



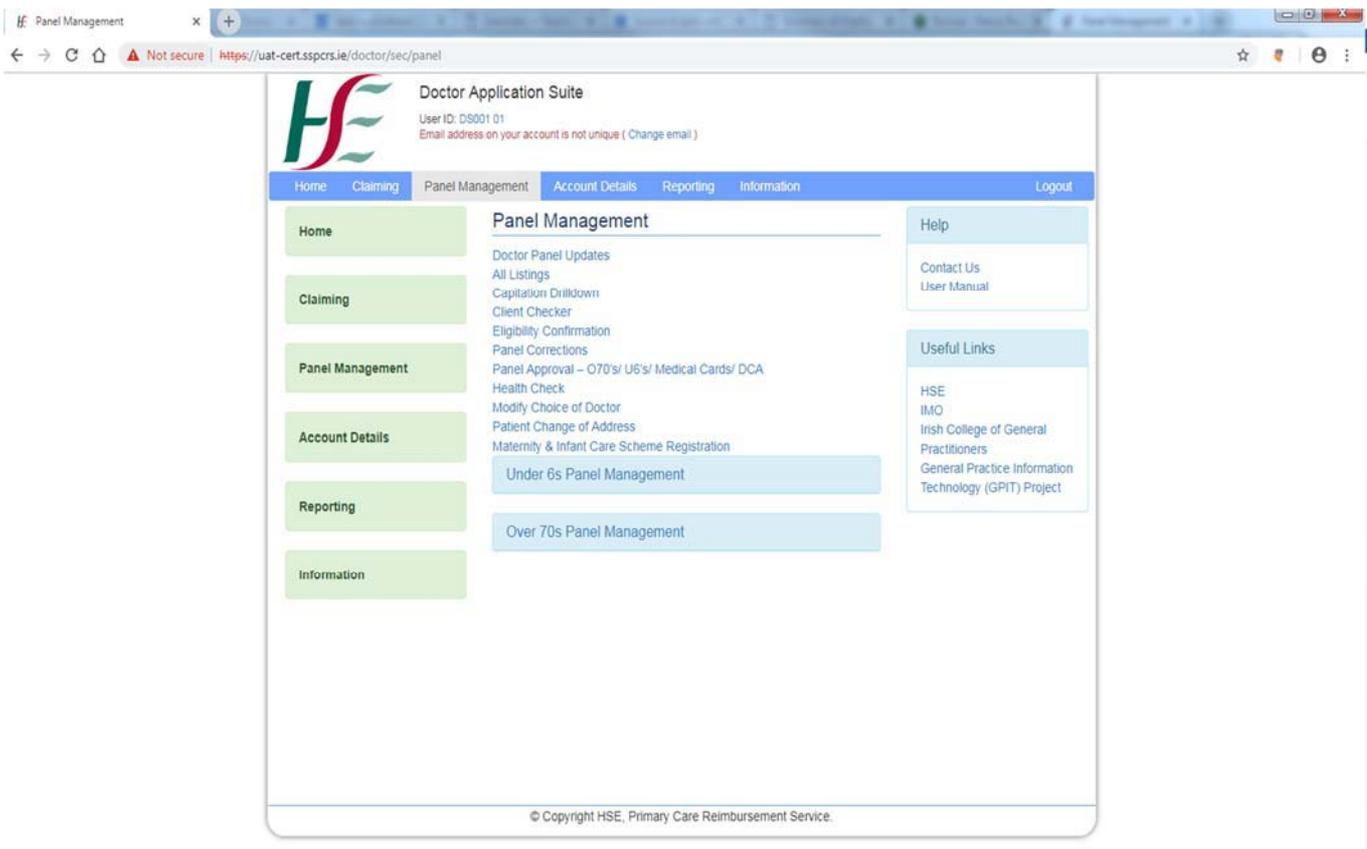
16 April 2019

Circular 012/19

Dear Doctor,

I refer to Circular 004/12 and Circular 020/17, both of which detailed measures to enhance the accuracy of the electronic record of persons listed on the Medical Card/GP Visit Card register - maintained by the HSE PCRS (Data Controller).

By utilising the online Doctor Application Suite, (Panel Management tab) - screen grab below - you have the ability to amend the electronic records of persons with current eligibility or, in some cases persons with expired eligibility. When making amendments to these records through the suite the GP is acting as a data processor.



The functionality to amend a person's electronic record includes the following:

- **Add a new baby:** Add a new baby to a family that have medical card eligibility or GP visit card eligibility.
- **Sensitive renewal:** Where a patient may lose eligibility because he/she cannot engage or complete his/her review due to a medical condition or social circumstances you can extend eligibility for that client for one year.

- **Patient Reinstatement:** If a patient presents for medical care that has had eligibility removed in error, e.g. due to a lack of response to the review process because of a change of address, you can reinstate eligibility for four months.
- **Remove a person from panel:** This allows you to remove a person with eligibility from your panel in circumstances where you are satisfied that the client has passed away or is non-resident.
- **Register movement of a patient in and out of a state medical facility:** This allows you to register the fact that a patient has entered or left a state medical facility, which will in turn cause the capitation payment to cease or re-commence.
- **Panel confirmation:** This allows you to confirm that your panel is, to the best of your knowledge, correct, on a quarterly basis.
- **Patients Change of address:** Update a change of address, having been informed by your patient
- **Modify Choice of Doctor:** This allows you to perform a change of GP at the request of a person with Medical Card eligibility or GP Visit eligibility. On completion of that process the person will be transferred on to your panel with immediate effect.

A detailed examination on all reported data protection instances is undertaken by the PCRS as a matter of routine practice. As part of this review we have come across a number of instances where errors have been made when utilising the Panel Management tab on the Doctor Application Suite - e.g. a person's personal details are incorrectly inputted resulting in correspondence or a medical card being dispatched to a different address or to a different family.

As you will be aware, since the coming into effect of the Data Protection Act 2018 and the General Data Protection Regulations (GDPR) on 25 May 2018 there is an enhanced range of obligations on Data Controllers and Data Processors. The HSE in its role as Data Controller must, where feasible within 72 hours of becoming aware of the breach, notify the Data Protection Commission of any breach. As Processor, where you become aware of a personal data breach, there is a requirement to notify the Data Controller of this without delay. If you become aware of a breach please send notifications to PCRS.DataProtection@hse.ie

The PCRS will now commence the practice of notifying you of any breach of personal data which arises, in circumstances where the root-cause of the breach is attributable to an error made by a user of the Doctor Application Suite in your practice.

The necessity for great care and attention to detail is essential when utilising the online Doctor Application Suite to make a modification to information maintained on the electronic records of a persons listed on the Medical Card/GP Vist Card central register.

I would be obliged if you would bring this Circular to the attention of all staff in your practice and I wish to thank you for your ongoing cooperation in ensuring that the personal data of patients, which are maintained on the Medical Card/GP Vist Card central register, is as accurate as possible.

Yours sincerely,



Anne Marie Hoey
Primary Care Reimbursement Service