

Data Protection Policy



Appointed person with responsibility for data protection – Matthew Derbyshire

Registered with the Information Commissioners Office: 28th March 2018

1 Information Held

- The following information is collected: Patient name, address, date of birth, email address, phone numbers, GP details, past medical history, family medical history and case history for treatment carried out at the clinic. Insurance or employee information is collected when required for account purposes. All information is given by the patient or their carer, parent or legal guardian.

2 Data Collection

- Information collected is sufficient for the purpose of making informed clinical decisions.
- Data is collected verbally on the phone by reception staff or practitioners to book appointments.
- Data is collected by consent and medical history forms completed in reception prior to seeing the Osteopath at first appointment or on re-examination.
- Medical information is collected by osteopath verbally face to face at consultation/treatment.
- Patients contact details and appointments are stored manually.
- Patients clinic records are manual.

3 Data Storage

- Current medical paper notes are stored in locked filing cabinets or cupboards. Older notes are stored in the locked cellar.
- All notes belong to the Osteopathic practice. In the event of death or the practice being sold the notes will remain stored at the practice. In the event of the practice ceasing to trade the notes will be securely archived by the final owner.

4 Data Disposal

- Records will be kept at least 8 years, and until a child reaches at least 25 years old.
- Notes are kept indefinitely to allow Osteopaths to maintain a comprehensive medical history.

5 Consent

- Patient data will be used to contact them regarding appointments or their care or other matters that may be of interest to them. Patients will give permission on the consent form at their first visit or re-examination.
- We will check patients still consent on a regular basis.
- Parents must give consent for communication with children under 16 years of age.

6 Data Sharing

- Patients identities and personal information must be kept confidential.
- Medical details or information will not be released or discussed with anyone including family, spouse, partner etc unless consent given.
- Information is only shared with other persons with the patient's permission. In the interests of the patients care their details may be passed on to other therapists / health professionals within the practice but not for marketing purposes. A patient's information is never passed on to other companies.
- Data would extremely rarely be shared without consent if there was a legal order or in cases of serious safety risk.

7 Data Checks

- Consent to be kept up to date. Re-examination patients will complete new Medical History and Consent forms. Patients who attend on a regular or ongoing basis will have their records checked occasionally.

8 Security

- Access to paper records is restricted to practitioners and staff who have signed a confidentiality agreement.
- Data transportation- any notes removed from the practice will be recorded in the log book.
- Clear desk policy- any notes should never be in view of other patients. Notes to be returned behind reception. Daily patients' notes should not be left in treatment rooms on view.
- Overnight all diaries and next day notes to be secured in locked cabinet.
- All electronic data is password protected and access to information can be restricted. Systems and antivirus software are kept up to date.
- Data breeches will be detected by observing unauthorised entry into storage areas, monitoring communications or becoming aware of a security breach. Data breeches will be investigated and reported to the information Commissioners Office by the appointed person. Patients will be informed if we believe a breach has occurred.
- Patients may contact the Information Commissioners Office if they believe a data breach has occurred. Information Commissioners Office 0303 123 1113

9 Subject Access Requests

- Subject access requests to be responded to within 1 month and no charge made.

Data is only released on receipt of a signed request from patients. Any data sharing is detailed in the patient record.

10 Other Therapists within the practice

- Therapists and Professionals other than Osteopaths are responsible for their own compliance with the GDPR

Name	Matthew Derbyshire
Position	Director
Date	28 th October 2020