

Privacy Notice for Patients

We, the University College of Osteopathy (UCO), of 275 Borough High Street, London SE1 1JE, telephone number: +44 (0)20 7407 0222, the Data Controller for personal data relating to you that we process.

This Privacy Notice informs you about how and why the UCO Clinic collects, processes, uses and shares your personal data and your rights regarding the personal data we hold about you as a patient.

Effective Date

This Privacy Notice is effective from: 25th May 2018.

The current version of this Privacy Notice can be found at <https://www.uco.ac.uk/policies-and-procedures>.

What information we collect

We hold a range of personal data about you that will enable us to provide the appropriate care and treatment that you need. Examples of categories of personal data which we may hold are:

- Your name and contact information, your date of birth and gender.
- Your occupational status and job description.
- Information about your family life.
- Your interests and activities.
- The name and address of your GP.
- Health related information required for the delivery of health care services.
- Your health history (e.g. details of any A&E visits, in-patient visits or other clinic appointments).
- Results of any scans, X-rays and pathology tests.
- Details of any diagnosis and treatment given.
- Payment details.
- Any other information that is deemed relevant to provide you with appropriate care.

This information may be recorded in writing (i.e. in your medical notes), or electronically on a computer, or a mixture of both.

How we collect your information

We collect your information from you in a number of ways which include:

- Through correspondence with you by letter, phone, text, email or in person.
- In person during patient consultations.
- From third parties, e.g. your GP / other healthcare practitioner.

The purposes for which we process your personal data and the legal basis

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We only process data for specified purposes and if it is justified in accordance with data-protection law.

The legal justification for the purposes for which we shall process your data is as follows:

- a) Contract** (the processing is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract) **and the provision of health care** (we collect sensitive personal data, such as information concerning your health and medical conditions, as it is necessary to do so for the purposes of providing you with health care).

Under this lawful basis we may use your sensitive personal information for the following purposes:

- To assess your health and deliver the care you need.
- To teach and train healthcare professionals.
- To plan, manage and audit the health services it provides.
- To conduct health research and development.
- To invite you to participate in surveys or research to enable the UCO Clinic to improve the way it delivers healthcare to its patients.

- b) Explicit consent** (you have given clear consent for us to process your personal data for a specific purpose).

Under this lawful basis we may use your sensitive personal information for the following purpose:

- To refer you to another doctor or health practitioner.

- c) Contract** (the processing is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract).

Under this lawful basis we may use your personal information for the following purpose:

- To seek payment for your clinic appointment.

Who it will be shared with

The UCO Clinic may need to share information about you and your healthcare internally with those employees, agents and contractors who are involved in your care, including administrative and IT staff.

The UCO Clinic may also need to share information about you and your healthcare with third parties outside of the UCO Clinic. These may include:

- GPs
- Health Authorities
- NHS Trusts

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- Department of Health
- Other health care practitioners as appropriate

If you are receiving care from other people (such as Social Services or the NHS) we may also need to share relevant information to help us work together for your benefit.

We will only give information to your relatives, friends and carers if you want us to and you have given your permission.

How long shall we keep it for?

Different records shall be retained for different periods of time as described below.

Adults (18 years +)

All records shall be retained for a minimum of eight years after your last consultation.

Children & Young People

All records shall be retained until your 25th birthday.

When your information is no longer required, we will always dispose of it securely in accordance with our Records and Information Management Policy: <https://www.uco.ac.uk/policies-and-procedures>

Information Security

Your information is a vitally important asset to the UCO and as such we are dedicated to ensuring that your information is kept securely and used appropriately. Your information shall be processed in line with our Information Security Policy to ensure that it is treated with the highest respect and appropriate standards to keep it safe and secure.

Please view our Information Security Policy here: <https://www.uco.ac.uk/policies-and-procedures>

Your rights

Under the GDPR¹ you have the following rights:

- To obtain access to, and copies of, the personal data that we hold about you.
- To require us not to send you marketing communications. If you ask us to delete your personal data, we will continue to maintain a core set of personal data comprising very brief information to ensure that we do not inadvertently contact you in future.
- To require us to correct the personal data we hold about you if it is incorrect or where appropriate, given the purposes for which your personal data is processed, the right to have incomplete data completed.
- To require us to erase your personal data. This is a limited right which applies, among other circumstances, when the data is no longer required or the processing

¹ <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

has no legal justification. There are also exceptions to this right, such as when the processing is required by law or in the public interest.

- To require us to restrict our data processing activities. This is a limited right which will apply in specific circumstances and for a limited period.
- Where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal.
- To receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller.
- To object to the processing of your personal data when such processing is based on the public interest or other legitimate interests, unless we have compelling legitimate grounds to continue with the processing.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exemptions or exceptions apply (please see our Freedom of Information Policy and Subject Access Request Procedure for further details²).

If you have given your consent and you wish to withdraw it, please contact our Clinic Reception Team at clinicappointments@uco.ac.uk.

Please note that where our processing of your personal data relies on your consent and where you then withdraw that consent, we may not be able to provide all or some aspects of our services to you and/or it may affect the provision of those services.

If you wish to access the personal data we hold about you, please submit a Subject Access Request to us. Please refer to our Subject Access Request Procedure which helps you to do this: <https://www.uco.ac.uk/policies-and-procedures>

Changing your information

Please tell us promptly about any changes to the information we hold about you. This is particularly important regarding your contact details.

You may send in a request to amend your details by emailing our Clinic Reception Team with the relevant information at clinicappointments@uco.ac.uk.

Contact the Data Protection & Freedom of Information Officer (DPFIO)

If you have any queries about this privacy notice or how we process your personal data, you can contact our Data Protection & Freedom of Information Officer by:

Email: dpfio@uco.ac.uk

Telephone: +44 (0) 20 7089 5355

² <https://www.uco.ac.uk/policies-and-procedures>

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Post: Data Protection & Freedom of Information Officer, University College of Osteopathy,
275 Borough High Street, London, SE1 1JE

If you are not satisfied with how we are processing your personal data, you can make a complaint to the Information Commissioner and you can find out more about your rights under data protection legislation from the Information Commissioner's Office website available at: www.ico.org.uk.