

Policy on Storage and Processing of Patient Data on College Information Systems

TO ALL STUDENTS AND STAFF

Attention to this policy is drawn to all first- and higher-degree **students** and to BSc, Diploma, Masters and PhD **project supervisors** and to **staff** conducting research or clinical service work. **PRHO's** are also permitted use of College Information Systems and the conditions of this Policy apply also to their use of such systems.

1. It may be necessary to store and use information about patients for a number of reasons, including:
 - Compiling reports on patients visited on wards or in clinics and/or community surgeries
 - Preparation of a case presentation of a specific patient
 - Part of a research study (*e.g.* by BSc, Masters or PhD students or by staff).You may wish to use College Information Systems to store and/or transmit such information in whole or in part by means of text documents, spreadsheets, presentations, databases, *etc.*, by the use of email or file transfer, through the College systems.
2. The General Medical Council's '**Duties of a Doctor**' include a requirement that Doctors and Medical Students:
 - respect patients' dignity and privacy
 - respect and protect confidential information
3. Data concerning patients are the property of the Primary Care or Hospital Trust. These wish to ensure that data about their patients are maintained and handled in a sensitive, secure and confidential manner. The Trusts with whom Imperial College has association, have stated that all records containing patient identifiers are to be kept under their control, on their information systems, unless special permission to copy the data to other means of secure storage and use has been explicitly given. This will invariably require Ethical Committee approval.
4. **The use of College systems for storing and/or transmitting such information is permissible only once the data has been anonymised.** The College email system and network servers, and all computers on the College network, are not protected by firewalls, and the standard security devices, such as access control through name/password, are not considered to provide adequate protection as they are liable to fraudulent misuse. Reference is made to the College's Code of Practice for Processing Patient Data [www.imperial.ac.uk/ict/services/security/securitypolicies/policy/patientdata]
Further details of the Data Protection Act 1998 are available at <https://www.imperial.ac.uk/spectrum/secretariat/publications/dp.htm>
5. Information about patients may be stored on College Information Systems (discs, networks, email, servers, *etc*) only if all patient identifiers have **first** been removed from the data, such that any patient cannot be identified either:
 - explicitly** by the use of combinations of patient name or case number (hospital and or laboratory number), date of birth or post code, which allow the individual to be identified
 - or, by implication** *e.g.* "Patient X, a 49-year old man on Ward 27 North", in which the individual can be identified by exclusion of others
6. If a College Information System is used for the storage and/or use of patient data which have been anonymised, and a 'key' to the decoding of the records is kept elsewhere, the processing of the data (including storage) must be in accordance with the eight principles of the Data Protection Act, as summarised in the College Code of Practice. The 'key' must not be stored on a College Information System.
7. Paper records containing details of identifiable patients must be kept secure at all times and, when no longer required, must be returned to the clinic/ward or disposed of by appropriate means for confidential waste *e.g.* by shredding or incineration.
8. Under the College's Information Systems Security Policy, storage/processing of Personal Data contrary to the College's notification under the **Data Protection Act 1998** is a serious misuse of Systems and may result in disciplinary and/or legal proceedings.
9. Use of College systems or personal PC's by students for storing/processing data about patients identifiable from the details being recorded, will be considered to be unbecoming of a member of the medical profession and the potential maximum penalty for a serious breach is suspension or termination of study. The College procedure for Assessment of Fitness to Practice Medicine will apply. <https://www.imperial.ac.uk/spectrum/collegesecretary/governance/charter/ftp.htm>