

# Privacy Policy

## **Introduction**

At Consulting Well, we are committed to protecting the privacy and security of your personal information. This Privacy Policy outlines the types of personal information we collect, how it is used, and the measures we take to ensure your data is handled securely.

Our goal is to provide you with transparent and detailed information about our privacy practices, so you can make informed decisions when using our services. Whether you are a client, supplier, customer, or just visiting our website, we respect your privacy and are dedicated to protecting your personal data in accordance with this policy and applicable laws.

## **What personal information we collect**

At Consulting Well, we may access and store various types of personal information to enable us to provide our fostering and adoption support services effectively. Consulting Well acts as the Data Controller for the personal information we process.

Communication data	<p>Such as your name, address, email, phone number and date of birth</p> <p>To respond to your enquires and/or validate your identity</p> <p>Legal ground: legitimate interest to respond to communications and/or to establish &amp; pursue legal claims</p>
Sensitive data	<p>Application and Medical Information</p> <p>From your personal health record or electronic integrated care record and notes from your application medical appointment</p> <p>Provided by applicants as part of the fostering or adoption process</p> <p>Legal ground: Your explicit consent is required to allow us to process your sensitive data</p>
Customer data	<p>Such as name, address, email, phone number</p> <p>Relating to the purchase of services</p> <p>Legal basis: To allow us to fulfil the contracted services</p>

## How we collect your information

Direct interactions	You may provide us with your information when you complete enquiry forms or communicate directly with us
Third Parties	We may receive information about you from third parties, including the fostering or adoption services responsible for co-ordinating your assessments

## Use of Artificial Intelligence assisted tools

At Consulting Well, we use carefully selected AI-based tools to support the accuracy and efficiency of administrative and medical processes. All use is compliant with UK GDPR and requires your explicit consent. We only use AI tools whose suppliers demonstrate robust security standards such as ISO 27001, Cyber Essentials Plus, or equivalent independent certification where applicable to the service being provided.

Medical Transcription Software	<p>We may use secure AI transcription software (such as Heidi Health, Tortus or similar UK GDPR compliant providers). These products</p> <p>Do not store or retain audio recordings</p> <p>Store the generated text transcription for a maximum of 7 days before automatic deletion</p> <p>Ensure all data is encrypted in transit and at rest</p> <p>Require strong authentication controls</p> <p>Operate within UK GDPR-compliant environments with no secondary use of your data</p> <p>Operate in accordance with UK GDPR principles of data minimisation and security</p>
Microsoft 365 Copilot (Work Environment Only)	<p>We may use Microsoft 365 Copilot (Work version, not web-based) to assist with administrative aspects of the medical assessment and support processes.</p> <p>Copilot <b>only</b> has access to data already held within our secure Microsoft 365 environment</p> <p>Data used within Copilot is not used to train Microsoft's foundation models.</p>

The legal basis for processing data using AI-assisted tools is your explicit consent, given the involvement of special category health data.

Administrative AI tools (such as Microsoft 365 Copilot) may also process communication data under our legitimate interest to support efficient and accurate service delivery.

All outputs generated by AI tools are reviewed and validated by a qualified professional. AI tools do not make decisions or provide clinical judgement.

You may choose not to have your data processed using AI-assisted tools, and this will not adversely affect the service you receive.

### **Automated Decision Making and Profiling**

We do not carry out automated decision-making or any type of automated profiling

### **Data sharing and disclosure**

At Consulting Well we only share your personal information with

The appropriate fostering and adoption agency or team for whom we are providing services
Service providers (associates) who perform services on our behalf such as administrative support function and medical consultations. All associates work in compliance with Consulting Well data protection and information sharing policies
Legal and regulatory authorities if required by law, to comply with legal processes, respond to claims or protect the rights or safety of our company

We are committed to ensuring that your information is secure and only used in accordance with this policy. We do not sell, trade, or otherwise transfer your personal identifiable information to outside parties without your consent, except as described in this policy.

