





## FOREWORD

This booklet explains what to expect when your child comes into the Ulster Independent Clinic for an operation or investigation under general anaesthetic.

The contents have been adapted from the leaflet – 'Your Child's General Anaesthetic – Information for Parents and Guardians of Children', produced by the Royal College of Anaesthetists, The Association of Anaesthetists of Great Britain and Ireland, and The Association of Paediatric Anaesthetists of Great Britain and Ireland, Fourth Edition 2014.

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# WELCOME

On behalf of the staff, I'd like to welcome you to the Ulster Independent Clinic.

We understand that the prospect of your child going into hospital can be worrying – for you as well as your child. Rest assured, we'll make every effort to lessen any anxieties by creating a calming atmosphere for your child and ensuring they're cared for at all times by skilled and professional staff.

This booklet sets out the basic things you should know about preparing your child for admission, about the treatment they will receive, and also about the Clinic itself and its facilities.

If you have any questions or if you would like further details, please don't hesitate to ask any member of our team. We'll be happy to help.

**Diane Graham**

Matron / Chief Executive







## PREPARING YOUR CHILD FOR HOSPITAL

There are several things that you can do to prepare your child for coming into hospital. Unless your child is very young, you should try and explain:

- that they are going into hospital
- that they will be having an operation or investigation
- some basic information about what will happen to them when they are in hospital.



When you are explaining things, try to use simple language that they can understand.

- Explain that the operation or investigation will help your child get better.
- Encourage your child to talk about the operation and ask questions. Books, games, role-play and stories can help with this.
- Talk about timing – when your child will have the operation or investigation and how long they will stay in hospital.
- If your child is going to be staying in hospital overnight, let them know that you will be able to stay with them in the same room in a parent bed next to theirs.

Your child can help pack their own bag and decide which nightclothes and toys to bring.

Each room has a TV with access to children's channels.

If you like, we can make arrangements for you and your child to visit the ward and operating theatre before admission day itself. To make an appointment, please call 028 9068 7666 on Monday to Friday between 9am and 5pm.

Do let us know in advance of any special requirements your child has and we will do whatever we can to help.

### Important

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Please let us know as soon as possible before the day of the procedure if your child has been ill – developed a severe cough or cold, vomiting or diarrhoea, or had contact with any infectious diseases, for example chickenpox. In these circumstances it may be best to delay the operation until they are better.



## When should I tell my child?

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Use your child's age as a rule of thumb to judge when best to tell them about going into hospital. That is:

### **Aged 2–3**

Children between two and three years of age should be told two to three days before and again on the day of admission.

### **Aged 4–7**

Children between four and seven years of age should be told four to seven days before the day of admission – and reminded again the day before.

### **Aged 7+**

Older children will usually be involved in making decisions about the operation or investigation, and discussion can take place a few weeks before the day of admission.





## FASTING

### Nothing to eat and drink: 'Nil by Mouth'

When we send you the letter about your child's admission, you'll find instructions about when to stop your child eating and drinking. Please note that this includes chewing gum as well. It is important for you and your child to follow these instructions. This is because, if there is food or liquid in your child's stomach during anaesthetic, it could come up into the back of the throat and damage his or her lungs.

These are the latest times at which you should give your child anything to eat or drink:

**6 hours before:** Your child can have a light meal, a glass of milk or a fizzy drink. Bottle-fed babies can have formula feed.

**4 hours before:** Babies can have breast milk.

**2 hours:** Children and babies can have a drink of water or diluted cordial – but not a fizzy drink or milk.



# ON THE DAY OF ADMISSION

## A pre-operative visit

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The anaesthetist will visit you on the ward before the procedure to discuss your child's anaesthetic.

The anaesthetist needs to find out about your child's general health, previous experiences of anaesthesia, any medicines your child is taking and any allergies he or she might have.

This is a good point to ask any questions you may have about this hospital visit, for example:

- What type of anaesthetic do you recommend?
- What are the risks of this type of anaesthetic?
- Does my child have any special risks?
- How will my child feel afterwards?

## Delays in the procedure

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Occasionally the anaesthetist may learn something about your child that means it would be safer not to do the procedure on that day. This could happen if your child has a bad cold, has a rash or has eaten food too recently. In this case, we will discuss rescheduling the procedure with you.

## Premedication

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Premedication (sometimes known as a pre-med) is the name for drugs sometimes given before an anaesthetic. Although they are used less often today, a pre-med may help your child to relax, or it may be recommended in relation to the kind of surgery your child will be having.

If your child does need a pre-med, this will usually be given as a liquid, some time before the anaesthetic.

A pre-med may make your child drowsier afterwards. If you plan to take them home on the same day, this will influence the discharge time.

The drugs used can be:

- sedatives to ease your child's anxiety
- pain-relieving drugs such as paracetamol that can help at the end of the procedure
- medications to protect your child from side-effects of the anaesthetic, such as nausea
- an extra dose of treatment for illnesses like asthma.

