



Gloucestershire
Safeguarding Adults
Board

Gloucestershire Safeguarding Adults Board

Information Sharing Guidance

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1. Purpose

This guidance:

- Sets out the legislative basis for the legitimate sharing of personal information in circumstances related to the protection of adults with care and support needs who are experiencing or at risk of abuse or neglect.
- Will be supplemented by relevant procedures and standards (Section 6 & 7).

Once information is shared with another organisation they become the data controller of the shared copy of the information and are responsible and accountable for the use and protection of it.

Some of the organisations represented on the Gloucestershire Safeguarding Adults Board (GSAB) have signed up to the overarching principles set out in the Gloucestershire Information Sharing Partnership Agreement (GISPA), and this guidance complements and supports this.

[Gloucestershire Information Sharing Partnership Agreement \(GISPA\)](#)

2. Introduction

This guidance covers all the agencies represented on the Gloucestershire Safeguarding Adults Board and provides a framework for making decisions about sharing information in order to help protect adults with care and support needs who may be experiencing or at risk of abuse or neglect. This guidance has been updated to reflect the General Data Protection Regulations (GDPR) 2016.

This guidance is also aligned to the principles set out in the [SCIE Guide: Adult safeguarding: sharing information 2015](#)

Making enquiries, assessing and responding to adults with care and support needs who are at risk and are unable to protect themselves are multi-disciplinary, joint agency responsibilities. The effectiveness of this work depends on the selective sharing of information, which is often confidential. Information sharing should comply with relevant pieces of legislation. [\(Section 8\)](#)

This guidance will help enable appropriate inter-agency communication and support decision making. Below are some examples of situations where information sharing within safeguarding adults work will be necessary:

- To obtain advice about specific safeguarding concerns or to establish grounds for progressing with safeguarding adults procedures.
- To raise a safeguarding concern.
- To gain immediate protection for a person(s) through referral to another service(s).
- To inform agencies who may need to take action against an alleged or known perpetrator(s) (this may include risks which are posed by members of the public, worker, volunteer or a service user).

- To make a referral to agencies for the purposes of requesting or amending services to people at risk of abuse or to those suspected of perpetrating abuse.
- To complete a criminal investigation, an employment investigation, a regulatory investigation, a risk assessment and management plan, a Safeguarding Adult Review or any other enquiry needed as part of the safeguarding adults process.
- To monitor and audit safeguarding adults work e.g. concerns, quality of outcomes, adherence to procedures.
- To continue reviewing and developing multi-agency policies and procedures to safeguard adults at risk.
- To deal with complaints, grievances and professional or administrative malpractice.

3. GSAB members:

Care Quality Commission
 Change, Grow, Live
 Cheltenham Borough Council
 Cheltenham Borough Homes
 Crown Prosecution Service
 Department of Work & Pensions
 Forest of Dean District Council
 Gloucester City Council
 Gloucester City Homes
 Gloucestershire Clinical Commissioning Group
 Gloucestershire Care Providers Association
 Gloucestershire Constabulary
 Gloucestershire County Council (and agencies acting on their behalf)
 Gloucestershire Diocese
 Gloucestershire Fire & Rescue Service
 Gloucestershire Health and Care NHS Foundation Trust
 Gloucestershire Hospitals NHS Foundation Trust
 Healthwatch
 National Probation Service
 POhWER Advocacy service
 South Western Ambulance Service Trust
 Stroud District Council
 Tewkesbury Borough Council
 Trading Standards
 VCS Alliance

In relation to GP practices, the general tenor of this document is in accordance with the guidelines laid down by the General Medical Council for data sharing purposes.

4. Why is this sharing required?

Gloucestershire Safeguarding Adults Board is a multi agency partnership which seeks to empower and protect adults with care and support needs who are at risk of abuse and neglect. This guidance is to support information sharing so that professionals can work together to safeguard those individuals.

The Care Act 2014 Statutory Guidance emphasises the need to share information about safeguarding concerns at an early stage and states that information sharing agreements/guidance should be in place based on the welfare of the adult or of other potentially affected adults.

