

PRIVACY POLICY

1. About this Privacy Notice

At the Independent Living Centre (ILC), we are committed to protecting your personal information and respecting your privacy.

This Privacy Notice explains what personal information we collect, why we collect it, how we use and protect it, who we may share it with, how long we keep it, and your rights in relation to your information.

The ILC processes personal information in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, together with other applicable data protection and privacy legislation.

We aim to collect only the information we need and to keep it only for as long as it is necessary.

2. Who is responsible for your information?

Wiltshire and Bath Independent Living Trust LTD, trading as the Independent Living Centre, is the data controller for the personal information we hold about you.

If you have any questions about how we use your information, or about this Privacy Notice, please contact us:

Telephone: 01380 871007

Email: ILCSemington@gmail.com

Postal address: Independent Living Centre, St George's Road, Semington, BA14 6JQ

3. What personal information do we collect?

The information we collect depends on how you interact with the ILC.

This may include:

- your name;
- address and postcode;
- telephone number;
- email address;
- date of birth or age;

- information about your mobility, daily activities and difficulties;
- information about your medical conditions and health;
- information about equipment or adaptations you are considering;
- information about your circumstances where this is relevant to the advice or service we provide;
- information relating to appointments and communications with you;
- information contained in Occupational Therapy assessment notes and reports;
- information relating to equipment purchases where applicable;
- information you provide when placing an item on our second-hand equipment list; and
- images captured by our CCTV system when you visit our premises.

Health information is classed as special category personal data under the UK GDPR and receives additional protection. We only collect and use health information where it is necessary for the service we provide and where the law allows us to do so.

You are not required to provide information that is not necessary for the service you are requesting. However, if you do not provide information that we reasonably need, we may not be able to provide an assessment or respond fully to your enquiry.

4. Why do we collect and use your information?

We use personal information for the following purposes:

Providing Occupational Therapy assessments and advice

We collect information about you so that our Occupational Therapists can understand your circumstances, assess your needs and provide appropriate, impartial advice.

This may include information about your health, medical conditions, mobility, daily activities, home circumstances and equipment needs.

Our Occupational Therapists are professionally required to maintain appropriate records of their work and are subject to professional standards and duties of confidentiality.

Managing appointments and enquiries

We use your contact details and information about your enquiry to arrange appointments, respond to questions and provide appropriate information or advice.

We may keep a record of enquiries where this is necessary to respond to you, provide continuity of service or maintain an appropriate record of our contact with you.

Maintaining records of our service

We keep appropriate records of the services we provide, including Occupational Therapy assessments and actions arising from appointments.

Records may be used to support continuity of service, demonstrate appropriate professional practice, manage the service and meet applicable legal, contractual and professional requirements.

Monitoring and improving our service

We may use information about the use of our services to understand demand, monitor the effectiveness of our service, plan staffing and resources and improve the service we provide.

Where information is used for statistical or reporting purposes, we take steps to ensure that individuals are not identifiable.

We may provide funders with statistics about our service, such as numbers of people supported, broad categories of need, equipment considered and other service-performance information. We do not provide funders with identifiable client information unless there is a lawful reason to do so.

Funding and reporting

As a charity, we may need to provide funders with information demonstrating how our services are used and the impact they have.

We use anonymised or appropriately aggregated information wherever possible.

Where we use information to create case studies or other material to support fundraising or demonstrate the impact of our work, we will ensure that individuals cannot be identified unless we have an appropriate lawful basis and, where necessary, their consent.

Second-hand equipment list

If you ask us to advertise an item on our second-hand equipment list, we will collect the information necessary to advertise the item.

This may include your name or other contact details and information about the item.

The information may be published on our website, included in our mailing list and displayed in hard copy at the Centre.

We rely on your consent for this processing. You can withdraw your consent and ask us to remove the advertisement at any time.

Advertisements are normally retained for approximately three months, unless they are removed earlier at your request or need to remain available for longer.

Sales

Where an item is purchased through the ILC, we collect the information necessary to record the sale and meet applicable financial, accounting and tax requirements.

Where necessary, information may be shared with the relevant retailer or supplier.

For example, where equipment is supplied by Medequip, relevant sales information may be provided to Medequip.

CCTV

CCTV operates at the ILC to help protect the charity's property and provide a safe and secure environment for employees, clients, customers and other visitors.

CCTV records images only; no audio is recorded or stored.

Appropriate signs are displayed to inform people that they are entering an area covered by CCTV.

The ILC relies on legitimate interests as its lawful basis for operating CCTV. Our legitimate interests are protecting our property, maintaining security and helping to provide a safe environment.

CCTV images are normally automatically overwritten after five weeks.

