THE PRINCE PHILIP DENTAL HOSPITAL

Administrative Circular No. 21/2013

Rules Governing Treatment of Patients and Handling of Patient Information

To raise the awareness of all staff/ students of the Hospital and the Faculty of Dentistry ("the Faculty") on the importance of good patient management and patient information management, Rules Governing Treatment of Patients and Handling of Patient Information, i.e. identical to Section E11 of the Hospital Human Resources Manual (HR Manual), are revised and attached for your perusal.

2. The assistance of the Clinic Managers, Area Managers and Program Directors is also sought in reminding the staff and students under their supervision to observe these Rules for strict compliance which are in the interest of good patient management, good patient care, efficient processing of records and compliance with the Personal Data (Privacy) Ordinance.

3. It must be emphasised that any breach of these Rules may subject the Hospital staff/ students concerned to disciplinary action. Serious cases may lead to termination of employment or expulsion from study. All Hospital staff and students are therefore requested to observe and strictly comply with these Rules.

4. Hospital staff and students are required to sign to acknowledge that they will undertake to abide by these Rules. The Hospital’s General Office and the Dental Ancillary Student Affairs Office will make the necessary arrangements for the signing accordingly.

5. The Revised Section E11 (Amendment No. 5/2013) will be distributed to individual officers who are keeping the hard copies of the HR Manual.

6. Thank you for your attention and cooperation.

(Professor L P Samaranayake )
Dean, Faculty of Dentistry, The University of Hong Kong
Director, The Prince Philip Dental Hospital

2 September 2013
PPDH/202/3/3 II
PPDH/202/3/9 II

Distribution
Clinic Managers/ Area Managers/ Program Directors, Faculty of Dentistry
Faculty Secretary, Faculty of Dentistry
All PPDH Staff
Tutor in DH, Faculty of Dentistry
Tutor in DSA, Faculty of Dentistry
Undergraduate and Postgraduate Dental Students, Faculty of Dentistry
Student DHs, Student DSAs and Student DTs, PPDH
ACCEPTANCE AND REGISTRATION OF PATIENTS

1. Except for referrals accepted on a private fee paying basis, only patients required for the purposes of teaching, research, or in dental distress shall be treated/ examined in The Prince Philip Dental Hospital (“the Hospital”).

2. The requirement for teaching can be interpreted broadly as the full range of dental treatments that must be carried out in a dental hospital to provide a proper environment for dental education of the University of Hong Kong (“the University”) and the Hospital.

3. Treatment of patients who are in dental distress but who are not required for the purposes of teaching shall be limited to that required to relieve their immediate symptoms.

4. Only patients who have been registered and who either have paid or have been waived the appropriate dues shall be treated in the Hospital.

PROVISION OF DENTAL CARE/ WORK

Registered Medical and Dental Practitioners

5. Registered medical and dental practitioners who are appointed as teaching staff, clinical dental surgeons, postgraduate dental officers, or research staff by the University, or appointed as Hospital Dental Officers or Junior Hospital Dental Officers by the Hospital, and who are formally admitted to the practice of the Hospital by the Board of Governors may undertake clinical and other procedures connected with the treatment of patients in accordance with the instructions, rules and standing orders governing the treatment of patients in the Hospital issued from time to time by the University, the Hospital or the Clinic to which they are posted.

Ancillary Dental Personnel

6. Ancillary dental personnel (e.g. all ranks and students of Dental Surgery Assistants, Dental Hygienists, and Dental Technicians) may undertake only those procedures which they are legally permitted to perform or only act under the instructions of a Registered Dentist.

Nurses and Radiographers

7. Nurses and Radiographers may undertake only those procedures which they are legally permitted to perform.

Students

8. No student shall undertake any clinical procedure unless authorized to do so by the teaching staff.
9. Students shall only treat patients under the supervision of the teaching staff.

10. Students have no authority to commit the Hospital to undertake any specific course of treatment.

11. No student shall treat or discharge any patients without the prior written permission to do so by the teaching staff.

12. Students must be conversant with and abide by the Standing Orders issued by the University, Clinics and the Hospital, and any instruction issued by or on behalf of the Dean of the Faculty of Dentistry/ Director of the Hospital.