5. What information is to be shared?

- Personal Information
- Sensitive Personal Information (Definitions at Annex A)

5.1 Description of the information to be shared:

- Clinical records, care plans or social care assessment documents which the person holding the record considers are relevant
- Information which enables people to ascertain the adult at risk's wishes and feelings, beliefs and values, or what these would be likely to be
- Contact details of any relevant professionals, and with their consent, those of any family members where appropriate, and any relevant information they may be able to provide.

5.2 Security of the information to be shared:

Data will be shared both manually and electronically as necessary. All data will be stored securely by means of 'appropriate technical and organisational measures' (GDPR 2016). GDPR requires agencies to:

- Consider risk analysis, organisational policies, and physical and technical measures
- Consider state of the art and the costs of implementation when deciding what measures to take, these need to be appropriate to both to the circumstances and the risk processing poses
- Consider measures such as a pseudonym or encryption
- Measures must ensure the confidentiality, integrity and availability of the systems and services and the personal data processed within them
- Ensure that appropriate processes are in place to test the effectiveness of the measures and undertake any required improvements

5.3 Sharing information

Sharing the right information, at the right time, with the right people, is fundamental to good practice in adult safeguarding but has been highlighted as a difficult area of practice. The holder of the information should ascertain that the sharing of information is lawful and necessary to the stated purpose, irrespective of any consent.

In cases where crimes are suspected, the person giving rise to a concern should not be forewarned as this could prejudice the investigation. Where crimes are suspected early consultation with Multi-Agency Safeguarding Hub (MASH) Decision Makers must take place to ensure that an investigation by the police can be commenced at the earliest opportunity without the person being informed, which could lead to loss of evidence.

In cases where crimes are not suspected, the person giving rise to the concern should usually be forewarned of the substance of the allegations against them and invited to comment before sharing the information. This should only be omitted in cases of serious, urgent risk where delay (or forewarning) will cause unacceptable risk. In such cases, the person should be informed after information is shared unless (very exceptionally) there is evidence that informing them even after the event will cause unacceptable risk.

5.4 Information Sharing Checklist

The following are questions to ask before agreeing to share information:

- How reliable and complete is the information I am considering sharing?
- How will sharing information contribute to risk reduction?
- How much information needs to be disclosed, and to whom?
- Have I sought, considered and recorded the views of the source and/or subject of the information about proposed disclosure?
- If consent is not forthcoming, or is refused, are there reasonable reasons to share information?
- Have I balanced rights to privacy and confidentiality against the scale of the assessed risk?

6. Consent to share information

6.1 Having consent to share information.

Under GDPR, the definition of consent refers to “any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her” (GDPR 2016).

GDPR sets a high standard for consent, but consent is not always needed if there is a lawful basis to share the information. If the information is being shared to ensure

safeguarding, for statutory purposes you do not need consent. However, all efforts should be made to gain consent to share personal information unless the person lacks capacity to give informed consent or after careful consideration it is felt that information should be shared without consent, as described in para 6.3.

Under GDPR the data subject has the right to withdraw or revoke consent at any time. The data subject has the right to request their data is removed or deleted. The data must be erased in order for a controller to comply with the legal obligations. However the data controller must also balance any request against the public interest. They must take into account the exceptions to the right of erasure and make a decision whether to comply with the request.

6.2 Sharing information without Consent

Information may still be shared between professionals if consent is withheld **if** the person responsible for coordinating believes that at least **one** of the following applies:

- there is a risk of serious harm to the adult at risk
- the person lacks the capacity to give informed consent
- consent was withheld under duress
- other vulnerable adults or children are at risk
- when the courts have made an order
- to prevent, detect or prosecute a serious crime
- there is a legal duty on the part of the holder or recipient of the information

If the person is unable to give informed consent and is assessed as lacking capacity to consent, but information needs to be shared in order to prevent or protect them from abuse, then the 'best interest' principle must be followed.

In these situations a decision should be made as to whether sharing information is reasonable in the circumstances. When making this decision the steps listed below should be taken into account, to evidence the rationale for sharing information without consent:

- a. The actions taken to obtain consent
- b. Any other sufficient reasons not to seek consent, for example if asking for consent may cause further harm and/or damage an investigation
- c. Any duty of confidentiality owed to the third party
- d. Whether the third party, with the legal right to make decisions on their behalf (e.g. a Power of Attorney), can give consent
- e. Any expressed refusal of consent

Any reasons given for refusing consent should be recorded and carefully considered in deciding whether or not to share the information.

