Casley-Smith Lymphoedema Education UK Ltd.

Company and Website Privacy Policy

Important note.

**This policy is in the process of adoption following the transition of the Macmillan Lymphoedema Association (MLA) to the above-named not-for-profit company. It has been prepared following the guidance and structure given by the Information Commissioner’s Office (ICO)**

This policy includes:

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	2. [Data and Information Storage](#Datastorage)
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Also:

Full **Legitimate Interest** explanation

**Full report of website cookies**

1. **COMPANY INFORMATION**

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

Email: enquiries@casle.org.uk

Company Number: 12310198

Registered office address: 3, Llwyngwern Herdy, Swansea, Wales. SA4 0AB

|  |  |
| --- | --- |
| Cheryl Pike(Director & Treasurer)3, Llwyngwern HerdySwansea Wales SA4 0ABMb: 07793 383390 Email: cheryl@casle.org.uk | John Everett(Administrator)6, Fellside GardensDurham City DH1 1ABMb: 07976 013709Email: john@casle.org.uk  |

1. **PRIVACY REQUIREMENTS**

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Data protection laws and regulations require all companies who “process personal information” (i.e. companies who keep written/computerised records which could, if accessed, lead to an individual being identified) to provide public information about the type of personal information they collect.

**2.1 Personal Information of trained therapists**

**Important note:**

**The nature of how we process personal information applies to CaSLE UK Ltd. The various teachers, schools and agencies who provide training in Casley-Smith techniques may have collection and retention policies which are different**. We advise therapists to make their own enquiries from the course leaders about the privacy of their personal information if they have any concerns.

We – Casley-Smith Lymphoedema Education UK Ltd( CaSLE UK Ltd.) – collect and process the following personal information from therapists who have been trained by one of our qualified teachers at an “approved training course”.

* Name (title, first name, and family name)
* Email address
* Date and place of initial training
* Date and place of update training

This information is held electronically in a document which we shall call “the CaSLE Database”.

We also collect therapists’ telephone number and details of professional background if it is voluntarily supplied by the therapist. These two items of personal information are not kept within the CaSLE Database, but they are included on the attendance form which we ask therapists to complete after they have attended an “approved training course”.

We collect all the above personal information so we can verify which therapists have been trained to the standard required by the Casley-Smith International organization, which includes the requirement for periodic update training (currently every two years).

Contact information is kept primarily for administrative purposes, essentially so that we can liaise with therapists concerning training requirements. On the form used to collect this information we state:

“No information on the database will be supplied to external parties except insofar as it relates to an approved enquiry from a recognized health care agency concerning a therapist’s training record.”

The personal information which is held on the CaSLE UK database will sometimes be shared with other teachers who belong to the CaSLE team. The teachers hold this information on an ad-hoc basis and have been asked to ensure its privacy and security in accordance with this policy.

Under the General Data Protection Regulations (GDPR), **Article 6**, the main **lawful basis** which we have identified as being most appropriate for the way in which CaSLE UK Ltd. processes personal information is:

**Legitimate Interest.**

In short, our reason for functioning as a not-for-profit organization is to provide education which enables therapists to become qualified practitioners of lymphoedema treatment in accordance with Casley-Smith methods. We therefore have a legitimate interest in collecting the minimum amount of personal information that we need to perform this objective, and – in accordance with guidance from the Information Commisioner’s Office (ICO) *“*people would not be surprised or likely to object” to us doing so.

Further information about our use of “legitimate interest” as a legal basis for processing personal information is available in Appendix One.

* 1. **Data and Information Storage:**

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All of the information and data which we process is kept securely by the CaSLE administrator in cloud storage. There is a two-factor verification system for cloud access, and we have a verified “strong” password for the laptops and tablets which are used. All of the data storage devices with potential cloud access (laptops, tablets and phones) are encrypted as fully as possible.

As the appointed data “processor”, the CaSLE administrator uses the ICO guidance for electronic data security – including safeguards against loss or theft:

<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/security/>

* + 1. **Retention policy**

We need to process the data of therapists whilst they continue to practise lymphoedema treatment as a recognised Casley-Smith health care practitioner.

