**General Data Protection Regulation Policy**

Both Wendy Redwood and Shelly Carroll are registered with the Information Commissioners Office (ICO)

**What information do we store and how do we collect it?**

In order to operate a safe medical practice, both the Society of Chiropodists and Podiatrists and the Health Care Professions Council require us to keep accurate, concise and relevant patient notes. Information gathered includes a patient’s name, address, contact details, designated GP, medical history, prescription medication, vascular status and any foot related problems or conditions. This information is collected during the initial consultation.

**How is this information used?**

The information gathered helps us to identify individual needs, assess and treat accordingly. If necessary to comply with a legal obligation or court order or in connection with a legal claim, such as retaining information about your purchases if required by tax law;

**How do we store this information?**

All paper notes are kept in a locked cabinet in a locked room. Digital notes are stored in a secure programme that is password protected

**Who has access to the data?**

Wendy Redwood and Shelly Carroll are the only people with access to any personal data stored by SW Podiatry.

**Sharing of personal data.**

Occasionally it might be necessary to share personal information with other health care professionals, this will only take place after discussion and written consent has been obtained which will be documented in patient notes.

In the case of underage children, both the legal guardian and patient will be consulted and consent obtained.

In the case of a patient deemed to not have capacity, the person who has medical power of attorney will be required to give consent.

Business transfers. If we sell or merge the business, we may disclose your information as part of that transaction, only to the extent permitted by law and with your consent.

Compliance with laws. we may collect, use, retain, and share your information if we are legally required to.

**How long is information stored for?**

We are required to retain this information to comply with our legal and regulatory obligations, to resolve disputes, and to enforce our agreements. The retention of podiatry records is normally a minimum of 7 years after the last entry for adults or up to the 25th Birthday for a young person – under 16 years of age (or 8 years after death). For patients who lack capacity or have a mental Health condition, records are retained for 20 years after last entry (or 8 years after death). For customers who are not patients but may have bought products from the business we will keep any data you may have provided for a minimum of 6 years in line with tax legislation.

**Transfers of Personal Information Outside the EU**

Our software provider CLINIKO, is based in Australia, as a result, we may transfer your personal information to a jurisdiction with different data protection and government surveillance laws than your jurisdiction. If we transfer information about you outside of the EU, we rely on Privacy Shield as the legal basis for the transfer, as CLINIKO is Privacy Shield certified.

**Your Rights**

You have a number of rights in relation to your personal information. While some of these rights apply generally, certain rights apply only in certain limited cases. A describe of these rights is below:

Access. You have the right to access and receive a copy of the personal information we hold about you by contacting us 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 our processing of some of your information based on our legitimate interests. 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 (see above)

Complain. If you wish to raise a concern about my use of your information (and without prejudice to any other rights you may have), you have the right to do so with the Information Commissioner [www.ico.org.uk](http://www.ico.org.uk)

**What happens if there is a breach?**

In the event of a data protection breach, the controllers are legally bound to report the breach to the ICO who will then guide us through any further steps.

**How to Contact us**

For purposes of the GDPR, we, Wendy Redwood and Shelly Carroll, are the data controllers of your personal information. If you have any questions or concerns, you may contact us on [SWCLINIC@OUTLOOK.COM](mailto:SWCLINIC@OUTLOOK.COM) Alternately, you may call us at: 07507 163999