6.3 Privacy Notices

Agencies need to be transparent and provide accessible information to individuals about how their data will be used. This information is provided through a Privacy Notice (also called a Fair Processing Notice). GDPR includes rules on providing individuals with privacy information (GDPR 2016 Articles 12, 13 & 14); these must be understandable and accessible.

Annex B provides a template for an Adult Social Care, GCC, Privacy Notice.

7 Frequency

The Care Act 2014 Statutory Guidance emphasises the need to share information about safeguarding concerns at an early stage, and as necessary, to ensure the safety of any adults with care and support needs.

8 Legislative basis

The law does not prevent the sharing of sensitive, personal information **within** organisations. If the information is confidential, but there is a safeguarding concern, sharing it may be justified. In addition the law does not prevent the sharing of sensitive, personal information **between** organisations where the public interest served outweighs the public interest served by protecting confidentiality – for example, where a serious crime may be prevented.

8.1 Clause 45 of the Care Act 2014

Clause 45 of the Care Act 2014 focuses on the ‘supply of information’. This relates to the responsibilities of others to comply with requests for information from Safeguarding Adults Boards. Gloucestershire Safeguarding Adults Board will share strategic information to ensure robust safeguarding adults practice is in place and each of its partners must cooperate with each other, and the local authority, in respect of requests for information on behalf of the Safeguarding Adults Board.

[Care Act 2014: Clause 45 Page 39 & Care and Support Statutory Guidance Page 270 - 272](#)

A Safeguarding Adults Board (SAB) may request a person to supply information to it or to another person. The person who receives the request **must** provide the information to the SAB if:

- the request is made in order to enable or assist the SAB to do its job;
- the request is made of a person who is likely to have relevant information and then either:
 - i. the information requested relates to the person to whom the request is made and their functions or activities or;
 - ii. the information requested has already been supplied to another person subject to a SAB request for information.

8.2 The Mental Capacity Act 2005

The presumption in the Mental Capacity Act 2005 is that adults have the mental capacity to make informed choices about their own safety and how they live their lives. Issues of mental capacity and the ability to give informed consent are central to decisions and actions in adult safeguarding.

Adults have a general right to independence, choice and self-determination including control over information about themselves. In the context of adult safeguarding these rights can be overridden in certain circumstances, such as emergency or life-threatening situations.

All interventions need to take into account the ability of adults to make informed choices about the way they want to live and the risks they want to take. This includes their ability:

- to understand the implications of their situation and to take action themselves to prevent abuse.
- to participate to the fullest extent possible in decision-making about interventions.

8.3 Common law duty of confidentiality

8.3.1 When does a duty of confidentiality apply?

There is a common law duty to keep information confidential either when the person supplying it says the information is confidential, or where it is clear from the circumstances that it should be treated as confidential (e.g. consultations between doctor and patient, and social worker and service user).

8.3.2 Can the duty of confidentiality give way in cases of risk?

The right to confidentiality is not absolute. The public interest in preserving confidences may be outweighed by a greater public interest in the information being shared.

Sharing relevant information at the right time is vital to good safeguarding practice. A professional who reasonably believes that people will be put at risk of danger if confidential information is not disclosed should take steps in these circumstances to communicate the grounds of their concern to the responsible authorities.

Absolute assurances of confidentiality cannot be given, especially where other adults or children may be at risk.

8.4 The Human Rights Act 1998

In addition to the right to have information about them treated confidentially, individuals have the right to respect for their private and family life under Article 8 of the European Convention on Human Rights.

Any disclosure of personal information needs to be “proportionate” to the risk involved and “necessary ... for the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others”. The “rights and freedoms of others” would include the rights of others, including children and adults at risk under Article 3 of the Convention not to “be subjected to inhuman or degrading treatment ...”, which is likely to include most, if not all, forms of abuse and neglect.

Potential victims and those giving rise to concern also have the right under Article 6 to be given a “fair hearing”. This includes being kept informed, having their views recorded and considered, and being given a reasoned explanation of any decision about sharing of information.

8.5 The Crime and Disorder Act 1998

Under this act any person may disclose information to a relevant authority (the police, local authorities, health authorities and probation boards), where disclosure is necessary or expedient for the purposes of the Act in reducing and preventing crime and disorder.

