

## Radmere Medical – Data Protection Statement (13-Aug-17)

Radmere Medical (Radmere) provides non-emergency Patient Transport Services, predominantly to Health & Social Care organisations, as well as occasionally to private individuals and their representatives.

To provide high quality, safe patient transport services that meet the needs of individual patients and customers, Radmere will always collect personal data as part of each patient transport journey. This allows the individual needs of each patient to be properly assessed and the right Radmere vehicles, medical equipment, transport procedures and staff to be selected before any patient transport journey is undertaken.

Radmere also uses personal data to provide detail to support customer invoicing. Where customer invoicing needs to be submitted to a separate 3<sup>rd</sup> party organisation for payment (as is typically required by many Health & Social Care organisations) then Radmere uses a unique reference for each patient transport journey to protect personal data (“pseudonymisation”).

Radmere also collects personal data from its staff for recruitment, selection, training and payment purposes (including consent for DBS checks) and to monitor equality and diversity.

- Radmere does not use any automated decision making as part of processing personal data
- Radmere is regulated by the Care Quality Commission (CQC) and works to CQC standards, including those relating to processing patient personal (sensitive) data
- Radmere does not share any personal (sensitive) data with 3<sup>rd</sup> party organisations (unless required to do so for legal or statutory purposes)
- Radmere stores any personal (sensitive) data securely within the EU (using Google’s G-Suite & Spin Backup for regular data backups) and maintains the necessary governance and security safe-guards in place to minimise the risk of any data loss or breach.

Radmere also maintains Cyber Essentials and IASME (including GDPR) certifications as an external assurance of “best practice” for Information Governance & Security

- Personal (sensitive) data collected as part of each patient transport journey is usually only retained for a maximum of two years from when the patient journey took place.

It is only kept for longer if specifically requested by a customer, or if there is or has been an associated Incident or Complaint (in these cases personal (sensitive) data will be retained for at least seven years from the resolution of each Incident or Complaint).

Generally, personal (sensitive) data is provided to Radmere by other Health & Social Care organisations who have already obtained and maintained the necessary consent from individuals to process and share their personal (sensitive) data, including with 3<sup>rd</sup> party organisations such as Radmere as described here. In these cases, Radmere acts as a **Data Processor** for each separate **Data Controller** (each Health & Social Care organisation).

Occasionally, Radmere will be asked to arrange patient transport journeys directly by private individuals or their representatives. In these cases, Radmere acts as a **Data Controller** (ICO registration number ZA201427) and will seek and record explicit consent from each private individual (or a suitably empowered representative) for Radmere processing and sharing their personal (sensitive) data as described here.

Radmere also acts as a Data Controller for staff personal (sensitive) data.

The personal data collected by Radmere may vary by patient and their specific needs. It includes:

- **Patient Name; NHS# or Hospital Reference#; Date of Birth** are always collected
- The contact details for the person arranging the patient transport journey are always collected – **Contact Name; Contact Details** (Telephone, Email, etc)
- If the patient transport journey is to/from the **Patient's Residential Address** then this will also be recorded, along with any **Pick Up/Drop Off Contact Details**.
- A **Patient Classification** (how independently mobile they are) will be established and recorded as part of assessing what kind of patient transport services are required
- Personal sensitive data (medical) will be collected and recorded in advance to ensure that Radmere can meet the specific patient's needs and as part of Radmere's quality operating procedures.

This includes checking for and recording:

- any **DNR** ("do not resuscitate") instructions
- any recent exposure to **MRSA** infections
- whether the patient is **Confused** and needs assistance
- whether the patient has a **Walking Frame**, or
- whether the patient is **Sectioned** under the Mental Health Act.

It may also include recording any other relevant personal or medical information that is provided by the contact arranging the patient transport journey, including but not limited to:

- the patient's **Current Medical Condition** & any **Medication** required
  - the patient's **Previous Medical History** where this might be relevant for safe patient transport
  - whether the patient is currently serving a **Custodial Sentence** and if so any additional escorts required
- Radmere will also record any other relevant notes as part of each Patient Transport Journey Care Record, including any **Treatment** given, **Incidents** or **Complaints**, at Pick-Up, during each Patient Transport Journey and at Drop-Off.

These may also contain personal or medical information and are used to provide a complete care record for each patient that can be subsequently reviewed, including for any Complaint handling needed.

Any private individual using Radmere's patient transport services has the right to:

- make a **Data Subject Request** in line with their rights under Data Protection Law (see [here](#) for the UK ICO's overview of these rights)
- **Withdraw Consent** for their personal data to be processed, although this may subsequently affect the ability of Radmere to offer or provide high quality, safe patient transport services to individuals that request this
- **Lodge a Complaint** with a supervising authority (e.g. the ICO or CQC within the UK)

Any Data Protection requests, change of consent or complaints should be directed to the appropriate Data Controller organisation.

Generally, for personal data processed by Radmere, this will be the Health & Social Care organisation that originally obtained the necessary consent from individuals to process and share their personal (sensitive) data. In these cases, Radmere (as Data Processor) will re-direct any Data Protection requests, change of consent or complaints received directly by Radmere to the appropriate Health & Social Care organisation, and then provide assistance as requested by them as Data Controller.

Where Radmere is the Data Controller (for occasional patient transport journeys arranged directly with private individuals or their representatives) Radmere will handle any Data Protection requests, change of consent or complaints directly.

Radmere is a private Limited company and is not directly subject to the Freedom of Information Act, however Radmere will work with public sector (Health & Social Care) customer organisations to help them respond to any Freedom of Information requests that they might receive.