We have been unable to find clear legal guidance on how long we should retain personal information once the therapist has ceased to practise in the way referred to above – e.g. if they retire or change their occupation.

Appendix ll of the NHS Records Management Code of Practice, 2021, stipulates that adult health records should be recorded accurately and retained for 8 years.

Although the training record of a therapist is different to an adult’s health record, we have decided to use the above a guide for our own retention policy.

After this eight year since the cessation-of-practise time limit has passed since , all information concerning the client will be securely erased from our cloud storage and electronic storage devices. All paper records will also be destroyed – if they haven’t already been.

* 1. **Your Rights.**

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Under data protection law, everyone whose personal information is held on the CaSLE UK database has various rights. These are:

* + 1. **Access** to any electronic information which we hold about you.

If you contact CaSLE in writing by post or email (see contact information on page 1), then we will arrange to let you have a copy of the information we are holding.

This will be presented to you in a written report which is both comprehensive and clear. Normally, we would expect to provide you with this within 14 working days from the date of your request. This may need to be extended if our ability to respond is affected by ill health or annual leave. In this event, we will endeavour to let you know how long we expect your request to take.

* + 1. **Rectification** of any information which you believe to be incorrect and/or inclusion of any **relevant** information which you believe to be missing.

If any such correction is needed, please will you contact us in writing by post or email (see contact information on page 1). If the correction is straightforward, then we would expect to make the changes in line with the timeframe given at **2.3.1** above.

If the changes are needed urgently, then we will do our very best to ensure that they are made more quickly.

If we need to obtain any further verification before the change can be made, then the change may be delayed until we are in receipt of the required verification.

* + 1. **Erasure** – in certain circumstances – of any personal information of yours which we are holding.

If you don’t want CaSLE UK Ltd. to continue holding personal information about you, then please will you contact us in writing by post or email (see contact information on page).

Once we have erased your information in accordance with the time frame given at **2.3.1** above, however, we will be unable to confirm details of your training if asked to do so – by an employer for example.

Please note: It will not be possible for us to recognise anyone as an up-to-date Casley-Smith therapist unless we are able to exercise our legitimate interest to process your personal information.

1. **WEBSITE PRIVACY AND COOKIES**

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Our CaSLE website uses cookies. Cookies are small data programs which have been set by third parties such as Squarespace, YouTube and Google. To find out about our privacy policy and use of cookies, please visit the[**PRIVACY PAGE**](https://www.casle.org.uk/privacy) **of our website**. You can also change your choice of cookies on this page.

Cookies are small text files that can be used by websites to make a user's experience more efficient.
The law states that we can store cookies on your device if they are strictly necessary for the operation of this site. For all other types of cookies we need your permission.

This site uses different types of cookies. Some cookies are placed by third party services that appear on our pages - YouTube for example. We embed videos from our official YouTube channel using YouTube’s privacy-enhanced mode. This mode may set cookies on your device/computer once you click on the YouTube video player, but YouTube will not store personally-identifiable cookie information for playbacks of embedded videos using the privacy-enhanced mode.

For a full list of the cookies we use on our website, please see the table at the end of this policy.

1. **HOW TO COMPLAIN**

4.1.If you have any concerns about our use of your personal information, you can write to us by post or email using the contact information given at the beginning of this policy.

4.2 You can also complain to the ICO if you are unhappy with how we have used your data.

Information Commissioner’s Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

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**Legitimate Interest**

All organizations that “process” personal data – i.e. that collect, organize and store it – are subject to General Data Protection Regulations (GDPR). These regulations require us to identify a legal “basis” for processing and to make a public record of it. The are six possible bases, and the one we have identified as being most appropriate is “Legitimate Interest” – or “LI”.

CaSLE UK Ltd. provides education and training courses that equip nurses and therapists to treat patients with lymphoedema with the very latest techniques as identified and developed by the Casley-Smith school of practice. As such, we believe we have a legitimate interest to process the personal data described in section 2.1 of this policy as it is fundamental to our stated legitimate objectives. The LI basis is relevant to us because we

“use people’s data in ways they would reasonably expect and which have a minimal privacy impact, or where there is a compelling justification for the processing.” (From the Information Commissioner’s Office resource document concerning LI)

Having satisfied the “Purpose Test” for using the LI basis, we are also required to satisfy two other tests: the “Necessity Test” and the “Balancing Test”.

