

Privacy Notice - Changing Minds UK*

**To include: Changing Minds Ltd., Changing Minds Wellbeing Ltd. & Changing Minds Services Limited*

September 2021

Visitors to our websites

When someone visits www.changingmindsuk.com or www.performingwell.com or www.cmcafs.com we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

Use of cookies by Changing Minds

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. Cookies are necessary for functionality, security and accessibility. You can read more about how we use cookies, and how to change your cookies preferences, on the Information Commissioner's Office (ICO) [Cookies page](#).

Security and performance

Changing Minds uses a third-party service to help maintain the security and performance of the website. To deliver this service it processes the IP addresses of visitors to the Changing Minds website.

WordPress

We can at times use a third-party service, WordPress.com, to publish certain news items or notices on the website. These sites are hosted at WordPress.com, which is run by Automattic Inc. We use a standard WordPress service to collect anonymous information about users' activity on the site, for example the number of users viewing pages on the site, to monitor and report on the effectiveness of the site and help us improve it. WordPress requires visitors that want to post a comment to enter a name and email address. For more information about how WordPress processes data, please [see Automattic's privacy notice](#).

People who contact us through our website or send emails

We monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

We may use Egress Switch <https://bit.ly/2Lj0luu> to encrypt and protect certain email traffic. This may involve the use of Transport Layer Security (TLS) to encrypt and protect email traffic. If your email service does not support TLS, you should be aware that any emails we send or receive may not be encrypted in transit.

Visitors to Changing Minds Offices

Visitors to Changing Minds offices are asked to sign in and out at reception and show a form of ID. The ID is for verification purposes only, we do not record this information. Our visitor records are kept for a short period of time unless an incident occurs, or an issue is identified that requires investigation (e.g. a health and safety incident).

Closed-circuit television (CCTV) operates outside the building for security purposes. Where CCTV is in use, there are signs in place to notify individuals. The images captured are securely stored and only accessed on a need to know basis (e.g. to look into an incident). CCTV recordings are typically automatically overwritten after a short period of time unless an issue is identified that requires investigation. The purpose for processing this information is for security and safety reasons. The lawful basis we rely on to process your personal data is article 6(1)(f) of the UK GDPR, which allows us to process personal data when its necessary for the purposes of our legitimate interests.

We have Wi-Fi on site for the use of guests. We will provide you with access to the address and password. We record the device address and will automatically allocate you an IP address whilst on site. We also log traffic information in the form of sites visited, duration and date sent/received. We don't ask you to agree to terms, just to the fact that we have no responsibility or control over your use of the internet while you are on site, and we don't ask you to provide any of your information to get this service. The purpose for processing this information is to provide you with access to the internet whilst visiting our site. The lawful basis we rely on to process your personal data is article 6(1)(f) of the UK GDPR, which allows us to process personal data when its necessary for the purposes of our legitimate interests.

Clients using Changing Minds Services

How we use your personal information

This Privacy Notice explains why Changing Minds UK collects information about you and how that information may be used. Our staff maintain records in order to provide you with the best possible care. These records may be electronic, on paper, or a mixture of both. We use a combination of working practices and technology to ensure that your information is kept confidential and secure. The processing of this information (including special category data e.g. health) is necessary for CMUK to comply with the law, including for the purposes of the provision of health or social care or treatment and the management of health of social care systems and services.

Records that CMUK hold about you may contain the following information:

- Details about you, such as your name, address, date of birth, phone number, email address, next of kin and emergency contact details
- Details of any contact that CMUK staff have had with you, such as appointments, meetings etc.
- Notes and reports about sessions with you
- Details of any treatment and care you have received with CMUK
- Relevant information from any other professionals, relatives or those who care for you.

In special circumstances (such as when preparing a report for Court), we may have access to information about an individual's criminal convictions. The lawful basis for holding this data is to use this only for the official specific purpose of undertaking the assessment / court report.

We used this data:

- To help inform decisions that we make about your care.
- To ensure that your treatment is safe and effective.
- To work effectively with other organisations who may be involved in your care.
- To support the health of the general public.
- To ensure our services can meet future needs.
- To review care provided to ensure it is of the highest standard possible and investigate any complaints.

How do we maintain the confidentiality of your records?

We are committed to protecting your privacy and will only use information collected lawfully in accordance with:

- Data Protection Act 1998 and General Data Protection Regulation 2016
- Human Rights Act 1998
- The UK General Data Protection Regulations (UK GDPR)
- Common Law Duty of Confidentiality
- Health and Social Care Act 2012

The Data Protection Act 1998 (DPA 2018) governs the use of information about people (personal data). The UK General Data Protection Regulation (UK GDPR, 2016) includes rules on giving information to data subjects. These are more detailed than DPA and place emphasis on making privacy notices more transparent and accessible.

Every member of staff who works for CMUK has a professional and legal obligation to keep information about you confidential. In order to carry out this duty, Changing Minds uses an electronic records system Writeupp® to maintain confidential client files in line with our obligations. Writeupp is GDPR compliant.

We will not disclose your information to any third party without your permission, unless there are exceptional circumstances (i.e. situations where we legitimately believe you or others may be at significant risk of harm, where we legitimately believe a crime is being or has been committed or other legal investigations), where the law requires information to be passed on and/or in accordance with the information sharing principle following Dame Fiona Caldicott's information sharing review (Information to share or not to share) where "the duty to share information can be as important as the duty to protect patient confidentiality". In order to provide the best care for you and to ensure your safety, it may be useful to share some of your information with other people or agencies (such as NHS/GP). If this was to occur we would generally seek your consent first.

Retention of personal data

Changing Minds will continue to hold personal data outlined above for the following purposes:

- The provision of health or social care;

- For the management of health or social care systems or services

Your personal data will be securely disposed of in line with our retention policy, of which the standard retention period is seven years after your discharge from the Changing Minds service.

Access to personal information

All Individuals who are the subject of personal data held by Changing Minds are entitled to

- Ask what information the company hold about them and why
- Ask how to gain access to it
- Be informed how to keep it up to date
- Be informed how the company is meeting its data protection obligation

If an individual contacts the company requesting this information, this is called a subject access request. Subject access requests from individuals should be made via email in the first instance via enquiries@changingmindsuk.com. You will then be sent a Subject Access Request form for completion in writing. You will also be asked to provide adequate information and provide copies of relevant documentation (e.g. name, address, date of birth, contact details, driving licence, passport, birth certification) in order to verify your identity. A nominal administration fee of £20 is charged. The Company will aim to respond within 28 days.

Objections / Complaints

When we receive a complaint from a person we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint. We will only use the personal information we collect to process the complaint and to check on the level of service we provide. We may compile and publish statistics showing information like the number of complaints we receive, but not in a form which identifies anyone.

We usually have to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant does not want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis. We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for two years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

Should you have any concerns about how your information is managed at CMUK, please contact Jen McDonald, Data Protection Officer, Changing Minds UK, 19 Wilson Patten Street, Warrington, WA1 1PG in the first instance (enquiries@changingmindsuk.com). If you are still unhappy following a review by CMUK, you can then complain to the Information Commissioners Office (ICO) via their website (www.ico.gov.uk).

If you are happy for your data to be used for the purposes described in this privacy notice, then you do not need to do anything. If you have any concerns about how your data is shared, then please contact us.

Rectification of Data

It is important that you tell CMUK staff if any of your details such as your name or address have changed, or if any of your details such as date of birth is incorrect in order for this to be amended. You have a responsibility to inform us of any changes so our records are accurate and up to date for you.

Notification

The Data Protection Act 1998 requires organisations to register a notification with the Information Commissioner to describe the purposes for which they process personal and sensitive information. This information is publicly available on the Information Commissioners Office website www.ico.org.uk. Changing Minds UK group of companies are registered with the Information Commissioners Office (ICO). The Data Controller, responsible for keeping your information secure and confidential is: Changing Minds Limited – for Performance Services, Changing Minds Wellbeing Limited – for Child & Family Services, Changing Minds Services Limited for visitors to 19 Wilson Patten Street.

Changes to our Privacy Policy

We keep our privacy notice under regular review. This privacy notice was last updated on 30th September 2021.