13. No student should attend to private fee paying patients under any circumstances.

Provision of Treatments

14. All clinical staff/students are reminded that it is their sole responsibility to give a full explanation on what treatment will be provided, and the related charges to the patients before commencement of any treatment. It is their responsibility to ensure that all stages of a patient’s treatment are promptly and correctly recorded in the Dental Health Information System (i.e. Salud System).

PATIENT INFORMATION

Classification of Patient Information

15. Patient information, which could be contained in the Patient Records, Salud System or other documents/systems, can be categorized as “Sensitive Personal Data” or “Potentially Sensitive Personal Data”.

<table>
<thead>
<tr>
<th>Sensitive Personal Data</th>
<th>Potentially Sensitive Personal Data</th>
</tr>
</thead>
<tbody>
<tr>
<td>Identification document number such as HKID and passport number; Name; Date of birth; Photo showing face without masking; Email address; Phone number; Pager number; Address; or Name of emergency contact person</td>
<td>PPDH record number; Initial; Ethnic group; Marital status; Occupation; Referring source; X-ray film without any Sensitive Personal Data; Photo from which patients’ identity could not be ascertained; Charting; or Any other treatment information</td>
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</table>

Access to Patient Information

16. As a general rule, only staff/students to whom a patient is assigned, together with the appropriate administrative staff involved in handling Patient Records and/or the Salud System, are allowed access to patient information on a need basis. Specific rules governing the access to and use of the Patient Records and Salud System are listed in paragraphs 34 to 40 below.
17. Staff/Students must not allow patients or unauthorized persons to have access to the Patient Records or Salud System under any circumstances.

Security of Patient Information

18. Staff/Students are reminded that all patient information, in any form, should be treated in the strictest confidence.

19. Staff/Students are forbidden to take any patients’ Sensitive Personal Data, in any form, out of the Hospital building.

Use of Patient Information

20. Before using any patient information, staff/students have to familiarize themselves with the provisions of the Personal Data (Privacy) Ordinance, Chapter 486, Laws of Hong Kong.

21. Patient information should only be used by the relevant staff/students of the University or the Hospital for purposes of teaching, research or treatment, unless with the prior consent of the patient concerned. Attention is drawn to Schedule 1 - Principle 3 of the Personal Data (Privacy) Ordinance which reads as follows: -

*Personal data shall not, without the prescribed consent of the data subject, be used for any purpose other than:* -

(a) the purpose for which the data were to be used at the time of the collection of the data; or
(b) a purpose directly related to the purpose referred to in point (a) above.

22. Sensitive Personal Data, in any form, should never be disclosed in any coursework (such as PowerPoint presentation, Log Diary, and Patient Care Synopsis) or in any teaching/research materials.

23. Should there be need to use a patient’s photo showing face in the coursework or teaching/research materials, staff/students should blur out or mask certain areas of the photo to the extent that the patient’s identity could not be ascertained.

24. Notwithstanding the absence of Sensitive Personal Data in the coursework or teaching/research materials, staff/students are still required to treat the coursework or teaching/research materials that contain Potentially Sensitive Personal Data in confidence, and apply effective protective measures on the electronic copies, e.g. encrypting the electronic copy with a password.

Transfer/Disclosure of Patient Information to a Third Party

25. Patient information could be provided, if necessary,

(i) to third party service providers if staff/students need their services (such as clinical, laboratory or technical services) in connection with treatment provided to the patients concerned; or

(ii) in the case of referrals from or to other clinicians/organizations, to the clinicians/organizations who referred the patients concerned to the Hospital,
or to the clinicians/ organizations to whom the patients concerned are referred; or

(iii) to any government departments or appropriate statutory authorities by the virtue of law.

26. Staff/ Students should never divulge any patient information, *in any form*, to any person for any purposes other than the purposes stated above or a directly related purpose, unless with the prior written consent of the patients concerned.

27. In the event that staff/ students wish to present or disclose any patient information (including Potentially Sensitive Personal Data) to the College of Dental Surgeons of Hong Kong (“the College”) or the Dental Council of Hong Kong (“HKDC”) for examination purposes, prior written consent of the patients concerned must be sought. To this end, staff/ students should use the respective standard consent forms from the College or HKDC, as appropriate. Otherwise, it may result in an infringement of the Personal Data (Privacy) Ordinance.

