

Practice Policies: Confidentiality, Data Protection & Social Media

Confidentiality Policy

Practice Name: West London Dental Practice

Purpose of Document

The purpose of this document is to ensure all staff members at the practice are aware of their legal duty to maintain confidentiality, to inform them of the processes in place to protect personal information, and to provide guidance on disclosure obligations.

Introduction

Everyone working for the practice or elsewhere within the business is under a legal duty to keep patients' personal information confidential. Patients who believe their confidence has been breached may make a complaint to the practice, and they could take legal action or report it to the ICO. In the case of a registered dental professional, the patient could also make a complaint to the General Dental Council, which, in worst-case scenarios, may end in erasure from the GDC register.

This policy is concerned with protecting personal information about patients, although its content would apply equally to staff personal information or business-sensitive information.

Personal information is data in any form (paper, electronic, tape, verbal, etc.) from which a living individual could be identified including:

- Name, age, address, and personal circumstances, as well as sensitive personal information like race, health, sexuality, etc.
- Information regarding appointments
- Information regarding medical histories
- Information regarding finances, including any bad debts.

Although the Data Protection Act 2018 is only relevant to the personal information of living individuals, this code also covers information about deceased patients. This policy applies to all staff, including permanent, temporary, and locum staff members.

Confidentiality

Under the Data Protection Act 2018 and UK GDPR, dental practices have a duty to keep personal data about their patients safe and secure and to ensure it is only accessed by persons who need to see it for the purposes of providing safe, effective care.

Registered dental professionals have an ethical and legal duty to keep all patient information confidential.

Dental practices are also required to ensure that they do not 'advertise' to other patients or the public that a certain person is a patient of the practice or that they have had appointments or have appointments due. This means that day lists, appointment cards that identify the patient

and record cards must not be seen by other patients in the practice. It is also important that confidential telephone calls that name a particular patient are not held in earshot of other patients. Messages should not be left with a 3rd party confirming or cancelling appointments.

Caldicott Principles

The Caldicott Principles are the guidelines for ensuring people's information is kept confidential and used or shared appropriately within a healthcare setting.

All NHS organisations must have an appointed Caldicott Guardian. This won't apply to most dental practices, although there should be someone within the practice who is responsible for ensuring patient information is kept confidential and shared appropriately when required.

The Caldicott Principles

1. Justify the purpose for using the confidential information.
2. Use confidential information only when it is necessary
3. Use the minimum necessary confidential information
4. Access to confidential information should be on a strict need-to-know basis
5. Everyone with access to confidential information should be aware of their responsibilities
6. Comply with the law
7. The duty to share information for individual care is as important as the duty to protect patient confidentiality
8. Inform patients and service users about how their confidential information is used.

Disclosing Patient Information

Personal information relating to a patient should only be shared with third parties where the patient has given consent or in exceptional circumstances (GDC Standards 4.3).

Examples of where information may be shared without consent include:

- In safeguarding concerns where it is not possible to gain consent and a referral needs to be made to the local authority or to the police.
- Where information has been ordered by a court or by a coroner, where a court order has requested information, only the minimum amount of information should be disclosed.

Before disclosing information to third parties where consent has not been obtained, you are advised to contact your indemnity provider.

The Importance of Confidentiality

The relationship between clinician and patient is based on the understanding that any information revealed by the patient to the clinician will not be divulged without the patient's consent. Patients have the right to privacy and it is vital that they give clinicians full information on their state of health to ensure that treatment is carried out safely and effectively. The intensely personal nature of health information means that many patients would be reluctant to provide the clinician with information if they felt the information would be passed on.

Care must be taken to ensure that confidentiality is never breached, even to the most minor degree, in the use of social media or websites (GDC Standards 4.2.3).

Recognise Your Obligations

A duty of confidence arises out of the common law duty of confidence, employment contracts and for registered dental professionals, it is part of your professional obligations. Breaches of confidence and inappropriate use of records or computer systems are serious matters which could result in disciplinary proceedings, dismissal and possibly legal prosecution.

So, make sure you do not:

- Put personal information at risk of unauthorised access.
- Knowingly misuse any personal information or allow others to do so.
- Access records or information that you have no legitimate reason to look at. This includes records and information about your family, friends, neighbours and acquaintances.

