



Appropriate Policy Document (APD)

Processing of Special Category Data

Student Clinic, College of Integrated Chinese Medicine (CICM)

### **1. Purpose of This Document**

This Appropriate Policy Document (APD) explains how CICM processes special category personal data within its student clinic in compliance with UK GDPR and the Data Protection Act 2018. The clinic provides supervised treatment to members of the public as part of student clinical training. This involves processing sensitive health data.

### **2. Scope**

This policy applies to student practitioners, clinical supervisors, administrative staff, and any third-party processors involved in clinic operations. It covers all patient data processed through physical records and digital systems, including Jane App.

### **3. Categories of Personal Data Processed**

#### **Special Category Data:**

- Medical history
- Presenting conditions
- Treatment records and clinical notes
- Medication details
- Lifestyle and health information

#### **Personal Data:**

- Name
- Address
- Date of birth
- Contact details
- Appointment information

### **4. Lawful Basis for Processing**

Article 6: 6(1)(e) task carried out in the public interest (clinical education and supervised care) & Article 9: 9(2)(h) provision of health or social care or treatment

## **5. Purpose of Processing**

- Delivery of safe clinical care
- Student training and assessment
- Continuity of care
- Legal compliance

## **6. Data Processing Systems**

Patient records are stored in Jane App, a secure cloud-based system. DPIA completed.

## **7. Security Measures**

- Role-based access controls
- Confidentiality agreements
- Encryption and secure storage
- Staff training
- Data minimisation

## **8. Retention**

Records retained for 7–8 years after last treatment unless legally required otherwise.

## **9. Data Subject Rights**

Access, rectification, restriction, objection, and erasure (where applicable).

## **10. Data Sharing**

Only shared where necessary for care, supervision, legal requirement, or with Jane App as processor.

## **11. Governance**

Compliance with UK GDPR and ICO guidance.

## **12. Review**

Reviewed annually or when processing changes.