About an hour before the operation is scheduled, a local anaesthetic "Magic Cream" can be put on the hand or arm so that injections do not hurt. This cream is held in place with a special clear plaster. It works well for 9 out of 10 children. This cream is called EMLA or Ametop.



# PARENTS' GUIDE TO ANAESTHESIA

## What is anaesthesia?

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The word anaesthesia means 'loss of sensation':

- **a general anaesthetic** ensures that your child is unconscious and free of pain during an operation or procedure
- **general anaesthesia** is a state of controlled unconsciousness and freedom from pain
- **anaesthetics** are the drugs that are used to start and maintain anaesthesia
- **anaesthetists** are specialist doctors who give the anaesthetic and look after the health of your child during surgery, and are also closely involved with your child's pain relief after surgery.



## Anaesthetics, choice & your child

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It's often possible for you and your child to choose how the anaesthetic and other medicines are given. Sometimes there are medical reasons why things have to be done a certain way. If so, this will be explained to you.

However, nothing will happen unless you understand and agree with what has been planned. Your wishes and those of your child are very important.





## CONSENT

Before going to theatre, the Consultant Surgeon will visit you both on the ward to discuss the surgery and answer any questions you or your child might have.

The Consultant will ask you to give written consent to the surgery (if your child is under the age of sixteen). Please ensure you have been given adequate information to enable you and your child to make an informed choice.

**Note: not all parents have parental responsibility.**

Adolescents are encouraged to be actively involved in the process of consent and, if deemed competent by their Consultant, may sign their own consent form if under 16. However, generally the parent or main carer of a child under 16 signs the form, or is present to give verbal consent.

It is recommended that children should be accompanied during all medical consultations.

Information regarding consent may be found online at [www.doh.uk/consent](http://www.doh.uk/consent)



### Who can provide consent?

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1. the child's mother
2. the child's father:
  - where he has married the child's mother
  - where he is not married, but has obtained an authorisation from the court or through a parental responsibility agreement
  - where he is registered as the father on the child's birth certificate for children born on or after 15th April 2002
3. a person who has acquired parental responsibility through a court order, residence order or guardianship order for example, foster parents, step-parents or grandparents
4. the young person who is 16 years or over
5. a young person under 16 years where the Consultant believes they are capable of understanding the issues and consequences
6. the child's legally adoptive parents.

### Who cannot consent?

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A partner who is not married to the child's mother/father and does not have a court authorisation confirming his/her parental rights cannot give consent.

# GOING TO THEATRE

## In the Anaesthetic Room

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The anaesthetic room is the room next to the operating theatre where anaesthetics are usually administered.

A nurse from the ward will accompany you both to the anaesthetic room. Your child may travel either in their bed, walk or be carried by a parent.

Your child will be able to take a toy or comforter with them, and they will be able to wear their own pyjamas to the operating theatre. (Or, if preferred, we will provide a colourful gown.) Your child will be able to keep underwear on.

You will normally be welcome to stay with your child until they are anaesthetised. It may be possible to give the anaesthetic while your child is sitting on your lap.

The anaesthetist will use either gas or an injection through a cannula to start the anaesthetic. This will have been agreed with you beforehand.

Most older children will have an injection through a cannula.

If both methods are safe for your child, you may be able to choose which is used.

If a cannula is used, your child will normally become unconscious very quickly indeed. The anaesthetist will then use a mask to continue the anaesthetic.

If the anaesthetic is started with gas, the anaesthetist generally uses a mask to give the gas, or may pass the gas through a cupped hand gently placed over your child's nose and mouth. Anaesthetic gases smell similar to felt-tip pens. It normally takes a little while (one or two minutes) for the anaesthetic to take effect. It is normal for the child to become restless during this time.



### What is a cannula?

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A cannula is a thin plastic tube that is placed into a vein under the skin, usually on the back of the hand. A needle is used to put the cannula in, but the needle is removed immediately, leaving only the soft cannula in place.

A cannula can be left in place for hours or days so that drugs and fluids can be given without need for further injections. Sometimes blood samples can also be taken the same way.

The cannula is removed before your child is discharged.

### What happens next?

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Your child will be taken into the operating theatre for the operation or investigation. You will not be able to accompany your child further at this stage.

The anaesthetist will stay with your child, monitoring their blood pressure, pulse and breathing throughout the procedure and ensuring that they are safe and remain fully sedated.



## AFTER SURGERY

### Recovery room

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Most children spend a period of time in the recovery room. This is a place near the operating theatre where patients go immediately after surgery until the effects of the anaesthetic drugs wear off. The nursing staff in the recovery room will telephone you to let you know your child's surgery has finished.

Each child is cared for by a specialist nurse until they have regained consciousness and are comfortable enough to return to their room.

