



Your Information: how it is used and how to gain access to it.

Who are we?

Talking Therapies East Cheshire is delivered by The Big Life Group, Oakfield House, Tytherington Business Park, Springwood Way, Cheshire, SK10 2XA, in partnership with Xyla Digital Therapies. We use information about you to enable us to provide safe and effective services, which meet both your needs and the needs of the community we serve. This privacy notice sets out how we will use your personal data.

What information we collect and how we collect it.

Usually we will collect this information directly from you, but sometimes we may collect this indirectly from someone else such as a GP or other health professional through our referral process. The types of data we collect are:

- **Personal details** (such as name, address, contact information and email) so that we know how to keep in touch with you
- **Details about your family, lifestyle or social circumstances** (such as details about your family and household members) where this is relevant to the service we are providing you with
- **Education and training details** (such as where you study) if this is relevant to service we are providing you with
- **Employment details** (such as where you have previously worked, the jobs you have had) if this is relevant to service we are providing you with
- **Financial details** (such as debt management) if this is relevant to service we are providing you with
- **Services provided** (such as details about any services you have accessed through us or another organisation) so that we understand what has or hasn't worked for you in the past
- Sometimes we also collect **sensitive, personal data** about you. This includes information about your health, religion or beliefs, sexuality, ethnicity, and offending details.

We collect information about your mental and physical health and other sensitive data (e.g. offending) because it is necessary to be able to provide you with this service. There are additional safeguarding procedures in place to ensure we understand our duty of confidentiality when processing this type of information.

We collect diversity information (e.g. ethnicity data) to monitor that the services we provide are being delivered equally and fairly to people from all types of backgrounds. In this case, you can indicate that you prefer not to give us this information.

Why we collect your personal data and what our legal basis for doing this is?

In most cases, we will process your data because it is necessary to provide you with a safe and effective service. This also includes any steps we have taken at your request to enable you to access this service. We process your personal data in order to:

- Keep a record of your personal and appointment details so that we have a record of how and when to keep in touch with you
- Record details about, for example, referrals, assessments and support plans with you so that we are clear about what you need and to provide you with a service that meets those needs
- Evaluate the effectiveness of our service

In some cases, providing us with your personal data is optional and in these cases, we will make this clear and ask for your explicit consent to process this data by providing you with a consent form. Even if you have given your consent, you will be able to withdraw your consent at any point if you change your mind and the form will tell you how to do this.

Who we share your information with.

Your information, whether on electronic or paper records - including referral forms and clinical records – is personal and sensitive and the processes we use for collecting, storing and retrieving your information are secure to prevent against unauthorised access.

Your worker, administrator and their supervisor/manager will usually be the only people authorised to access your information and they will do so to ensure we are providing an effective service. Other managers may need to access your information to investigate complaints, incidents or to audit services.

Sometimes we will need to share information to people outside the service involved in your care – for example your GP or other teams within the care pathway – to safeguard your health and well-being. You will be informed of the nature of the information shared in this way – and to whom – and all professionals with whom we share such information must meet all our conditions for keeping your information confidential and secure. Your GP will be routinely sent a discharge report when you exit the service.

We may share your data with our partner Xyla Digital Therapies, who partner with the NHS, private sector and higher education institutions to offer accessible assessments and evidence-based talking therapies. In this instance your referral and/or assessment details will be shared with Xyla Digital Therapies who will contact you to arrange your appointments with them. Sessions with Xyla Digital Therapies are delivered Monday-Sunday between 7am-11pm, access to therapy is via secure video, online audio, telephone and text, available in over 45 languages. Xyla Digital Therapies privacy policy can be found here:

<https://xyladigitaltherapies.com/privacy-policy/>

There are other situations when we may need to share your information; situations when:

- There is a serious risk to the health and safety of others (e.g. children and vulnerable adults)
- Information is required to be used in court
- We need to give information to the police to help detect or prevent a serious crime
- We believe there is a threat to your safety

Where possible we will always inform you when we need to share information for the reasons given above. In other situations (e.g. a request from an employer or insurance company) we will not share your information without your written consent.

Information is shared more widely to monitor and evaluate the quality and performance of services; in these circumstances your name and any other details which may identify you will be removed prior to analysis and inclusion in reports.

All our staff and volunteers are required to adhere to our confidentiality and information security policies. If we find out that an unauthorised person has had access to your information we will inform you, and take appropriate action.

How long we keep your data and why.

We will store your information according to NHS mental health records retention periods. This is currently for 20 years after you have left the service.

Your rights under the data protection law.

Under the data protection law, your rights are as follows:

- You have the right to be informed about how we process your data (this is detailed in this privacy notice)
- You also have the right to request that we correct your data if it's factually inaccurate or incomplete. We are required to respond to requests within 1 month
- You have the right to access a copy of the information we keep about you or authorise another person or organisation to be provided with your information – this is known as a subject access request. We are required to provide this within 1 month
- In some circumstances, you have the right to ask us to erase all your personal data (but we may refuse to do this if we can show we have a lawful reason to keep it)
- In some circumstances you have the right to object to data processing or request that data processing is restricted (but we may refuse to do this if we can show we have a lawful reason to keep it)

If you have a concern about the way we are collecting or using your personal data, want to ask us about any of your rights described above or ask us any other questions about this privacy notice, please our Data Protection Officer:

Rachel Hart
The Big Life Group HQ
1st Floor
463 Stretford Road
Manchester
M16 9AB
rachel.hart@thebiglifegroup.com

If you are not happy with our response, you have also the right to complain to the Information Commissioners Office. This is the UK's independent authority. It has enforcement powers and can investigate complaints and compliance with data protection law. Your rights are described in detail on the ICO's website - <https://ico.org.uk/>.