28. Notwithstanding the patients’ informed consent for the transfer of their information to a third party, staff/ students should satisfy themselves that only absolutely essential information is to be transferred or disclosed.

Duration of Retaining Patient Information Contained in Patient Records and Salud System

29. Patient information contained in the Patient Records or Salud System will be kept indefinitely by the Hospital. Staff/ Students are not allowed to remove or damage the patient information, documents or papers (including radiographs, slides and photos) contained therein without the written approval of the Dean/Director.

Destruction of Documents Containing Patient Information

30. Any documents containing patient information which have no backup value should be shredded before disposal. Staff/ Students could deposit any documents requiring shredding, e.g. draft Clinical Notes, to the collection box placed at each Clinic.

Loss of Patient Information and Patient Records

31. In the unfortunate event that any patient information, *in any form*, or any Patient Record, is lost, staff/ students are required to report in writing to the Dean/Director immediately.

PATIENTS’ RIGHT OF CORRECTION OF AND ACCESS TO THEIR PATIENT INFORMATION

32. Staff/ Students, except staff of the Reception and Records Office, should not amend a patient’s personal particulars contained in the Patient Records or Salud System. Staff/ Students are requested to advise patients to inform staff at the Information/ Registration Counters by phone (2859 0238), by fax (2859 0232), by email (enquiry@ppdh.org.hk) or in person for making amendments to their personal particulars.

33. Patients have a right of access with respect to their own personal data. However, such exercise of the right by patients should be centrally handled by the Reception and Records Office. Staff/ Students are requested to refer those requests from patients to the Information/
Registration Counters in the first instance. Similarly, requests from third parties should also be administered through this channel.

**PATIENT RECORDS**

34. All Patient Records are kept in the Records Office. Requests for Patient Records should be made to the Receptionist in the appropriate Clinic or, in urgent cases, to the staff of the Records Office on the First Floor.

35. No persons other than the authorized Hospital administrative staff should enter the Records Office.

36. Staff/ Students should make every effort to return Patient Records to the Records Office or the Clinic Receptionist on the day of issuance. Patient Records can also be deposited in the Folder Drop boxes placed at the Information Counter (1/F), the 3A Polyclinic Counter (3/F), or the Oral Rehabilitation Counter (4/F) after office hours.

37. In principle, students are not allowed to retain Patient Records. But for specific purposes, they may retain Patient Records for up to two (2) calendar days. Clinical staff may retain Patient Records for specific purposes for up to seven (7) calendar days. However, such instances should be kept to an absolute minimum and if at all possible, Patient Records should be returned to the Records Office by 5:30 p.m. on the last working day before weekends.

38. Staff/ Students are responsible for the safe custody of the Patient Records requested by them, and should not leave any Patient Records unattended under any circumstances.

39. Staff/ Students are forbidden to take any Patient Records out of the Hospital building, except to Queen Mary Hospital and The Duchess of Kent Children’s Hospital where the Hospital patients will undergo surgery/ treatment under general anaesthesia. In such exemptions, staff/ students are reminded to stay alert when transporting or carrying the Patient Records between these places with a view to avoiding any loss of Patient Records and keeping confidentiality of patient information.

**HOSPITAL’S DENTAL HEALTH INFORMATION SYSTEM, COMPUTERS, AND NETWORK**

40. Staff/ Students are required to pay heed to the prevailing “Regulations Governing Use of Computers and Portable Electronic Storage Devices” issued by the Hospital when using the Hospital computers/ application software/ network or connecting their own computers to the Hospital network.

**ASSIGNMENT OF TEACHING PATIENTS FOR TREATMENTS**

41. As a general principle, teaching patients should always be attended to according to the Chronological Date on the Waiting Lists. Should there be a need to assign/ request teaching patients not according to the Chronological Date of the Waiting Lists for meeting students’ education need, sound justifications and approval by authorized persons will be required.

