

# PRIVACY POLICY

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## 1. Introduction

Consulting Well is committed to protecting the privacy and security of personal information.

This Privacy Policy explains how we collect, use, store and protect personal data when individuals interact with our services.

We process personal data in accordance with:

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

This policy should be read alongside our **Data Protection Policy and Information Security Policy**, which define how personal data is protected within our organisation.

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## 2. Who We Are

Consulting Well provides professional services supporting fostering and adoption processes.

For the purposes of data protection legislation, **Consulting Well acts as the Data Controller** for the personal information it processes.

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## 3. Personal Data We Collect

We may collect and process different types of personal information including:

### Communication Data

Examples include:

- name
- address
- email address
- telephone number
- date of birth

This information is used to respond to enquiries, communicate with individuals and deliver services.

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## Customer Data

Information related to services provided to clients including:

- contact details
- service records
- appointment information

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## Special Category Data

In some circumstances we process **sensitive personal data**, including health information.

This may include:

- medical reports
- information provided during application assessments
- health information required for professional assessments

Special category data will be processed only where:

- explicit consent has been obtained; or
- another lawful basis under UK GDPR applies.

Additional safeguards are applied, including:

- restricted access to authorised individuals
- secure storage within protected systems
- defined retention periods and secure deletion procedures.

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## 4. Legal Basis for Processing

Consulting Well processes personal data only where a lawful basis exists under UK GDPR.

<b>Purpose of Processing</b>	<b>Type of Data</b>	<b>Lawful Basis</b>
Responding to enquiries and communications	Contact information	Legitimate interest
Providing professional services	Client and service information	Contractual necessity

<b>Purpose of Processing</b>	<b>Type of Data</b>	<b>Lawful Basis</b>
Processing health or assessment information	Special category data	Explicit consent
Administrative and operational activities	Business contact information	Legitimate interest
Compliance with legal obligations	Various business records	Legal obligation

Where special category personal data is processed, additional safeguards and legal conditions apply.

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## **5. How We Collect Personal Data**

We collect personal information through:

### **Direct Interactions**

Individuals may provide information directly when they:

- complete enquiry forms
- communicate with us by email or telephone
- participate in consultations or assessments

### **Third Parties**

In some circumstances we may receive information from organisations such as:

- fostering or adoption agencies
  - partner organisations involved in assessments or service delivery
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## **6. Use of AI-Assisted Tools**

Consulting Well may use carefully selected **AI-assisted administrative tools** to support efficient service delivery.

All use of AI tools complies with UK GDPR and appropriate security standards.

Where personal or sensitive data is processed using AI-assisted tools, this occurs only where:

- explicit consent has been obtained; or
- processing is necessary to provide services.

All outputs generated by AI systems are reviewed by a qualified professional.

AI systems do **not make automated decisions about individuals**.

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## 7. Microsoft 365 Copilot

Consulting Well may use **Microsoft 365 Copilot (enterprise)** to assist with administrative tasks.

Copilot operates within the organisation's Microsoft 365 environment and accesses information only according to existing user permissions.

Security safeguards include:

- encryption in transit and at rest
- tenant isolation within Microsoft 365
- organisational control over data access

Copilot is used to support administrative processes and does not replace professional judgement.

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## 8. Sharing Personal Data

Personal information may be shared where necessary with:

- fostering or adoption services involved in assessments
- associates providing services on behalf of Consulting Well
- professional advisers
- regulatory or legal authorities where required by law

All third parties must process personal data securely and in accordance with data protection requirements.

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## 9. Data Security

Consulting Well implements technical and organisational measures to protect personal data.

Security measures include:

- secure cloud systems
- strong password and authentication controls
- multi-factor authentication

- restricted access to sensitive information
- staff awareness and training

These measures protect the **confidentiality, integrity and availability** of personal information.

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## 10. Data Retention

Personal data is retained only for as long as necessary to fulfil the purposes for which it was collected.

Retention periods are defined in the organisation's **Data Retention Policy**.

When personal data is no longer required it will be securely deleted.

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## 11. Individual Rights

Individuals have rights regarding their personal data.

These include:

- the right to access personal data
- the right to correct inaccurate information
- the right to request deletion of data
- the right to restrict processing
- the right to object to processing
- the right to data portability where applicable

Requests will normally be responded to within **one month**.

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## 12. Complaints

If you have concerns about how your personal data is handled, you may contact us directly.

Individuals also have the right to lodge a complaint with the **Information Commissioner's Office (ICO)**.

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## 13. Cookies

Our website may use cookies to improve functionality and user experience.

Cookies may include:

- essential cookies required for website operation
- performance cookies that help us understand website usage
- functional cookies that remember user preferences

Users may manage cookie preferences through their browser settings.

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#### **14. Policy Updates**

Consulting Well may update this Privacy Policy periodically to reflect changes in legal requirements, technology or services.

Updated versions will be published on our website.

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#### **15. Contact Information**

If you have questions about this Privacy Policy or how we handle personal data, please contact:

**Email:** [medicals@consultingwell.co.uk](mailto:medicals@consultingwell.co.uk)

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#### **16. Approval**

**Name:** Lorna MacColl

**Position:** Director

**Date:** 11 March 2026

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