9 Principles

The basic principles around sharing information, to avert or reduce risk:

- Try to gain consent to share information as necessary.
- Consider the person’s mental capacity to consent to information being shared and seek assistance if you are uncertain.
- Consider the likely nature and degree of risk posed.
- Make sure that others are not put at risk by information being kept confidential.
- Could sharing information prevent a crime?
- Do not put management or organisational interests before safety.
- Consider if there is sufficient reason not to seek consent.
- Do not share more information than is necessary to anyone who does not need to know.
- Record the decision to share information, the reasoning behind it, and where possible communicate to those who have been consulted with.
- If information is being shared with anyone who is not in a responsible position of authority then consider how they are likely to respond if the information is disclosed to them.

10 Review

This guidance will be reviewed every two years or earlier if a significant change occurs.

Annex A

Glossary of Terms

Within this document, the following GDPR definitions apply:

Personal Data or Personal Information	Personal data means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
Sensitive Personal Data	Personal data consisting of : <ul style="list-style-type: none">• racial or ethnic origin• political opinions• religious or philosophical beliefs• trade union membership• data concerning health or sex life and sexual orientation• genetic data• biometric data where processed to uniquely identify a person
Data Controller	Any person (including company organisation or individual) who (either alone or jointly or in common with other persons) determines the purposes, conditions and means of processing personal data.
Data Processor	Any person (including public authority, agency or any other body) which processes personal data on behalf of the Data Controller.
Processing	Any operation performed on personal data, whether or not by automated means, including collection, use, recording, etc.
Data Subject	An individual who is the subject of the personal data and whose personal data is processed by a Controller or Processor.
Biometric Data	Any personal data relating to the physical, physiological, or behavioral characteristics of an individual which allows their unique identification.
Consent	Freely given, specific, informed and explicit consent by statement or action signifying agreement to the processing of their personal data.
Data Erasure	Also known as the Right to be Forgotten, it entitles the data subject to have the data controller erase his/her personal data, cease further dissemination of the data, and potentially have third parties cease processing of the data.

Annex B

Adult Social Care Privacy Notice

Adult Social Care is a Gloucestershire County Council service for people aged 18 and over whose day to day life is affected by illness, disability or other impairment. We work with older people, people with a disability or long term illness and people with mental health needs who need support with day to day living. We also work with adults who can't keep themselves safe from abuse and neglect.

In addition, we work with carers who need support to continue with their caring role.

Information and advice, assessment, support planning, review and advocacy services may be provided on our behalf by other organisations.

This Privacy Notice explains what information we collect about you, how we use it and your information rights.

How we use your information

Why we collect and use your information:

Gloucestershire County Council is the data controller for the personal information we collect from you.

We collect and use your personal information to provide Adult Social Care services effectively and to meet our statutory duties under the Care Act 2014 and other relevant legislation, for example:

- The Data Protection Act 2018
- The Equalities Act 2010
- The Human Rights Act 1989
- The Mental Capacity Act 2005
- The Mental Health Act 1983

The information we collect about you:

We will collect only the personal information we need to perform our duties. We will collect your name and contact details as well as information relevant to your social care needs or to your support needs if you are a carer.

How we will use the information about you:

We will use your information for Adult Social Care purposes only. We may use your information in anonymised form for statistical purposes or to review and improve our

services. We may use your contact details to ask if you would like to provide feedback or take part in local or national surveys about social care.

How long we keep your information for:

In most cases, we will keep your information for 8 years after we close your record. We are required to keep the information for this long by the Records Management NHS Code of Practice Part 2 (2nd Edition).

We may have to keep some records for longer than 8 years and some for a shorter period. How long we keep each type of record is published in the Council's Records Retention and Disposal Schedule.

Who we share your information with:

We only share information on a 'need to know' basis. We may need to share information with other individuals and organisations working with you so that everyone understands your needs and circumstances.

We will ask for your consent before we share your information except when we are required by law to share it, for example when:

- we believe there is a risk of serious harm to you or someone else
- we are required to by the Courts
- the Police want information related to a serious criminal investigation

If Adult Social Care services are provided to you by an organisation acting on our behalf, information will be transferred between that organisation and Adult Social Care.