Where footage needs to be retained for a specific reason, such as an incident or investigation, it may be retained for longer for as long as it is necessary for that purpose.

Where footage is requested by or provided to law enforcement, it may be retained in accordance with the requirements of that investigation.

The UK GDPR does not prescribe a particular CCTV retention period. The retention period should instead be based on the purpose for which the footage is required and should not be longer than necessary.

5. Who do we share your information with?

We do not sell your personal information and we do not share your information with third parties for their marketing purposes.

We may share information where this is necessary, lawful and proportionate to provide our services or meet our legal, professional or contractual responsibilities.

For example, information may be shared with:

- a healthcare or other professional involved in supporting you, where this is appropriate and lawful;
- a supplier or retailer where necessary to arrange or provide equipment;
- organisations that process information on our behalf, such as IT or software providers;
- funders, where appropriate, using anonymised or aggregated information;
- law enforcement agencies where we are legally required or permitted to do so; and
- other organisations where you have specifically asked us to share information and the appropriate legal basis applies.

Where an Occupational Therapist identifies additional needs and believes that sharing information with another organisation would help to support you, this will normally be discussed with you first.

Where consent is the appropriate basis for sharing, you will be asked for your consent.

There may, however, be circumstances where information must or may lawfully be shared without your consent.

These may include circumstances where:

- we believe that you or another person is at risk of serious or significant harm;
- we are required to disclose information by law;
- disclosure is necessary for the prevention or detection of crime; or

- another lawful basis permits or requires the disclosure.

We will only disclose information in these circumstances where we consider that the disclosure is lawful and appropriate.

6. How long do we keep your information?

We do not keep personal information for longer than is necessary for the purpose for which it was collected.

Different types of information are retained for different periods.

Our current retention periods include:

Type of Contact	Data Taken	Purpose	Third Parties	Data Retention
Telephone/Email Enquiry	Contact details, enquiry details. Age, weight and medical condition may be asked for depending on the enquiry.	To provide a record of contact, and to allow the Occupational Therapist or OTA to give the most relevant advice.	Anonymised data is shared with third parties in the form of statistics to aid in securing funding.	Your data is not kept for basic information requests. If the request requires research into specific equipment relating to a medical condition or certain area of difficulty, then records are kept securely for 3 years.
Appointment Booking	Name, contact details, age, medical condition, reason for appointment.	To provide a record of patient contact, and to allow the Occupational Therapist to complete your assessment accurately.	Anonymised data is shared with third parties in the form of statistics to aid in securing funding.	If the appointment is not made, then data will be securely destroyed. If an appointment is made, the notes are kept for 3 years.
Appointment Notes/Reports	A written summary of the appointment, detailing any actions required and taken.	Comprehensive written records are a legal obligation for an Occupational Therapist. Occupational therapists are bound by a professional code of conduct, local and national policy.	Anonymised data is used at random to create case studies to help secure future funding. Nothing identifiable is ever used.	3 years

Sales Form	Contact details, and equipment bought. Medical condition is needed for VAT exemption.	To provide a record of sale.	A copy of the sales form is sent to Medequip as they are the retailer.	Kept at the ILC for 1 year. Medequip keep for 7 years.
Second Hand List	Contact details and item description.	To provide a forum for the sale of second hand items.	Details are shared on our website, mailing list, and available in hard copy at the Centre.	The duration of the advert. This is usually 3 months, but can be extended or taken down early at the request of the seller.
CCTV	Video and images. No audio is recorded or stored.	To protect the charity's property and to provide a safe and secure environment for employees and visitors to the premises	Law enforcement agencies, where the images recorded could assist in the prevention or detection of a crime.	5 weeks unless retained by law enforcement.

7. How do we protect your information?

We take appropriate technical and organisational measures to protect personal information against unauthorised access, loss, misuse, alteration or disclosure.

Access to personal information is limited to people who need it for their role.

Staff are expected to follow the ILC's data protection, confidentiality and information security procedures.

Where we use external organisations to process information on our behalf, we take appropriate steps to ensure that they provide adequate protection for personal information and only process it in accordance with our instructions and applicable law.

8. Do we use automated decision-making?

We do not use your personal information to make solely automated decisions that have legal or similarly significant effects on you.

Our Occupational Therapists and other staff make decisions about the advice and services we provide.

9. Your data protection rights

Under data protection law, you have a number of rights in relation to your personal information.

Depending on the circumstances and the lawful basis on which we process your information, these may include the right to:

- be informed about how your personal information is used;
- access the personal information we hold about you;
- have inaccurate information corrected;
- request restriction of how we use your information;
- object to certain types of processing;
- request erasure of your personal information where the legal requirements for erasure are met;
- withdraw consent where we rely on consent as our lawful basis; and
- data portability, where the legal requirements for this right are met.

