



## GENERAL PRIVACY NOTICE

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### 1 INTRODUCTION

- We are committed to protecting and respecting your privacy. Integrated Care Support Services Limited (“ICSS”) is a non-profit company, limited by guarantee. In this privacy notice, references to “we”, “us”, “our” or “ICSS” refer to Integrated Care Support Services Limited.
- This privacy notice explains how we collect, use, store and protect personal data in the course of our relationship with you. This notice applies to potential and actual participants on our courses and programmes, partners, suppliers, alumni, representatives of participating organisations and other individuals with whom we interact.
- Please read this notice carefully to understand our practices regarding your personal data.
- For the purposes of the UK General Data Protection Regulation (“UK GDPR”) and the Data Protection Act 2018, ICSS is the data controller. Our registered office is 6 Pilsdon Close, London, SW196DR.
- ICSS is registered with the Information Commissioner’s Office (ICO) under registration reference ZB792119.
- If you are reading this notice online, we recommend that you print and retain a copy for future reference.

### 2 INFORMATION WE COLLECT ABOUT YOU

#### Information you provide directly to us

We may collect personal information about you in a number of ways, including when you:

- Complete forms on our website or through a third-party organisation working with ICSS
- Contact us by email, telephone or post
- Visit our offices or attend meetings, interviews, workshops, courses or events
- Apply for employment, consultancy, freelance or supplier opportunities
- Provide information requested by us in connection with our services, programmes, courses or business activities
- Correspond with us regarding enquiries, contracts, partnerships or other business matters
- Make information available publicly, including through professional websites, social media platforms or other publicly accessible sources.

Depending on the nature of our relationship with you, the personal information we collect may include:

- Name and title
- Photograph or image
- Contact details, including home and/or work address, email address and telephone numbers
- Employment information, including job title, employer and professional background

- Salary and remuneration information where relevant
- Financial information, including payment and bank account details required for processing payments
- Educational history, qualifications, professional registrations and achievements
- Information required to comply with safeguarding, health and safety or accessibility requirements
- References provided as part of recruitment, consultancy or supplier engagement processes

Any other information you choose to provide to us in connection with our services or activities.

### **Information we collect automatically when you visit our website**

When you visit our website, we may automatically collect certain technical information, including:

- Internet Protocol (IP) address
- Browser type and version
- Device type and operating system
- Time zone settings
- Website usage data, including pages visited, time spent on pages and navigation paths
- Other analytics information that helps us improve the performance, security and usability of our website

### **Information we receive from other sources**

We may receive personal information about you from third parties where this is necessary for our legitimate business activities. These may include:

- Current or former employers
- Partner organisations
- Referees
- Training or programme sponsors
- Professional advisers
- Service providers supporting the delivery of our activities

Any information received from third parties will be processed in accordance with this privacy notice and applicable data protection legislation.

## **3 CONTACT US**

Questions, comments and requests regarding this privacy notice should be addressed to:

Data Protection Officer  
 Melanie Ashdown  
 Email: [m.ashdown@nhs.net](mailto:m.ashdown@nhs.net)

Integrated Care Support Services Limited  
 6 Pilsdon Close  
 London SW19 6DR

## **4 HOW WE USE YOUR INFORMATION**

ICSS will only process personal data where we have a lawful basis to do so under the UK GDPR and the Data Protection Act 2018. Depending on the nature of our relationship with you, our lawful bases for processing may include:

- Performance of a contract
- Taking steps at your request prior to entering into a contract
- Compliance with a legal obligation
- Legitimate interests pursued by ICSS or a third party

- Consent, where required

In many cases, more than one lawful basis may apply to the same processing activity.

### **Information you provide to us**

We may use the personal information you provide to us for the following purposes:

- To administer, deliver and evaluate our courses, programmes, workshops and events
- To manage relationships with participants, partner organisations, suppliers, consultants and other stakeholders
- To communicate with you regarding enquiries, applications, contracts, services or activities
- To manage recruitment, engagement and onboarding processes
- To assess applications and suitability for participation in programmes or employment opportunities
- To process payments and maintain financial and accounting records
- To manage contracts and agreements entered into with you or your organisation
- To comply with safeguarding, health and safety and other regulatory requirements
- To maintain accurate records and management information systems
- To protect the interests, reputation and operations of ICSS
- To comply with our legal and regulatory obligations

In pursuing these purposes, ICSS may use secure software applications, databases, finance systems and other technology platforms. Any third-party service providers used to support these systems are subject to appropriate contractual and data protection requirements to ensure that personal information is processed securely and lawfully.

Where we are considering entering into a contract with you, recruiting you, engaging you as a consultant or supplier, or arranging your participation in one of our programmes, we may process personal information as necessary to take steps prior to entering into that arrangement and to fulfil any resulting contractual obligations.

We may also process personal information where required by law, including for the purposes of maintaining financial records, demonstrating compliance with employment and recruitment obligations, responding to lawful requests from public authorities, and meeting other statutory or regulatory requirements.

### **Information collected through our website**

We may use information collected through our website for the following purposes:

- To respond to enquiries and requests for information
- To contact you or your organisation regarding current, future or previous courses, programmes or services where appropriate
- To administer and maintain our website
- To monitor and improve website performance, functionality and user experience
- To undertake troubleshooting, testing, analysis, research and statistical reporting
- To protect the security and integrity of our systems and website
- To detect, prevent and investigate fraud, cyber threats or unauthorised access

### **Information received from other sources**

Where we receive personal information from third parties, we may combine it with information already held by ICSS and use it for the purposes described in this privacy notice.

