

NWNT

A BESPOKE NEUROPSYCHOLOGY SERVICE

CONSULTANT PRIVACY POLICY

NWNT are committed to protecting and respecting your privacy.

This Policy explains when and why we collect personal information about people who use our services, how we use it, the conditions under which we may disclose it to others and how we keep it secure. It explains how to access and make changes to your personal information and who to contact if you have queries of objections in line with your rights in compliance with the General Data Protection Regulation (GDPR).

Please contact adunne@nwnt.co.uk with any queries or requests about the personal information collection process.

You have the right to:

- Be informed: the contents of this policy informs you of our privacy policy.
- Access: you have the right to request access to the information we hold on you. This will be facilitated where possible.
- Rectification: you have the right to rectify any inaccuracies in information we hold on you.
- Erasure: you have the right to request that the information we hold on you is erased. This will be facilitated where possible.
- Restrict processing: you have the right to request that we do not process your data. This will be facilitated where possible.
- Data portability: you have the right to request that your data is transferred in an easy and commonly used format. For example, to another provider of neuropsychological services.
- Object: you have the right to complain to the ICO: <https://ico.org.uk/make-a-complaint/>; Tel. 0303 123 1113 or our professional regulating body: HPCP 0300 500 6184.

We may change this Policy from time to time so please check this page occasionally to ensure that you are happy with any changes. By using our services, you are agreeing to be bound by this Policy.

Any questions regarding this Policy and our privacy practices should be sent by email to adunne@nwnt.co.uk or in writing to NWNT, Lester House, 21 Broad Street, Bury BL9 0DA. Alternatively, you can telephone us on 07889 859 658.

The Data Protection Offices are Dr Gemma Mercer, Dr Antonia Kirkby and Dr Gemma Wall, contact details as above.

You can find more information at the ICO website: <https://ico.org.uk>

Who are we?

We are Consultant Clinical Neuropsychologists who provide assessment and treatment services to people who have either a neurological, psychological condition or an acquired brain injury. We are based at Lester House, 21 Broad Street, Bury BL9 0DA and Sutton House, 27 Wilson Patten Street, Warrington, WA1 1PG.

How do I collect information from you?

We obtain information about you when you enquire about and/or use our services. We obtain information about you when you agree for us to provide the services that you have requested or that have been requested on your behalf.

What is the legal basis for processing your data?

We process your data in line with meeting our contractual obligations to you. That is, to provide you with neuropsychological services.

In relation to any special category personal data, such as health records, or information concerning race, ethnic origin, or gender, we rely on the Legitimate Interests basis for processing personal data. We need to see and analyse documents containing this information in order to provide neuropsychological services.

What type of information is collected from you?

The personal information we collect might include your name, address, email address, and any other information you or someone acting on your behalf such as your case manager or legal team provide(s) us with about the reasons for engaging with our services. This may include details of your personal and medical history.

The purpose of collecting this data is to fulfil our contractual obligations to provide neuropsychological services within Legitimate Interests to you. We collect information from you that allows us to provide you with these services.

Categories of data we collect:

- Name, date of birth, address, medical reference numbers
- Telephone number, email address, video platform addresses
- Medical and clinical history
- Personal history
- Test and questionnaire data: for example on your cognitive (thinking skills) and psychological functioning
- Data on outcomes of your progress: measures of goals you and / or your team have identified, repeats of questionnaires or ratings you have given, repeat tests of your functioning.
- Clinical notes taken from what you tell us and what we discuss in our meetings together along with actions we have agreed.
- Information from others involved in your care: medical, care or legal team. For example, their reports, assessments, testing and letters.

When do We Collect Information from you?

We may collect information from you at any time you have contact with us. For example, when requesting our services, when contacting us by email or telephone, or meeting us face to face. If you have been referred by someone else, we may collect information on you provided by that person prior to meeting with you for the first time.

We will provide you with our privacy policy on our website and also in paper form if requested, at the time we collect personal information from you and explain this to you on meeting. It is available in paper form should you wish to request this at adunne@nwnt.co.uk.

Anybody providing information about you to us will also be given a copy of our privacy policy or directed to it.

This will be done in most cases at the time of collecting the information and certainly within one month of collecting the information.

How is your information used?

We may use your information:

For Enquiries:

- process enquiries that you have submitted;

For Providing our Services:

- to carry out our obligations arising from any contracts entered into by you and us; for example, we may write letters and reports to assist in providing neuropsychological services to you, these may be shared with others in your care or legal team;
- we may also communicate via email, telephone or in letter form with members of your team to ensure you are receiving the best services;
- to inform or seek advice to fulfil legal requirements (for example, in the context of a complaint; or provide information in line with legal requests);
- we may use different media to support your rehabilitation including written, audio, filming and photographs to be used in a support plan or other in-house documents and not to be shared for any other reason than your direct support and care.

