

LORNA ROSE OSTEOPATHY – PRIVACY POLICY

I am committed to protecting and respecting your privacy and keeping your personal data safe.

This statement explains the circumstances under which I collect personal data, how it is used, and the conditions in which I might be required to disclose it to third parties.

By accessing the services that I offer as an osteopath/sports massage therapist you are agreeing to be bound by the statements detailed within this policy.

If you have any questions regarding this policy please send them to Lorna Rose at lorna.osteopath@gmail.com

Date: 1/05/2018

Next Review: 1/05/2019

Author: Lorna Rose

1. Personal Details and Consent

- a. It is necessary to collect personal information about your health in order to provide you with safe treatment.
- b. You are able to refuse to provide information, however in some case this may prevent me from applying clinical reasoning in order to formulate an informed diagnosis and provide you with treatment to the best of my ability.
- c. As a primary care practitioner, I have a 'Legitimate Interest' in collecting data from you because without it we would not be able to do our jobs effectively and safely.
- d. I also have a 'Legitimate Interest' in providing you with appointment confirmations, appointment reminders, and aftercare advice.
- e. I am not legally required to ask for your consent to contact you if the purpose for me doing so is considered of 'Legitimate Interest'
- f. I am however required to obtain consent to send you newsletters, information about events, or any other information that could be considered marketing.
- g. I do use direct marketing at the moment and have no plans implement this in the near future.
- h. You can withdraw your consent at any time.

2. Personal Details; what we keep and for how long

- a. I have a legal obligation to retain adult patient notes under our Code of Practice dictated by the General Osteopathic Council for a minimum of 8 years. Notes belonging to patients under the age of consent are kept until their 25th birthday.
- b. Our patient notes must include:
 - i. Patients personal details
 - ii. Any problems or symptoms reported by the patient
 - iii. Relevant medical and family history
 - iv. Clinical findings
 - v. Information and advice provided
 - vi. Information given to the patient about risks of treatment
 - vii. Records of Consent (we have forms for consent to Dry Needling and intimate area examination and treatment, Chaperone requests) and we seek ongoing verbal consent for all other treatment, which we record in your file)
 - viii. Treatment provided, reaction to treatment and ongoing evaluation of findings.
 - ix. Any correspondence about the patient (with consent requested and recorded) with other health professionals.
 - x. Whether anyone else was present in the consultation.

3. Personal Details; where and how we store your data:

- a. I store all case histories electronically on a password protected laptop, this information is backed up on Dropbox, an online cloud storage system which is also password protected.
- b. I am solely in possession of the password to both my laptop and to Dropbox.
- c. As well as your name, address, email address, date of birth and telephone number being contained within your patient notes, these are also stored on a booking system called

Cliniko. When you first register with Cliniko you are asked whether you consent to our Privacy policy (detailed in this document). As stated previously I am required to obtain your consent prior to sending you marketing. I am not legally required to ask for your consent to contact you if the purpose for me doing so is considered of 'Legitimate Interest'.

- d. Cliniko also provides details on how they store information about you and ask for your consent to this when you make an online booking. Their privacy policy is also available here: <https://www.cliniko.com/policies/privacy>
- e. When I no longer need to store your data in Cliniko (after our statutory obligation to hold data for 8 years passes), I will delete your records.
- f. For patients who have been prescribed a program of exercise, I sometimes use a system called RehabMyPatient, which stores your name and email address (for the purposes of being able to send you the exercise program) and no other data. This data is held securely. RehabMyPatient does use GoogleAnalytics to collect anonymized data which they use to improve the site. From this they record: the computer you used to access the site, your general location, how long you stayed on the site. The details are available in their Privacy Statement available here: www.rehabmypatient.com/gdpr
Their data is stored in a Digital Ocean data center in London, who are GDPR compliant.

4. **Controlling your Personal Details**

You have rights concerning the information I hold about you:

- a. You can request a copy of all the data I hold about you. Upon request I will provide you electronic copies of the personal data I am in possession of.
- b. If you change your name, address or email address, please contact us so that I can keep our data up to date.
- c. You have the right to request erasure of your personal data that we are not legally obligated to keep for a minimum of 8 years.
- d. I do not sell your information to third parties.
- e. I do not share your data with third parties for marketing or any other purpose, without prior consent by you (for example sharing your data with other healthcare professionals)
- f. If we have agreed that you should be treated by another osteopath at the practice, I will obtain your consent to share your notes with them.
- g. We do not gather sensitive personal data such as political opinions, religious or philosophical beliefs, trade union membership, sexual orientation or criminal convictions)

5. **Data breaches and Complaints**

If you wish to raise a complaint about how I handle your personal data, you can contact me directly and I will take the appropriate steps to ensure that the matter is resolved.

If you are not satisfied with my response or believe that the way I am processing your personal information not in accordance with the law, you can raise your complaint to the Information Commissioner's Office (ICO). <https://ico.org.uk/>