For example, we may receive references from previous employers as part of a recruitment process, or information from a partner organisation to support your participation in a programme or event. We may

also receive information relating to accessibility, dietary or other requirements to help us ensure that our activities are delivered safely, effectively and inclusively.

### **Sharing personal information**

Where necessary and appropriate, ICSS may share personal information with:

- Employees, associates and freelance facilitators working on behalf of ICSS
- Partner organisations involved in delivering programmes or services
- Professional advisers, including legal, financial and audit advisers
- Suppliers, contractors and service providers who support our operations
- Regulatory bodies, law enforcement agencies or other organisations where disclosure is required by law.

ICSS will only share personal information where there is a lawful basis to do so and appropriate safeguards are in place.

### **Marketing communications**

We will not send direct marketing communications where consent is required unless that consent has been provided. You have the right to withdraw your consent or opt out of receiving marketing communications at any time by contacting us.

## **5 YOUR RIGHTS**

Under the UK GDPR and the Data Protection Act 2018, you have a number of rights in relation to the personal information that ICSS holds about you.

**Right of access.** You have the right to request confirmation that we are processing your personal data and to obtain a copy of the personal information we hold about you, together with information about how and why it is being processed.

**Right to rectification.** You have the right to request that we correct or update any inaccurate, incomplete or out-of-date personal information that we hold about you.

**Right to erasure.** In certain circumstances, you have the right to request that we delete your personal information. This right may apply where:

- The information is no longer required for the purpose for which it was collected;
- You withdraw consent where consent is the lawful basis for processing;
- You successfully object to the processing of your personal data;
- The information has been processed unlawfully; or
- We are required to erase the information to comply with a legal obligation.

This right is not absolute and may not apply where we are required to retain information for legal, regulatory or legitimate business purposes.

**Right to restrict processing.** You have the right to request that we restrict the processing of your personal information in certain circumstances, including where:

- You contest the accuracy of the information;
- The processing is unlawful but you do not wish the information to be erased;
- We no longer require the information, but you need it for the establishment, exercise or defence of legal claims; or
- You have objected to processing and we are considering your objection.

**Right to data portability.** Where processing is based on consent or contract and carried out by automated means, you may have the right to receive your personal information in a structured, commonly

used and machine-readable format and to request that it be transferred to another organisation where technically feasible.

**Right to object.** You have the right to object to the processing of your personal information in certain circumstances, particularly where processing is based on legitimate interests or for direct marketing purposes.

We will consider all objections carefully and will cease processing where required by law.

**Right to object to direct marketing.** You have the right to ask us at any time to stop using your personal information for direct marketing purposes. Where you exercise this right, we will stop sending marketing communications to you.

**Rights relating to automated decision-making.** ICSS does not currently carry out solely automated decision-making or profiling that produces legal or similarly significant effects on individuals. Should this change, we will update this privacy notice accordingly.

**Right to complain.** If you have any concerns about how ICSS collects, uses or protects your personal information, we encourage you to contact us in the first instance so that we can seek to resolve the issue. You also have the right to lodge a complaint with the Information Commissioner's Office (ICO), the UK's independent authority for upholding information rights and data protection law.

**Exercising your rights.** If you wish to exercise any of your data protection rights, or if you have any questions about how your personal information is processed, please contact our Data Protection Officer: Melanie Ashdown - [m.ashdown@nhs.net](mailto:m.ashdown@nhs.net).

We will respond to requests in accordance with applicable data protection legislation and within the timescales required by law.

## 6 HOW LONG WE KEEP PERSONAL INFORMATION

ICSS will only retain personal information for as long as is necessary to fulfil the purposes for which it was collected, including to meet legal, regulatory, contractual, financial and operational requirements.

The length of time we retain personal information will vary depending on the nature of the information, the purpose for which it was collected and any applicable legal or regulatory obligations. When determining appropriate retention periods, we take into account factors such as:

- The purpose for which the information was collected and is being processed;
- Legal and regulatory requirements;
- Contractual obligations;
- The need to establish, exercise or defend legal claims;
- Financial and audit requirements; and
- Good practice guidance relating to records management and information governance.

ICSS maintains a Records Retention and Disposal Schedule which sets out the retention periods that apply to different categories of information. Personal information is securely deleted, destroyed or anonymised when it is no longer required and retention is no longer justified.

Where personal information is retained for longer periods for archiving, research, statistical or historical purposes, appropriate safeguards will be applied to protect individuals' rights and freedoms.

If you would like further information about how long we retain specific categories of personal information, please contact our Data Protection Officer using the details provided in Section 3.

## 7 USE OF OUR WEBSITE AND SECURITY

Where we have provided you with, or where you have chosen, a password that enables you to access certain parts of our website or systems, you are responsible for keeping that password confidential. We ask that you do not share your password or login details with anyone.

Whilst ICSS takes appropriate technical and organisational measures to protect personal information, the transmission of information via the internet is not completely secure. Although we take reasonable steps to safeguard personal data submitted through our website, we cannot guarantee the security of information transmitted to us electronically and any transmission is at your own risk.

Once we receive your information, we will apply appropriate security procedures and controls designed to prevent unauthorised access, loss, misuse, disclosure or alteration of personal data.

Our website may contain links to websites operated by third parties, including partner organisations and service providers. These websites have their own privacy notices and terms of use, and ICSS does not accept responsibility or liability for their content, security or privacy practices. We encourage you to review the privacy information provided by any third-party website before submitting personal information.

## **8 CHANGES TO OUR PRIVACY NOTICE**

Any changes to this privacy notice will be published on our website and, where appropriate, communicated directly to affected individuals. Please review this notice periodically to ensure you remain aware of any updates.