

# ENHANCING FUTURES LTD

## PRIVACY NOTICE



Version: 1.0

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Review Date: June 2027

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### 1. INTRODUCTION

Enhancing Futures Ltd is committed to protecting the privacy, confidentiality and security of the personal information entrusted to us. We recognise the importance of handling personal information responsibly and transparently and are committed to complying with applicable data protection legislation.

This Privacy Notice explains how Enhancing Futures Ltd collects, uses, stores, shares and protects personal information when providing assessments, interventions, medication services, training, consultancy and other services.

This Privacy Notice applies to all individuals who engage with Enhancing Futures Ltd, including clients, parents, carers, family members, training participants, consultees, professionals and representatives acting on behalf of others.

Enhancing Futures Ltd processes personal information in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other applicable legislation.

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### 2. WHO WE ARE

Enhancing Futures Ltd is the data controller responsible for determining how personal information is processed.

**Enhancing Futures Ltd**

Company Number: 12401434

One Regent Place Wellbeing Centre

1 Regent Place

Rugby

Warwickshire

CV21 2PJ

Telephone: 07309 730951

Email: [contact@enhancingfutures.co.uk](mailto:contact@enhancingfutures.co.uk)

If you have any questions regarding this Privacy Notice or the way in which your information is handled, please contact us using the details above.

### 3. THE INFORMATION WE COLLECT

Depending upon the services being provided, we may collect and process the following categories of information.

#### **Personal Information**

This may include:

- Full names;
- Home addresses;
- Email addresses;
- Telephone numbers;
- Dates of birth;
- NHS numbers;
- GP details;
- Emergency contact details;
- Information relating to parental responsibility;
- Educational setting information;
- Employment details where relevant to the service being provided.

#### **Special Category Information**

In order to provide healthcare and related services, we may process information relating to:

- Physical health;
- Mental health;
- Neurodevelopmental differences;
- Medications and prescribing information;
- Developmental history;
- Family circumstances;
- Educational needs;
- Disabilities;
- Assessment outcomes;
- Therapeutic interventions;
- Safeguarding concerns.

#### **Information Obtained From Third Parties**

Where appropriate and lawful, information may also be obtained from:

- General Practitioners;
- Schools and educational settings;
- Other healthcare professionals;
- Local authorities;
- Social care services;
- Family members or carers;
- Legal representatives;
- Other individuals involved in the client's care.

## 4. WHY WE COLLECT YOUR INFORMATION

We collect and use personal information to:

- Provide assessments, interventions and other services;
- Develop reports and recommendations;
- Maintain clinical records;
- Prescribe and monitor medication;
- Communicate with clients, families and professionals;
- Coordinate care with other providers;
- Manage appointments and bookings;
- Process invoices and payments;
- Recover outstanding debts where necessary;
- Undertake quality assurance activities;
- Meet legal and regulatory obligations;
- Investigate complaints;
- Defend legal claims;
- Protect children and vulnerable adults through safeguarding processes.

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## 5. OUR LEGAL BASIS FOR PROCESSING

Under UK GDPR, we must identify a lawful basis for processing personal information.

### Article 6 UK GDPR

We may process personal information because processing is necessary for:

- The performance of a contract;
- Compliance with legal obligations;
- Legitimate interests pursued by Enhancing Futures Ltd;
- Consent, where required.

### Article 9 UK GDPR

Where health or other special category information is processed, this is generally because processing is necessary for:

- The provision of health or social care;
- Safeguarding purposes;
- Reasons of substantial public interest;
- The establishment, exercise or defence of legal claims;
- Compliance with legal obligations.

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## 6. CLINICAL DOCUMENTATION AND USE OF DIGITAL SYSTEMS

Enhancing Futures Ltd uses approved digital systems and technologies to support the safe, efficient and effective delivery of services.

This includes the use of Cliniko, which supports the administration and management of services. Information held within Cliniko may include:

- Personal and contact details;
- Appointment information;
- Clinical records;
- Reports and correspondence;
- Invoices and payment information;
- Consent documentation;
- Treatment and service information.

