

Privacy Notice

About Standing CT

The Standing CT Company (Standing CT) is a private provider of mobile weight-bearing CT scanning across the UK and Europe. We are a Controller under data protection legislation and our ICO registration number is ZA241480. Our company registration number is 10380100 and our registered office is 71-75 Shelton Street Covent Garden London, WC2H 9JQ. Our business address is Aston Court, Frederick Place, High Wycombe, Buckinghamshire HP11 1JU.

We understand the importance of privacy and we want to ensure that you have knowledge of what personal data we collect about you and what we do with it, so that you can be confident that we are a good custodian of your personal data.

You have the right to confidentiality in accordance with:

- General Data Protection Regulation
- Data Protection Act 2018
- Human Rights Act 1998
- Common Law Duty of Confidentiality

'We', 'us', and 'our' all refer to The Standing CT Company.

This privacy notice was last updated on 29th July 2021 and historical versions can be obtained by contacting us. It is important that the personal data we hold about is accurate and current. This is of particular importance if you are a patient.

Please keep us informed if your personal data changes during your relationship with us.

Types of personal data which we collect

Healthcare professionals who treat you will keep a record of the treatment and care that they provide. This is to ensure that:

- healthcare professionals involved in your care have accurate and up-to-date information
- we have all the information necessary for assessing your needs and providing excellent care
- your concerns can be properly investigated if you raise a complaint
- accurate information about you is available if you:
 - move to another area
 - need to use another service
 - see a different healthcare professional

The first point at which you will become known to us will usually be once we have received a referral. This referral form will include personal data relating to you such as your:

- name
- date of birth
- address
- NHS number
- hospital number
- National Insurance number
- contact details
- health information

We need this information so that we can:

- uniquely identify you from other patients
- communicate with you in relation to your scan
- ensure all procedures are completely accurately and safely
- match details of the procedure and other health information to your health record to ensure your record is accurate and up to date.

How you can help us to keep your health record accurate

We take steps to ensure the content of your health record is accurate and where necessary, kept up to date. You can help us keep your record accurate by:

- letting us know when you change address, telephone number or name
- keeping a note of your NHS number
- telling us if any information in your record is factually incorrect so that we have the opportunity to correct it
- telling us if you change your mind about how we share the information in your record or if you object to your personal data being used for purposes beyond your direct care

How we use your personal data

Once we have received your referral form, a member of the team will promptly contact you, usually by telephone so that a suitable date, time, and location can be arranged for your CT scan.

You will be asked to make payment for your scan via Paypal which you will access using your own log-in credentials. We do not see your card number, bank account or any other financial information as part of this process.

Once payment has been made, written confirmation of your appointment will be sent to you.

Your referral, record of your scanning episode and any report will be stored electronically within our electronic clinical record keeping system.

If necessary, we can provide you with up to two DVDs containing the images of your CT scan to support the provision of any care or treatment which you might require.

How we share your personal data

The first point at which you will become known to us will usually be once we have received a referral for a CT scan, which must be endorsed by a registered clinician referrer. Our administrator will co-ordinate your referral, communicate with you to arrange an appropriate date, time and location for your scan, co-ordinate payment and ensure our Radiographer has the required information to conduct the scan.

To make sure you receive all the care and treatment you require, we may need to share the information in your health record with other staff and organisations that are also involved in your care. This could include:

- other healthcare professionals, such as doctors and radiology staff involved in the analysis and reporting of diagnostic tests
- other hospitals and private sector organisations involved in your care
- administrative support staff

We will not normally share information about your scan with your family or friends unless you ask us to or with the person you name as your Emergency Contact (except in an emergency), unless you have told us to do so.

Securing your personal data

The security of your personal data is of paramount importance to us - our guiding principle is that we hold your records in strict confidence.

We have senior individuals within the organisation who are responsible for ensuring information is be managed and shared appropriately.

Standing CT has a Caldicott Guardian who is responsible for protecting the confidentiality of patient information and making sure that information is shared where this is appropriate.

Within our practices, we ensure:

- we only use personal data where it is necessary
- we use the minimum personal data necessary for a defined purpose
- access to personal data is restricted to those with a strict need to access the data e.g. because they are supporting the provision of your healthcare.

All our staff are legally and contractually bound by the Common Law Duty of Confidentiality which means we have a duty to keep your information confidential and secure. Anyone who receives information from us also has a legal duty to keep it confidential.