These rights are not all absolute and some only apply in particular circumstances. For example, the right to erasure does not apply where we have a lawful reason to retain information.

10. How can I request access to my records?

You have the right to request a copy of the personal information we hold about you. This is known as a Subject Access Request (SAR).

You can make a request verbally or in writing. We recommend making the request in writing so that there is a clear record of what you have asked for.

You should provide enough information for us to identify you and locate your records.

We may ask for reasonable evidence of your identity where this is necessary to ensure that personal information is not disclosed to the wrong person. Any request for identification will be proportionate to the circumstances.

If you are making a request on behalf of another person, we will need to establish that you are authorised to act on their behalf. This may include written authority from the individual, appropriate evidence of parental responsibility or another form of legal authority, depending on the circumstances.

Where someone is unable to make a request themselves, we will consider requests made by an appropriate representative on a case-by-case basis and may need evidence of their authority to act.

We normally respond to a valid Subject Access Request within one month. Where a request is particularly complex, the law may allow additional time. If this applies, we will explain this to you.

In most circumstances, there is no charge for making a Subject Access Request.

To make a Subject Access Request, please contact:

Independent Living Centre
St George's Road
Semington
BA14 6JQ

11. What if I do not want to provide certain information?

You are not generally required to provide personal information simply because we ask for it.

However, some information is necessary for us to provide an appropriate service.

For example, we need your address or postcode to establish whether you live within the area for which the ILC is funded to provide its service.

We may also need information about your health, mobility and circumstances for an Occupational Therapist to provide an appropriate assessment.

If you choose not to provide information that is necessary for the service you have requested, we may be unable to provide that service or may be unable to provide it safely and appropriately.

12. Confidentiality

We understand that information about your health, disability and personal circumstances can be highly private.

Our staff are expected to maintain confidentiality and only access or disclose information where there is an appropriate reason to do so.

If you would prefer not to discuss sensitive information with reception staff when arranging an appointment, you can request a private discussion with an Occupational Therapist.

Please let us know if you require any reasonable adjustment to help you provide information privately or access our services.

13. Information about children and young people

Where we provide services to children or young people, we will process their personal information in accordance with the UK GDPR, the Data Protection Act 2018 and our safeguarding procedures.

Additional safeguards may apply where information concerns a child or young person.

Where another person is acting on behalf of a child or young person, we may need to establish their authority to act before providing or sharing personal information.

14. Website analytics and cookies

We may use cookies and website analytics tools to understand how visitors use our website and to help us improve it.

We will provide appropriate information about cookies and, where required by law, obtain consent before placing or using non-essential cookies or similar technologies.

15. Anonymised statistics

We collect statistical information about our services to help us understand how the ILC is being used and to demonstrate the impact of our work.

This may include information such as:

- the number of people using our service;
- broad age ranges;
- broad categories of health or mobility needs;
- equipment considered;
- benefit-related outcomes;
- waiting and response times; and
- other information about service use.

Where information is genuinely anonymised, individuals cannot be identified from it and it is no longer personal data.

We take care to avoid including information in published statistics that could identify an individual, particularly where the numbers involved are small.

16. What happens if we need to use your information for another purpose?

We will normally only use your personal information for the purposes explained in this Privacy Notice.

If we need to use your information for a new purpose that is materially different from the original purpose, we will consider whether the processing is lawful and whether we need to provide you with additional information or obtain consent.

17. What if there is a serious risk to someone?

There may be exceptional circumstances where we need to use or disclose information without your agreement because we believe that you or another person is at risk of serious harm, or where the law requires or permits us to do so.

Any such disclosure will be considered carefully and limited to the information that is necessary and appropriate in the circumstances.

18. Making a complaint about how we use your information

If you have concerns about how the ILC has collected or used your personal information, please contact us in the first instance.

We will take your concerns seriously and investigate them in accordance with our complaints procedure.

You also have the right to complain directly to the Information Commissioner's Office (ICO), which is the UK's independent supervisory authority for data protection.

You can find information about making a complaint on the ICO's website:

Information Commissioner's Office – Make a complaint

The ICO can also be contacted by telephone on 0303 123 1113 or by post at:



St George's Road,
Semington
BA14 6JQ

01380 871007
ILCSemington@gmail.com

www.ILC.org.uk

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

The ICO recommends that individuals contact the organisation concerned first where possible, but you have the right to complain to the ICO.

19. Changes to this Privacy Notice

We may update this Privacy Notice from time to time to reflect changes in the services we provide, the way we process information or changes in data protection law.

The latest version will be available from the Independent Living Centre.