



Privacy Statement

Date of implementation: August 2025

Date of review: N/A

Date of next review: August 2026

Person responsible for policy implementation and review: Operations Director

Document Control

Version Date	Version	Amendment details	Reviewed by	Ratified by
August 2025	v001	Policy implemented	Lucy Squire	Patrick Kwesiga

Contents

1. Introduction.....	2
2. Who We Are.....	2
3. Scope of This Statement	2
4. What Personal Data We Collect.....	2
5. How Referrals Work Within the Consortium	2
6. How We Collect Information	3
7. Why We Collect and Use Your Data	3
8. Lawful Basis for Processing.....	3
9. Consent and Communication Preferences	3
10. Data Storage and Security.....	4
11. Sharing Your Data.....	4
12. Automated Decision-Making.....	4
13. Your Data Rights.....	4
14. Retention of Data	5
15. Changes to This Privacy Statement.....	5
16. Complaints	5



1. Introduction

- 1.1. Living Well Consortium (LWC) is committed to protecting and respecting your privacy. We handle your personal information responsibly and in compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and other applicable laws.
- 1.2. This Privacy Statement outlines how we collect, use, store, and share your personal data, your rights, and how to contact us regarding your information.

2. Who We Are

- 2.1. Living Well Consortium is a partnership of voluntary, community, and social enterprise organisations providing accessible mental health and wellbeing services across Birmingham and Solihull. We also deliver the NHS talking therapies.
- 2.2. **Company Registration Number:** 07412677
- 2.3. **Registered Address:** Avoca Court, 23 Moseley Road, Birmingham, B12 0HJ
- 2.4. **Website:** www.livingwellconsortium.com
- 2.5. **Email:** info@livingwellconsortium.com
- 2.6. **Data Protection Officer:** Lucy Squire

3. Scope of This Statement

- 3.1. This Privacy Statement applies to personal information collected through our services and our website, www.livingwellconsortium.com and work delivered by our providers on behalf of Living Well Consortium. It does not apply to third-party websites linked from our site.

4. What Personal Data We Collect

- 4.1. We may collect the following categories of personal data:
 - Name, date of birth, and contact details
 - Referral and medical information
 - Mental health assessments and therapy session notes
 - Minimum data set (MDS) questionnaires and outcomes
 - Demographic information (e.g., gender, ethnicity, employment status)
 - Online and social media interaction (where applicable)
- 4.2. Some of this data may be classified as special category data, such as health, ethnicity, or other sensitive personal information.

5. How Referrals Work Within the Consortium

- 5.1. Living Well Consortium (LWC) is made up of multiple partner organisations (providers) who deliver mental health and wellbeing services across Birmingham and Solihull. When you are referred to LWC (either by a professional or via self-referral), your information is received centrally by

LWC and then assigned to the most appropriate provider within the consortium.

- 5.2. All providers within the consortium use a shared secure clinical system (IAPTUS) for the storage and management of your data. This means that your information may be accessible to authorised staff across partner organisations involved in your care. However, access is strictly controlled, audited, and limited to those who need it to deliver your service.
- 5.3. We are committed to ensuring that you are informed about how your information is used across the consortium. You will be asked for your consent during the referral process to store, share, and process your data within the consortium to support safe and effective care.

6. How We Collect Information

- 6.1. We collect your personal data through:
 - Referrals from GPs, healthcare professionals, or self-referral
 - Participation in events, training, or online interactions
 - Communication via phone, email, or other channels
 - Forms completed on our website or through our services

7. Why We Collect and Use Your Data

- 7.1. We collect and process personal data to:
 - Deliver mental health and wellbeing services
 - Manage and improve our services
 - Fulfil legal and contractual obligations
 - Communicate updates and service changes
 - Evaluate service performance and outcomes
 - Prevent fraud and ensure IT security
 - Support research and development (with consent)

8. Lawful Basis for Processing

- 8.1. We process your data based on:
 - Consent – e.g., for sharing data with third parties or for marketing
 - Contractual obligation – to deliver services you have requested
 - Legal obligation – to comply with regulatory or statutory requirements
 - Legitimate interests – e.g., internal audits, improving services

9. Consent and Communication Preferences

- 9.1. Consent is obtained:
 - At the point of referral for storing and sharing your data
 - Before sharing information with third parties for research or development
 - For marketing or communication preferences

9.2. You can modify or withdraw consent at any time.

10. Data Storage and Security

- 10.1. We store personal data securely, primarily through IAPTUS, our clinical data management system (since April 2023). Prior to this, data was stored in DCRS. All historic data was securely migrated.
- 10.2. We use strict access controls, encryption, and audit trails. Only authorised staff have access to your data for legitimate purposes.

11. Sharing Your Data

- 11.1. We may share your data with:
- NHS partners, referring agencies, GP's or care providers involved in your treatment
 - Third-party service providers under contract with us (e.g., IT systems)
 - Legal or regulatory bodies where required
 - Academic research partners (only with your explicit consent)
- 11.2. We require third parties to maintain the confidentiality and security of your data and to use it only as instructed.

12. Automated Decision-Making

- 12.1. We may use automated systems to support decision-making in some services. This occurs only where:
- Necessary for service delivery
 - You have provided consent
 - Safeguards are in place to protect your rights
 - You will not be subject to automated decisions with significant impact unless legally permitted and informed.

13. Your Data Rights

- 13.1. You have the following rights under UK GDPR:
- **Access**- Request a copy of your personal data
 - **Rectification**- Correct inaccurate or incomplete data
 - **Erasure**- Ask us to delete your data (where applicable, this may not always be possible, due to health records)
 - **Restriction**- Ask us to limit processing in certain cases
 - **Portability**- Request your data in a machine-readable format
 - **Objection**- Object to processing based on legitimate interest or for direct marketing
 - **Withdraw Consent**- Withdraw previously given consent at any time, however, this may result in discharge from the service.

- 13.2. To exercise any of your rights, contact our Data Protection Officer at info@livingwellconsortium.com or call 0121 663 1254.

14. Retention of Data

14.1. We retain personal information only as long as necessary, usually no more than 7 years, unless required by law or contract. You may request further information on retention periods.

15. Changes to This Privacy Statement

15.1. We may update this statement from time to time. Significant changes will be communicated directly and updated on our website. You should review our privacy notice regularly.

16. Complaints

16.1. If you have concerns or complaints about how we handle your data, contact our Data Protection Officer:

Lucy Squire
Avoca Court, 23 Moseley Road, Birmingham, B12 0HJ
Email: info@livingwellconsortium.com
Phone: 0121 663 1254

16.2. You also have the right to lodge a complaint with the Information Commissioner's Office (ICO) at www.ico.org.uk.