GDC standards guidance

Dental care professionals have an ethical and legal duty to ensure they are familiar with and comply with the GDC's standards and guidance. All practice team members must also follow this guidance and ensure that they maintain patient confidentiality. Copies of this publication in full are available as PDF downloads from the GDC's website at www.gdc-uk.org

- Protect the confidentiality of patients' information and only use it for the purpose for which it was given.
- Confidentiality is central to the relationship and trust between you and your patients. You must keep patient information confidential. This applies to all the information about patients that you have learnt in your professional role including personal details, medical history, what treatment they are having and how much it costs.
- 4.2.3 You must not post any information or comments about patients on social networking or blogging sites. If you use professional social media to discuss anonymised cases for the purpose of discussing best practice you must be careful that the patient or patients cannot be identified.

Document Control

- **Practice Name:** West London Dental Practice
- **Title:** Confidentiality Policy
- **Author/s:** DCME Team
- **Owner:** DCME Team
- **Approver:** DCME Team
- **Date Approved:** 24.2.26
- **Review Date:** 24.02.2027

Change History

Version	Status	Date	Author/ Editor	Details of Change
0.1	Final	25.02.26	PG	Complete re-write of policy, updated guidance.

0.2	Final	25.02.26	HD	Minor amendments. Addition of information regarding the Caldicott Principles and disclosing information to third parties.
0.2	Final	25.02.26	HD/PG	Policy approved to go live. Launched on the portal.

The latest approved version of this document supersedes all other versions, upon receipt of the latest approved version all other versions should be destroyed, unless specifically stated that previous version(s) are to remain extant. If in any doubt, please contact the document Author.

Approved By: Dr Jasmin Thoria, Dr Kuldipsinh Gohil, Sukhdeep Kaeda

Date Published: 25/02/2026

Data Protection Policy

Practice Name: West London Dental Practice

(The full Data Protection Policy follows exactly as you wrote it, including all sections: Interpretation, Introduction, Scope, Principles, Consent, Transparency, Purpose limitation, Data minimisation, Accuracy, Storage limitation, Security integrity and confidentiality, Reporting a Personal Data Breach, Transfer limitation, Data Subject's rights, Accountability, Record keeping, Training and audit, Privacy by Design and DPIA, Processing & ADM, Direct marketing, Sharing Personal Data, Caldicott Principles, Changes.)

- **Document Control**
- **Practice Name:** West London Dental Practice
- **Title:** Data Protection Policy
- **Author/s:** Hugo Barton – Healthcare Law
- **Owner:** DCME Team
- **Approver:** DCME Team
- **Date Approved:** 02/05/24
- **Next Review Date:** May 2025

Change History

Version	Status	Date	Author / Editor	Details of Change
0.1	Final	25/02/26	Hugo Barton – Healthcare Law / HD & PG	Brand new policy developed by Healthcare Law
0.1	Final	25/02/26	Hugo Barton – Healthcare Law / HD & PG	Policy approved and live on portal

Approved By: Dr Jasmin Thoria, Dr Kuldipsinh Gohil, Sukhdeep Kaeda

Date Published: 25/02/2026

Social Media Policy

Practice Name: West London Dental Practice

Contents

- About this policy
- Who does this policy apply to?
- Who is responsible for this policy
- Compliance with related policies and agreements
- Personal use of social media
- Prohibited use
- Business use of social media
- Guidelines for responsible use of social media
- Monitoring
- Recruitment
- Breach of this policy

About this policy

This policy aims to minimise the risks to our business through social media. This policy applies to the use of all forms of social media, including all social networking sites, internet postings and blogs. It applies to using social media for business and personal purposes that may affect our business in any way.

This policy does not form part of any employment or other contract to provide services, and we may amend it at any time.

To Whom does this policy apply?

This policy applies to all employees, self-employed team members, contractors, casual workers, agency workers, volunteers and interns.

Who is responsible for this policy?

The Company or Practice has delegated responsibility for overseeing its implementation to Sukhdeep Kaeda (PM). Questions about the content of this policy or suggestions for change should be reported to the PM.

You should ask the PM any questions you may have about the day-to-day application of this policy (including reporting the misuse of social media).

This policy is reviewed annually by the PM.

