

Mr Shaun Ridgeway *FRCS (Orth), MBChB, MRCS*
Consultant Orthopaedic, Trauma and Spinal Surgeon

Clementine Churchill Hospital Sudbury Hill Harrow Middlesex HA1 3RX	Bishops Wood Hospital Rickmansworth Road Northwood Middlesex HA6 2JW	Princess Margaret Hospital Osborne Road Windsor Berkshire SL4 3SJ	Spire Thames Valley Hospital Wexham Road Wexham Buckinghamshire SL36NH	One Hatfield Hospital Hatfield Avenue Hatfield Hertfordshire AL10 9UA
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PA/Private Secretary:
NHS Secretary:
Fax:
Practice Mobile:
Practice Website:

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PRIVACY POLICY – RIDGEWAY PRACTICE

WHO ARE WE?

This policy applies to the practice of Mr Shaun Ridgeway FRCS (Orth) MBChB, MRCS

Registered Company: Shar Ltd
Company No: 4937500
Registered Office: 73 Palmerston Road, East Sheen SW14 7QA
Nature of Work: Healthcare
Website: mrridgeway.co.uk

If you are a new or existing patient, a specialist consultant, pain management centre, physiotherapist, medical insurance company or any legal identity who we either refer patients to or hold information you may require from us as a direct request from a patient we want to show you that we are committed to keeping that trust.

This privacy notice (together with our terms if use and any other documents referred to on it) describes how we collect and use personal information about you in accordance with existing and new data protection legislation.

This privacy policy applies to any users who share information with us. The information you share with us, as a patient, for example and provide details about yourself, we want to be clear that security is in place to provide you with the highest level of security.

It is important that you read this policy together any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you so that you are aware of how and why we are using such information.

Our Data Protection Principles:

We will comply with data protection law. This says that person information we hold about you must be:

Used lawfully, fairly and in a transparent way

Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.

Relevant to the purposes we have told you about and limited only to those purposes.

SHAR Ltd, Company No. 4937500, Registered Address: 73 Palmerston Road, East Sheen, London, SW14 7QA. Tel: 07961 306 314

Accurate and kept up to date

Kept only as long as necessary for the purposes we have told you about.

Kept securely.

Please refer to the ICO website for further information.

Data Controller:

The Data Controller is Shar Ltd of 73 Palmerston Road, East Sheen SW14 7QA. This means that we are responsible for deciding how we hold and use personal information about you.

Our nominated representative is Mr Shaun Ridgeway

Our Data Protection ICO Number is: Z3261935

Registration Start Date: 12th July 2012

Registration Expiry Date: 11th July 2018

This registration is updated annually by Shar Ltd.

Data Operators:

As a private medical practice we have appointed the following people as data operators who will be responsible to the collection of personal information and processing that information onto our secure practice management system.

Practice Manager/PA
Carol Wollington

Medical Secretary
Amanda Reynolds

As data operators for Shar Ltd they have completed all required data protection training which is updated annually and adhere to the code of ethics of Shar Ltd and the privacy standards of the facility where any information held by Shar Ltd is stored.

This information is current as at 30th April 2018 and will be updated if staff changes within the practice.

Data Collection and use:

Our Legal Basis for Collecting and Processing Person Data:

We have several legal bases for processing your personal data. In each case personal data, or personal information, means information about an individual from which that person can be identified.

Consent:

When you make your initial appointment you provide us with information which we can identify you by and we will only share that information with another healthcare professional, for example an onward referral to another specialist who you will see in relation to a specific condition not treated by Mr Ridgeway e.g. a shoulder specialist, a pain specialist or a physiotherapy clinic. We will also share your information with certain hospitals in relation to required tests such as imaging requirements, blood tests, pre assessments. However, we will not share your information with any third parties without your consent, such as your insurance company, legal or government departments such as DWP, schools, colleges, universities, employers etc without your written consent.

Children:

New GDPR regulations state that a child under the age of 16 must have consent given by a parent or guardian in order to process their personal data lawfully and to that end the hospital where your child is seeing Mr Ridgeway may ask for proof of identity.

We undertake to send all correspondence to the parent or guardian in all cases and to obtain all relevant authority in relation to approval for onward referrals for children under 16 in accordance with regulations.

Legitimate Interest:

When undergoing a spinal procedure we ask patients to allow us to provide details to the British Spine Registry for the collection and collation of information to help improve patient care across the UK.

We will ask you in those instances to read the information on this by going to their website at www.britishspineregistry.com and reading their terms and conditions, if you then agree to participate in this survey you will be invited to sign the BSR consent form and then to go online to fill in details about your symptoms.

Participation in BSR is voluntary but we encourage all patients having surgery to participate.

You have the right to withdraw your consent at any time and we would require that in writing.

The Information We Collect:

In order to provide our services both in the hospital we use and across digital platforms we need to collect accurate personal data and in each case we process this data in the most sensitive manner possible.

Information you provide:

Name
Address
Date of Birth
Phone Numbers
Email Address
Registered GP Name and Address
Next of Kin or Emergency Contact details
Private Medical Insurance details

Information created:

The information provided is then entered onto 2 secure sites:

- *The Hospital where you attend your consultation
- *The Ridgeway practice management system: Midex Pro

Both systems are password protected, have antivirus software protection and have hard drive and cloud based backup systems to safeguard your information.

When providing your information directly to our data controllers information is immediately loaded onto our secure network and if you provide information to a BMI, Spire or One Healthcare hospital they will share this information with us by secure online programs.

Usage:

When you contact us we will ask you to verify your details before any interactions via phone and if you wish another person to discuss issues on your behalf due to health or language issues for example then we will ask you to sign a written consent which we will keep on file.

