

ROATHWELL SURGERY

Privacy Policy

Effective Date: October 2025

Version: 1.0

Author: Practice Manager

1. Introduction

Roathwell Surgery is committed to protecting the privacy and confidentiality of all personal data we process. This Privacy Policy outlines how we collect, use, store, and protect patient and operational data in compliance with UK GDPR, NHS Wales guidelines, and other applicable regulations.

2. Scope

This policy applies to all staff, systems, and processes involved in the handling of personal data at Roathwell Surgery, including patient records, administrative data, and technology-assisted documentation.

3. Data Controllers and Key Contacts

- Senior IT Lead GP, responsible for data quality and coding standards.
- Practice Manager, responsible for audits, reporting, and privacy oversight.
- Practice Administrator – Responsible for maintaining coding systems (Read/SNOMED).

4. Data Collection and Use

- Delivery of healthcare services
- Clinical documentation and coding
- Audit and quality assurance
- Legal and regulatory compliance
- COVID-19 data reporting (under public interest and legal obligation)

5. Legal Basis for Processing

- Consent (where applicable)
- Performance of a contract
- Legal obligation
- Vital interests
- Public task
- Legitimate interests

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6. Access Control

Access to personal data is strictly role-based and managed through secure login credentials. Access is granted based on job responsibilities and revoked immediately upon termination or role change.

7. Data Retention

We retain personal data in accordance with NHS Wales and UK GDPR retention schedules. Clinical and administrative records are stored securely and disposed of appropriately when no longer required.

8. Data Security and Breach Response

We implement technical and organisational measures to safeguard personal data. Any suspected data breach must be reported immediately to the Practice Manager. Investigations are conducted promptly and reported to relevant authorities as required.

9. Technology-Assisted Documentation

- Roathwell Surgery may use artificial intelligence (AI) tools, including speech recognition software, to assist in clinical documentation.
- All AI-generated notes are reviewed by clinical staff.
- Audio and transcription data are securely processed and stored.
- Access is restricted to authorised personnel.
- Use of these technologies complies with UK GDPR and NHS Digital guidelines.

10. Staff Training

All staff must complete mandatory training on data protection, system use, and coding standards. New staff receive onboarding and are monitored for compliance.

11. Policy Review

This Privacy Policy is reviewed annually or when significant changes occur. The review is conducted by the Practice Manager in consultation with the IT Lead GP.

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