



How We Handle Your Data

At the Independent Living Centre we are committed to protecting your personal data and your rights to privacy. This document explains why information is collected about you, the ways in which this information is used, and how long it is kept for.

What is GDPR?

The General Data Protection Regulation (GDPR) will apply from 25 May 2018, when it supersedes the UK Data Protection Act 1998 (DPA). The new law gives individuals greater rights to control how their personal data is collected and processed, and places a range of new obligations on organisations to be more accountable for data protection.

What personal data does the ILC collect?

To be able to offer the most relevant advice during your appointment, we need to be aware of certain sensitive information such as age, weight, and medical conditions. This is to ensure our Occupational Therapist or Benefits Advisor are able to complete your assessment accurately.

We also need to know your address as we are only funded to provide assessments to those living in Wiltshire or BaNES, and your telephone number in case we need to contact you in relation to the appointment you have booked, or information you have requested.

Please see the table below/attached for full details.

What does the ILC do with the information?

Your data is retained for no longer than necessary. When the information is no longer required it will be destroyed securely. Please see the table below/attached for full details.

During an appointment the Occupational Therapist or Benefits Advisor may identify additional needs that you have. In order to support you further they may need to share your information with a third party. This process will be explained to you in person and you will be given a consent form to sign. We do not share your information with third parties for marketing purposes.

There are exceptional circumstances where we may have to disclose your information without your permission. These are:

- If we believe that either you or someone else is at risk of significant harm
- Where there is another legal requirement to disclose your information

Numerical information is gathered anonymously on: numbers of patients visiting the centre, range of medical conditions, items of equipment looked at, successful benefit appeals, time taken to see or respond to patients, sales from the ILC shop. This is to allow funders of the ILC to see how resources are used, review efficiency and productivity of the service, and to allow the management team to review staff resources.

We use Google Analytics to analyse visits to our website. This is completely anonymous and your IP address is not stored.

What are my rights?

If you do not feel comfortable disclosing sensitive information to reception when booking an appointment, you have the right to request a private discussion with the Occupational Therapist or Benefits Advisor.

You have the right to request your personal data be deleted at any time, and we will fulfil your request immediately unless we have a legal or contractual obligation to keep it.

You have the right to access your own records free of charge.

How do I request a copy of my records?

Please send a written request including your name and address, and a form of personal identification.

For those acting on another's behalf, the ILC requires some form of evidence that they are acting on their behalf legally. This can be in the form of a jointly signed subject access request form, a letter from the client giving authority, or evidence showing parental responsibility. For those unable to make requests for themselves due to incapacity, authorisation may be given by a police officer, a doctor or another legal representative.

You will receive your records within one month of receipt of the request, or if it is not possible to provide the records you will be given a valid reason why.

Does the ILC need my consent?

When you come for your appointment with the Occupational Therapist or Benefits Advisor you will be asked to sign confirming that you have read and understood our Privacy Policy.

When requesting to advertise something on our second hand list you will be asked to provide consent verbally if over the phone, or in writing if via email.

When receiving information via post/email or hiring a wheelchair you will also receive a copy of our Privacy Policy.

What if I have further questions?

Please speak to any ILC member of staff, and we will be happy to answer your questions.

Type of Contact	Data Taken	Purpose	Legal Ground	Third Parties	Data Retention
Telephone/Email Enquiry	Contact details, enquiry details. Age, weight and medical condition may be asked for depending on the enquiry.	To provide a record of contact, and to allow the Occupational Therapist, OTA, or Benefits Advisor to give the most relevant advice.	Legal Obligation	Anonymised data is shared with third parties in the form of statistics to aid in securing funding.	Your data is not kept for basic information requests. If the request requires research into specific equipment relating to a medical condition or certain area of difficulty, then records are kept securely for 3 years.
Appointment Booking	Name, contact details, age, medical condition, reason for appointment.	To provide a record of patient contact, and to allow the Occupational Therapist or Benefits Advisor to complete your assessment accurately.	Legal Obligation	Anonymised data is shared with third parties in the form of statistics to aid in securing funding.	If the appointment is not made, then data will be securely destroyed. If an appointment is made, the notes are kept for 3 years.
Appointment Notes/Reports	A written summary of the appointment, detailing any actions required and taken.	Comprehensive written records are a legal obligation by an Occupational Therapist or Benefits advisor. Occupational therapists are bound by a professional code of conduct, local and national policy.	Legal Obligation	Anonymised data is used at random to create case studies to help secure future funding. Nothing identifiable is ever used.	3 years
Sales Form	Contact details, and equipment bought. Medical condition is needed for VAT exemption.	To provide a record of sale.	Legal Obligation	A copy of the sales form is sent to Medequip as they are the retailer.	Kept at the ILC for 1 year. Medequip keep for 7 years.
Second Hand List	Contact details, and item description.	To provide a forum for the sale of second hand items.	Legitimate Interest	Details are shared on our website, mailing list, and available in hard copy at the Centre.	The duration of the advert. This is usually 3 months, but can be extended or taken down early at the request of the seller.
Wheelchair Hire	Contact details, medical condition, weight of user.	To provide a record of the hire, and to ensure the wheelchair is suitable for the needs of the user.	Legal Obligation	Anonymised data is shared with third parties in the form of statistics to aid in securing funding.	3 years