

**Independent Clinical Initiative Services Limited, (I C I S), take privacy very seriously. In undertaking the terms of engagement, you have requested, or, if you are one of our suppliers, that we have requested from you, we need to capture and hold information. This will enable the requirements of the service to be satisfied.**

**The European Union, (EU), General Data Protection Regulation, (GDPR) requires we notify you of our policy in regard to this. This document provides you with information that will help you understand our practices regarding your personal data and how we will treat it.**

## **1 Purpose of This Notice and Interpretation**

Within this notification, Independent Clinical Initiative Services Limited T/A ICIS is referred to as “We” / “Us” /”Our” and “You” or ”Your”, refers to the Commissioning Authority / Client, its Representative(s), Interested Parties or individual(s) who have engaged I C I S to provide service.

This notice describes how we collect and use personal data about you, in accordance with the General Data Protection Regulation, (GDPR), the Data Protection Act 1998 and other national implementing laws, regulations and secondary legislation, as amended or updated from time to time in the United Kingdom, (UK), (“Data Protection Legislation).

## **2 About Us**

Independent Clinical Initiative Services Limited, (I.C.I.S), is a private limited company providing training and family assessment / intervention programmes across the platform of social care and support for both children and adults. We are registered in England & Wales as a limited liability company under number 04786095; our registered office is at Gosforth Park Avenue, Newcastle upon Tyne NE12 8EG.

For the purpose of the Data Protection Legislation and this notice, we are the “data controller”. This means in effect, that we are responsible for deciding how we hold and use personal information. We are required, under this legislation, to provide notification of the information contained in this privacy notice.

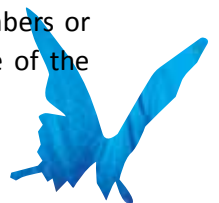
We have appointed a Data Compliance Officer who will be our “Data Protection Point of Contact”. The Data Compliance Officer is responsible for assisting with enquiries in relation to the privacy notice or our treatment of your personal data. You can contact our Data Compliance Officer, the details of which, can be found in point number 14 below.

## **3 The Kind of Information We Hold From**

We capture and hold some or all of the following information from you. This enables us to undertake and complete the terms of the engagement that have been requested; these include:

Contact information, including full name(s), title(s) or prefix, of employee(s), professional title(s) regarding position(s) of employment, telephone, (mobile and fixed line) and fax number(s) email addresses, employment address’ and possibly the same of your colleagues. Also, regarding assessment, therapy intervention programmes and clinical intervention programmes where our engagement requires working with your clients or service users, we will collect and process this same information, but may also process dates of birth, home address’ and telephone number(s), (mobile and fixed line), of this client group, that impact upon us being able to satisfy the terms of our engagement with you.

We may also capture and hold information relating to others, for example, family members or professionals of your client or service user, that are disclosed to us, during the course of the



engagement. This may be secured within a number of different forums, for example at meetings with you, or via correspondence or / and reports.

Should you visit our Web Site, we will capture, the information input at the time of registration. This will include, full name, title or prefix, the organisation(s) employed at, (if relevant to the purpose of the inquiry), the title regarding position of employment, telephone and fax number(s) and email addresses.

The categories of data listed in Section 3 are collected in the following ways and we collect information as part of the business engagement, and know your client (KYC), processes that are relevant and enable us to complete the engagement requested:

- During interaction with us, or through electronic platforms, eg our web site or electronic correspondence.
- We may collect or receive information relevant to the engagement from other sources, for example, in assessment(s) via court documentation.
- Data secured during meetings from the engaging authority or other(s), relevant to the engagement.
- If services are provided to I C I S, we will take administrative personal data, (personal contact details of personal or representative), to enable I C I S to administer the relationship with the supplier and to ensure we receive goods and services requested.

#### **4 How We Use Personal Data We Hold**

The data we capture is used to administer and complete the engagement requested. In addition, this may be used to advise of products we think may be of interest to you.

We may be requested, in fulfilling our legal and regulatory obligations, to use data we capture to establish or exercise or defend legal claims.

#### **5 Meetings and Attendance**

- We will collect and process personal information from you, that is relevant and integral to the engagement you have requested.
- We will collect and process information about other(s) from you that is relevant to the engagement requested.
- If you refuse to provide I C I S with certain information when we have requested it and that forms part of the remit of our engagement, we may not be able to perform the terms of the engagement we have entered, and, we may be unable to comply with our legal or regulatory obligations of the same.
- We may process data without your knowledge or consent, relating to the engagement requested, where we are legally required or permitted to do so.



