure all users log in with their own user name and password
- All accounts should have 'strong' passwords
- Permissions set to only allow authorised staff to access data
- Ensure your practice software system provides an audit trail
- Ensure the physical security of both paper and electronic records

INFORMATION SHARING

- Be aware of the Information Sharing Guidelines for Primary Care Teams
- Ensure written consent is provided for every request for a PMA report
- Ensure anonymity of records when carrying out audit or research

MANAGING DEVICES

- Don't put patient records on USB memory sticks
- Encrypt the hard drive of any laptops or mobile devices that hold patient records

DATA RETENTION

- Be aware of the data retention periods for different kinds of patient records
- Implement a defined policy on retention periods for all patient records

INFORMATION SECURITY

- Implement the information security measures advised by the document 'No Data No Business'
- Put in place a practice policy on use of the Internet
- Don't use email for sending patient identifiable information

BACKUPS

- Backup all patient records at least daily
- Store backups off site in a secure location
- Do a test restore on a regular basis

This Data Protection Checklist should be used alongside the documents:

A Guide to Data Protection Legislation for Irish General Practice, available from www.gpit.ie

Data Protection Audit Resource, available from www.dataprotection.ie

No Data No Business, available from www.gpit.ie

Interim Guidelines on Information Sharing in Primary Care Teams, Draft 7, Revision 13, 2008, available from the HSE