
POLICY

Patient Privacy Notice

Owner:

Chief Operating Officer



**THE COLLEGE
OF HEALTH**

Document Control

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Patient Privacy Notice

**Data controller: The McTimoney College of Chiropractic, part of the The College of Health Ltd,
McTimoney House, 1 Kimber Road, Abingdon OX14 1BZ**

Privacy Notice Statement

Under the current law, your personal information is processed under the legal basis of 'Provision of Healthcare or Treatment and Services' (Article 9 GDPR) and (Chapter 2, section 9 of the Data Protection Act 2018). For further information on this legislation please visit: [http:// www.legislation.gov.uk/](http://www.legislation.gov.uk/)

Reasons for processing your Data?

When you supply your personal details to the McTimoney College of Chiropractic as a patient of the Community Clinic they are stored and processed for five reasons (the sections in **bold** are the relevant terms used in the Data Protection Act 2018, which includes the General Data Protection Regulation – ie the law):

1. We need to collect personal information about your health in order to provide you with the best possible care. Your requesting treatment and our agreement to provide that care constitutes a **contract**. You can, of course, refuse to provide this information, but if you were to do that we would not be able to provide you with chiropractic care.
2. We have a '**Legitimate Interest**' in collecting that information, because without it we couldn't deliver our service effectively and safely.
3. We also think that it is important that we can contact you in order to confirm your appointments with us or to update you on matters related to your chiropractic care. This again constitutes '**Legitimate Interest**', but this time it is your legitimate interest.
4. Provided we have your **consent**, we may occasionally send you general health information in the form of prescribed exercises, relevant health articles, advice or newsletters. You may withdraw this consent at any time – just let us know by any convenient method.
5. As part of a Higher Education provider, and for the purposes of furthering knowledge, data from the community clinic may be used anonymously for **research purposes**. You can opt out of this at any time.

NOTE: Printouts of policy documents must be compared to the master copy on the Intranet to determine whether they are up to date.

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What information do we collect?

The personal information we collect from you includes your name, date of birth, address and contact details alongside any health related information required for the delivery of chiropractic care. We may also ask you to provide us with your GP details so that we can liaise with them appropriately during your care with us.

The information you provide may be recorded in writing (i.e. in your treatment notes), electronically on a computer, or a mixture of both.

As explained to you in your consultation as a teaching clinic the College operates a CCTV system to provide effective clinic supervision and recordings of consultations.

It is important that you notify us of any changes to your personal details (e.g. address, contact number, next of kin etc.).

By collecting this information from you we are legally recognised as processors of your information and are required by law to adhere to strict processing rules.

Most of our patients find it helpful to receive clinic appointment confirmations and reminders, please ensure that you let us know should you prefer not to receive this service.

How long will we keep hold of your records?

We have a **legal obligation** to retain your records for 8 years after your most recent appointment (or until you are aged 25, if this is longer), but after this period you can ask us to delete your records if you wish. Otherwise, we will retain your records indefinitely in order that we can provide you with the best possible care should you need to see us at some future date.

How do we store your records?

Your records are stored in several ways:

- On paper, in locked record storage, and the offices are always locked out of working hours.
- Where we use electronic notes (“in the cloud”), we use a specialist medical records service. This provider (PracticeHub) is also fully compliant with the General Data Protection Regulations. Access to this data is password protected, uses two factor authentication, and the passwords are changed regularly.
- On our office computers. These are password-protected, backed up regularly, and the offices are locked out of working hours.
- Through our secure storage of CCTV recordings

How do we use the information we collect?

The information we hold may be used to deliver personalised chiropractic care, in the following ways:

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- Recording of information for co-management with or referral to other healthcare professionals, including your GP
- To keep you informed of changes to your appointments or care, including scheduled appointment reminders and confirmation emails
- To maintain an open line of communication should you have any concerns which you feel require further investigation
- To contact you regarding feedback you have provided
- To assist in the education and training of healthcare professionals
- To discuss clinical matters with you, relating to your care and future appointment scheduling

Wherever possible your information will be anonymised in order to protect patient confidentiality, unless there is a legal basis to act otherwise.

Who has access to your data?

We will never share your data with anyone who does not need access without your written consent. Only the following people/agencies will have routine access to your data:

- The medical records service who store and process our medical files
- Your practitioner and clinical supervisor in order that they can provide you with chiropractic care
- Our reception staff, who organise our practitioners' diaries, and coordinate appointments and reminders (but they do not have access to your medical history or sensitive personal information)
- Our research director, where you have provided consent for your information to form part of our ongoing development of the profession and teaching of students
- Other administrative staff, such as our finance officer. Again, administrative staff will not have access to your medical notes, just your essential contact details. In most instances only your ID number is included in the data shared with our finance team
- Where an appointment reminder and CRM system is in place to coordinate our messages, so your name and email address may be saved on this server

We will not disclose your information to third parties without your permission unless there are exceptional circumstances such as the health and safety of another person being at risk or where the law requires information to be passed on.

There may be occasions when we must pass on information without your consent which can include:

- Reporting of some infectious diseases as required by the Health Protection (Notification) Regulations 2010
- To help prevent, detect or prosecute serious crime
- If a court orders us to do so
- When you have expressly requested that we do so i.e. to your solicitor or insurance company.

From time to time, we may have to employ consultants to perform tasks which might give them access to your personal data (but not your medical notes). We will ensure that they are fully aware that they must treat that information as confidential, and we will ensure that they sign a non-disclosure agreement.

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What are your rights?

You have the right to see what personal data of yours we hold, and you can also ask us to correct any factual errors. Provided the legal minimum period has elapsed, you can also ask us to erase your records.

Where you agree, this access right may be met by enabling you to view the record without obtaining a copy.

Data Protection Officer

We want you to be absolutely confident that we are treating your personal data responsibly, and that we are doing everything we can to make sure that the only people who can access that data have a genuine need to do so.

Of course, if you feel that we are mishandling your personal data in some way, you have the right to complain. Complaints need to be sent to what is referred to as the '**Data Protection Officer**'. Here are the details you need for that:

Email: dataprotection@collegeofhealth.uk

Tel: 01235 523336

Postal Address:

McTimoney College of Chiropractic, McTimoney House, Kimber Rd, Abingdon OX14 1BZ

If you are not satisfied with our response, then you have the right to raise the matter with the Information Commissioner's Office (ICO).

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1. Document Controls

1.1. Document Approvals

Named person(s) below indicates that this document has been reviewed and approved by the appropriate people. This document is subject to formal change control procedure.

Date	Role/Position	Name
02/12/22	COO	Matt Green

1.2. Amendment History

Date	Version	Author	Description
02/12/22	2.0	Matt Green	Updated as part of institution wide data protection review.

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