



Privacy Statement

Date of implementation: August 2025

Date of review: February 2026

Date of next review: February 2027

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
January 2026	v002	Policy updated to include the use of Heidi (Ambient Scribing AI)	Lucy Squire	Patrick Kwesiga
February 2026	v003	Policy updated to include the recording of sessions	Lucy Squire	Patrick Kwesiga



Purpose and Scope

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.

This Privacy Statement outlines how we collect, use, store, and share your personal data, your rights, and how to contact us regarding your information.

Who Are We

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.

Company Registration Number: 07412677

Registered Address: Avoca Court, 23 Moseley Road, Birmingham, B12 0HJ

Website: www.livingwellconsortium.com

Email: info@livingwellconsortium.com

Data Protection Officer: Lucy Squire

Scope of This Statement

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.

What Personal Data We Collect

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).

Some of this data may be classified as special category data, such as health, ethnicity, or other sensitive personal information.

How Referrals Work Within the Consortium

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.

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.

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.

How We Collect Information

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.

Why We Collect and Use Your Data

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).

Lawful Basis for Processing

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.

Consent and Communication Preferences

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.

You can modify or withdraw consent at any time.

Data Storage and Security

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.

We use strict access controls, encryption, and audit trails. Only authorised staff have access to your data for legitimate purposes.

Sharing Your Data

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).

We require third parties to maintain the confidentiality and security of your data and to use it only as instructed.

Automated Decision-Making

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.

Your Data Rights

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.

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

Retention of Data

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.

Use of Heidi (Ambient Scribing AI)

Commencing on 12.01.2026, a small number of practitioners will be piloting the use of Heidi, and Ambient Scribing AI tool, in clinical sessions. This is outlined to clients impacted in the Client Contract provided.

You have the right to decline the use of this software.

All data will be handled by LWC in accordance with the standards outlined in this Privacy statement.

For information on how Heidi handles data, please review their privacy policy found at [Privacy Policy · Heidi Health | Heidi AI](#).

Recording of Therapy Sessions

Some therapy sessions delivered by trainee therapists may be audio/video recorded to support supervision and professional assessment.

These recordings are used only to:

- Assess and support the trainee's clinical skills;
- Ensure safe and effective care.

Recording is optional. Your care will not be affected if you choose not to be recorded.

Recordings are:

- Treated as confidential health information;
- Stored securely with strict access controls;
- Accessed only by the trainee's supervisor and authorised assessors;
- Kept only until assessment is complete and then permanently deleted;
- Not kept as part of your long-term clinical record.

Changes to This Privacy Statement

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.

Complaints

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

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