DOLAN'S PODIATRY

PRIVACY NOTICE

Practitioner/Data Controller: Michelle Dolan
Practice: Dolan's Podiatry
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1. Who I am

I am Michelle Dolan, an independent HCPC-registered Chiropodist/Podiatrist and the person responsible for personal data processed by Dolan's Podiatry.

I provide podiatry and chiropody services to people of all ages and abilities.

This privacy notice explains how I collect, use, store and protect personal information.

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2. Information I collect

Depending on the services provided, I may collect:

- name;
- date of birth;
- address;
- telephone number;
- email address;
- emergency contact details where appropriate;
- medical history;
- medication;
- allergies;
- relevant health information;
- clinical observations;
- treatment records;
- photographs where clinically appropriate;
- appointment history;
- correspondence relating to care;
- payment and financial information where required for business purposes.

Health information is special category data and is handled with appropriate safeguards.

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3. Why I use your information

I use information where necessary to:

- assess and treat you safely;
- provide appropriate podiatry care;
- maintain your clinical record;
- arrange and manage appointments;
- communicate with you about your care;
- provide aftercare information;
- communicate with other healthcare professionals involved in your care where appropriate;
- manage payments and accounts;
- meet legal, regulatory and professional obligations;
- deal with complaints or incidents;
- manage safeguarding concerns;
- protect patients and others from harm.

I will only collect information that is relevant and necessary for these purposes.

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4. Lawful processing

Personal information will be processed using the lawful bases applicable to the particular purpose.

For healthcare provision and practice administration, this may include processing that is necessary to provide healthcare, comply with legal obligations, pursue legitimate interests, or protect vital interests where appropriate.

Health information will be processed using an appropriate condition for special category data under UK data protection law.

I will not rely on consent as a blanket requirement for necessary healthcare record keeping.

Where consent is the appropriate lawful basis for an optional activity, such as certain uses of photographs, that consent will be obtained separately.

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5. Sharing information

Information will only be shared when there is a lawful and appropriate reason.

This may include sharing information with:

- your GP;
- another healthcare professional involved in your care;
- NHS or other healthcare services;
- safeguarding services;
- emergency services;
- the police where appropriate;
- professional or regulatory bodies where required;
- relevant service providers who process information on behalf of the practice.

I will only share information that is relevant and necessary.

I will not sell patient information.

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6. Confidentiality

Patient information is confidential.

Information will only be disclosed where:

- you have given permission;
- the law permits or requires disclosure;
- disclosure is necessary in your best interests;
- disclosure is necessary to protect you or another person from serious harm;
- safeguarding responsibilities require information to be shared.

This reflects the HCPC requirement to treat service-user information as confidential and the circumstances in which disclosure may be appropriate.

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7. Clinical photographs

Clinical photographs may be taken where they assist assessment, treatment planning or monitoring.

Clinical photographs form part of the confidential clinical record.

Separate permission will be obtained before photographs are used for:

- advertising;
- social media;
- promotional material;
- teaching;
- publication;

- other non-clinical purposes.

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8. Appointment communications

I may contact you using the details you provide to:

- confirm appointments;
- send reminders;
- rearrange appointments;
- provide aftercare information;
- respond to enquiries;
- communicate about your treatment.

If you have a preferred method of communication, please tell me.

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9. Storage and security

I will take reasonable steps to protect information from:

- loss;
- theft;
- accidental disclosure;
- unauthorised access;
- inappropriate use;
- alteration or destruction.

Paper records will be stored securely.

Electronic records will be protected by appropriate security measures.

I will take particular care with health information because of its sensitivity.

The HCPC requires registrants to keep records secure and protect them from loss, damage or inappropriate access.

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10. Retention

Clinical and business records will be retained for the period required by applicable law, professional guidance, insurance requirements and appropriate clinical practice.

Records will not be retained indefinitely without a reason.

When information is no longer required, it will be securely destroyed or deleted.

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11. Your data protection rights

Depending on the circumstances, you may have rights to:

- request access to your personal information;
- request correction of inaccurate information;
- request restriction of processing;
- object to certain processing;
- request deletion where there is no longer a lawful reason to retain the information;
- exercise other rights available under UK data protection law.

Some rights are subject to legal exemptions and requirements. For example, I may need to retain clinical records even where a patient asks for them to be deleted.

The ICO requires privacy information to explain retention and the rights available to individuals.

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12. Subject access requests

If you want to see the information I hold about you, please contact me using the details above.

I will deal with requests in accordance with UK data protection law.

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13. Complaints about data protection

If you have a concern about how I have handled your personal information, please contact me first so that I can investigate and try to resolve the issue.

You may also contact the:

Information Commissioner's Office (ICO)

if you remain concerned about the handling of your personal data.

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14. Review

This privacy notice will be reviewed annually or sooner if there are significant changes to data-protection law, the practice, systems or services.

SIGNIFICANT INCIDENT / CLINICAL INCIDENT PROCEDURE

1. Purpose

Dolan's Podiatry aims to provide safe and effective care. If something goes wrong, or nearly goes wrong, it will be taken seriously and used as an opportunity for learning and improvement.

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2. Examples of incidents

A significant incident may include:

- an injury to a patient;
- unexpected significant bleeding;
- a suspected adverse reaction;
- a sharps injury;
- a fall;
- incorrect treatment;
- treatment provided without appropriate consent;
- a serious infection-control failure;
- loss of confidential information;
- a safeguarding incident;
- medication-related harm;
- an incident involving another person at a clinic;
- a serious near miss.

A near miss should also be recorded where it provides useful information about a risk.

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3. Immediate response

My first priority will always be the safety of the patient and anyone else affected.

I will:

1. stop treatment if necessary;
2. provide appropriate immediate assistance within my competence;
3. call emergency services where required;
4. arrange appropriate medical assessment;
5. preserve relevant evidence or equipment where appropriate;
6. inform the patient honestly about what has happened.

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4. Openness

Where something has gone wrong, I will be open and honest with the patient.

I will explain:

- what happened;
- what is known;
- what is not yet known;
- what action has been taken;
- whether further assessment or treatment is required;
- what I will do to reduce the chance of recurrence.

An apology can be given where appropriate. An apology does not, by itself, mean that negligence or liability has been admitted.

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5. Recording

I will make a factual record as soon as reasonably practicable.

The record will include:

- date and time;
- patient details;
- what happened;
- relevant clinical findings;
- action taken;
- advice obtained;
- people or organisations contacted;
- outcome;
- any further action required.

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6. Further reporting

Depending on the circumstances, I may need to notify:

- my professional indemnity insurer;
- the clinic or venue;
- the patient's GP or another healthcare professional;
- safeguarding services;
- the police;
- the HCPC or another relevant body.

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7. Learning

Following a significant incident I will consider whether I need to:

- change a procedure;
- undertake additional CPD;
- change equipment;
- change the clinic environment;
- update a policy;
- seek professional advice.

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8. Review

Significant incidents will be reviewed promptly and this procedure will be reviewed annually.