

TOeTAL HEeLING CHIROPODY

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Information Security Privacy & Dignity Policy

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Introduction

Preserving patient / customer privacy is a key priority for us at Toetal Healing.

In the course of providing a quality service to our patients / customers it is necessary to receive and keep certain personal information when either they attend for an appointment, purchase something from us or even contact us with a query; information such as name, postal address, email address, phone numbers, medical information, credit and debit card information etc.

This Information Security, Privacy & Dignity Policy aims to describe, under the General Data Protection Regulation (GDPR) 2018, what information will be collected, when, how, by whom, for what purpose, how it will be used and stored and how it might be shared outside of our practice.

General Patient Privacy & Dignity










Respecting our patients / customers privacy & dignity rights is of paramount importance to us; in providing a safe, comfortable, caring, secure and trustworthy service to all those that access our care.

Patients / customers and staff also have a right to be treated and spoken to in a respectful manner. Using befitting language (no foul language or swearing) and ensuring sensitivity and care when taking or discussing personal data / issues e.g. our staff will not take or discuss such in front of other patients or where they may be overheard. When treating, the clinic door will be closed unless in cases of extreme heat and then only if no other patients are waiting in the waiting area.

The above is general principal and not exhaustive. More is discussed in the remaining body of this document.




Information / Data We May Collect

In order to provide healthcare advice, assessment and treatment, booking of appointments and to enable purchases from our practice, we will likely need to collect certain information from our patients / customers. Information we may need include:

-  Your full name
-  Your address, post code and contact details e.g. phone numbers, email address
-  Your date of birth
-  Your GP details
-  The name and contact details of your next of kin or someone who can act on your behalf
-  Details of how to access your property e.g. key code number
-  Your medical and surgical history
-  Your current medication
-  Your social history and current circumstances



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-  Your job and recreational activity
-  Pictures / videos of your feet or legs
-  Your payment information e.g. card details

The above list, again, is not exhaustive and to ensure the best quality and most efficient provision of care and service to all who access Toetal Healing; there may be a requirement to collect other types of information from our patients and customers. At all times, our practice and staff will remain open and transparent and explain why we require the information being sought and for what purpose.

How is the Information Collected?

Information is usually collected face to face on arrival or during consultation / treatment.

New patient appointments are reserved using name and contact number and in the case of home visits, address. This information may be collected over the phone or via social media e.g. facebook.

On arrival in clinic you may be asked to complete a registration form in order to be registered if there are other patients in the waiting area, to protect your data. Any registration forms are securely shredded once registration is complete.

Appointment requests can now be made securely online via our website; personal information is supplied in a form format and is deleted immediately on agreement of an appointment.

Purpose / Use of Information Collected

In the main, the information collected will be required in order to register you with our practice, to assess your foot / lower limb problems, provide an appropriate diagnosis and create and provide an appropriate treatment plan / treatment. During the course of care, information collected may be used / shared with relevant parties, with your consent, in connection with your treatment e.g. your GP, consultant etc.

Pictures / videos of your feet or legs will only be taken with express consent and used for tracking progress of treatment, advice and education for you and others and in some cases for marketing means. You have the right to refuse and / or to withdraw this consent at any point.

Contact information may from time to time be used, with consent, for marketing purposes e.g. to inform of offers or signing up for a mailing list. Again, this may be revoked at any time.

Information collected may be necessary to comply with a legal obligation, used to fulfil a court order or in connection with a legal claim.



Information Storage and Retention

All information collected is stored on an electronic patient record and diary system. The information is held on a remote off-site server and not on local laptops / computers and is double password protected. The system currently used is TIARA9, hosted by Ethitec and was designed for and used by the NHS Podiatry Service in Leicestershire from 2000 to 2018; thus, giving added confidence in its security.

There are only two hard copy documents used by our practice, aside the registration form already discussed –

- 👣 Consent forms for nail surgery
- 👣 Insole / Orthotic prescription forms – these have no identifiable data apart from patient name

Consent forms are scanned post surgery and filed electronically on a password protected forum with access limited to the Podiatrist only. Insole prescriptions are held on site, in a locked cabinet for 12 months (in case a reorder is required) then scanned and stored as above.

Both paper copy forms are then securely shredded.

Payment information e.g. card details are rarely collected as most such transactions are face to face. On occasion it may be necessary to take payment over the phone, required information is directly input to the secure card terminal and processed immediately. No card information is recorded or retained at any point.

Podiatry patient records are required by law to be retained for a minimum of 8 years, after the last appointment. These are held on a secure offsite server and heavily protected with fire walls and security passwords.

Card receipts will be stored for 6 years in line with tax legislation.

Information Sharing / Disclosure

Information about our patients / customers is important to our practice. Personal information is therefore only disclosed or shared for very limited reasons and in very limited circumstances, as follows:





- 👣 Medical professionals. With your consent we will share information with medical professionals such as your GP or consultant to allow continuity of care
- 👣 Legal compliance. We may collect, use, retain and share your information if legally required to do so.



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Patient / Customer Rights

Patients / customers of Toetal Heeling have a number of rights in relation to their personal information. While some of these rights apply generally, certain rights apply only in certain limited cases. These are as follows:

-  Access. You have the right to access and receive a copy of the personal information we hold about you by contacting the practice director, using the contact information below.
-  Change, restrict, delete. You may also have rights to change, restrict our use of, or delete your personal information. In the case of health records these are normally exempt from change and deletion requests.
-  Object. You can object to (i) our processing of some of your information based on legitimate interests and (ii) receiving marketing messages after providing your express consent to receive them. In such cases, we will delete your personal information unless we have compelling and legitimate grounds to continue using that information or if it is needed for legal reasons.
-  Complain. If you wish to raise a concern or query about our use of your information (and without prejudice to any other rights you may have), you can contact our Director in the first instance. Should your concern not be adequately resolved, you have the right to further this with the Information Commissioner www.ico.org.uk

Contact Us

For purposes of the GDPR, the data controller of your personal information is Amin Pabani Director / Senior Podiatrist. If you have any questions or concerns, contact details are given at the start of this Policy.