For Marketing:

- seek your views or comments on the services or information we provide;
- notify you of changes to our services;
- send you communications which you have requested or that may be of interest to you. These may include information about new services, events, promotions of our associated companies' goods and services
- we do not use automated decision making or profiling

We will not contact you for marketing purposes unless you have given your prior consent. You can change your marketing preferences or chose to stop receiving marketing information at any time by contacting me by email: adunne@nwnt.co.uk or telephone on 07889 859 658.

How long is it used for?

We review our retention periods on a regular basis. We will hold personal information on our systems for 20 years or as long as is set out in any relevant contract held with us. This is because the information you provide may well be useful at any point in your future lifetime.

Who has access to your information?

We will not sell or rent your personal information to third parties.

We will not share your personal information with third parties for marketing purposes. We will not disclose the data to parties other than those that are discussed with you initially, unless there is a requirement to do so, for example to fulfil legal or duty of care obligations. For example, we may provide information you have given to us in the form of a report to other members of your clinical or legal team; or outside agencies that are also involved in your care, such as the NHS.

If relevant, we may provide your notes to your legal team if requested to do so.

This will be discussed with you initially and also revisited, where possible, each time it occurs.

We may share your data with those people who are involved in your care or people with whom we are required to share your data. For example:

- Solicitors or barristers or members of your legal team
- Case managers
- GPs
- Members of the multidisciplinary team
- Care or support staff
- Family
- Employees of health and social care services
- Statutory services
- Legal representation services, e.g., professional indemnity insurers.

This will be with your knowledge and consent where possible and you may request that certain information is not shared. These requests will be upheld where possible and where not against statutory duties of legality or duty of care. For example, any issues of risk, best interests, or if a complaint is made.

Third Party Service Providers working on my behalf:

We may pass your information to our third party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on my behalf (for example to book appointments for you or type up reports). However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and confidential.

Please be reassured that we will not release your personal information to third parties beyond this for them to use for their own direct marketing purposes, unless you have requested me to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

The security precautions we have in place to protect the loss, misuse or alteration of your personal information

To prevent unauthorised access, maintain data accuracy, and ensure the correct use of information, we have put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the information we collect.

While we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk.

Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given (or where you have chosen) a password that enables you to access certain documents and/or emails, you are responsible for keeping this password confidential. We ask you do not to share your password with anyone.

Please see my Information Security Policy and Service Policy for more information.

How to access or correct your information

We are committed to providing reasonable and practical access to allow our clients to identify inaccuracies in their personal information and request to have information removed. Our clients may submit enquires about the accuracy of personally identifiable information they have previously submitted and requests to have it removed by contacting our PA at adunne@nwnt.co.uk. Where possible and practical, we will, upon request, modify or delete personally identifying information.

All data provided will be done so in plain language in a concise, transparent, intelligible and easily accessible manner. We adhere to my professional practice record keeping standards which can be reviewed in our Service Policy.

You have the right to object to personally identifiable information held about you. To complain you can approach the Information Commissioner's Office (ICO): <https://ico.org.uk/make-a-complaint/>; Tel. 0303 123 1113 or our professional regulating body: Health & Care Professions Council (HCPC) 0300 500 6184.

My Commitment to children's privacy

We do not knowingly collect personally identifiable data on anyone under 16 other than noting the names and ages of children associated with my clients. This is with the exception of any safeguarding concerns where additional details of a child may be collected to pass on to appropriate services.

Transferring your information outside of Europe

As part of the services offered to you, the information which you provide to us may be transferred to countries outside the European Union ("EU"). By way of example, this may happen if any of our servers are from time to time located in a country outside of the EU. These countries may not have similar data protection laws to the UK. By submitting your personal data, you are agreeing to this transfer, storing or processing. If we transfer your information outside of the EU in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy.

If you use our services while you are outside the EU, your information may be transferred outside the EU in order to provide you with those services.

Review of this Policy

We keep this Policy under regular review. This Policy was last updated in March 2021. If we plan to make any changes in how we use personal data, this policy will be amended as a result of this change and you will be directed to that new policy.

We are keen to have feedback on this policy to ensure it is effective in informing you of how we collect, process and transfer your personally identifiable information. You may be asked directly to comment as part of testing the effectiveness of this information or please feel free to give any feedback you feel appropriate to adunne@nwnt.co.uk.

If you have any concerns about the way your personal information has been processed, please contact adunne@nwnt.co.uk. Alternatively, you may contact the Information Commissioner's Office on 0303 123 1113.