Laboratory Policy on Data Protection and Information Release

Data Protection

St. James's Hospital is a registered Data Controller under the Irish Data Protection Acts 1988 – 2018 and the General Data Protection Regulation (GDPR). The hospital takes very seriously the protection of patients' rights to privacy and confidentiality. This is achieved by following best practices in how all information is handled and stored in the hospital and in accordance with Data Protection laws and other regulatory and professional best-practice guidelines. The roles and responsibilities of all staff in the protection of personal data are described in the hospital's Data Protection Policy. The key requirements for all staff are highlighted in both corporate and local induction programmes. All Hospital staff must familiarise themselves with the up-to-date data protection and data breach policies which are available on the PPGs section of the SJH Intranet:
SJH Data Protection Policy
SJH Data Breach Policy

Patient data is collected and processed for the following purposes in accordance with the applicable laws and regulations:

- Patient care & treatment (both within & outside the hospital)
- Appropriate sharing of information in line with the flow of treatment with health professionals including other hospitals, general practitioners, etc.
- Clinical education within the Hospital (e.g. students who are part of a patient's treatment team or working in diagnostics).
- Internal audit for the purpose of effective and efficient functioning and improvement of the hospital's services

Additional information is available in the SJH Data Protection Leaflet, available at:
SJH Data Protection – Patient Information Leaflet

The Department of Laboratory Medicine retains the following information in relation to each test request received, for defined minimum retention periods, based on regulatory and best practice guidelines. This information may include some or all of the following:

- Patient full name
- Patient medical record number
- Patient date of birth
- For each specimen: date/time of collection, date/time of receipt in the laboratory and date/time of report, specimen type, priority
- Clinical information provided by clinicians
- The results and where appropriate, interpretation of each test requested
- Requesting clinician and address.

St. James' Hospital acknowledges the requirement to ensure that data is kept securely and will take appropriate precautions to protect against physical loss, damage or inappropriate access and disclosure.

Release of Information

The Laboratory does not issue results directly to patients. Results are issued to the requesting clinician/location (i.e. SJH clinician / General Practitioner / External Hospital). Results are reported electronically where the GP / external hospital has implemented electronic

requesting systems. All GPs and external hospitals are requested to sign-up to electronic requesting systems as this ensures accurate and timely reporting of results. Where electronic requesting is not in place the laboratory at SJH will issue a hardcopy report to the requesting clinician. Patients that attend the outpatient department will get their results at their next outpatient appointment.

There are specific requirements in relation to the transfer of data to third parties. Requests may require referral to the hospital's Data Protection Officer.

The Access to Information Office processes requests from patients relating to their healthcare records. Please find further information at: Access to Information | St James's Hospital

The laboratory is required to inform the patient in advance of any information it intends to place in the public domain. To that end, please note the following:

The laboratory, as per legislative requirements, is required to notify the Medical Officer of Health (MOH)/Director of Public Health (DPH/Health Protection Surveillance Centre) of certain diseases. The list of Notifiable Diseases and their respective causative pathogens is contained in the Infectious Diseases Regulations 1981 and Subsequent amendments. The most recent amendment: S.I No. 528/2024 Infectious Diseases (Amendment) (No. 2) Regulations 2024 can be found on the HPSC website under List of Notifiable Diseases. Refer to the following link for the latest list: HSE-List-Infectious-Diseases

In addition, the laboratory, as per legislative requirements (Article 15 of the EC Blood Directive 2002/98/EC), is also required to report all Serious Adverse Reactions (SARs) and Serious Adverse Events (SAEs) to the National Haemovigilance Office.

Serious Adverse Reaction is defined as: An unintended response in the patient associated with the collection or transfusion of blood and blood component that might:

- Lead to death.
- Be life-threatening
- Cause disabling or incapacitating conditions for the patient.
- Result in, or prolong, hospitalisation or morbidity.

Serious Adverse Event is defined as: Any untoward occurrence associated with the collecting, testing, processing, storage and distribution of blood and blood components that might:

- Lead to death.
- Be life-threatening
- Cause disabling or incapacitating conditions for the patient.
- Result in, or prolong, hospitalisation or morbidity.

Information disclosure may also be required when it is in the interests of the wider public, such as public security issues (where it may prevent serious harm or threats to public safety) or when court orders compel the disclosure of confidential information.
Where examination results (sensitive category data e.g. genetic results) are shared e.g., with a national register; that will be made known to the patient and the patient's consent will be obtained.