Managing Remote Clinics

BRITISH ASSOCIATION FOR PERFORMING ARTS MEDICINE

CARING FOR PERFORMERS' HEALTH

Category	Policy
Version	1.0
Summary	This policy outlines BAPAM's procedures for running clinics outside London including handling confidential information when working remotely to ensure compliance with Information Governance policies and Data Protection legislation. It applies to all personnel (staff, clinicians, volunteers) who work for BAPAM.
Valid From	June 2018
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Approval Date/ via	Medical committee
Distribution	BAPAM clinicians email and online forum, staff meetings BAPAM website
Related Policies	*Data Protection* *Data Transmission* *Information Governance* *Incidents* *Health Records Management* *Clinical Governance* *Lone Working*
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1. Purpose:

This policy outlines BAPAM's governance, safety and security procedures for managing clinics outside London including handling confidential information. The aim is to ensure that safe and effective working practices are employed whilst working remotely.

Enabling personnel to work remotely is key to BAPAM's operations as a national not-for-profit healthcare organisation to provide access to BAPAM services across the UK in a variety of locations and with a diverse workforce including part-time, sessional and volunteer personnel.

Our aim is to ensure that any BAPAM clinic operates to the same quality standards wherever it is located.

2. Scope:

This policy applies to all BAPAM personnel – all administrative staff, clinicians and volunteers working directly for BAPAM. It is especially relevant to personnel delivering BAPAM's healthcare services at sites separate from the administrative office and clinic in London, particularly regional clinicians.

Remote working heightens risks in a number of areas which can lead to the risk of:
- Breach of confidentiality/data protection
- Compromised data quality
- Poor patient administration, follow up and overall experience
- Personal and corporate reputation damage
- Financial costs (including ICO fines due for breaches; compensation claims)
- Disciplinary action

BAPAM personnel are required to follow the working practices contained within this document and any related documents to ensure they deliver a quality service including:
- following the correct processes and guidelines to facilitate safe remote access to confidential information under data protection legislation and BAPAM policy
- ensuring the safe and effective use of personal and mobile devices
- comply with BAPAM clinical governance policies

3. Definitions:

Data and Information: definitions of the types of information BAPAM is responsible for are outlined in detail in the Data Protection policy. Note that all information collected and held about our performer patients (including contact details, healthcare records, correspondence) is held legally by BAPAM on their behalf under Data Protection legislation, and the terms on which we collect and use their data are outlined in our 'Patient Contract'. This information is not the property of an individual clinician or staff member. Healthcare/Medical records are considered 'sensitive' data (in legal terms) and must be afforded the most stringent protection.

Mobile device: any device which renders BAPAM information portable. This may include (but is not limited to): laptops, tablets, mobile phones (Smartphones, Blackberries etc), digital recording and storage devices such as USB sticks, CDs, DVDs, etc. Mobile devices may belong to BAPAM or may fall within the 'personal devices' category.

Hard copy information: any information arising from BAPAM work that is held in a print format (paper notes, X-rays and other imaging, etc).

4. Standards

The BAPAM Medical Committee approved standards for regional clinics in January 2018. These are attached at Appendix 1, and are expected to evolve with experience. It is the responsibility of the Director with the Clinic Manager to ensure standards are met and that clinicians at the regional site are aware of and comply with BAPAM policies and procedures. A risk assessment should also be carried out at each venue. (Appendix 2)

BAPAM personnel are bound by the same rules of confidentiality whilst working remotely as they are when working within the central BAPAM administration office and BAPAM's secure online systems. Individual personnel are responsible for the security of any electronic and hard copy information in their care which relates to BAPAM and are required to be aware of and understand this guidance and related documents.

BAPAM policies apply to regional clinics, with the exception of steroid injections. No injections will be delivered in regional clinics.

5. Patient Registration and Clinic Preparation

All patients are registered at the BAPAM London headquarters. When regional clinics are set up and assessing clinicians approved, a resource is set up in the CRM for that clinic which automatically sends the patient the correct details.

The regional clinic administrator for a clinic (who will be attending the clinic) will be appointed at a team meeting and should:

- review the spreadsheet at W:\AAA\ClinicsNew\Regional Clinic\Regional Standards by Clinic and check that all equipment and information is ready to take
- liaise with the Clinic/Deputy Clinic Manager to ensure that clinic and patient information is ready by the time they need to leave
- make travel arrangements
- Print out any updated policy, procedure or advice documents so that they can be inserted into the clinic folder at the location.

