

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, are the Data Controller for personal data relating to you that we process.

The UCO is registered with the Information Commissioner's Office (Registration Number: Z7454534) and www.clinic.uco.ac.uk is a website operated by the UCO.

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: 11 Nov 2020.

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 hold are:

- Your name and contact information (such as your postal address, email address, home phone number, mobile phone number and work phone number as applicable), 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 or via video conferencing virtual sessions.
- From third parties, e.g. your GP / other healthcare practitioner.
- When you sign up to receive newsletters or other information from us.

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

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 of delivering direct care to you. In this context direct care means “A clinical, social or public health activity concerned with the prevention, investigation and treatment of illness and the alleviation of suffering of individuals”¹:

- To elicit, use and record information about you to directly assess, manage and deliver healthcare to you.
- To remind you about your appointments.
- To send you relevant correspondence regarding your health care.
- To seek payment for your clinic appointment.
- To inform you about changes to the delivery of our healthcare services, e.g. changes to this Privacy Notice, our opening hours, clinic appointment fees, health care provision etc.

- b) Public Interest** (the processing is necessary for the performance of a task carried out in the public interest):

To teach and train healthcare professionals.

To evaluate and improve the health care we provide by asking for your input and feedback:

- To plan, manage and audit UCO health care services and education.
- To conduct health research and development, including relevant student research

¹ [National Data Guardian for Health and Care Review of Data Security, Consent and Opt-Outs, National Data Guardian, June 2016](#)

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- To send you information about our Public and Patient Involvement Group and activities.
- To report and investigate complaints, claims and untoward incidents.
- To report events to the appropriate authorities when we are required to do so by the law.

Where possible, we will always aim to anonymise your personal information to protect patient confidentiality unless there is a legal basis or requirement that permits or requires us to use it. We will only use/share the minimum of information necessary and will do our best to notify you of this sharing.

c) 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.
- To inform your relatives, friends and carers of your health status should you wish us to do so.
- To send you newsletters and general updates about the UCO Clinic and the clinical services we provide indirectly related to your health care.
- To send you information about our fundraising activities, including occasional targeted requests to consider giving financial support to the UCO, or to ask you to consider supporting us in other ways by your preferred method of communication.

We have adopted an 'opt-in only' communication policy. This means that we will only send marketing or fundraising communications to those who have explicitly stated that they are happy for us to do so via their preferred channel(s) (email, SMS, phone or post).

You do not need to subscribe to marketing or fundraising communications from us when you become a patient or when you use any other of our health care services and opting out or unsubscribing from these communications does not affect your status as a patient with us or the health care you will be provided with.

If you would like to receive such communications but have not opted-in please contact us on 020 7089 5360 or email clinicappointments@uco.ac.uk.

If you do not wish to receive such communications or would like to cancel your subscription or withdraw your consent to receive such communications, click on the "Unsubscribe" button at the end of these communications or contact us on 020 7089 5360 or email clinicappointments@uco.ac.uk to update your preferences.

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, as well as student practitioners and supervising clinicians.

The UCO Clinic may also need to share information about you and your healthcare with third parties outside of the UCO Clinic and you will be asked for your consent for this to be shared. These may include:

- GPs
- Social Services
- Health Authorities
- NHS Trusts
- Department of Health & Social Care
- Other health care practitioners as appropriate

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

There may be situations where we are under a legal duty to share your personal information. This includes, but is not limited to, disclosure under a court order, sharing with the police for the prevention or detection of crime, where there is an overriding public interest to prevent abuse or serious harm to others, or where the health and safety of others is at risk. In all cases we will always do our best to notify you of this sharing.

How long shall we keep it for?

Different records may be retained for different periods of time as described below. We will balance the retention of records with your use of our services.

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 GDPR² 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 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.

If you have given your consent and you wish to withdraw it, please contact our Clinic Reception Team at clinicappointments@uco.ac.uk or on 020 7089 5360.

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>

² <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

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 or on 020 7089 5360.

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

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.

| Document Amendment Record | | | | | | |
|---------------------------|---|---|--|--------|--|--|
| Version number | Dates produced and approved (include committee) | Revision Summary | Reason for production/ revision | Author | Location(s) | Proposed next review date and approval required |
| V1.0 | May 2018 SMT | New Document | To comply with new EU data protection legislation (GDPR). | DPFIO | All master versions will be held in: J:\0 Quality Team - Core Documentation Website | May 2020 |
| V2.0 | Nov 2020 SMT | Reviewed and amended legal basis of processing patient data. Clarified opt-in for marketing / fundraising communications and how patients may change their preferences. Clarified who data may be shared with and why. Updated weblinks. | To clarify what personal data is collected from patients. To reflect that personal data may be processed by consent for marketing and participation in student project and research activities. | DPFIO | All master versions will be held in: J:\0 Quality Team - Core Documentation Website | Nov 2023 Or in response to legislative changes. |