



Further Teleos GDPR Tools – ‘Right of Access’ and ‘Right Of Erasure’

Following on from the ‘GDPR Compliance Handout 1’, further tools have been added to the Teleos program to aid your compliance. These cover the areas of ‘Right of Access’ and ‘Right to Erasure’.

NB This handout should serve as a guide and you should consult your own Data Protection Officer (DPO) as to its implementation in your practice.

Right of Access

Under the new GDPR regulations, coming into force on 25 May 2018, individuals have a right to view what information you hold on them. You have to supply this information within 30 days of the person requesting it and you are not allowed to make a charge for doing so. However, if a client makes multiple requests for the same information then it would be considered perfectly reasonable by the ICO to charge an administration fee.

Obviously, the vast majority of the information you retain is animal related, so is not relevant to these new regulations - as animals have no status under GDPR. You will see from the screenshot below that there are several new options that have been added to the GDPR status button. If a client requests a copy of the information you hold on them you can simply select ‘Print client detail/amendment form’. A printout will then be provided detailing the client name, address and contact details. This form can also be used to make amendments to the client record card.

It should be noted that a client has the right to have copies of everything you hold and that may include other documents outside of the Teleos program or additional notes within it.

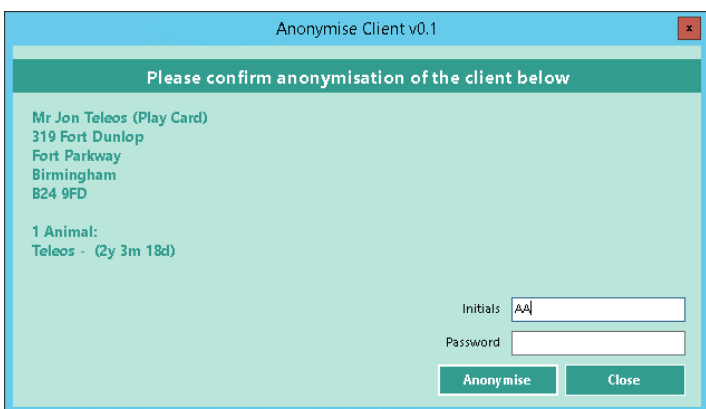
Right Of Erasure (also known as the Right to be Forgotten)

Under the GDPR, individuals have a 'Right to Erasure' which is also known as the 'Right to be Forgotten'. Whilst this is great for us as individuals (as, in theory, we can control who has our details), this is problematic in an application such as a Practice Management System. Firstly, HMRC require you to keep financial records for seven years. Secondly, although the RCVS does not specify a time period and you can determine your own policy as a practice, you are required to keep clinical records for a reasonable time period. As you know, you must keep records of prescribed drugs for five years.

So, you cannot fully 'erase' a client record unless they have not been seen for over 7 years. However, the client still has the right to have their details removed from your database if you do not have a legitimate interest for keeping them. An obvious 'legitimate interest' would be if the client owes you money. You have the right to retain their records to enable you to chase a debt or keep a record if they have had a debt written off (as they very often come back!).

The solution is to 'anonymise' the client. As you will see from the dropdown menu, you can produce a 'Right to Erasure' form that the client can sign to confirm that they would like to be removed from your system. The template provided is named 'GDPR Right To Erasure A4.RTF' and 'GDPR Right To Erasure A5.RTF' and found in your main d:\Televet folder. These can be edited as required. Before anonymising the client, you should get some form of photographic proof of ID.

Once you are happy that the client can be anonymised, use the 'Remove Client' option from the dropdown list. This will only appear as an option if you have been given permission to use it by your system manager in Teleos settings. You are also required to confirm your user name and password before performing this procedure.



The 'Remove Client' option leaves all animal clinical and financial information in place but anonymises the client by removing their name, address and contact details from the record card.

Printing or Emailing Histories

An area that you do need to be careful is ensuring that you have permission to send client histories to a third party. If a client is changing practice for example, you should be careful to ensure that you have the clients' permission to send on their details and not just respond to a request from another practice. Your own Data Protection Officer (DPO) has probably covered this in your own procedures.

However, an additional option has been added to the program that allows you to remove the client details from histories. This would allow you to print/E-mail histories and address them to the animal, eg 'Fluffy Smith'. As no client name or contact information would be present, the owner could not be identified without the receiving party knowing further information. This complies with the GDPR.