We follow national guidelines on best practice when we share information. We share information securely. Anyone who receives information from us is legally required to keep it confidential.

Your consent:

If we need to share your information with other people or organisations not directly involved in your care we will ask for your consent. We will explain what information we wish to share, the reason why and who we wish to share it with.

If you do not give your consent, we will respect your wishes (except when we are required by law to share your information) but this may limit the support that we or other people can offer.

If you are not able to make decisions about your information, decisions can be made by your authorised representative, i.e.

- someone who holds a registered power of attorney given by you or
- a Deputy appointed by the Court of Protection.

If you don't have an authorised representative, the professionals involved in your care will make a decision about what would be best for you. They will take the views of your relatives and carers into account.

Your information rights under the Data Protection Act 2018

The General Data Protection Regulation (GDPR) as enacted within the Data Protection Act 2018 gives you the following rights over your information.

- **Right to withdraw your consent to share information:** You have the right to withdraw your consent to the Council sharing your information. Please be aware that there may be some situations where we are still allowed to keep and use your information, even when you have withdrawn consent. To withdraw your consent, contact the Adult Social Care Helpdesk in writing by:
 - email: socialcare.eng@gloucestershire.gov.uk, or
 - writing to: Adult Social Care Helpdesk
Shire Hall
Westgate Street
Gloucester GL1 2TG
- **Right to access to your information:** You have the right to ask for a copy of the information we hold about you. Someone else can make the request on your behalf, but we will only release information to them if you give us your written consent to do so, or the person:
 - holds a registered power of attorney given by you, or
 - is a Deputy appointed by the Court of Protection.

You can request access to your personal information [online](#).

- **Right to correct inaccurate information:** You have the right to ask the Council to correct information that you believe is inaccurate or incomplete. You may not always be able to change the information. However, we will correct information that is inaccurate and may include your comments in your record.

Contact our [Information Management Service](#) in writing if you wish to use your right to correct inaccurate information.

If you just want to change your address and contact details, contact the Adult Social Care Helpdesk instead:

- email: socialcare.eng@gloucestershire.gov.uk
- telephone: 01452 426 868
- address: Adult Social Care Helpdesk
Shire Hall
Westgate Street
Gloucester GL1 2TG

- **Right to be forgotten (erasure):** You have the right to ask the Council to delete your information when there is no good reason for us to continue using it. Please be aware that in certain situations we are still allowed to keep and use your information, even when you request that it should be erased. Contact our [Information Management Service](#) in writing if you wish to use your right to be forgotten (erasure).
- **Right to object:** You have the right to object to us using your information if we have collected more than we need to fulfil our duties. Please be aware that in certain situations we are allowed to still use your information if there is good reason to do so. Contact our [Information Management Service](#) in writing if you wish to use your right to object.

If you receive services from an organisation acting on our behalf:

You have the same legal rights over your information whether you receive services directly through the Council's Adult Social Care service or from an organisation acting on our behalf.

If you receive services from an organisation acting on our behalf and you want to use your information rights, contact the organisation directly. They will let the Council know that you wish to use your rights.

How to contact the Council's Information Management Service:

If you have any questions about this Privacy Notice or how to use any of your information rights, please contact the Council's **Information Management Service**:

- email: informationsecurity@gloucestershire.gov.uk
- telephone: 01452 32 4000
- address: The Data Protection Officer
Information Management Service
Shire Hall

Westgate Street
Gloucester GL1 2TG

How to contact the Information Commissioner

The Information Commissioner's Office (ICO) is an independent authority set up to uphold your information rights.

You can contact the Information Commissioner's Office for more information about your information rights or if you wish to make a complaint about how we use your personal information:

- through their website: <https://ico.org.uk/>
- by telephone: 0303 123 1113
- in writing: Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Annex C

Your information:

This leaflet is about the information we collect about you, how we use it and your information rights

Please read the Adult Social Care privacy notice on our website for more detail or ask a staff member for help if you are unable to access our website.

About Adult Social Care:

Gloucestershire County Council provides Adult Social Care services for people aged 18 and over whose day to day life is affected by illness, disability or other impairment.

We work with older people, people with a disability or long term illness and people with mental health needs who need support with day to day living.

