

COTSWOLD NEURODEVELOPMENTAL SERVICE LTD. – PRIVACY POLICY

Last updated: 19 April 2026

Cotswold Neurodevelopmental Service Ltd. ("CNS", "we", "us", "our") is committed to protecting your personal data and respecting your privacy. This Privacy Policy explains how we collect, use, store, and protect personal information in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

1. Data Controller and Contact Details

Data Controller: Cotswold Neurodevelopmental Service Ltd.

Data Protection Lead: Mark Brady

Email: Admin@cotswoldneuro.com

Where CNS engages associate clinicians or contractors, they act as independent data controllers for the clients they work with directly and are responsible for their own data protection compliance.

2. The Personal Data We Collect

We collect and process the following categories of personal data:

a. Identity and Contact Information

- Name
- Postal address
- Email address
- Telephone number
- Date of birth

b. Health and Special Category Data

- Medical, psychological, and developmental history
- Assessment information and clinical notes
- NHS number
- GP, school, and other professional details

c. Administrative and Financial Information

- Appointment records
- Invoicing and payment information
- Health insurance details (where applicable)

d. Website and Communication Data

- Information submitted via our website contact form
- Records of email, telephone, or written correspondence

Where services are commissioned by third parties (such as GPs, local authorities, NHS bodies, or private insurers), relevant personal data may be provided to us to enable service delivery.

3. Lawful Bases for Processing

Under UK GDPR, we rely on the following lawful bases to process personal data:

- **Article 6(1)(b)** – Performance of a contract (providing agreed clinical services)
- **Article 6(1)(c)** – Compliance with a legal obligation
- **Article 6(1)(e)** – Performance of a task carried out in the public interest (where applicable)
- **Article 6(1)(f)** – Legitimate interests (administration, safeguarding, and service quality)
- **Article 9(2)(h)** – Provision of health or social care (processing special category health data)
- **Article 9(2)(c) and (g)** – Vital interests and safeguarding where there is risk of harm

Where consent is required (e.g. sharing reports with third parties), this will be obtained explicitly and can be withdrawn at any time.

4. How We Use Personal Data

We use personal data to:

- Deliver neurodevelopmental and clinical services
- Arrange and manage appointments
- Communicate with clients, parents, or carers
- Carry out assessments and prepare reports
- Invoice clients or third-party funders
- Liaise (with consent or legal justification) with GPs, schools, NHS services, local authorities, and other professionals

- Manage safeguarding and risk

We do not use personal data for marketing purposes.

5. Data Sharing

Personal data may be shared with:

- CNS staff and associate clinicians on a strict need-to-know basis
- Healthcare, education, and social care professionals involved in care
- Regulatory or legal authorities where required by law

We only share the minimum necessary information and ensure appropriate safeguards are in place.

6. Data Storage and Security

We take appropriate technical and organisational measures to protect personal data, including:

- Locked storage for paper records
- Password-protected and GDPR-compliant electronic systems
- Role-based access controls
- Encrypted devices where personal data is stored
- Regular data backups

Sensitive information is only sent electronically with consent and using secure methods.

7. Data Retention

We retain personal data only for as long as necessary. Health records are retained in line with professional guidance and legal requirements (normally **at least 8 years after discharge, or until a child reaches age 25**, whichever is longer), unless a longer period is required by law.

Data that is no longer required is securely deleted or destroyed.

8. International Data Transfers

We do not routinely transfer personal data outside the UK. Where any data is processed by IT service providers outside the UK, appropriate safeguards (such as UK adequacy regulations or standard contractual clauses) are in place.

9. Your Rights Under UK GDPR

You have the right to:

- Access your personal data
- Rectify inaccurate or incomplete data
- Request erasure of data (where legally possible)
- Restrict processing
- Object to processing
- Data portability
- Withdraw consent at any time (where processing is based on consent)

There is no fee for making a subject access request. Requests will usually be responded to within **one month**.

Requests should be made in writing to the Data Protection Lead.

10. Data Breaches

In the event of a personal data breach, CNS will:

- Assess the risk to individuals
 - Notify the Information Commissioner's Office (ICO) within 72 hours where required
 - Inform affected individuals without undue delay where there is a high risk to their rights and freedoms
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11. Complaints

If you have concerns about how your data is handled, please contact CNS first. You also have the right to complain to:

Information Commissioner's Office (ICO)

Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Tel: 0303 123 1113

Website: <https://www.ico.org.uk>

12. Cookies

Our website uses essential and performance cookies to ensure functionality and monitor usage. Cookies are managed via our website provider. No unnecessary cookies are placed without consent.

You can manage or disable cookies through your browser settings. Further information is available at: <http://www.aboutcookies.org>

13. Changes to This Policy

We may update this Privacy Policy from time to time. The most recent version will always be available on our website and will show the date of the last update.