### **Data Security**

At Consulting Well we recognise the importance of securing your personal information. We have implemented a variety of security measures to maintain the safety of your personal data from unauthorised access, alteration, disclosure, or destruction. These measures include:

Technology safeguards including firewalls, multifactor authentication, password protection and access restriction
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Employee and supplier training and awareness to ensure application of data protection and information security policy processes.

### Data breach notification

In the event of a data breach that might expose your personal information we will notify you and any applicable regulator when we are legally required to do so.

### Data Retention

At Consulting Well we are committed to only retaining your personal information for as long as necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements.

#### Criteria for determining retention periods

Operational purposes	Personal data is retained for the period required for us to perform services for you  For applicants this could be a period of up to 180 days
Contractual necessity	Data is retained to fulfil our contractual obligations
Legal obligation	Retention as required by law such as corporate and tax laws
Training & development	In some circumstances we may fully deidentify your personal data for training purposes. In which case we may use this data indefinitely without further notice to you

### Disposal of data

On expiry of the retention period all data is securely deleted

### User Rights

#### Your Rights Regarding Personal Data

At Consulting Well, we ensure that you have significant control over your personal information. Below are the rights that you, as a data subject, have in relation to your personal data:

Right to Access	To request access to the personal data we hold about you and to obtain information about how we process it
Right to Rectification	To request that we correct any inaccurate or incomplete personal data we hold about you
Right to Erasure	You can ask us to delete or remove personal data where there is no good reason for us continuing to process it
Right to Restrict Processing	To request that we suspend the processing of your personal data, for example if you want us to establish its accuracy or the reason for processing it
Right to Data Portability	To request the transfer of your personal data to another party in a structured, commonly used, and machine-readable format
Right to Object	To object to the processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground
Right to Withdraw Consent	Where you have given consent for our use of your personal data, you have the right to withdraw that consent at any time

### Exercising Your Rights

To exercise any of these rights, please use the form in this link to [Contact Us](#). We aim to respond to all legitimate requests within one month and shall notify you of the action we have taken.

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If you believe that we have not been able to assist with your complaint or concern you have the right to make a complaint to the Information Commissioner's Office.

## **Cookies and Tracking Technologies**

### **What are cookies and why do we use them**

At Consulting Well, we use cookies and similar tracking technologies to enhance your browsing experience and provide our services. Cookies are small text files that are stored on your browser or device by websites, apps, online media, and advertisements. There are several types of cookies:

Essential Cookies	Are vital for the basic functionality of our website and are automatically enabled when you use it to support the functional aspects of our website, such as user account functionality
Performance Cookies	Help us understand how visitors interact with our website by providing information about the areas visited, the time spent on the site, and any issues encountered, such as error messages. By understanding how you use our services, we can improve them, making them more efficient and accessible
Functional Cookies	Enhance functionality and personalisation, such as remembering your preferences and settings, so you have a better user experience

### **Your Choices Regarding Cookies**

If you prefer to avoid the use of cookies on our website, first you must disable the use of cookies in your browser and then delete the cookies associated with this website that may be saved in your browser. You may use this option for preventing the use of cookies at any time.

If you do not accept our cookies, you may experience some inconvenience in your use of our website and some features may not function properly.

## **Policy Updates**

### **Changes to This Privacy Policy**

At Consulting Well we are committed to maintaining the highest standards of privacy and protection of your personal data. To reflect changes in our business practices, technology, or legal requirements, we may update this Privacy Policy from time to time.

### How We Notify You About Changes

We will notify you of any significant changes to our privacy policy by posting a prominent notice on our website and, if applicable, sending you a direct communication. We encourage you to periodically review this page for the latest information on our privacy practices.

### Effective Date

This policy was last updated on 28 November 2025. Any changes or modifications will be effective immediately upon posting the updated Privacy Policy on our website, unless otherwise noted.

### **Contact Information**

#### How to Contact Us

If you have any questions, concerns, or complaints about our Privacy Policy or the practices of our services, you are encouraged to contact our privacy officer at:

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

- email us
- let us have enough information to identify you
- let us have proof of your identity (a copy of your driving licence, passport or a recent credit card/utility bill)
- let us know the information to which your request relates