## 6 Data Retention

We will only retain data captured during the course of the engagement you have requested, as long as it is necessary and to fulfil the purposes for which it is collected.

When we consider assessing what retention period is appropriate for the data we have collected, we take into consideration:

- The requirements of our business and the service(s) required.
- Any statutory or legal obligations.
- The purpose for which we originally collected the data.
- The lawful grounds on which we based our processing.
- The different categories of data we have collected.

## 7 Change of Purpose

Where it becomes apparent to use the data collected, for another reason, other than for the purpose for which it was collected; we will only use the data where the reason is compatible with the original purpose.

If it becomes necessary to use this data for another reason, we will communicate the legal basis that allows us to do so.

## 8 Data Sharing

We may share the data we collect with other parties, this will be in accordance with the terms of our engagement or where our written notification advises you of the same. Circumstances where this applies relate to:

- Other professionals, service users or clients, that are relevant to the terms of our engagement.
- IT and Cloud Service(s) applications.
- Third parties engaged in the process of our engagement, for example in regard to Assessment and Therapy Intervention Programmes, Solicitors, Barristers and Other Social Healthcare Professionals.
- Where necessary and to comply with our legal obligation(s) to parties external to I C I S.
- Where we are instructed by other(s) and based upon a notification to satisfy a court directive.
- Where in the future, we re-organise or transfer all or part of the business to a new entity.



## 9 Transferring Personal Data Outside Of The European Economic Area (EEA)

The requirement to provide data, we have captured about you, should at this time, not impact upon us transferring data though the EEA. However, should this become necessary, we will provide a notification to yourself, with details of the legal requirement we are satisfying.

## 10 Data Security

We have put in place commercially reasonable and appropriate security measures to prevent the data we collect during the period of our engagement, being accidentally lost, stolen, used, accessed, altered or disclosed in an unauthorised way. In addition, we limit access of the data we have secured during the engagement, to employees and third parties, who require access to satisfy the terms of the engagement or where there is a legal mandate to satisfy.

## 11 Rights of Access, Correction, Erasure and Restriction

Accuracy of the data, captured during the engagement needs to be kept as accurate and current. Should information, relevant to the engagement change, we need to be made aware of the change and we require you to contact us, to provide an update notification.

Certain circumstances, by law, provide you the right to access the data we hold. You have the right to:

- Request access to personal information that is relevant and was secured during the terms of the engagement undertaken.
- Request correction of the data held and that is pertinent to the terms of our engagement.
- Request erasure of the data. This means you can ask for us to delete or remove data, where there is a good reason for us to discontinue processing.
- Request the restriction of processing the data we hold. This will enable ICIS to suspend the process of collecting data relevant to the engagement, but may defer the conclusion of our engagement.
- Request the transfer of the data to yourself or other(s) or another data controller that will enable us process the terms of the engagement.

Should you wish to exercise any of the above, please contact the data controller, detailed in point 14 below, stating the basis of the request.

## 12 Right To Withdraw Consent

Certain limited circumstances, where data has been collected, may have consent withdrawn. Subject to there being no legal basis why this can not be accommodated, you are requested to contact the data protection officer detailed in point 14 below.

## 13 Changes To this Notification

Any changes we may make to our privacy notice will be updated on our website at [www.icisuk.com](http://www.icisuk.com)

Should you wish to contact us, regarding this notification, please either write or telephone, the contact details can be found at point 14.



You also have the right to make a complaint to the Information Commissioner's Office, (ICO), the United Kingdom's supervisory authority for data protection issues. The ICO's contact details are as follows:

Information Commissioner's Office

Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK8 5AF

Telephone: 0303 123 1113 (local rate) or 01625 545 745

Website – <http://ico.org.uk/concerns>

#### **14 Data Protection Point of Contact**

The contact details for our Data Protection Point of Contact are:

Mr Antony S Bainbridge  
Clinical Director  
Independent Clinical Initiative Services Limited  
PO BOX 584  
North Shields  
NE27 0WS

Email – [antony.bainbridge@icisuk.com](mailto:antony.bainbridge@icisuk.com)

Telephone Number 0191 216 16 41