Many children, especially younger children, show signs of confusion or distress when they wake up in the recovery room. A few children become very agitated. This may last around 30 minutes.

It's naturally worrying for parents and carers if a child wakes in distress. However, the recovery room nurses are very experienced in this situation, and will advise you on how best to comfort and reassure your child.

If your child is distressed, it may also be possible for you to be with them in the recovery room during this time.

### The ward

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When your child returns to the room, they may still be quite drowsy. This is normal, and nursing staff will maintain close observation. Your child may drink on return to the room and will be given an ice-lolly and/or food when more awake.



## PAIN RELIEF

Pain-relieving drugs (analgesics) are given during anaesthesia to ensure that your child is as comfortable as possible. The type of pain relief will depend on the procedure. The anaesthetist, Surgeon and nurses will talk to you about the best type of pain relief for your child.



### How pain relief is administered

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- Syrups and tablets: just like at home.
- Suppositories: some pain-relieving medicines like paracetamol can be given rectally (into the bottom). These are often given while your child is anaesthetised and last for several hours. Suppositories are very helpful when children cannot take medicines by mouth or are feeling sick.
- Local anaesthetics: these are injected near the nerves around the operation site to numb the area. The injections are given while your child is anaesthetised and the pain relief lasts for several hours.
- Strong pain-relieving drugs such as morphine can be given in many different ways.

# GOING HOME



Many children have their investigations or operations carried out as 'day patients' and go home on the same day, while others may stay for one or two nights post-operatively.

After surgery, your child may experience some pain or discomfort. You will be given pain-relieving medications to take home with you, and we will explain how these should be taken. You will also be given an advice sheet and any dressings that may be required.

Occasionally children may feel sick after they have left hospital, or even vomit. This sometimes happens in the car on the way home, so two adults are required to accompany the child.

Your child may not sleep well after a stay in hospital. Their behaviour might be a little more clingy or difficult than before. This is a normal reaction, and they will usually return to normal within three to four weeks.

**If you have any concerns about your child when you get home, contact the Clinic on the number provided on the discharge information leaflet.**



## SIDE-EFFECTS AND COMPLICATIONS

In modern anaesthesia, serious problems are uncommon. Risk cannot be removed completely, but today's equipment, training and drugs have made it a much safer procedure in recent years.

Most children recover quickly and are soon back to normal. Some may experience side-effects like sickness or a sore throat. These usually last only a short time and there are medicines available to treat them if necessary.

The exact likelihood of complications depends on your child's medical condition and on the nature of the surgery and anaesthesia your child needs. The anaesthetist can discuss this with you in detail at the pre-operative visit.

For a child in good health having minor surgery:

- 1 child in 5 becomes agitated on waking
- 1 child in 10 experiences a headache, sore throat, sickness or dizziness
- around 1 child in 10,000 develops a serious allergic reaction to anaesthetic.

To put this into context, throughout the whole of their life, an individual is at least 100 times more likely to suffer serious injury or death in a road traffic accident than as a result of anaesthesia.

# CHECKLIST

- ☐ Prepare your child as instructed in this booklet
- ☐ Make sure your child fasts from the time stated
- ☐ Bring pyjamas / t-shirts and pants, dressing gown, slippers
- ☐ Favourite toy or blanket, favourite mug / cup or bottle
- ☐ Any medications and inhalers
- ☐ Note of any drug or food allergies

## KEY INFORMATION: AT A GLANCE

- A child under the age of 12 coming into the Clinic must be accompanied by one parent at all times throughout their stay. This includes overnight.
- If you have medical insurance, the company will cover the cost of this, in most cases.
- If one parent of an adolescent wishes to stay with them overnight, arrangements can be made for this at an additional cost.
- The parent who remains with their child will receive a snack, light meal or full meal / meals depending on their length of stay.
- There are tea and coffee facilities on each ward for your use.
- If your child is staying overnight, a fold-away parent bed will be placed in their room for you.
- You will have full use of the facilities in the room – en-suite facilities with towels supplied, telephone and television.
- All other visiting children must be supervised at all times.
- Two adults are required to accompany the child home in the car.



## USEFUL ORGANISATIONS

### **Royal College of Anaesthetists**

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The organisation is responsible for the standards in anaesthesia, critical care and pain management throughout the UK.

[www.rcoa.ac.uk](http://www.rcoa.ac.uk)

### **Association of Anaesthetists of Great Britain & Ireland**

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This organisation works to promote the development of anaesthesia and the welfare of anaesthetists and their patients in Great Britain and Ireland.

[www.aagbi.org](http://www.aagbi.org)

### **Action for Sick Children**

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This is a children's healthcare charity, specially formed to ensure that sick children always receive the highest standard of care. They have a series of information leaflets specifically to help parents cope with, and prepare for, different aspects of children's healthcare.