6. Clinical Governance Responsibilities

BAPAM regional clinics should comply with all BAPAM policies. No regional clinic can currently offer steroid injections and all consultations are limited to:

- clinical assessment

- physiotherapy
- osteopathy

There will be some regional differences, these include:

- Safeguarding
The safeguarding responsibilities are the same, but the local authority referrals contacts will be different for regions and will be contained in the clinic policies book held in each regional clinic
- Medical Emergencies:
Contact details should be updated for local hospitals and phone numbers

7. Data Management:

7.i Hard Copy information

- BAPAM's hard copy records are stored securely at BAPAM's administrative centre and can only be accessed and distributed by authorised BAPAM personnel

- BAPAM personnel who are travelling to and working at regional clinics may take hard copy healthcare records offsite provided this is for clinics and that the information is kept secure and confidential

- A locked suitcase will be provided to BAPAM personnel working in regional clinics. This will include patient records and equipment needed for the clinic and should be prepared in the London office, locked and only unlocked on arrival at the regional clinic.

- Hard copy, sensitive data about performers following a clinic should be stored in the locked case and returned to the BAPAM office for filing as soon as possible following the clinic.

7.ii Electronic Information:

- Access to BAPAM's electronic database and secure server is confined to authorised Admin Team members

- Authorised personnel may access BAPAM information through personal email accounts and shared workspaces using any internet connection and/or device. A BAPAM laptop will be provided to BAPAM administration staff attending regional clinics with access to the CRM via a VPN link.

- A Dictaphone will be provided for clinicians to use to dictate patient referral letters. This will be stored in the locked suitcase.

- Any *sensitive data* arising from BAPAM work that is transmitted, accessed, shared or downloaded electronically must be protected by reliable encryption methods using Egress (both within the BAPAM administrative system and when working remotely) as outlined in

the *Data Protection* and *Data Transmission* policies. Clinicians working remotely who need to enter into email correspondence with the Team or with third parties about patient care or onward referral should do this through BAPAM's Egress system. A record of all correspondence arising from a BAPAM patient's assessment must also be available within our central administrative system. If clinicians wish to type out letters directly, they can make use of the BAPAM laptop to do so, or, can type documents directly into the Egress workspace.
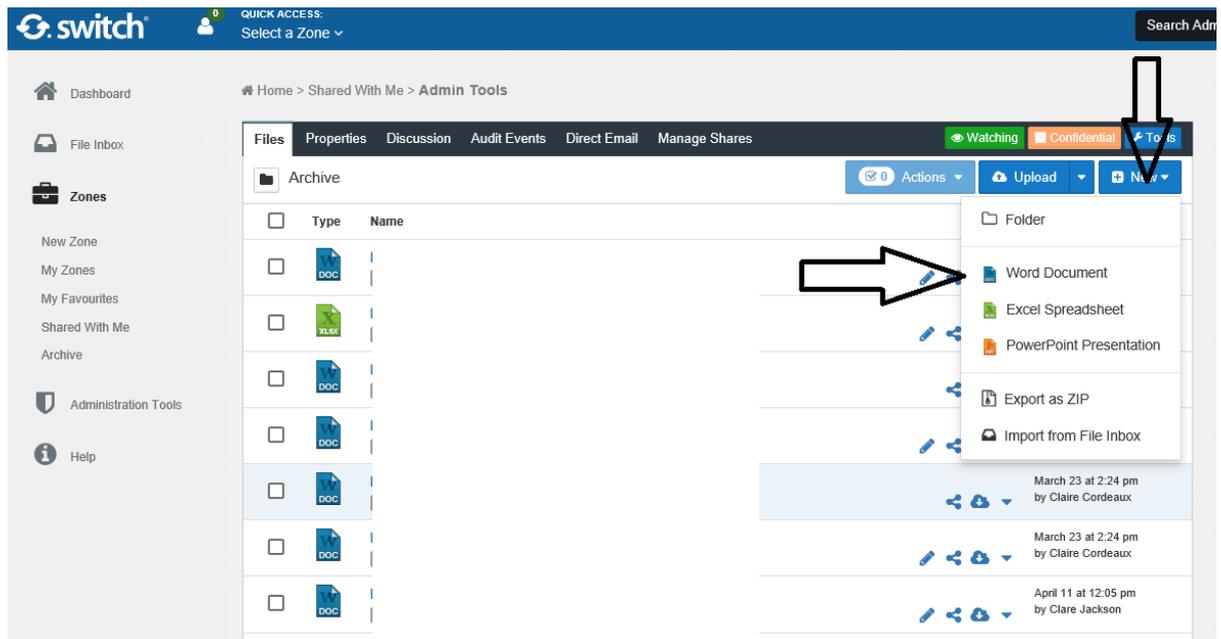
- No documents should be stored on mobile or shared personal devices temporarily

