

# Privacy notice.

#### Who we are:

Neurobility Limited Contact hello@neurobility.co.uk 01295 810691

We provide private physiotherapy and rehabilitation to our clients in clinic or home settings. Services may also be provided in gyms, swimming pools and other locations as agreed with the client.

#### People involved in the processing of your data

Emma Thomas is the Clinical Director. The team also consist of specialist physiotherapists and physiotherapy assistants to provide therapy; and practice managers and client care team to provide support with administration. There may be additional staff members recruited in future to deliver therapy, or to carry out administrative work. All current and future employees will be governed by the appropriate confidentiality and data protection legislation to ensure that your information is processed and handled in the correct way.

## The lawful basis for collecting and holding your information

In the first instance when you first make contact with us to arrange an appointment we will collect your data to form a contact between us for the provision of physiotherapy and rehabilitation.

Once an assessment has been carried out we will collect and hold data relating to clinical records for the purposes of a legal obligation to do so. We are legally and professionally obliged to make and hold records of assessment and treatment interventions.

If we wish to use your data for the purposes of marketing we will only do so if you have given your consent for this.

#### Information we hold

We will ask for and hold personal confidential information about you which we will use to support us in the provision of high quality care and treatment. It is important to collect and hold this information to deliver effective care that meets your needs.

The records may include:

- o Basic details such as name, address, contact numbers, email address, date of birth and next of kin.
- O Details of contact we have had such as appointments in clinic or at home, telephone calls and email conversations.
- Records of treatment and care, including notes about your health and clinical impressions.



- o Results of scans, x-rays and blood tests
- o Information from other health professionals involved in your care
- o Information provided by family members or significant others
- o Details of invoicing and payments for equipment and therapy
- o It may also include personal sensitive information such as sexuality, race, your religion or beliefs, and whether you have a disability, allergies or health conditions.

Where you have given details of someone (for example next of kin, main carer, or power of attorney) we will also hold their personal data. It is your responsibility to ensure that this individual is aware of and accepts the terms of this Privacy Notice.

#### How information is collected

- o Given directly by you in person, via email, via our website or via social media.
- o Given by a family member or significant other
- o Given by a third party such as another health professional or your GP in a referral or via other communication or report

#### How we use the information we collect:

- o For audit purposes
- o To train other health care professionals.
- o To ensure treatment is safe and effective
- o To help inform decisions about your care and treatment
- o To ensure we work effectively with others involved in your care
- o To review the care we provide to make sure it is of a high standard

### How long your information is kept for and how it is stored

Your information is retained in secure electronic and paper records and access is restricted to only those who need to know. Information will be retained in line with the Records Management Code of Practice for Health and Social Care 2016 retention schedules as follows:

**Adult records** – Basic health and social care retention period is 8 years after the last appointment.

**Children's records** - Basic health and social care retention requirement is to retain until 25th birthday or if the patient was 17 at the conclusion of the treatment, until their 26th birthday.

Records will be reviewed prior to destruction to check for any other involvements that could extend the retention, or take into account any serious incident retentions. This includes medical illustration records such as X-rays and scans as well as video and other formats.

## Who we share your information with

We would like to make it clear that we will never pass on any of your contact details to third parties without your consent.



There are often occasions when we will send a report or discharge letter to medical practitioners associated with your care (such as GP, consultant, specialist nurses or other therapists), you may decline to share this information, however it may be detrimental to your health to do so. Please let us know if you would rather we did not share this information.

Under no circumstances will we pass on your full clinical records unless you have given written consent.

We may share your personal data or make it available to third parties on the basis of protecting your 'vital interest' (i.e. your life or your health).

We can confirm that your data will not be used for any automated profiling purposes.

There may be occasions when we may wish to share anonymised data (such as a case study), photographs or video footage with others for the purposes of teaching other health professionals. This data will never be used unless you have given your written consent.

You have the right to refuse or withdraw consent to us sharing your information at any time. We will fully explain the possible consequences to you.

#### Your right to see the data we hold about you

You have the right to request to see all the data we hold about you. Requests must be made in writing and your identity will be verified before we share any information. Any information request will be dealt with within 30 days, however we reserve the right to extend this by a further 2 months where requests are complex or numerous. If this is the case, you will be informed within one month of the receipt of the request and an explanation of why the extension is necessary will be given.

We must provide this information free of charge. However a fee based on the administrative cost of providing the information will be charged if a request is manifestly unfounded or excessive, particularly if it is repetitive. We may also charge a reasonable fee to comply with requests for further copies of the same information.

## Your right to rectify your data

You have the right to request that we rectify any inaccurate data we hold about you. Request for rectification can be made verbally or in written format. We will take reasonable steps to ensure that your data is accurate and rectify if necessary.

We are not able to re-write or rectify your clinical records, however if new information has come to light (for example a change of diagnosis) we will take reasonable steps to ensure that subsequent records reflect these changes.



To ensure that your data is accurate and up to date please inform us of any changes to your personal information. For example, change of contact details, change of medication, changes to medical history.

## Your right to delete your data

You have the right to have to have your personal data deleted on request and to withdraw consent to treatment. However, we are required to retain clinical records in line with the Records Management Code of Practice for Health and Social Care 2016 retention schedules. There may be elements of your data that can be deleted, such as data for the purposes of marketing or for use in teaching (if you have previously consented to this). Please contact us to request deletion of data that does not pertain to clinical records.

## Your right to restrict processing of your data

You have the right to restrict processing of your data. This means that you can request that we limit the way that we use your data.

### Contacting us

If you have any questions or concerns regarding the information we hold on you, the use of your information or would like to discuss further, please contact Emma Thomas

Neurobility Limited The Old Dairy Charlton House Farm Hinton-in-the-Hedges Brackley NN13 5LH

## hello@neurobility.co.uk 01295 810691

If you remain dissatisfied with our decision or how we have dealt with your request you may wish to contact:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Helpline - 0303 123 1113

Their web site is at www.ico.gov.uk