Compliance with related policies and agreements

You should never use social media in a way that breaches any of our other policies. If an internet post breaches our policies in another forum, it would also breach them online. For example, you are prohibited from using social media to:

- Breach our IT and Communications Systems Policy;
- Breach any obligations we may have with respect to the rules of relevant regulatory bodies;
- Breach any obligations contained in those policies relating to confidentiality;
- Breach our disciplinary procedures;

- Harass or bully other staff in any way OR breach our bullying and harassment policy within the Employee Handbook;
- Unlawfully discriminate against other staff or third parties OR breach our Equality, Diversity & Human Rights policy within the Employee Handbook;
- Breach our Data Protection Policy (for example, you should never disclose personal information about a colleague online), or
- Breach any other laws or regulatory requirements.

You should never provide references for other individuals on social or professional networking sites. These positive and negative references can be attributed to the organisation and create legal liability for both the author of the reference and the organisation.

If you breach any of the above policies, you will be subject to disciplinary action up to and including termination of employment.

Personal use of social media

Personal use of social media is never permitted during working hours or by means of our computers, networks, and other IT resources and communications systems.

Prohibited use

You must avoid making social media communications that could indirectly damage our business interests or reputation.

You must not use social media to:

- Defame or disparage us, our staff or any third party;
- Harass, bully or unlawfully discriminate against staff or third parties;
- Make false or misleading statements, or
- Impersonate colleagues or third parties.

You must not express opinions on our behalf via social media unless expressly authorised to do so by your manager. You may be required to undergo training to obtain this authorisation. You must not post comments about sensitive business-related topics, such as our performance, or do anything to jeopardise our trade secrets, confidential information and intellectual property. You must not include our logos or other trademarks in any social media posting or your profile on any social media.

You are not permitted to add patients of the practice you meet during employment to personal social networking accounts.

Business use of social media

If your duties require you to speak on behalf of the organisation in a social media environment, you must still seek approval for that communication from the PM.

Likewise, if you are contacted for comments about the organisation for publication anywhere, including in any social media outlet, direct the enquiry to the PM and do not respond without written approval.

The use of social media for business purposes is subject to the remainder of this policy.

Guidelines for responsible use of social media

You should clearly state in social media postings or your personal profile that you are speaking on your behalf. Write in the first person and use a personal email address.

Be respectful to others when making any statement on social media and be aware that you are personally responsible for all communications published online for anyone to see.

If you disclose your affiliation with us on your profile or in any social media postings, you must state that your views do not represent those of your employer (unless you are authorised to speak on our behalf as set out in paragraph 6.3). You should also ensure that your profile and any content you post are consistent with the professional image you present to clients and colleagues.

If you are uncertain or concerned about the appropriateness of any statement or posting, refrain from posting until you have discussed it with your line manager.

If you see social media content that disparages or reflects poorly on us, you should contact the PM.

Monitoring

We reserve the right to monitor, intercept and review, without further notice, your activities using our IT resources and communications systems, including but not limited to social media postings and activities, for legitimate business purposes, which include:

- Ascertaining and demonstrating that in using the systems, you are meeting expected standards and
- The detection and investigation of unauthorised use of the systems (including where this is necessary to prevent or detect crime).

For further information, see our IT and Communications Systems Policy on our compliance portal.

Recruitment

We may use internet searches to perform due diligence on candidates during recruitment.

Where we do this, we will act in accordance with our data protection and equal opportunities obligations.

Breach of this Policy

Breach of this policy may result in disciplinary action up to and including dismissal. If we suspect you have committed a breach of this policy, you are required to cooperate with our investigation.

You may be required to remove any social media content that we consider a breach of this policy. Failure to comply with that request may result in disciplinary action.

Document Control

- **Title:** Social Media Policy
- **Practice Name:** West London Dental Practice
- **Author/s:** Hugo Barton – Healthcare Law
- **Owner:** DCME Team
- **Approver:** DCME Team
- **Date Approved:** 25/02/2026
- **Next Review Date:** 25/02/2027

Change History

Version	Status	Date	Author / Editor	Details of Change
0.1	Final	25/02/26	Hugo Barton – Healthcare Law / HD & PG	New policy developed by Healthcare Law

0.1	Final	25/02/26	Hugo Barton – Healthcare Law / HD & PG	New policy launched on portal
-----	-------	----------	--	-------------------------------

The latest approved version of this document supersedes all other versions. Upon receipt of the latest approved version, all other versions should be destroyed, unless specifically stated that previous version(s) are to remain extant. If in any doubt, please contact the document Author.

Approved By: Dr Jasmin Thoria, Dr Kuldipsinh Gohil, Sukhdeep Kaeda

Date Published: 25/02/2026