

Conductive Education

The Percy Hedley Foundation is committed to providing and developing Conductive Education services for adults with neurological conditions, predominantly Parkinson's Disease, Multiple Sclerosis and people who have suffered a stroke.

More information can be found on our website at: <http://www.percyhedley.org.uk/adult-services/conductive-education/>

Information collection

Information you give us.

Upon enrolment at our Conduction Education course, we will collect various personal information about you. This will include; full name, date of birth, address, contact telephone number, email address, emergency contact details, next of kin.

Due to the specialised nature of the course, we will also be required to collect personal information relating to your medical condition. Under data protection laws, this is classified as **Special Category data**. This information will include; specific medical condition, medical diagnose and any relevant medical history.

We may also require financially related information, for instance, your bank account information (if required) or any associated funding information to support your application.

Information from third parties.

We may need to contact third parties, for instance, your GP, Local Authority, NHS, neurologist, Therapist (or similar) to request previous medical records, or associated health records relating to your health and wellbeing. This is to ensure we have all the relevant and up to date information relating to your medical and health history, so we can fully support your specific needs. We will ask your permission to do so prior to requesting this specific information.

How we will use your information

The categories of information that we collect, hold, and share include:

- Personal information (such as name and address)
- Characteristics (such as age, gender, and nationality)
- Personally identifiable information (such as your National Insurance Number and your images)
- Special Category information (such as medical and health information)
- Financial information (such as your bank account details)

The information you give us and we collect from relevant third parties will be used to form your user record. For instance, your session activities, progress, and any medical needs will be added to your records.

Additional relevant communications that contains key information relating to your wellbeing needs may also be added to your records, including records of telephone calls, email communications, or letters from third parties e.g. GP, neurologist etc.

We will use this information to formulate our decision making process for your health and wellbeing needs, to ensure we provide you with the required support.

For instance:

- to enable us to communicate with you and to fulfil your request for information or services appropriate to your needs
- to monitor and improve our performance in responding to your request
- to ensure we meet our regulatory and legal obligations
- to protect individuals from harm or injury
- to process financial transactions
- to allow the statistical analysis of data so we can plan the provision of services.

Legal basis for our processing

As the data controller when we collect your personal information, we will make sure this is only done in accordance with an appropriate legal basis, alongside an additional special category legal basis under data protection laws. This means we will never process your information without a legal basis to do so.

Our legal basis for processing your information is **consent** (*the data subject (you) has given consent to the processing of his or her personal data for one or more specific purposes*) Article 6 (a) GDPR, and

Our **special category condition** will also be **consent** (Article 9 (a) GDPR).

Images of individual's play an important part of our activities and we will use **consent** as our legal basis for processing any image of you. (Article 6 (a) and Article 9 (a) GDPR).

Your consent will be gained via our Image Consent Form, which you will have received, signed, and returned to the service outlining your specific preferences of what images can, or cannot be processed.

Recipients and disclosing your personal information

Where appropriate, we will share some of your personal information internally between relevant departments, and within the Foundation, for instance, therapy teams and finance.

We may also disclose your personal information external to the Foundation in the following circumstances:

- With third parties who also process your information, for instance, organisations you have a vested interest in your health and wellbeing. These include;
 - Local Authorities
 - GPs
 - Social Workers
 - NHS
 - External therapy
 - MS Society
 - Parkinson's UK
- Where we are under a duty to disclose your personal information in order to;
 - comply with any legal obligation (for example to a government body, law enforcement agency), or
 - in order to enforce or apply our rights (including in relation to our website or other applicable terms and conditions), or

- in order to protect our organisation, (for example in cases of suspected fraud or defamation), or
- in order to protect your vital interest or the vital interests of another individual (for example in cases of abuse or suspected abuse).

We can assure you, we require third parties and suppliers we contract with to comply with data protection laws and have appropriate controls in place.

Keeping your personal information

We keep your personal information only for as long as required to operate the service in accordance with a legal, regulatory, or specific business purposes. Where your information is no longer required, we will ensure it is disposed of in a secure manner.

Any information that we are required to retain for archive purposes will be held securely, with limited access rights and this information will not be further processed.

Our retention period for conductive education records:

We will retain your record for 5 years after you leave our services, in line with CQC guidance.

To find out more information about CQC governance go to: <http://www.cqc.org.uk/guidance-providers/regulations-enforcement/regulation-17-good-governance>

An exception to the above retention periods will occur, for any record relating to allegations of abuse or suspected abuse. These records will be retained for a minimum period of 50 years, to comply with our insurance terms and conditions.

Our retention period for your images:

Records that may include images that evidence your progress and achievement will need to be retained in line with CQC requirements as outlined above.

Images that are not directly related to your conductive education record will only be retained while you attend our service (unless you have given explicit consent to continue to use your images for a longer period).

We have made a business decision to preserve our history and heritage by retaining some archive materials permanently. This may include some images of our service users. Examples of categories of images that we can archive permanently are as follows (but not limited to):

- Award ceremonies, or similar
- Leavers balls/leavers assemblies, or similar
- Career/progression case studies, or similar
- Anniversary celebrations, or similar

ⁱ *Processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of generic data, biometric data for the purposes of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation (Article 9 Processing of special categories of personal data)*