Hard copy patient files are also kept in a secure office and or secure location with alarm, monitoring, password protected and specific codes to ensure safety of your records at all times.

Information from other sources:

Written referral from other medical practitioners, GP's, specialists, hospitals, insurance companies,

solicitors, NHS departments or any other body will be scanned directly into your electronic file and held in our secure storage facility and not provided to a third party without the consent of the patient.

If you fail to provide personal information:

Due to medical confidentiality if you fail to provide all required information this may result in unforeseen complication for example if telephone numbers are incorrect then we may not be able to reach you in an emergency.

If you fail to provide next of kin or GP details this may raise separate issues, so we ask that you assist us by providing all the necessary information to allow our practice to care for you at all times and under all circumstances.

Communication from us:

We may use the information we collect to communicate with you via your consented forms of communication.

In relation to email: if you do not have your own but use a relative/friend or organisations email we will need written consent from you to send emails to that party.

Change of Purpose:

We will only use your personal information for the purpose for which we collect it unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. For example we may need to discuss your symptoms with other specialists in a multi-disciplinary team meeting (MDT) in order to gain opinions on certain conditions and treatment pathways and in this case we may discuss your information without your knowledge or consent, in compliance with medical ethics and GDPR rules.

Third party Technologies:

We will not share your information with any third party without your written consent.

Case Studies: As a medical practitioner Mr Ridgeway does attend conferences where he may give lectures on specific spinal issues but will not use any personal information or identify the patient in any case study.

Shar Ltd does not participate in advertising.

Information Sharing and Disclosure:

We treat the information we collect from our patients with the upmost care.

If we receive a request to supply any information about you, your written consent is required prior to any information being sent and you can withdraw your consent at any time.

Public Forum:

We love to hear from our patients including public forums via the internet or the testimony section on our web site.

If you communicate with us through either our web page or any social media network, this communication may be viewable to the public.

For Legal reasons or in the event of a dispute:

We may share your information if we believe it is required by applicable law, regulation, legal process or government request. This includes exchanging information with other companies and organisations for the purpose of credit control, debt collection. We will not however disclose any medical information without your prior knowledge and written consent.

Information retentions and deletion:

We retain your information while the Ridgeway practice and Shar Ltd remain active unless you ask us to delete your personal information and this request must be provided in writing.

Medical history will remain confidential and on record.

We do not keep any financial information on record and we use the secure site of Worldpay to process payments from patient. Worldpay card transactions are encrypted and delete a financial card details records once the transaction has been processed.

If you would like to delete or anonymise any personal information then please email ridgewaypractice@gmail.com and we will action any request within 30 days.

Storage of your Data

The data we collect will be stored electronically on our medical system Midex Pro by our practice staff the system is password protected on secure servers. Computers are located in a locked office within a hospital which has monitoring and access protocols in place.

Hard copies of files are stored in a secure location, monitored by CCTV, staffed and locked with access restricted to the Data Controller and Data Operators.

Data Security:

We have put in place measures to protect the security of your information.

Unfortunately transmission of information via the internet is not completely secure, we cannot guarantee the security of data transmitted **to our site and any transmission is at your own risk**. Once we have received the information we will use strict protocols and security features to try and prevent any unauthorised access.

Third parties will only have access to your information on our instructions in relation to medical referral or treatment and where they have agreed to treat your information confidentially and to keep it safe and electronic transmission will be by hospital, NHS or Egress encrypted emails.

We have put into place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Choice and Transparency:

By using our practice you do not forfeit any rights. We make it easy for you to withdraw consent at any time to:

1. Your Rights

We will not use your personal data for any other purpose than what was intended in the relation to your treatment by Mr Shaun Ridgeway and you can withdraw consent at any time.

2. Accessing and Correcting

We will always give you the right to access information held about you. Your right of access can be exercised in accordance with the General Data Protection Regulation (GDPR)

Any access is free of charge and we will ask you specific details to confirm your identification in order for us to verify your identity to facilitate any changes to your personal information.

If you want to amend privacy preference with us for example you may have nominated a spouse or friend to act on your behalf and they are no longer your choice please notify us in writing and we will update your preferences on our system within 30 days.

Please also advise if you General Practitioner as soon as possible so that clinic letters reach the doctor in charge of your care.

Please notify us of changes to health insurance companies in writing, failure to do so may result in you being liable for consultations fees.

Under certain circumstances, by law, you have the right to:

Request Erasure of your **personal** information. This enables you to ask us to delete or remove person information where there is no good reason for us to continue to hold it.

Request the transfer of your personal information to another party.

Both can be actioned within 30 days with a written request and completing an identity check.

Auditing:

Our Data Controller will undertake a review of all aspects of our data protection and privacy standards and security within 60 days to review and analyse implementation of all new guidelines under GDPR, check that all staff are adhering to new guidelines and to check overall security.

We will also audit our practice and procedures annually to ensure that all protocols are in place and that our high standards are being met or at any time that we feel that a review is necessary.

New staff will be trained, monitored and reviewed to ensure consistency and accuracy in reporting and managing data and to make sure mandatory training is up to date.

Updates to our Privacy Policy

Summary:

We may occasionally update this policy. If you use our practice after an update, you consent to the updated policy.

We will always keep you in the know, so any updates to our privacy policy will be posted on our web site at www.mrridgeway.com and we will notify patient by mail with a notation on clinic letters. If you do not have access to our website, please contact our office and we will be happy to send a hard copy of our privacy policy via mail and advise of any updates.

Contact:

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to ridgewaypractice@gmail.com.

You have the right to make a complaint to the Information Commissioners Office (**ICO**) the UK supervisory authority for data protection issues.

You can contact the ICO via their website at: <https://ico.org.uk>

Date 30th April 2018