We also work with carers who need support to continue with their caring role and with adults who can't keep themselves safe from abuse and neglect.

Some Adult Social Care services may be provided on our behalf by other organisations.

Your information:

Why we keep information about you:

We have a duty to keep accurate records whenever we provide you with any kind of support or service, such as providing information, assessing your needs or helping you to plan the support you need. We keep your information confidential, secure and up to date.

What information we collect and how we use it:

We only collect information necessary to carry out our legal duties under the Care Act 2014 and other laws. We record your name and contact details as well as information relevant to your social care needs or to your support needs if you are a carer.

We may use your information for statistical purposes or to review and improve our services. We may use your contact details to ask if you would like to provide feedback or take part in local or national surveys about social care.

How long we keep your information:

In most cases, we keep your information for eight years after we close your record.

Who we share your information with:

We only share information on a 'need to know' basis and as required by the Data Protection Act 2018.

We may need to share information with other individuals and organisations working with you or the person you care for so that everyone understands your circumstances and needs.

If Adult Social Care services are provided to you by an organisation acting on our behalf, information will be transferred between that organisation and Gloucestershire County Council.

Your consent:

We will ask for your consent to share your information with other individuals and organisations and explain:

- what information we want to share and why
- who we will share it with
- what not agreeing to share your information could mean for you or the person you care for, for example it might limit the support we or other people can offer.

Sometimes we are legally required to share your information even without your consent, for example when:

- we believe there is a risk of serious harm to you or someone else
- we are required to by the Courts
- the Police want information related to a serious criminal investigation.

If you are not able to make decisions about sharing your information, decisions can be made by your authorised representative, i.e.

- someone who holds a registered power of attorney given by you or
- a Deputy appointed by the Court of Protection.

If you don't have an authorised representative, the professionals involved in your care may decide that sharing the information is in your best interests. They will take the views of your family and carers into account.

Your information rights:

The Data Protection Act 2018 gives you rights over your information. You have the right to:

- **withdraw your consent to share information**, although in some circumstances we

are still allowed to keep and use your information. To withdraw your consent, contact the Adult Social Care Helpdesk in writing by:

- email: socialcare.enq@gloucestershire.gov.uk, or
- writing to: Adult Social Care Helpdesk
Shire Hall
Westgate Street
Gloucester GL1 2TG

- **ask for a copy of your information.** Someone else can make the request on your behalf, but we will only release information to them if you give us your written consent to do so, *or* the person:
 - holds a registered power of attorney given by you, or
 - is a Deputy appointed by the Court of Protection.

You can ask for your information through our website:

- <http://www.gloucestershire.gov.uk/requestaccess>

If you are unable to access our website, contact our Information Management Service instead – see last page for contact details.

You also have the right to request that we correct information you think is incorrect, request that we erase the information we hold about you and the right to object to us using the information. You may not always be able to use these rights if there is a good reason for us to refuse your request.

Contact our Information Management Service to ask us to correct your information – see last page for contact details.

If you receive services from an organisation acting on our behalf:

You have the same legal rights over your information whether you receive services directly through the Council's Adult Social Care service or from an organisation acting on our behalf.

Tell the organisation that you receive services from if you want to use your information rights. They will let the Council know.

How to contact the Council's Information Management Service:

You can contact the Council's **Information Management Service:**

- by email: informationsecurity@gloucestershire.gov.uk

- by telephone: 01452 32 4000
- in writing: The Data Protection Officer
Information Management Service
Shire Hall
Westgate Street
Gloucester GL1 2TG

The Adult Social Care Privacy Notice

The Adult Social Care Privacy Notice has more information about your information rights and is published on our website:

- <https://www.gloucestershire.gov.uk/privacy-notices>

Ask a staff member to help you if you are unable to access our website or ask our Adult Social Care Helpdesk for a copy:

- email: socialcare.enq@gloucestershire.gov.uk
- [telephone: 01452 42 6868](tel:01452426868)

How to contact the Information Commissioner's Office:

The Information Commissioner's Office (ICO) can provide independent information about your rights. You can also make a complaint to ICO if you are concerned about how we have used your personal information. Contact ICO:

- through their website: <https://ico.org.uk/>
- by telephone: 0303 123 1113
- in writing: Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF