

Privacy Notice - Changing Minds UK*

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

April 2024

1) Your Privacy

Changing Minds UK is a group of companies providing office rental and psychological services. The group includes:

- Changing Minds Ltd, (T/A Changing Minds Performance Services) a company limited by guarantee registered in England and Wales (registered company no: 06194653). Our registered office address is: 19 Wilson Patten Street, Warrington, WA11PG. Our ICO Registration number is Z1840445.
- Changing Minds Wellbeing Ltd, (T/A Changing Minds Child & Family Services) a company limited by guarantee registered in England and Wales (registered company no: 11469587). Our registered office address is: 19 Wilson Patten Street, Warrington, WA11PG. Our ICO Registration number is ZB035511.
- Changing Minds Services Ltd, (T/A 19 Wilson Patten) a company limited by guarantee registered in England and Wales (registered company no: 11139088). Our registered office address is: 19 Wilson Patten Street, Warrington, WA11PG. Our ICO Registration number is ZA760932.

This website www.changingmindsuk.com (the “website”) is operated by Changing Minds Ltd, (T/A Changing Minds Performance Services)

- Changing Minds Ltd. is the data Controller for personal data processed via this website and professional services provided by Changing Minds Performance Services.
- Changing Minds Wellbeing Limited is the data Controller for personal data processed for professional services provided by Changing Minds Child & Family Services.
- Changing Minds Services Limited is the data Controller for personal data processed for professional services and visitors to 19 Wilson Patten Street.

This Privacy Notice describes how Changing Minds Group of Companies. (“*Changing Minds*” “we,” or “us”) collects, uses, and discloses information about you. This Privacy Notice applies when you use our products and services, including our offices, psychological services, communications and websites (collectively, our “*Services*”), or otherwise interact with us, such as through our customer support channels or on social media pages. This privacy notice (together with our website terms and conditions) sets out the basis on which any personal data we collect from or about you, or that you provide to us, will be processed by us. This notice includes our cookies policy for the website.

Our group Data Protection Officer is Jen McDonald. If you have any questions about the content of this notice you can contact us at:

Changing Minds
19 Wilson Patten Street
Warrington, Cheshire
WA1 1PG
Tel: 01925 483069

Email: enquiries@changingmindsuk.com

2) Your rights regarding your personal data

Under data protection law, you have rights we want to make you aware of. The rights available to you depend on our reason for processing your information and may only apply in certain circumstances. You can check the [Information Commissioners website](#) for more detail or contact the DPO.

- Your right to be informed – This notice informs you what data we collect and how we use it.
- Your right of access – You have the right to ask us for a copy of your personal information and an explanation of why we are using it.
- Your right to rectification - You have the right to ask us to correct information about you which you think is inaccurate or incomplete.
- Your right to erasure - This is known as the ‘right to be forgotten’ and you have the right to ask us to erase your personal information in certain circumstances.
- Your right to restriction of processing - You have the right to ask us to limit the processing of your information.
- Your right to object to processing - You have the right to request we stop processing some or all of your data.
- Your right to data portability - You have the right to get your personal data from us in a way that is accessible.
- Rights around automated decision making and profiling – where decisions are made about you without people being involved, though we don’t use your data in this way.

If you contact the company requesting access to the data we hold about you, this is called a subject access request. If you make a subject access request, you are not required to pay a charge for doing so, although there is an administration fee of £20. We generally have one month within which to respond to your request. Subject access requests should be made via email in the first instance via enquiries@changingmindsuk.com. You will be sent a Subject Access Request form for completion in writing. You will also be asked to 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.

Please contact your Practitioner directly, contact our Head Office on 01925 483069, or email us at enquiries@changingmindsuk.com if you wish to make a request with regard to any of your data rights.

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.

3) The Data We Collect

We will process personal data from the following categories of people visiting and using this website or using Changing Minds services:

- i. Website visitors and users (cookie data and any personal data you choose to send us when filling in forms on the site).
- ii. Potential and existing clients (any personal data you send or is sent to us by a third party on a referral form or communicated to us subsequently. This includes any letter or any other document, email, communication or message, including health details).
- iii. Payments (any personal data you include when making a payment or setting up a direct debit, including your financial details).

- iv. Training and conferences applicants and attendees (any data you submit when applying or paying for a training course, including financial details).
- v. Job seekers and prospective volunteers (any personal detail you submit in your application, including education and employment history and optional diversity monitoring data).

4) Our lawful bases for the processing

We rely upon various lawful bases, as set out in the GDPR, to collect and use your data;

- 6.1.a **Consent:** with your clear and informed consent and for a specific purpose or purposes.
- 6.1.b **Contract:** as necessary for a contract, or to enter in to one with you.
- 6.1.c **Legal obligation:** where necessary for us to comply with the law
- 6.1.d **Vital interests:** the processing is necessary to protect someone's life
- 6.1.e **Public task:** where we are performing a task in the public interest, usually this applies to data processing for research purposes.
- 6.1.f **Legitimate interests:** where the processing is necessary for our legitimate interests but only where it does not override your rights and freedoms.

It is in the legitimate interest of Changing Minds to collect and process data about you and your usage of the website, in order to evaluate use, ensure that the information and resources provided are useful, and to identify areas for improvement.

It is in the legitimate interest of Changing Minds to collect and process data from people wishing to join any mailing list, submit a job application, submit a request or referral for use of our services. We also rely upon Legitimate Interest to process CCTV data at our Warrington site. We do not believe that this processing will have an adverse effect on your rights as a data subject.

Where we collect Special Category personal data, particularly sensitive or private information such as ethnicity, or health information, we rely on an additional lawful basis.

We generally rely upon your explicit consent (Art 9(2)(a)) to process this information, or, where the processing is necessary for the purposes of the provision of health or social care or treatment (9(2)(h)), and for research purposes (9(2)(j)), with the relevant condition in the Data Protection Act 2018.

5) How we keep, process and dispose of your personal information

Every member of staff who works for CMUK has a professional and legal obligation to keep information about you confidential. We keep your personal information securely. The information you provide will only be used for the purpose(s) specified when it was collected; such as to supply you with the goods or services you have requested and/or to keep you informed about upcoming Changing Minds activity.

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

We do not disclose your information to any third party without your permission unless legally obliged to do so. There may be some exceptional circumstances where information is disclosed (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 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 also be useful to share some of your information with other organisations or agencies (such as the NHS, your General Practitioner, or other organisations with a duty of care to you). Where this does occur, we would typically seek your consent to do so.

Data retention

We keep your data for various lengths of time, depending on the purpose it was collected for. Financial data is retained for 6 years. If you sign up to a mailing list or newsletter, we will retain your data until you unsubscribe from the list. Training and events data is kept until after the event. Job applications are retained for 6 months or for 6 years after you leave employment if your application is successful. Referrals or requests for services are retained for 6 months, unless you use a service, in which case it will be retained with your case file while you use the service and for a period of up to 25 years after that.

Partner organisations

We work in partnership with and for various organisations and we may be the Controller, a Processor or a joint Controller of personal data used for services and activity delivered in partnership.

Third party organisations

We use third parties to collect and process payments and other data submissions to the website. We have contracts with the organisations to ensure that your data is used appropriately and held securely by them on our behalf.

We use iZettle (a Paypal company) secure payment for credit and debit card payments onsite for the purchase of goods and services. iZettle may ask for your name, address, phone, email address, and credit/debit card information. Your card details will only be retained by iZettle. Their website has their privacy statement available at [iZettle privacy policy](#)

We use Stripe secure payment pages for credit and debit card payments online for the purchase of goods and services. Stripe asks for your name, address, phone, email address, and credit/debit card information. Your card details will only be retained by Stripe. Their privacy statement is available at [Stripe's privacy notice](#).

Online forms may be protected by Google reCAPTCHA v2. This ensures the form is completed by a real person and not automated software, to protect systems against abuse. Data captured by Google will include information such as IP address, length of page visit, mouse movements. Google reCAPTCHA is covered by [Google's privacy policy](#) and [terms](#).

Changing Minds uses a secure online electronic records system Writeupp to maintain confidential client records in line with our legal and regulatory obligations. Writeupp is

ISO27001 certified. ISO27001 is a globally recognised information governance and security standard. WriteUp's systems and processes comply with this standard and are audited annually to ensure continued compliance. Writeup uses 2 factor authentication and any data is encrypted in flight and at rest and your navigation runs on 256 bit SSL encryption ensuring that your data is secure. Writeup is provided by Pathway Software (UK) Ltd, who have been a trust NHS provider for over 10 years. Their privacy statement is available at [Writeup privacy notice](#).

Changing Minds uses Microsoft Office 365 for email and other office data function. Personal data such as email addresses may be processed using Microsoft Office 365. As part of the Office 365 suite, Changing Minds uses Microsoft Forms to capture data. Microsoft's privacy policy can be found here [Microsoft 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. Changing Minds uses TLS, a standard encryption protocol, for its electronic communications and attachments. However, Changing Minds does not guarantee that the integrity of any email communication has been maintained nor that email communication is free of viruses, interceptions or interference.

We may use Egress Switch <https://bit.ly/2Lj0luu> to encrypt and protect certain email traffic. This may also 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.

6) Cookies Policy

What are cookies?

A "cookie" is a small text file that is placed on a website user's device/computer hard drive by a website. There are various types of cookie and they may be essential or non-essential to the operation of the website but all have a purpose.

Website cookie acceptance

When you first visit our site(s) you can choose to accept or decline our non-essential cookies and you can adjust that choice at any time by clicking on the cookies pop up.

We will use a cookie to record if you have accepted the use of cookies on this website. This cookie will be stored on your device/computer if you have consented to our use of cookies by indicating your consent to the pop-up message on the website.

The cookies we use

Google Analytics are used widely by websites to collect information about how website visitors use a site. We will use Google Analytics cookies to collect information about how users use the website and to improve the website. Google Analytics collect information in an anonymous form and will not allow us to identify you or collect any personal information about you. Google Analytics does not track your internet activity after leaving the 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](#).

More information about cookies

The following links provide more information about cookies:

- [About Cookies](#)
- [ICC UK Cookies Guidance](#)

7) 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 whilst 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.

8) Clients using Changing Minds Services

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 Changing Minds to comply with the law, including for the purposes of the provision of health or social care or treatment and the management of health or 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 support or 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 use 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.

9) Questions & Complaints

If you have any questions or concerns about how we are processing your data you can contact us via email at enquiries@changingmindsuk.com, or via telephone on 01925 483069.

If you are not satisfied with our response, and wish to make a complaint about our data processing activity you can also contact the [Information Commissioner's office](#).

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.

10) Rectification of Data

It is important that you tell Changing Minds if any of your details such as your name or address have changed, or if any of your details such as your 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.

11) Amendment of this policy

We regularly review this privacy policy and may amend the content or wording from time to time to ensure it remains relevant and effective. You can see when it was last updated by checking the date at the end of the notice. The published version will be the applicable version.

Last Reviewed: 10th April 2024