

GDPR

Consultant & Medical Secretary Update No.4

May 2018

Are you ready?



A key change!

On Friday 25 May 2018, the law relating to personal data changes radically.



Consultant microsite now live

GDPR information is now available at a microsite set up just for Spire consultants and their medical secretaries. See www.spirehealthcare.com/gdpr

GDPR Seminars

We have now held GDPR seminars at all hospitals for consultants and medical secretaries (both Spire employees and external). If you were not able to attend, the presentation slides are now available at www.spirehealthcare.com/gdpr and a recording will be made available shortly.

Documentation available now

The following documents are now available online at www.spirehealthcare.com/gdpr:

- **Spire's GDPR Guide for consultants**
This describes what needs doing and how to do it and is very comprehensive as it has to cover a wide variety of practice types.
- **An example privacy notice for consultants to use in their private practice**
For consultants, Spire GPs and AHPs to adapt and use in their private practice as data controllers.

- **Spire's current privacy notice for patients**
Which will usually cover consultants' data activities for Spire patients (will also be available on the Spire website).
- **Model contract clauses for data controllers to use with third party data processors** (one for any corporate – including entities providing med sec services - and one for individual med secs).

Information on the website is currently in PDF format. Documents available to edit by consultants have been made available in Microsoft Word format to your hospital GDPR Lead and will be online shortly.

Documentation to follow

The documents below will be available in the coming days at www.spirehealthcare.com/gdpr:

- **Example consultant record of processing**
- **Spire's Data Sharing Agreement**
- **Data Protection Rules**
- **Spire's updated documents such as Panel T&Cs, Self-pay T&Cs and GP engagement letter**
- **Spire's Information Governance, Data Protection and other relevant policies**

Updates will also be made to the Spire's GDPR guide as required.

What's new?

Egress subscription

Spire's new email policy requires many emails containing information on Spire patients to be sent by encrypted email. If you do not already have encryption software we have negotiated a discount with Egress, the provider that Spire uses. You can sign up with to use Egress at <https://switch.egress.com/ui/registration/accountcreate.aspx>

Please remember to use **SPIRE20JP** in order to receive 20% off the annual subscription.

GDPR Guide

As you are aware, this is now available at www.spirehealthcare.com/gdpr. Part of this guide includes further information on what you must do now. In summary:

1. **ICO**: register or notify and pay
2. **Compliance plan**: produce and maintain
3. **Identify legal bases**: for processing personal data
4. **Record of Processing**: create and include data inventory
5. **Privacy Impact Assessment**: conduct if needed
6. **Contracts**: audit and update (review international transfers)
7. **Privacy Notices**: review and decide if you need your own
8. **Data subject rights**: policies and processes
9. **Staff**: contracts and training
10. **Breaches**: policies and processes
11. **Security practices**: audit policies and practices

Further information on each of the above suggested actions can be found in the GDPR Guide and consultant slides on the microsite www.spirehealthcare.com/gdpr.

Further reading

In addition to the information available at www.spirehealthcare.com/gdpr you may find the below links useful:

Information Commissioner:

<https://ico.org.uk/for-organisations/data-protection-reform/>

NHS Digital Website:

<https://digital.nhs.uk/information-governance-alliance/General-Data-Protection-Regulation-guidance>



If you would like to contact the Spire team please get in touch at gdpr@spirehealthcare.com