**PRIVACY POLICY**

This document informs you in plain English of the data we collect at Ombersley Physiotherapy, how it is stored and what data might be shared and with whom.

**Data collected**

We collect data that is essential for your treatment. This includes your name, address, telephone numbers, insurance details, referral letters, correspondence and your actual physiotherapy clinical notes. We treat your data with the upmost respect and confidentiality.

**Data storage**

Your data is stored in a variety of ways depending on the format that it is in.

**Paper format**
Paper documents include your initial consent and assessment forms alongside any paper correspondence we have received from your GP, specialist or insurance company.
These are mostly stored in a locked filing cabinet with in the GP surgery.
Occasionally, a physio might need to take a copy of your notes out of the surgery for a home visit or writing an in-depth report. In this instance, your physio will store your notes in a locked filing cabinet in their own home.

**Clinical notes upto March 2020**
Our clinical notes were written in word format on the clinic computer. This computer is in a safe environment (GP surgery), is password protected and always kept up to date with anti-virus software. Clinical notes need to be backed up to ensure the safety of your data and this was done using a password protected USB stick and then transferred to an encrypted data storage device (hard copy).

**Jane practice management system**Since July 2020 we have subscribed to a specialist medical practice management software called ‘Jane’. Jane are fully GDPR compliant and the data is stored on a secure server in London. Data is transferred with the same level of security and encryption that the major banks use. The practice management system also enables contactless card payments using stripe. Only the last 4 digits of your card and expiry date are stored on Jane’s server, the rest is secure with a PCI-compliant payment processor. For more information on Janes Security features please see <https://jane.app/guide/security/list-of-security-features>

**Data on mobile phones**If you have sent texts or voice mails to your physiotherapist these will be deleted within 6 months of being sent. We pride our selves on offering a personal service so we do often talk to our patients by telephone. If you use your physiotherapists mobile phone frequently it is useful for the physiotherapist to have your number in their phone contacts list so we will store you under your first name or initials only (not full name or any other data). If you are not happy for this please do let us know.

**E-mails**E-mails that have been sent to us (either by yourself, referring professionals or insurance companies) are currently filed in our g-mail account which is password protected and has 2 step authentication in place to help prevent unauthorised access. The e-mails are held on the system for up to 6 months to enable us to refer back to them if necessary.

**Contacting you**

During your treatment we need to be able to contact you in case of any changes to appointments. The consent form you sign on your initial session enables you to tick how you are happy for us to contact you about your treatment / appointments and also if you are happy for us to leave voice mails or answer phone messages.

**Data sharing**

The data we hold in your clinical notes is accessible by the 3 physiotherapists who work together at Ombersley Physiotherapy who will access your data only as necessary (that is in relationship to your treatment).

We share your data with your GP or specialist when appropriate and will inform you of this. If you have come though your medical insurance, we may also need to send reports on your progress and will inform you of this if necessary

Letters are still posted to some consultants and GPs, others that we have secure encrypted e-mail links with we will send letters by e-mail, or we will send letters as an encrypted attachment. Invoices that we send to your insurance company are done online either through the insurance companies own safe on-line portals or healthcode which is a secure site.

If your GP is also based at Ombersley Medical Centre then we can input some of your physiotherapy notes directly into your medical notes as necessary to help keep your GP up to date with what we are doing. We are also able to access consultant letters and investigations that are relevant to your care if you are registered with the medical centre and have given your consent on the initial intake form.

**Exercise sheets**We use a rehabilitation soft wear programme called ‘Rehab my patient’ so we can e-mail your exercises to you. For this your name and e-mail address are shared with the company who then e-mail the exercise sheets out to you. They only have your name and e-mail address and do not use it for any other purpose.

**We never have and never will share any of your details with any marketing company or use them for marketing ourselves.**

**Disposal of Data**

We are legally obliged to keep your clinical data for 8 years from the date you were last seen (or up to your 25th birthday) after which time your records will be destroyed. Paper records will be shredded and computer files deleted. This will happen in yearly batches which practically means that your data will be destroyed between 8-9 years from final contact.

**Access to your Data**

You have a legal right to access the personal data we hold on you. If you would like to do this please inform Moira Slawson in writing.

If you have any further questions or wish to access the data we hold on you please contact Moira Slawson who is the designated data protection officer for Ombersley Physiotherapy.

Ombersley Physiotherapy 2020