[www.actionforsickchildren.org](http://www.actionforsickchildren.org)

Further information, including additional information leaflets for children to download, can be found on the website

[www.rcoa.ac.uk/patientinfo](http://www.rcoa.ac.uk/patientinfo)



# GETTING HERE

The Ulster Independent Clinic is situated in South Belfast at the corner of Stranmillis Road and Malone Road.

## By car from M1 Motorway

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From M1 take exit at Junction 2 for A55 Outer Ring.

Continue through two sets of traffic lights, under railway bridge and through a third set of lights to Balmoral Avenue.

Continue along Balmoral Avenue to junction with Malone Road.

Take the slip road on the left on to Malone Road.

Prepare for turning right on to Stranmillis Road at the lights.

The Ulster Independent Clinic is clearly signposted on the left.

## By car from M2 Motorway

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Follow signposts for the Westlink/M1 from the M2.

Take the exit at Junction 2 for A55 Outer Ring.

Continue through two sets of traffic lights, under railway bridge and through a third set of lights to Balmoral Avenue.

Continue along Balmoral Avenue to junction with Malone Road.

Take the slip road on the left on to Malone Road.

Prepare for turning right on to Stranmillis Road at the lights.

The Ulster Independent Clinic is clearly signposted on the left.

## By car from Belfast city centre

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From Queen's University, keep in the left-hand lane.

Continue uphill to Stranmillis and past Ulster Museum.

Continue through Stranmillis Village.

At roundabout, take 3rd exit signposted for M1.

Continue along Stranmillis Road.

The Ulster Independent Clinic is the last entrance on the right, just before the traffic lights.

## By bus

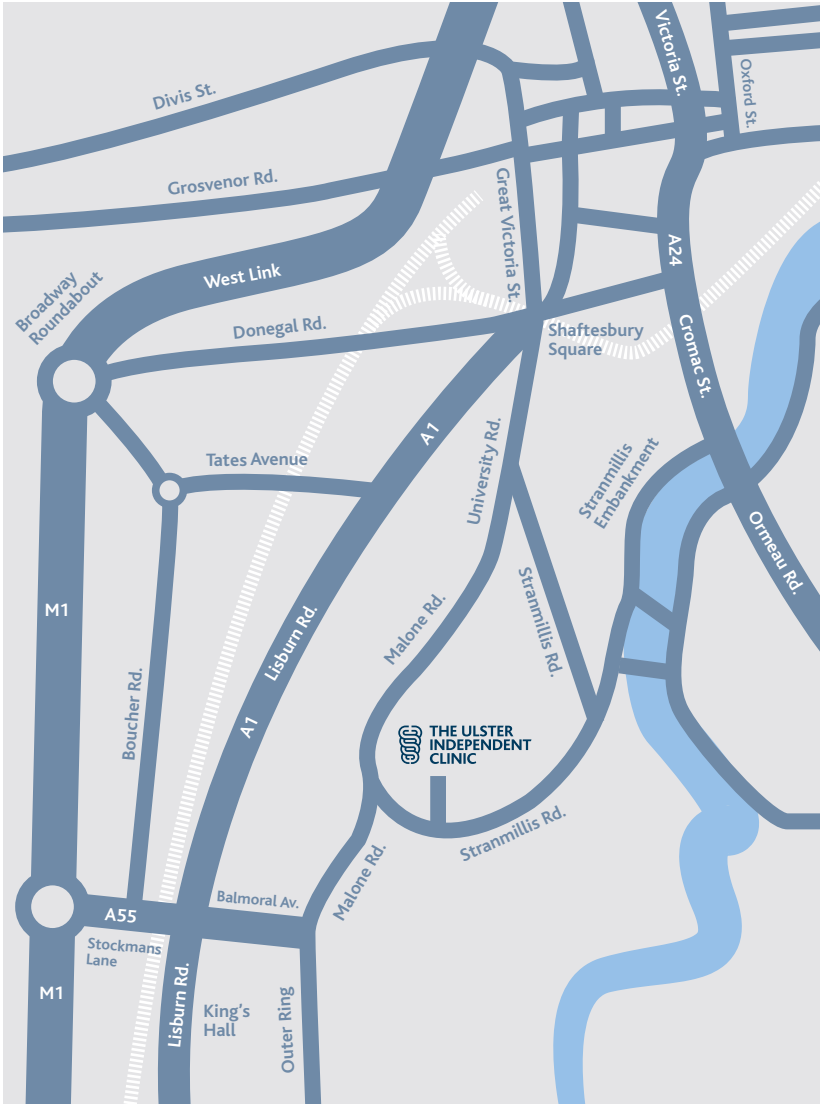
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The nearest bus stop is a 5–10 minute walk from the Clinic. From Donegall Square East in the city centre, take: Number 8A Stranmillis or Numbers 8B or 8C for Malone.

## By train

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The nearest train station is Botanic Station. It is a 30-minute walk or 10-minute taxi journey to the Clinic.





