

**Key points of the GDPR changes, effective from 25/5/2018, and how this affects businesses like West Midlands Referrals (WMRs) in general:**

WMRs maintains procedures to prevent, report and investigate data breaches. All staff working for/with WMRs are informed of GDPR policy (including client GDPR consent forms), security for electronic storage systems including protecting passwords and access, their personal accountability for breaches, the serious financial and legal consequences of breaches, and the fact that any breaches will undoubtedly result in investigation and disciplinary action.

WMRs maintains effective data protection policies and procedures, and stores information on secure electronic storage systems protected by layered security and encryption. Data is also securely stored as hard copies and on practice phone systems as numbers and recorded conversations. WMRs keeps/shares the minimum of personal data compatible with providing an efficient veterinary referral service but does need to keep full names or owners, full postal addresses of owners, telephone number(s) and sometimes email addresses, as well as clinical information about individual pets. WMRs minimises the usefulness of data stored for malicious intent, and places great regard to maintaining security. WMRs has procedures in place to be able to investigate/trace the source of any breach. Electronic data is kept for periods of years as required by the financial transaction/tax regulations and by the need to maintain clinical records for future use. Hard copies of consent forms etc are scanned and electronically stored so the hard copies can be securely destroyed shortly after they are completed by clients. All data is ultimately securely destroyed/deleted.

At their first appointment with us after 25/5/2018, all clients receive a clear simple explanation of WMRs GDPR policy so that they can give informed consent to “opt in” to accept our systems by signing a GDPR consent form. Under GDPR regulations, individual clients will have stronger rights to:

- a. Be informed
- b. Access and demand rectification of data stored about them
- c. Erasure
- d. Have their data deleted and/or restrict processing.
- e. Data portability
- f. Object / complain

At their first visit, clients need informing of our data storage and data sharing policy along with our general Terms and Conditions, and sign GDPR consent (see attached). This consent form will be available to print on Cirrus, (along with GA forms etc), and GDPR form completion is recorded by “ticking” on a box on Cirrus. Until we have GDPR consent from a client, we will not forwards their data to any other parties including referral veterinary practices or insurance companies. At their first visit, clients will also get a reference copy of our Terms and Conditions including our GDPR policy and these will be available on our website.

For most cases we will receive information electronically by email from the referring general practice. We assume that the referring practice has the permission of the client to send this data to us. We will only usually share information by email or on occasion by post/hard copy. We only usually share data with the referring practice (our reports deliberately have very limited and abbreviated personal data); with other practices (if the patient moves general practice or needs redirecting for special services eg MRI); or with insurance companies (where claims are being made). We minimise the data we send and we limit the personal information on it. We will never share data with any third party other than in delivering continuity of care or in the pursuit of debt collection.

Any queries on WMRs GDPR policy should be made to practice administrators or to the partners.