CURECAST
CLINICAL PHOTO MANAGEMENT

Daily, Weekly and Yearly Checklist for Storing Clinical Photos

For clinics that do not use a clinical photo app

Daily

- [ ] Ask the patient for permission before taking the photo, and tell them how it will be used.
- [ ] Transfer every clinical image from the capture device (phone, camera) to the patient's electronic health record immediately after the encounter.
- [ ] Delete the image from the capture device once the transfer is confirmed and verified in the patient record system.
- [ ] Document in the patient record that a photograph was taken, its clinical purpose and that the patient authorized it.

Weekly

- [ ] Check every staff phone and camera for clinical images that have not been transferred.
- [ ] Confirm no clinical images have been sent via personal email, SMS, iMessage or consumer messaging apps (these are not safe ways to send patient photos unless they are encrypted end to end).
- [ ] Verify that automatic cloud backup (iCloud, Google Photos) is turned off on every device used for clinical photography.

Monthly

- [ ] Review who has physical access to cameras, USB drives, external hard drives or shared folders that hold clinical images.
- [ ] Confirm every user accessing image storage has a unique login (no shared passwords).
- [ ] Remove access to shared folders, drives and cameras for staff who have left or changed roles, and change any shared passcodes.
- [ ] Test that you can locate and restore a specific patient's images from your backup system.
- [ ] Check that any patient who withdrew consent has been noted in their record, and that none of their photos are used for the purpose they withdrew from.

Quarterly

- [ ] Audit a random sample of patient files to confirm each clinical image has a matching signed consent form on file.
- [ ] Check that each consent form states what the photo can be used for, and that no image is used beyond that (for example care, teaching, marketing or research).
- [ ] Inventory all devices and storage locations that hold clinical images: phones, cameras, USB drives, shared network folders, personal laptops, external hard drives.
- [ ] Confirm every device with clinical images has encryption turned on, a passcode set and remote wipe configured where available.
- [ ] Review whether any clinical images are stored with a cloud provider or IT vendor and confirm a signed written agreement is in place for each one.
- [ ] Make sure every staff member knows what to do if a device with clinical photos is lost or stolen: tell the clinic lead straight away, wipe the device if you can, and write down what happened.

Annually

- [ ] Check every system, device and location that stores or sends clinical images for security risks, and write down what you find and fix.
- [ ] Complete a full backup restoration test and document the date, result and who performed it.
- [ ] Review and update your written policies on clinical photography capture, storage, access, transmission and destruction.
- [ ] Confirm the person in charge of patient privacy and security is still named and up to date.
- [ ] Confirm all staff with image access have completed privacy and security training in the past 12 months.
- [ ] Run a retention review based on your local medical record retention law (the period varies by country and region). Securely destroy images that are past it, using a recognized secure-deletion method. Log what was destroyed.
- [ ] If using any cloud storage or hosted patient record system, confirm the vendor's written agreement is current and check where the data is stored.
- [ ] Review your data breach steps: confirm you can find, investigate and report a breach of patient data within the deadline set by your local law.

Important: *This checklist is a practical review aid. It is not legal advice, a certification or a guarantee that your clinic follows the law. Privacy rules differ by country and region, so check the rules where your clinic works and ask a qualified adviser when you need to.*

Source: CureCast
https://dr.curecasthealth.com/blog/checklist-storing-clinical-photos/

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