The Ulster Independent Clinic is accredited by CHKS. The primary objective of accreditation is to help healthcare organisations improve their management and operational systems, and demonstrate their ability to provide quality services. The clinic undergoes regular reviews and service improvements to maintain this accreditation.

The HDSU department of the Ulster Independent Clinic is accredited by ISO.

# PRIVACY NOTICE

## 1: WHAT IS THE PURPOSE OF THIS DOCUMENT?

**Ulster Independent Clinic is committed to protecting the privacy and security of your personal data.**

This privacy notice describes how we collect and use your personal data during and after your treatment and provides information in respect of your privacy rights and how the law protects you.

It is important that you read this privacy notice together with any other privacy notice or consent request we may provide on specific occasions when we are collecting or processing your personal data so that you are fully aware of how and why we are using your data.

## 2. WHO WE ARE AND GENERAL INFORMATION

### CONTROLLER

Ulster Independent Clinic is a "data controller" for any of your personal data we hold (collectively referred to as the "Clinic", "we", "us" or "our" in this privacy notice). This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

The Consultant/s providing your private medical treatment at the Clinic are joint "data controllers" in relation to your personal data which they hold for the provision of your private medical care.

This privacy notice is for all patients of the Clinic.

### CONTACT DETAILS

If you have any questions about this privacy notice, including how we handle your personal data or requests to exercise your legal rights, please contact our Data Protection Officer (DPO), in one of the following ways:

**Email:** [secretary@uic.org.uk](mailto:secretary@uic.org.uk).

**Postal Address:**

Data Protection Officer  
Ulster Independent Clinic  
245 Stranmillis Road  
Belfast BT9 5JH

**Telephone:** 028 9066 1212

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the opportunity to deal with your concerns before you approach the ICO so please contact us in the first instance outlining your concerns.

## CHANGES TO THIS PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

We keep our privacy notice under regular review. This version was last updated on 8th September 2023. We ensure that any updates to this privacy notice are made available on our website and in our patient booklets.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### THIRD PARTY LINKS

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy notices. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## 2: DATA PROTECTION PRINCIPLES

***We will comply with data protection law, which says that the personal data we hold about you must be:***

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

## 3: THE KIND OF DATA WE HOLD ABOUT YOU

***Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the person's identity has been removed (anonymous data).***

There are certain types of more sensitive personal data which require a higher level of protection, such as information about a person's health, religion or race, which are called "special category data".

We will collect, store, and use the following categories of your personal data:

- **Contact Data** - personal contact details such as name, title, addresses, telephone numbers and personal email addresses.
- **Identity Data** - personal details such as date of birth, gender, marital status, photographic ID, next of kin, emergency contact information and dependants.
- **Private Medical Insurance Data** - medical insurance details, including membership numbers and compensation history.
- **Financial Data** - payment information, including invoices, payment methods, bank/card details and billing address.
- **Image Data** – visual images, personal appearances and behaviour of individuals (but not sound) shall be collected by our CCTV when patients attend the publicly accessible parts of our property. For the avoidance of doubt, there are no CCTV cameras within the consulting rooms, wards or theatres on our property.
- **Audio Data** – recordings of phone calls, which are taken for training and complaint management purposes.
- **Personal Views** – your feedback and responses to our patient satisfaction survey, should you provide same, or details of any complaint you submit to us.
- Any further information that you choose to tell us.

We will also collect, store and use the following more sensitive types of personal data:

- **Health Data** – details of your health comprising records, records of health conditions, any disability, treatments and care received including vaccination status, prescriptions, notes and reports about your health from your GP, results of x-rays, MRI or CT results, blood tests, pathology tests, tissue samples and other relevant medical examinations.
- **Religious Data** – data in respect of your religion is collected at admission so that we can make any arrangements as necessary being mindful of your religious beliefs, such as arranging any chaplaincy attendances.
- **Sex Life Data** – on occasion, we may collect data pertaining to your sex life or sexual orientation, such as we will make enquiries of female patients on the chance of pregnancy prior to undertaking an x-ray, tests or procedure.

#### 4: HOW IS YOUR PERSONAL DATA COLLECTED?

*The Clinic will collect the personal data identified above to provide your medical care and in order to improve the quality of the services provided by the Clinic. We use different methods to collect personal data from and about you, including through:*

- **Direct interactions** – primarily we collect personal data about you, the patient, through the referral process and throughout the course of the provision of medical care to you, either directly from you or from your parent, carer or guardian. Such collection occurs when you: enquire after medical services the Clinic provides; you complete forms; you request information from us; throughout the provision of medical care and when you give us feedback by completing voluntary surveys.
- **Third parties** – in some circumstances, we shall receive personal data from the following sources: your GP, dentist, physiotherapist or optometrist; a health care trust; a consultant or other health care provider by a referral letter; your medical insurance provider; your employer; your other third party payee such as a sports club; the Home Office or other parties involved in facilitating the care of asylum seekers; or in some instances from your legal representative.