Our staff are regularly trained to ensure they understand how to keep your information secure and confidential in accordance with the Common Law Duty of Confidentiality and data protection legislation.

Standing CT uses secure electronic systems to store medical records, and, for some patients, their CT scan images. We do not hold patient data on paper, where we receive a referral we scan the document, storing the scanned image in a secure database and destroy the paper copy securely.

In addition, we have deployed various technical security measures to keep your information secure which include password security controls, use of auditable systems and encrypted devices.

For any support organisations who are processing personal data on our behalf, we have written contracts in place with them, contractually binding them to comply with data protection legislation and confidentiality.

How we will communicate with you

We take your privacy seriously so please let us know if you have any preferences in relation how you would like us to contact and communicate with you. Unless you ask us otherwise, we will use;

1. Telephone

If you provide a mobile phone number or landline: we may ring, leave a message or text you, so tell us if you do not want us to do so.

2. Email

If you provide us with your email address: we may use it to send confidential health information in an encrypted format, unless you have told us not to do so.

Please read the following before providing us with your email address.

- Emails can be quick and convenient and will allow you to keep a record (unlike a phone call). However, email systems are not secure and there are associated risks with this method of communication, potentially leading to risk of interception.
- Be aware also that if you share your computer others may read your emails.
- You could use email to contact staff in relation to a query or to ask about an appointment.
- Do not give more personal information than we need to process your request.
- Do not ask us to send you medical details that you would not want seen by other people.

Other purposes that do not directly support your healthcare

There are occasions where we might be required to process your personal data for reasons that are not directly supporting your healthcare. These include:

1. Investigating incidents and near misses
If an incident occurs which was not expected, it will be reported and investigated to enable the identification of lessons learned so that we can improve our service and prevent an incident happening again.
2. Feedback
We are constantly looking for ways to improve our service and a member of the team may provide you with a feedback card once your scan is complete. You can choose whether to complete this feedback or not. Any information which we collect from you as part of this process will not identify you.
3. Concerns, complaints or litigation
Your feedback is important to us, especially where you have received a service which you feel does not meet your expectations. We will therefore investigate any concerns or complaints that you notify to us.
If a claim is made against us, we will pass relevant information onto our insurer to handle.
4. Special circumstances
Certain occasions exist where we have a legal duty to process your personal data. This includes:
 - Reporting infectious diseases under the Public Health (Control of Disease) Act 1984 and the Health Protection (Notification) Regulations 2010
 - When we have received a Court order instructing us to share information
 - Sharing information to safeguard adults or children in accordance with the Care Act 2014, Safeguarding Vulnerable Groups Act 2006 and Children Act 1989 and 2004
5. Regulatory functions
The Care Quality Commission is the independent regulator of healthcare, and they also protect the interests of people whose rights are restricted under the Mental Health Act. They routinely inspect our premises to quality check information we hold and the services we provide in line with the Health & Social Care Acts. This is designed to ensure that patients using services are protected

and receive the care, treatment and support they need. These inspectors have the authority to access personal information without the permission of patients.

Anonymised data

We will only process your personal data where it is necessary to achieve a defined purpose. If it is possible for us to reasonably achieve the purpose without using your personal data, we will remove your name and any other information that could identify you. We may use anonymised data to:

- monitor and improve the quality of care received by patients
- protect the health of the general public, for example we may share anonymous and aggregated patient information with organisations such as the National Institute for Clinical Excellence and the Cancer Registry for research or statistical purposes
- train and educate staff

Sharing and transferring your records outside the EU

If your permanent address is outside the EU, or your treatment is continuing outside the EU, we will send details of your treatment to individuals based outside the EU specifically to promote your ongoing care and where it is appropriate and secure to do so. This would normally be the doctor who referred you to us for treatment. If you wish, we can give you the documents so that you have physical control over this information.

In the usual course of our business, we use third parties to process and store your data on our behalf. We always store your data on secure servers in the European Economic Area (EEA). Such processing is subject to contractual restrictions regarding confidentiality and security in addition to the obligations imposed by the General Data Protection Regulations (GDPR).

How can I stop my information from being shared and used?

Standing CT is a clinical diagnostic service which acts to provide information principally for other health professionals who have requested this since they require further detailed investigations on their patients. We will normally need to share this information with your doctor, who has referred you to our service.

