

PRIVACY STATEMENT

This Privacy Statement sets out the data processing practices carried out by Engaging Communities Solutions CIC (ECS), delivering local Healthwatch, Research, Engagement, Consultancy and Advocacy Services. We retain and use personal data (information that relates to and identifies living people) to help us carry out our role as the independent patient champion for people who use health and social care services.

Find out more about our purpose and what we do here: www.weareecs.co.uk

We will always make sure that your information is protected and treated securely. Any information that you give will be held in accordance with:

- Data Protection Act 2018
- the UK General Data Protection Regulation (UK GDPR)

We are registered with the UK supervisory authority, Information Commissioner's Office ("ICO"), in relation to our processing of Personal Data under registration number ZA063891.

INFORMATION WE COLLECT

We collect personal information from visitors to this website through the use of online forms and every time you email us your details. We also collect feedback and views from people about the health and social care services that they access. In addition, we receive information about our own staff and people who apply to work for us.

- Information about people who use our website
- Information about people who share their experiences with us by other means
- Information about our own staff and people applying to work for us

SECURITY

We are strongly committed to data security, and we take reasonable and appropriate steps to protect your personal information from unauthorised access, loss, misuse, alteration, or corruption.

We have put in place physical, electronic, and managerial procedures to safeguard and secure the information you provide to us.

Only authorised employees and contractors under strict controls will have access to your personal information. We also require our staff to undertake training on data protection when they join the organisation and refresher training every year to make sure your information is handled sensitively and securely.

INFORMATION ABOUT PEOPLE WHO USE OUR WEBSITE

Please note that this statement does not cover links within our websites to other websites.

We use Google Analytics to monitor use of our website. Google Analytics uses cookies to help analyse how people use our site.

When you browse through the information on our websites, it does not store or capture your personal information. We do log your IP address (as it is automatically recognised by the web server) but this is only so you can download this website onto your device rather than for any tracking purpose; it is not used for any other purpose.

We will only collect personal information provided by you, such as:

- feedback from surveys and online forms
- email addresses
- preferred means of communication.

We seek your consent to use non-essential cookies when you first visit our website.

COOKIES

Please be aware that some of our systems on our website require the use of cookies, but we will always state if this is the case. We will never collect and store information about you without your permission.

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added, and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

HOW WE WILL USE YOUR PERSONAL INFORMATION

Personal information about you can be used for the following purposes and under the following lawful bases:

- in our day-to-day work (legitimate interests).

- to send you our newsletter where you have requested it (consent).
- to respond to any queries that you may have (legitimate interests).
- to improve the quality and safety of care (performance of a contract).

This may include any personal information that you choose to share with us, but we will treat this as confidential and protect it accordingly.

We will never include your personal information in survey reports.

Please note that where it is necessary for the performance of a contract to which you are a party, we will be unable to provide our services without the required information.

INFORMATION ABOUT PEOPLE WHO SHARE THEIR EXPERIENCES WITH US BY OTHER MEANS

There are a number of ways that we collect feedback from people about their experiences of using health and social care services day to day. Our staff will visit different health and social care settings as part of their role to evaluate how services are being delivered. We also receive phone calls and requests for information directly from members of the public as part of our signposting service.

Where personally identifiable information is collected, we will ensure that we have your consent to keep it and we will be clear on how we intend to use your information. We will aim to anonymise information where we can but there may be instances where this is not possible in order to make change happen on your behalf. There may be exceptional circumstances where we can and will keep the data without consent, but we must have a lawful basis for doing so, such as for safeguarding purposes.

We ensure that where consent is required it will be freely given, used only for agreed specific and unambiguous purposes and that you are well informed about how the information will be kept. This includes where it will be stored, details on security and for how long it will be kept. We will comply with current data protection legislation at all times.

Personal information may be collected with your consent through:

- Our signposting and advice service
- Research surveys and focus groups
- When we receive feedback by phone, outreach work or through surveys
- Advocacy referrals and case work
- Enter and View activity

PERSONAL DATA RECEIVED FROM OTHER SOURCES

On occasion we will receive information from the families, friends and carers of people who access health and social care services. We use this data to inform providers and commissioners to help them deliver services that work for you.

Where it is practically possible, we will make sure that we have your consent to use information that is about you. We will only process your personal data where there is a lawful basis to do so under current data protection legislation.

PUBLISHING INFORMATION

In most circumstances, we anonymise our data to ensure that a person cannot be identified, unless this has been otherwise agreed and consent has been given.

SHARING YOUR DATA WITH HEALTHWATCH ENGLAND

When we deliver a local Healthwatch contract, we are required to share information with Healthwatch England to ensure that your views are considered at a national level. This enables them to analyse service provision across the country and supply the Department of Health and national commissioners with the information you provide.

[Find out more about Healthwatch England's purpose and what they do.](#)

The information we provide to Healthwatch England contains no personally identifiable data. Any information that is used for national publications is anonymised and will only be used with the consent of a local Healthwatch.