42. For details of the arrangements, staff/ students should refer to the prevailing “Guidelines for Maintaining Teaching Patient’s Waiting Lists and Assignment of Teaching Patients for Treatments”.
COLLECTION OF PATIENT FEES

43. It is the responsibility of clinical staff/students to ensure that all stages of a patient’s treatment are promptly and correctly recorded in the Salud System. If a clinical staff/student fails to make the necessary entry in the Salud System which results in bad debts, he/she will be required to provide a written explanation to the Comptroller of the Hospital for consideration of write-off.

ACCIDENT/INJURY REPORT

44. In case any accident, injury or dangerous incident happens to any person who is not a Hospital staff (e.g. patient, patients’ accompanying person, University staff/student or Hospital student) inside the Hospital building, a staff member/student in the clinic/area of the Hospital should fill in a form PPDH 149A, and submit it to the Hospital’s General Office as soon as possible.

45. If the injured persons are University staff/students or Student Dental Hygienists, they should report the same separately to the University or HKU SPACE as appropriate.

46. For PPDH staff, they should fill in the Report on Injury on Duty (Form PPDH 149), and submit it to the Hospital’s General Office as soon as possible.

CLINICS’ ARRANGEMENT DURING BLACK RAINSTORM WARNING OR TYPHOON WARNING SIGNAL NO. 8 OR ABOVE

47. For treatment NOT yet started*

<table>
<thead>
<tr>
<th>Condition</th>
<th>Arrangement</th>
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<tbody>
<tr>
<td>If either of the Typhoon Warning Signal No.8 (or above) or the Black Rainstorm Warning is hoisted or in force <strong>at or after 6:00 a.m.</strong></td>
<td>All patient appointments commencing <strong>before 1:45 p.m.</strong> will be <strong>cancelled</strong> automatically and queue cards will not be issued for a.m. session.</td>
</tr>
<tr>
<td>If either of the Typhoon Warning Signal No.8 (or above) or the Black Rainstorm Warning is hoisted or in force <strong>at or after 11:00 a.m.</strong></td>
<td>All patient appointments commencing <strong>after 1:45 p.m.</strong> will be <strong>cancelled</strong> automatically and queue cards will not be issued for p.m. session.</td>
</tr>
</tbody>
</table>

48. For treatment already started*

<table>
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<td>When Hong Kong Observatory issues the Pre-No.8 Special Announcement</td>
<td>All patient treatment should be completed as soon as possible, the clinics should then be closed after clearance.</td>
</tr>
<tr>
<td>When Black Rainstorm Warning Signal is hoisted</td>
<td>Services will be provided to patients who have arrived and are at the clinics.</td>
</tr>
</tbody>
</table>

*Staff or students should try to contact patients and arrange re-appointments if necessary.
GENERAL

49. Apart from these Rules Governing Treatment of Patients and Handling of Patient Information, the Hospital has other rules, regulations and guidelines issued from time to time. All staff/ students should also comply with them as appropriate.

50. Any breach of rules, regulations and guidelines may subject the Hospital staff/ students concerned to disciplinary actions. Serious cases may lead to termination of employment or expulsion from study.

51. All machines, dental and laboratory equipment, other electrical equipment and installations including computers and monitors, lighting, air-conditioners, water taps, gas ,etc. which are no longer required to be in use MUST BE turned off immediately after use and before staff and students leave their work place, the pantry and/or washrooms. Staff/ Students being assigned to check on switching-off of machines, equipment and installations are urged to undertake their duty with a responsible and serious attitude.

52. Hospital staff/ students are prohibited from using their private mobile phones while working inside clinics and laboratories unless such usage is related to the discharge of their duties or their training.

53. Hospital staff/ students are reminded to wear the Hospital Identity Cards at all times within the Hospital for identification purpose.

54. Smoking is not permitted in the Hospital, including carparks, garden and changing rooms.

55. Only authorized persons may use the parking facilities of the Hospital.

56. Unauthorized photography is not allowed within the Hospital.

57. Hospital property, especially instruments and equipment, must not be misused or moved without permission. If any Hospital property is damaged, lost or contaminated, the person(s) who is(are) responsible must pay for its repair, replacement or cleansing costs.

58. Staff/ Students are responsible for the security of their own personal property in the Hospital.

2 September 2013