#### 5: HOW WE WILL USE YOUR PERSONAL DATA

*We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:*

- Where we need to perform an agreement we have entered into with you.
- Where we need to comply with a legal obligation.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests

*We may also use your personal data in the following situations, which are likely to be rare:*

- Where we need to protect your interests (or someone else's interests).
- Where it is needed in the public interest.

We have set out below a description of the ways we plan to use your personal data and sensitive data (Health Data), and which of the legal bases (legal grounds) we rely on to do so. Note that we may process your personal data on more than one legal basis, when several grounds exist.



Purpose	Description	Type of personal data	Lawful basis
<b>Pre-admission and admission</b>	We will collect and process personal data before you are admitted as a patient and upon admission, both directly from you and third parties as identified above. This will allow us to provide you with the medical care you wish to receive and to arrange your medical care appointments.	Contact Data Identity Data Health Data Religious Data Sex Life Data	Necessary in order to take steps prior to entering a contract and as necessary for the performance of a contract with the patient.  Necessary for the medical diagnosis and provision of health care or treatment pursuant to a contract with a health care professional.
<b>Private Medical Insurance and payment details</b>	We will collect your private medical insurance or payment details at the outset, and process it throughout your patient journey, to facilitate the billing and payment of your medical care and to collect money owed to the Clinic.	Contact Data Identity Data Private Medical Insurance Data Financial Data Health Data	Necessary in order to take steps prior to entering a contract and as necessary for the performance of a contract with the patient.  The use of the data (save for Health Data) is in our legitimate interest to ensure that the Clinic receives money owed to it.  The use of limited Health Data relating to the treatment received by a patient is processed as necessary for the provision of health care or treatment. The lawful basis of any such processing by your Private Medical Insurance company shall be on the basis they have communicated to you in their respective privacy notice.
<b>Treatment of patient</b>	We will collect and process your personal data throughout your care at the Clinic to facilitate treatment and enable consultants to make decisions in respect of your diagnosis and treatment and to ensure you receive safe and effective care. This will include obtaining tests, delivering treatment, ordering medication and recording such data for clinical audit and quality purposes.	Health Data Identity Data Contact Data Private Medical Insurance Data Financial Data	Necessary for the performance of a contract with the patient.  Necessary for compliance with legal obligations, to which we are subject and for review by RQIA or the Department of Health.  Necessary for the medical diagnosis and provision of health care or treatment pursuant to a contract with a health care professional.  Necessary for reasons of public interest in the area of public health and ensuring protection against cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices
<b>Patient Survey</b>	As part of your medical care, we engage a third party to obtain patient feedback in the form of surveys, which you can complete voluntarily.	Contact Data Identify Data Health Data	Necessary for compliance with a legal obligation to which we are subject as a private health care provider under the Private Healthcare Market Investigation Order 2014 (PHIN) and in our legitimate interests to outsource this survey to ensure the efficient response and in turn improve the quality of the health care we provide.  Necessary for reasons of public interest in the area of public health and ensuring protection against cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices.
<b>Investigation of Complaints</b>	It may be necessary to process personal data to investigate complaints received from patients.	Contact Data Identify Data Health Data (if disclosed by you) Patient feedback	We have a legitimate interest and in the course of our legitimate activities in the provision of a complaint-handling service to patients.  Necessary for the performance of a contract with the patient.  Necessary for reasons of public interests in the area of public health to ensure high standards of quality and safety of health care.

Purpose	Description	Type of personal data	Lawful basis
<b>Reporting Infections Diseases</b>	It may be necessary to report an infectious disease to the Director of Public Health, should we suspect that a patient is suffering from a notifiable disease.	Identity Data Contact Data Health Data	Necessary for compliance with a legal obligation to which health care providers are subject.  Necessary for reasons of public interest in the area of public health and ensuring protection against cross-border threats to health.
<b>Reporting to RQIA and the Department of Health</b>	We shall record data as required by our regulators, including RQIA and the Department of Health, and disclose data to such regulators as required to comply with our legal obligation and evidence compliance with accreditation standards. Whilst on most occasions, the data will be aggregated, in some circumstances the data will not be aggregated and will comprise personal data, such as your age, date of birth and sex together with any corresponding Health Data.	Health Data Identity Data	Necessary for compliance with legal obligations, to which we are subject and for review by RQIA or the Department of Health.  Necessary for reasons of substantial public interests and the public interest in the area of public health and ensuring protection against cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices.
<b>Reporting to Medical Implant and Device Registries</b>	We shall submit data to medical implant and device registries as required by law, such as the National Joint Registry and the Breast and Cosmetic Implant Registry. The purpose of which is to improve patient safety and help facilitate patient contact should the need arise to recall any implants or medical devices.	Identity Data Contact Data Health Data	Necessary for compliance with legal obligations, to which we are subject pursuant to the Health and Social Care Act 2012 and for as necessary for the performance of a task carried out in the public interest.  Necessary for reasons of public interest in the area of public health and ensuring protection against cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices and processing is necessary for the purposes of preventive medicine, medical diagnosis, the provision of health care or treatment or the management of health care systems pursuant to contract with a health care professional.
<b>Medical Research and statistical purposes</b>	Subject to your prior consent, the Health Data we are obliged to disclose to the statutory registries as set out above may be processed by the recipient data controller (NHS and the Department of Health) (directly or indirectly by its processors) for research and statistical purposes), in order to make advancements in medicine and improve treatment for the benefit of the public.	Health Data	Following receipt of your explicit consent to process the personal data for these purposes.
<b>CCTV</b>	We operate CCTV throughout our premises (excluding wards, consulting rooms and theatres) to protect the property, our staff and patients. Our CCTV facilities record images only.	Image Data	We have a legitimate interest to ensure safety and security of patients, staff, visitors and our property and to also deter crime.