OUR DATA SYSTEMS

We have invested in our IT infrastructure and systems and use a secure digital system to manage our data as we are committed to keeping your data secure. We use a variety of security technologies and procedures to help protect your personal data from unauthorised access, use or disclosure.

INFORMATION ABOUT OUR OWN STAFF AND PEOPLE APPLYING TO WORK WITH US We need to process personal data about our own staff (and people applying to work for us) so that we can carry out our role and meet our legal and contractual responsibilities as an employer.

The personal data that we process includes information about racial or ethnic origin, religion, disability, gender, and sexuality. We use this information to check we are promoting and ensuring diversity in our workforce and to make sure we are complying with equalities legislation.

Our employees decide whether or not to share this monitoring data with us and can choose to withdraw their consent for this at any time. Employees who wish to withdraw their consent for us to process this data can let us know.

Other personal data that we are required to process includes information on qualifications and experience, pay and performance, contact details and bank details.

We check that people who work for us are fit and suitable for their roles. This may include asking people to undertake [Disclosure and Barring Service](#) (DBS) checks.

All employees will be asked to complete a 'declaration of interests' form to identify any services with which they have close links (for example, because they have previously

worked there or because the service is run by a close relative) or any other issues which could cause a perceived conflict of interest. Staff are regularly asked to update these forms.

We have a legal obligation to comply with the Freedom of Information Act 2000 and this may include the requirement to disclose some information about our employees – especially those in senior or public facing roles. We also publish some information about our staff, including the names and work contact details of people in some roles.

HOW WE SHARE INFORMATION WITH OTHER ORGANISATIONS

We only share personal information with other organisations where it is lawful to do so and in accordance with our Information Governance Policy. Information is shared in order to fulfil our remit which is to pass on your experiences of care to help improve them on your behalf.

We work with Healthwatch England, the Care Quality Commission (CQC), local commissioners, NHS Improvement, and our local authority to make this happen. We can also engage external suppliers to process personal information on our behalf.

We will only disclose your personal information where we have your consent to do so, or where there is another very good reason to make the disclosure - for example, we may disclose information to the CQC or a local authority where we think it is necessary to do so in order to protect a vulnerable person from abuse or harm. Any such disclosure will be made in accordance with the requirements of the current data protection legislation.

Wherever possible, we will ensure that any information that we share or disclose is anonymised, to ensure that you cannot be identified from it.

We will not sell, distribute, or lease your personal information to third parties unless we have your permission or are required by law to do so. We may use your personal information to send you promotional information about third parties which we think you may find interesting if you tell us that you wish this to happen.

We sometimes use other organisations to process personal data on our behalf. Where we do this, those companies are required to follow the same rules and information security requirements as us, outlined in a Data Processing Contract. They are not permitted to use or reuse the data for other purposes.

RETENTION AND DISPOSAL OF PERSONAL DATA

We maintain a retention and disposal schedule which explains how long we keep different types of records and documents for, including records and documents containing personal data. Personal data is deleted or securely destroyed at the end of its retention period.

You can view our retention and disposal schedule 2024/2025 at Appendix 1 at the end of this privacy statement.

YOUR RIGHT TO ACCESS INFORMATION ABOUT YOU

If you think we may hold personal data relating to you and want to see it, please write to SAR@weareecs.co.uk A small fee may be payable.

CORRECTING OR DELETING YOUR PERSONAL DATA

If you know that we are holding your personal data and believe that it may be wrong or incomplete, or if you want it to be deleted or for us to stop using it, you have a right to request that it can be deleted or amended. We will promptly correct any information found to be incorrect.

Please make your objection in writing to the Corporate Services Manager.

Email: SAR@weareecs.co.uk

Or send it by post to:

Engaging Communities Solutions CIC

Meeting Point House

Southwater Square

Telford

TF3 4HS.

COMPLAINTS ABOUT HOW WE LOOK AFTER OR USE YOUR INFORMATION

If you feel that we have not met our responsibilities under data protection legislation, you have a right to request an independent assessment from the Information Commissioner's Office (ICO). You can find details [on their website](#).

OUR CONTACT DETAILS AND KEY ROLES

Engaging Communities Solutions (ECS) is data controller for all the personal data that you provide us with. Any issues relating to the processing of personal data by or on behalf of ECS may be addressed to: Engaging Communities Solutions CIC, Meeting Point House, Southwater Square, Telford, TF3 4HS.

Telephone: 0800 470 1518

Email: contactus@weareecs.co.uk

Ametros Group Ltd. is the designated Data Protection Officer for ECS England under Article 37 of the GDPR. They can be contacted using the details that follow:

dpo@ametrosgroup.com Telephone: 0330 2232246

Appendix 1

Data retention and record keeping and destruction schedule

1. Policy statement

Engaging Communities Solutions CIC recognises the importance of keeping all data safe and secure and we take all necessary steps to ensure we do this and comply with all relevant laws, regulations, and guidance.

Accurate, proportionate records are kept to:

- Provide a high-quality service to patients and the public.
- To ensure that feedback can be provided.
- To ensure good support and supervision to volunteers
- To comply with all employment, charity, and company legal requirements
- To comply with quality assurance systems.