If you do not want us to share your information with your GP, other healthcare providers or carers, please tell the team looking after you. But please note that not sharing your information may mean we will be unable to perform your scan.

You have the right to request that your confidential information is not used for purposes beyond your direct care. Exemptions exist where the processing is necessary for a mandatory legal requirement or an overriding public interest. Where your wishes cannot be followed you will be offered an explanation.

If you wish to exercise your right to opt-out, or to speak to somebody to understand what impact this may have, please discuss your concerns with your clinician, or email kirsty.collins@standingct.com using 'Opt Out Request' as the subject line of the email.

Lawful basis for processing your personal data

We will only use your personal data in ways that the law permits. Our lawful bases under the GDPR for the types of processing detailed within this notice fall into the following categories:

- processing is necessary for the performance of a contract with you or to take steps to enter into a contract with you
- processing is necessary for the purposes of legitimate interests
- processing is necessary for compliance with a legal obligation

Our additional lawful bases for processing special categories of personal data (such as health information) are:

- processing is necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement
- processing is necessary for the establishment, exercise or defence of legal claims or where courts are acting in their judicial capacity
- processing is necessary for the purposes of...medical diagnosis, the provision of health or social care or treatment or management of health or social care systems and services on the basis of Union or Member State law or a contract with a health professional
- processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of healthcare and of medicinal products or medical devices

Your rights

You have the right under data protection legislation to:

- be told how personal data is used
- have personal data kept secure
- have factually incorrect information corrected

We will only use your personal data in ways that the law permits. The lawful basis for which we are relying upon for processing your personal data will determine what other rights are available to you.

	Right to erasure	Right to portability	Right to object
Consent	R	R	⊗ But right to withdraw consent
Contract	R	R	⊗
Legal obligation	⊗	⊗	⊗
Vital interests	R	⊗	⊗
Public task	⊗	⊗	R
Legitimate Interests	R	⊗	R

- The right to erasure (also known as the right to be forgotten):
 - A right in certain circumstances to have personal data erased.
- Right to restrict processing:
 - The right, in certain circumstances, to limit the way in which we use your personal data. This is linked to your rights to object and right to rectification.
- Right to data portability:
 - The right, in certain circumstances, to receive your personal data in a structured, commonly used and machine readable format and/or transmit this data to another controller
- Right to object:
 - The right, in certain circumstances, to object to the processing of your personal data or stop processing your personal data.

These rights only apply in certain circumstances. If you wish to exercise your rights, enquire whether a right is available to you, or to speak to somebody to understand what the impact might be, please discuss your concerns with your clinician, or email kirsty.collins@standingct.com using 'My rights - Request' in the subject line of the email.

Right of access

You have the right to apply for access to the information we hold about you. Other people can also apply to access your health records on your behalf. These include anyone authorised by you in writing (such as a solicitor), or any person appointed by a court to manage your affairs where you cannot manage them yourself.

If you wish to apply for access to the information we hold about you, please note:

- you should send your request in writing to James Kraft, CEO, The Standing CT Company, Aston Court, Kingsmead Business Park, High Wycombe HP11 1JU
- you should provide enough information to enable us to correctly identify your records, for example include your full name, address, date of birth, Standing CT Company's unique identifier number and NHS number (if known)
- you may be required to provide a form of ID before any information is released to you
- we will reply to your request within 28 calendar days of receiving your request and sufficient information to enable us to progress with your application

Right to complain

If you have any concerns in relation to how we are processing your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. You can find their details in the Useful Contacts section of this notice on the page below

How long do we retain your records for?

We have adopted the record retention periods as set out in the IGA Records Management Code of Practice for Health and Social Care 2016.

Currency

This Privacy Policy is effective immediately after being posted on this webpage and will remain in effect until further notice.

We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of the Service after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy

Last updated: July 2021

Useful contacts for complaints, compliments, questions:

If you require this leaflet in a different format or need further information or assistance, please speak to:

- Julian Tsang, Imaging Manager
 - julian.tsang@standingct.com
- James Kraft, Caldicott Guardian & Senior Information Risk Officer
 - james@standingct.com
- Information Commissioner's Office (ICO)
 - The Information Commissioner's Office
Wycliffe House
Cheshire SK9 5AF
 - Helpline: 08456 30 60 60
 - Website: www.ico.gov.uk