Purpose	Description	Type of personal data	Lawful basis
<b>Telephone recording</b>	Telephone enquiries may be recorded for training and quality purposes.	Audio Data (together with any other data you may choose to disclose over the telephone)	We have a legitimate business interest in ensuring that all telephone enquiries are dealt with effectively. Necessary for reasons of public interest in the area of public health to ensure high standards of quality and safety of health care.
<b>Fraud Prevention</b>	We may process your personal data to verify your identity, to prevent fraud, compliance with anti-bribery obligations.	Identity Data Financial Data	It is our legitimate interest to minimise fraud that could be damaging for patients and us. Necessary for compliance with legal obligations to which we are subject.
<b>Debt Collection</b>	We may share your personal data with Debt Collection Agencies used by the Clinic from time to time for the purposes of recovering debts owed to us.	Financial Data Contact Data	We have a legitimate interest in processing personal data for the purposes of recovering debts owed to us.
<b>Enforcement of legal rights and defence of legal claims</b>	We may process your personal data for the purposes of protecting our legal rights and defence or legal claims.	Contact Data Identity Data Health Data (if applicable) Finance Data	We have a legitimate interest to protect our business, interests and rights. Necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.
<b>Health and Safety Investigations</b>	We may process personal data when required to do so pursuant to statutory investigations.	Contact Data Identity Data Health Data (if applicable)	Necessary to comply with our legal and regulatory obligations. Necessary for the purposes of the management of health care systems and services and necessary for reasons of public interest in the area of public health including ensuring high standards of quality and safety of health care.
<b>Private Medical Insurance Audits</b>	We may process personal data pursuant to audits of invoices as required by private medical insurance companies. This helps us ensure that the information provided to Private Medical Insurance companies is accurate and aligned with the terms of your insurance policy.	Finance Data Health Data	Necessary for the performance of a contract with the patient where they have engaged a Private Medical Insurance provider. Necessary for the provision of health care pursuant to a contract with a health care professional. We have a legitimate business interest in ensuring accuracy of information and compliance with Private Medical Insurance policies.
<b>Next of kin</b>	Subject to your consent, we may share your personal data with your next of kin as identified by you prior to or on your admission, as a patient of the Clinic.  In an emergency, we may need to liaise with your next of kin to obtain instructions in respect of your treatment when you do not have capacity to provide instructions.	Health Data	Following receipt of your explicit consent to process the personal data for these purposes.  We shall share your Health Data with your next of kin when it is necessary to protect your vital interests and when you are physically or legally incapable of giving consent.
<b>Data Subject Access Requests</b>	We may process your personal data pursuant to a Data Subject Access Request to fulfil our legal obligation under the data protection laws.	Contact Data Identity Data Health Data (if applicable) Private Medical Insurance Data Financial Data	Necessary for the purposes of compliance with the Data Protection Act 2018.

## CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## DO WE NEED YOUR CONSENT?

We do not need your consent if we use your personal data and sensitive data in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of your medical care. In limited circumstances as identified above, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the data that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

## 6: DATA SHARING

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We may have to share your data with third parties, including third party service providers. We require third parties to respect the security of your data and to treat it in accordance with the law. If we do, you can expect a similar degree of protection in respect of your personal data.

### WHY MIGHT WE SHARE YOUR PERSONAL DATA WITH THIRD PARTIES?

We will only share your personal data with third parties where required by law, where it is necessary to administer your medical care pursuant to our contract with you.