- Personnel must ensure that their passwords for accessing confidential and sensitive BAPAM information electronically are kept secure, and that they do not use automatic log-ins such as 'remember me' facility on mobile or shared personal devices

7.iii Security in transit

Personnel should make every effort to ensure that sensitive and confidential information in any format is not misplaced, lost or stolen. They should be especially vigilant in public settings. The information should be carried as hand luggage when using public transport. BAPAM personnel must not leave notes, paperwork or mobile devices in a car overnight or for any extended period of time.

BAPAM staff working on public transport using laptops should use privacy screens.

7.iv Inspection and access

BAPAM personnel are not permitted to store electronic or hard copy records away from BAPAM's central records system on a permanent basis. BAPAM is obliged to fulfil Access

requests from patients and the Admin team must be able to access information centrally at short notice. Regulatory bodies such as the Care Quality Commission (CQC) and Information Commissioner (ICO) also have powers to inspect personal data held by BAPAM, and it is essential that information is held centrally to facilitate access and to avoid breaches in data protection standards.

8. Post Clinic

As soon as feasible (the following day, or the Monday if a weekend), the regional administrator should return the locked suitcase to BAPAM London HQ, and ensure that the Clinic/Deputy Clinic Manager has all documentation from the clinic consultations and can take forward any action.

The regional administrator should note down all improvements required and enter them with any actions in the regional clinic spreadsheet. at W:\AAA\ClinicsNew\Regional Clinic\Regional Standards by Clin and report them to the Clinic/Deputy Clinic Manager.

9. Incident reporting

Any adverse incident involving remote working from a regional clinic or working from home must be reported in accordance with BAPAM's incident reporting procedures. Lost and stolen devices or equipment must be reported to the Office Manager and the Director

10. Breach of Policy

All BAPAM personnel will receive a copy of this procedure and training at induction and will be required to comply as a condition of working at BAPAM.

In certain instances, breaches of these procedures may constitute professional misconduct and could lead to disciplinary action.

Version 1.0 = Dec 2016 (D Charnock, R Whiticar)
Version 2.0 = June 2018 (C Cordeaux)
Review date = June 2019

Appendix 1

Regional Clinic Standards Name of Clinic	Details	Standard met: Yes/No
1 **Location**		
Contacts for Location		
Risk Assessment completed		
12x 12 ft- minimum 8ft confidential space		
2 Waiting room (space to wait)		
3 **Equipment**		
Couch		
Couch roll		
alcohol gel		
Tongue depressor		
Gloves		
Tissues		
Otoscope		
Stethoscope		
4 PC and wifi available for administrator with BAPAM VPN access		
5 Telephone		
6 Printer		
7 Dictation equipment		
8 Patient appointment list		
9 BAPAM literature		
10 Signs to clinic - BAPAM door buzzer or reception. Clinics sign, do not disturb sign and blue-tac		
11 Patient feedback forms		
12 Staff policy folder		
13 Patient records with secure storage		
14 Clipboard, compliment slips and headed paper		
15 Network of local clinicians for referrals		
16 Administrator under contract/honorary contract to BAPAM also able to chaperone if necessary		
17 Link to Education Providers/local performing artist organisations with talks set up to advertise clinic		
18 Assessing clinicians		
19 Start date		
20 Publicity out		

Appendix 2: Risk Assessment Template to be amended at each site

Potential Hazard	Prevention/Action
Patient arrival – patient not sure where to go	Advance letter gives address Receptionist knows who is arriving and keeps information confidential. Administrator welcomes patient when they arrive Signs are on the front door and clinic door
BAPAM clinician can't attend at last minute	Cancel clinic, call all patients, call location
BAPAM administrator can't attend	Possibility of egressing patient notes to clinician as long as 2 x staff available on site to meet lone working policy and act as chaperone if required
On site health and safety and cleaning standards do not meet standards	Check standard routine in advance of using location and have contact details in case ongoing problems