All records are made and held in accordance with the principles of the Data Protection Act 1998. It is Engaging Communities Solution (ECS) responsibility to ensure that their activities, whether solely or as part of another organisation, are covered by their registration with the Information Commissioner's Office.

Records are retained for the period specified in the procedure below, and with the exception of items that must be stored permanently, are then safely destroyed.

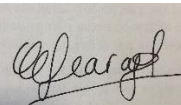
2. Procedure

1. All paper-based records are held securely in a locked filing cabinet. These include, HR files, comments received, signed consent forms and Record of Concerns Forms (ROCA). Where possible such records should be scanned and saved electronically.
2. Electronic files are kept securely, are password protected and regularly backed up. These include the database, payroll information, financial records, all HR records, and retention records.

3. Members of the public who choose to engage with ECS are asked for consent that their comments be stored on a secure database and informed that personal information will be kept confidential and will not be shared unless express consent has been given. When asking for consent to pass on personal details, ECS will always confirm how the information will be used and passed on.
4. When DBS checks are requested, ECS will keep a record of the DBS reference number and the date the check was completed on the relevant volunteer or staff file, but do not keep a copy of the DBS check.
5. ECS complies with the requirements of company law and records are maintained and retained in accordance with the retention summary below. ECS also complies with the Statement of Recommended Practice (SORP) in relation to its financial record keeping and reporting; and all financial records are retained in accordance with the retention summary below.
6. ECS stores insurance policies and employer's liability insurance certificates and records relating to the ownership or leasehold of premises securely and in line with the retention summary below.
7. Confidential hard copy records that are waiting to be destroyed should be kept securely and shredded or disposed of using a reputable company.
8. Electronic records should be destroyed in line with the retention schedule below by a reputable company and a certificate of destruction provided.

This policy was adopted in April 2024 and will be reviewed in April 2025.

ECS Managing Director: Elizabeth Learoyd

Signature: 

Retention schedule

Retention of records in Engaging Communities Solutions (ECS).

Employment Staff and volunteer records should be retained for six years after the end of employment but need to only contain sufficient information in order to provide a reference (e.g., training, and disciplinary records).

Copies of any reference given should be retained for six years after the reference request.
Director's files should be retained for six years.

Application form	Duration of employment, destroy when employment ends
References received	Duration of employment, destroy when employment ends
Sickness and maternity records	Six years from end of employment
Annual leave records	Six years from end of employment
Unpaid leave/special leave records	Six years from end of employment
Records relating to an injury or accident at work	12 years
References given/information to enable a reference to be provided	Six years from end of employment
Recruitment and selection material (unsuccessful candidates)	Two years after recruitment is finalised
Disciplinary records	Six years after employment has ended
Statutory maternity pay records, calculations, and certificates	Retain while employed and for seven years after employment has ended
Redundancy details, calculation of payments and refunds	Seven years from date of redundancy
<p>Note: if an allegation has been made about the member of staff, volunteer, or trustee the staff record should be retained until they reach the normal retirement age or for ten years if that is longer. E.g., around Safeguarding.</p>	
<p>Record of comments and other evidence, e.g., observations, interviews, enter and view notes.</p>	
Comments recorded on internal databases	Comments recorded on internal databases
Retain in line with local policy	Retain in line with local policy
Any paper-based comments recorded on the database.	Any paper-based comments recorded on the database.

One year (This is in case there is a query regarding an entry on the database)	One year (This is in case there is a query regarding an entry on the database)
DBS checks	
Record disclosure reference numbers. and date of check and return to the volunteer or staff member.	
Record of concern forms (ROCA)	
All ROCAs and related information should be kept for ten years. If the record relates to children and young people, the record must be kept until they are 21 years old before destroying. Financial records	
Financial records	
Financial records	Financial records
Six years (public funded companies)	Six years (public funded companies)
Income tax and NI returns, income tax records and correspondence with HMRC	Income tax and NI returns, income tax records and correspondence with HMRC
Not less than three years after the end of the financial year to which they relate	Not less than three years after the end of the financial year to which they relate
Payroll records (also overtime, bonuses, expenses)	Payroll records (also overtime, bonuses, expenses)
Corporate	
Employers' liability certificate	40 years
Insurance policies	Permanently
Certificate of incorporation	Permanently
Minutes of Board of Trustees	Permanently
Memorandum of association	Original to be kept permanently
Articles of association	Original to be kept permanently
Variations to the governing documents	Original to be kept permanently

Statutory registers	Permanently
Membership records	20 years from commencement of membership register
Rental or hire purchase agreements	Six years after expiry
Research	
Research records, including transcripts, survey responses and analysis records	3 months after the final report has been accepted by commissioner or published on relevant ECS/Healthwatch website.
Others	
Deeds of title	Permanently
Leases	12 years after lease has expired
Accident Books	Three years from the date of the last entry (or, if the accident involves a child/ young adult, then until that person reaches the age of 21).
Health and safety policy documents	Retain until superseded
Assessment of risks under health and safety legislation	Retain until superseded