### WHO WE SHARE YOUR PERSONAL DATA WITH

We will share your personal data with the parties set out below for the purposes set out in the table above:

- medical consultants involved in the provision of your medical care at the Clinic acting as joint controllers;
- GP's, other doctors and consultants or other health professionals or providers who are involved in the provision of your medical care, who do not operate at the Clinic acting as controllers;

- NHS England, HSC Northern Ireland, HSE Northern Ireland, HSE Republic of Ireland including for the provision of your medical care and for the maintenance of statutory registers acting as controllers;
- RQIA and the Department of Health, PHIN and other statutory bodies, regulators and health boards acting as controllers;
- your insurer, legal representative or other third party payee such as your sports club or society, acting as controllers;
- our auditors as we may engage from time to time acting as controllers, who may on occasion request certain data sets which comprises personal data;

### together with the following third party service providers we engage:

- our legal representatives, in connection with the defence of any claim or other analogous legal advice;
- our hardcopy storage providers we may instruct;
- debt collection agencies we engage from time to time;
- third party providers who supply IT support and maintenance services in respect of our systems and equipment, which include, Acorn, Toadstool Technologies, Siemens, Philips, and GE, together with other such providers;
- providers of shredding services who we appoint from time to time.
- our third party supplier Cemplicity, who shall collect feedback, as we are required to seek this information by law, the responses of which we are legally obliged to submit to PHIN. Cemplicity use a sub-processor Twilio and Sendgrid Services, to issue a text message and emails with a link to the survey. Twilio and Sendgrid Services will not receive any of your sensitive personal data and the information shall be limited to your name, phone number and email address.

We will only share personal information as necessary to achieve the purpose of the processing.

### SECURITY OF MY PERSONAL DATA SHARED WITH THIRD PARTY SERVICE PROVIDERS

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies and to treat your personal data in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and they are only permitted to process your personal data for specified purposes and in accordance with our instructions.

## WHAT ABOUT OTHER DATA CONTROLLERS?

We will only share your personal data (including your sensitive personal data) with the health care professionals and Consultant/s providing your private medical care at the Clinic for the purpose of fulfilling our legal obligations to you or as required by law.

## 7: TRANSFERS OF PERSONAL DATA OUTSIDE THE UNITED KINGDOM

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For the most part, we do not transfer your personal data outside the United Kingdom. However, in the following limited circumstances, your personal data will be transferred outside the United Kingdom so that we can perform our contract with you and provide the medical services:

- it may be necessary to transfer your personal information (including your sensitive personal data) to another health care professional located outside the United Kingdom for the provision of further health care advice and treatment;
- our service provider Cemplicity provide some technical support services from New Zealand. Any personal data transferred or accessed in New Zealand shall be aggregated;
- Cemplicity's sub-processors Twilio and Sendgrid are located in San Francisco, which will involve a transfer of your name, email address and mobile number to San Francisco; or
- if you are a patient from another jurisdiction visiting Northern Ireland (either for leisure or specifically for health care) and attend at the Clinic for treatment, we may transfer your personal data to your home jurisdiction once you leave the Clinic through any ongoing engagement.

## MEASURES WE TAKE

- Whenever we transfer your personal data outside of the United Kingdom, we ensure a similar degree of protection is afforded by ensuring at least one of the following standards is implemented: we only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data (which includes EU countries and New Zealand); or
- where we use service providers, we use specific contracts approved for use in the United Kingdom which give personal data the same protection, or ensure they have entered such contracts with their sub-processors.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data outside the United Kingdom.

## 8: DATA SECURITY

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We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 9: DATA RETENTION

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We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or statutory reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

We shall retain your all health records collated during your treatment at the Clinic and which relate to your health records, which shall comprise Contact Data, Identity Data, Health Data and Sex Life Data (where applicable) for the following time periods, being the statutory retention periods for health records:

- Adult patients – 8 years from the date of last entry;
- Paediatric patients – until 25th birthday, or if the patient is 17 at the time of last entry, then to be retained until 26th birthday;
- Chemotherapy patients – 30 years or for 8 years if the patient has died.

Data relating to the payment of the services shall be retained for the following retention periods:

- Invoices and Private Medical Insurer details comprising Identity Data, Financial Data and insurance Data – 7 years;
- Private Medical Insurance remittances comprising Identity Data and Private Medical Insurance Data – 3 years; and
- Details of non-payers comprising Identity Data – until account has been paid.



## 10: RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

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### INFORM US OF CHANGES

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your treatment.

### YOUR RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Under such laws, you have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below). Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons, which will be notified to you (if applicable) at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.
- **Request the restriction of processing** of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.

- **Request the transfer** of your personal data to another party.

If you want to review, verify, correct or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact our DPO.

### WITHDRAWING CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact our DPO. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

## **ADDITIONAL INFORMATION**

For more information on the range of treatment and services we offer at the Ulster Independent Clinic, please visit:

**[www.ulsterindependentclinic.com](http://www.ulsterindependentclinic.com)**

**The Ulster Independent Clinic**

245 Stranmillis Road  
Belfast, BT9 5JH

Phone: 028 9066 1212

Fax: 028 9038 1704

Email: [secretary@uic.org.uk](mailto:secretary@uic.org.uk)