Enhancing Futures Ltd also uses Heidi Health, a clinical documentation platform that may assist professionals in creating draft clinical notes and related documentation based upon information discussed during appointments.

Information processed through Heidi Health and similar technologies may be used to generate:

- Clinical notes;
- Reports;
- Correspondence;
- Summaries;
- Medication documentation;
- Treatment records; and
- Other records required for the safe and effective provision of services.

Enhancing Futures Ltd may also utilise other appropriate electronic systems, software applications and service providers to support the administration, delivery, governance and continuous improvement of services. These may include systems used for:

- Appointment scheduling and management;
- Secure communication;
- Electronic record keeping;
- Online consultations and remote service delivery;
- Billing and payment processing;
- Quality assurance and audit activities;
- Training and educational activities;
- Information governance and regulatory compliance; and
- Other legitimate operational purposes.

Enhancing Futures Ltd undertakes appropriate due diligence when selecting digital service providers and seeks to ensure that systems used to process personal information maintain appropriate standards of security, confidentiality and data protection consistent with applicable legislation.

The use of these systems forms part of our routine record-keeping and service delivery processes and supports accuracy, quality assurance, continuity of care and the efficient administration of services.

Clinical notes, draft notes, transcripts, dictations, summaries and other internal working documents generated through these systems form part of the clinical record maintained by Enhancing Futures Ltd.

Clients will not routinely receive copies of clinical notes, draft notes, transcripts, dictations or other internal working documents generated through these systems. Requests for access to information held by Enhancing Futures Ltd will be managed in accordance with applicable data protection legislation and our Subject Access Request procedures.

## 7. WHO WE MAY SHARE INFORMATION WITH

Information may be shared where appropriate and lawful with:

- General Practitioners;
- Schools and educational settings;
- Other healthcare professionals;
- Pharmacies;
- Local authorities;
- Social care services;
- Safeguarding agencies;
- Legal representatives;
- Regulators;
- Courts and tribunals;
- Insurers or funding organisations where appropriate authority exists;
- Approved service providers supporting our operations.

Information will only be shared where there is an appropriate legal basis to do so.

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## 8. SAFEGUARDING

Enhancing Futures Ltd is committed to protecting children, young people and vulnerable adults.

Where safeguarding concerns arise, information may be shared without consent where this is permitted or required by law in order to protect an individual from harm.

This may include sharing information with:

- Social care services;
- Police;
- Healthcare providers;
- Educational settings; and
- Other safeguarding authorities.

Safeguarding responsibilities may override normal expectations of confidentiality where there is a risk of significant harm.

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## 9. ONLINE SERVICES

Some services may be delivered remotely using secure platforms.

Where online services are used:

- Clients are responsible for ensuring they participate from an environment that protects privacy and confidentiality;
  - Clients must not record appointments without prior written consent;
  - Enhancing Futures Ltd cannot guarantee uninterrupted access where circumstances outside our reasonable control affect internet or technology services.
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## 10. TRAINING, WORKSHOPS AND WEBINARS

Where individuals attend training events, workshops, webinars or online learning programmes, Enhancing Futures Ltd may process:

- Registration details;
- Attendance records;
- Payment information;
- Feedback forms; and
- Certificates of attendance or completion.

Information collected in relation to educational events will only be retained for legitimate business, legal and quality assurance purposes.

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## 11. INSURERS AND THIRD-PARTY FUNDERS

Enhancing Futures Ltd does not ordinarily contract directly with insurers.

Where information is requested by insurers or funding organisations, information will only be disclosed where appropriate consent, legal authority or another lawful basis exists.

Additional administrative work requested by insurers or funding organisations may incur separate charges.

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## 12. DEBT RECOVERY

Where invoices remain unpaid, Enhancing Futures Ltd may use personal information to recover outstanding debts.

This may include sharing limited information with:

- Debt recovery agencies;
- Legal representatives; and
- Courts.

Only information necessary for this purpose will be disclosed.

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## 13. HOW LONG WE KEEP INFORMATION

Enhancing Futures Ltd retains personal information only for as long as necessary to fulfil the purposes for which it was collected and to comply with legal, regulatory, professional and business obligations.

Clinical records are stored securely in electronic format using approved systems and platforms designed to protect the confidentiality, integrity and availability of personal information.

Unless a longer retention period is required or permitted by law, clinical records will generally be retained in accordance with recognised healthcare records management guidance, including the NHS Records Management Code of Practice, as follows:

- Adult clinical records: retained for a minimum of eight (8) years following the conclusion of treatment or discharge from services.
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- Children and young people's clinical records: retained until the individual's 25th birthday, or 26th birthday where the young person was 17 years old at the time treatment concluded.
- Training, webinar and educational event records: retained only for as long as necessary for administrative, quality assurance and legal purposes.
- Financial records: retained for the period required by applicable tax and accounting legislation.
- Complaints records: retained in accordance with regulatory requirements and organisational policies.

At the end of the applicable retention period, information will be securely deleted, destroyed or anonymised unless there is an overriding legal, regulatory or safeguarding reason requiring continued retention.

Enhancing Futures Ltd reserves the right to retain records for longer periods where this is necessary for the establishment, exercise or defence of legal claims, in response to regulatory investigations, to comply with statutory obligations, or where other lawful grounds for continued retention apply.

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## 14. YOUR RIGHTS

Under data protection legislation, you may have the right to:

- Access your personal information;
- Request correction of inaccurate information;
- Request restriction of processing;
- Object to certain processing activities;
- Request erasure where applicable;
- Request transfer of information in certain circumstances;
- Withdraw consent where processing relies on consent; and
- Lodge a complaint with the Information Commissioner's Office.

Some rights are subject to legal and professional exemptions.

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## 15. SUBJECT ACCESS REQUESTS

Requests for access to personal information should be made in writing.

Enhancing Futures Ltd may require proof of identity before information is disclosed.

Information will usually be provided within one month unless an extension is permitted by law.

Certain information may be withheld where legal exemptions apply.

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## 16. DATA SECURITY

Enhancing Futures Ltd takes reasonable and proportionate steps to protect personal information from unauthorised access, loss, misuse, disclosure, alteration or destruction.

Personal information is primarily maintained electronically using secure systems and approved service providers, including Cliniko, Heidi Health and other appropriate systems that support the safe delivery of healthcare, assessment, therapy, medication, training and associated services.

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Access to records is restricted to authorised individuals who require access as part of their role and is subject to appropriate security controls, including password protection, access permissions and other safeguards designed to maintain confidentiality.

Enhancing Futures Ltd undertakes appropriate due diligence when selecting third-party systems and seeks to ensure that service providers maintain standards of security and data protection consistent with applicable legislation.

While no electronic system can be guaranteed to be entirely secure, Enhancing Futures Ltd implements reasonable technical and organisational measures to minimise risks and protect the information entrusted to us.

Any suspected personal data breaches will be managed in accordance with our internal policies and applicable legal obligations, including notification to the Information Commissioner's Office and affected individuals where required by law.

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## 17. COOKIES AND WEBSITE USE

Our website may use cookies and similar technologies to improve functionality and analyse usage.

Further information is available within our Cookie Policy.

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## 18. CHANGES TO THIS PRIVACY NOTICE

Enhancing Futures Ltd reserves the right to amend this Privacy Notice from time to time to reflect changes in legislation, guidance, organisational practices or service delivery arrangements.

The most current version of this Privacy Notice will be made available through our website and on request.

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## 19. CONTACT US

If you have any questions about this Privacy Notice or the way your information is handled, please contact:

**Enhancing Futures Ltd**

One Regent Place Wellbeing Centre

1 Regent Place

Rugby

Warwickshire

CV21 2PJ

Telephone: 07309 730951

Email: [contact@enhancingfutures.co.uk](mailto:contact@enhancingfutures.co.uk)

## 20. COMPLAINTS

If you are dissatisfied with how your personal information has been handled, please contact Enhancing Futures Ltd in the first instance so that we can seek to resolve your concerns.

You also have the right to complain to the Information Commissioner's Office (ICO).

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Telephone: 0303 123 1113

Website: [www.ico.org.uk](http://www.ico.org.uk)