

Data Protection Policy May 2018

Clinic Data Protection Policy

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 clinic.

All information is given by the patient or their carer, parent or legal guardian.

Data Collection

Information collected is sufficient for the purpose of making informed clinical decisions and communicating with patients.

Data is collected verbally on the phone, online via my website and 10to8, by email by reception staff or Dr McCulloch to book appointments and take contact details. Medical information is collected and recorded by Dr McCulloch verbally and by email at face to face, phone, Skype or other modalities of appointment.

Patient contact details and appointments are stored on the Best Reception Database, 10to8 Booking System and Zohoo CRM.

Patient clinical records are stored electronically by Dr. McCulloch.

Data Storage

Contact details and appointments are stored within 10to8 and on the Best Reception database which are password protected. Contact details and communications are stored within Zohoo CRM which is password protected.

Patient clinical records are stored electronically by Dr Liz McCulloch as Microsoft OneNote records. These are stored securely encrypted in the cloud on the Microsoft Professional One Drive. All electronic devices used to access patient records are either password or fingerprint protected.

Aesthetic Medical Records will be stored electronically within the clinical record and as paper copy in a locked cabinet in the clinic by Dr. Liz McCulloch.

Data disposal (minimum 8 years, 25 years of age for children)

Records cannot be deleted before statutory requirements for data retention – 8 years or up to 25 years of age for children

If paper records are received for example new patient questionnaires, pathology or radiology reports, letters from clinicians etc they are scanned onto the patient's clinical record and then the paper copy is shredded.

Electronic records are deleted from the system after 8 years or 25 years of age for children.

Consent

Patient data is used by 10to8 and Best Reception for appointment reminder text/email messages. Dr Liz McCulloch will primarily communicate by email about clinical matters and will also send out an occasional email clinic updates and health news.

Prior to/at their first appointment patients will be asked for their consent to the use of their data for these purposes plus every email from Liz McCulloch will remind patients of their option to opt out of further communications.

We process patient data using the lawful basis of consent for marketing, and fulfilment of contract and legitimate interest for processing your medical record and sending you health information and exercises relating to your condition. Your medical record is processed as Special Category Data under Article 9 2(h) of the GDPR.

Parents must give consent for communication with children under 16 years.

Data Sharing

Information is generally only shared with other persons with patient's permission. This would usually be with other health professionals.

Data such as name, address and D.o.B may be shared with the pharmacy and lab suppliers if you have requested a blood test or a medical product for your treatment.

I may receive information about your health from other organizations who are involved in providing you with health and social care. For example, your GP or a specialist may send me a letter to let me know about your care.

In some circumstances I might also share medical records in anonymised form for medical research.

Data would extremely rarely be shared without consent if there was a legal order or in cases of serious safety risks. In certain circumstances it is a legal and professional requirement to share information for safeguarding reasons such as if there were concerns about domestic or child abuse or to prevent infectious diseases from spreading or to check the care being provided to you is safe. This is to protect people from harm.

Security

All electronic data is password protected and access to information is restricted. Systems are kept updated and antivirus security systems are in place and updated.

Passwords are changed according to current guidelines.

Data breaches will be detected by observing signs of unauthorized access to data, monitoring communications or becoming aware of a security breach (e.g. a virus or unauthorized log on or change to permissions) on the computer system. Data breaches will be investigated and reported to the Information Commissioner's Office within 72 hours by Dr Liz McCulloch. Patients will be informed if I believe a data breach has occurred.

Patients may contact the Information Commissioner's Office if they believe a data breach has occurred.
Information Commissioner's Office: 0303 123 1113

Subject Access Requests

Medical record access requests must be responded to within a month and no charge can be made. Data is only released on receipt of a signed request from patients or in exceptional circumstances.

Any data sharing is detailed in the patient record.

Patient Rights

Patients and anyone I hold data about have some rights under GDPR: You can request to: see your data at any time, move your data to another practice, correct any inaccuracies, prevent marketing.

You may request for details to be deleted but due to my legal obligation I cannot delete your health record but I can remove you from my contact list and from Zohoo CRM.

Complaints

Patients may raise any complaints about data processing with the Data Controller Dr Liz McCulloch who may be contacted at: mskin, Hove Natural Health Clinic, 33 Montefiore Road, BN3 1RD, Hove

You may also contact the Information Commissioner's Office Directly on: 0303 123 1113