We believe that processing personal data is essential to our core education objective. Without doing so, we would be unable to verify when and where an individual therapist has been trained to the standard laid down by Casley Smith International, nor that they have updated this training at the required intervals, and nor would we be able to communicate with the therapists concerning ongoing training requirements.

Finally, we don’t believe that the way in which we process the personal data poses any fundamental issues for the therapists privacy, rights or freedoms. The possible consequences of unauthorised access to the data are believed to be only slight and do not outweigh our legitimate interest in processing the data.

We have completed a full Legitimate Interest Assessment (LIA) as required by the regulations, which explores all three of these tests in more detail and is available on request.

**Full report of website cookies.**

Cookie declaration last updated on 27/02/2022 by [Cookiebot](https://www.cookiebot.com/%22%20%5Co%20%22Cookiebot%22%20%5Ct%20%22_blank):

**Necessary (4)**

Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.

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| **Name** | **Provider** | **Purpose** | **Expiry** | **Type** |
| CONSENT | [YouTube](https://policies.google.com/privacy) | Used to detect if the visitor has accepted the marketing category in the cookie banner. This cookie is necessary for GDPR-compliance of the website. | 2 years | HTTP Cookie |
| CookieConsent | [Cookiebot](https://www.cookiebot.com/goto/privacy-policy/) | Stores the user's cookie consent state for the current domain | 1 year | HTTP Cookie |
| crumb | www.casle.org.uk | Ensures visitor browsing-security by preventing cross-site request forgery. This cookie is essential for the security of the website and visitor. | Session | HTTP Cookie |
| test | [Squarespace](https://www.squarespace.com/privacy) | Used to detect if the visitor has accepted the marketing category in the cookie banner. This cookie is necessary for GDPR-compliance of the website. | Persistent | HTML Local Storage |

**Statistics (1)**

Statistic cookies help website owners to understand how visitors interact with websites by collecting and reporting information anonymously.

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| **Name** | **Provider** | **Purpose** | **Expiry** | **Type** |
| p.gif | [Adobe Inc](https://www.adobe.com/privacy.html) | Keeps track of special fonts used on the website for internal analysis. The cookie does not register any visitor data. | Session | Pixel Tracker |

**Marketing (12)**

Marketing cookies are used to track visitors across websites. The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third party advertisers.

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| **Name** | **Provider** | **Purpose** | **Expiry** | **Type** |
| squarespace-likes | [Squarespace](https://www.squarespace.com/privacy) | Facilitates the sharing function on the website - The cookie also allows websites to track and target the user with advertisement based on the user's likes and shares. | Persistent | HTML Local Storage |
| ss\_cvr | [Squarespace](https://www.squarespace.com/privacy) | Collects data on visitors. This information is used to assign visitors into segments, making website advertisement more efficient. | 2 years | HTTP Cookie |
| ss\_cvt | [Squarespace](https://www.squarespace.com/privacy) | Collects data on visitors. This information is used to assign visitors into segments, making website advertisement more efficient. | 1 day | HTTP Cookie |
| yt.innertube::nextId | [YouTube](https://policies.google.com/privacy) | Registers a unique ID to keep statistics of what videos from YouTube the user has seen. | Persistent | HTML Local Storage |
| yt.innertube::requests | [YouTube](https://policies.google.com/privacy) | Registers a unique ID to keep statistics of what videos from YouTube the user has seen. | Persistent | HTML Local Storage |
| yt-remote-cast-available | [YouTube](https://policies.google.com/privacy) | Stores the user's video player preferences using embedded YouTube video | Session | HTML Local Storage |
| yt-remote-cast-installed | [YouTube](https://policies.google.com/privacy) | Stores the user's video player preferences using embedded YouTube video | Session | HTML Local Storage |
| yt-remote-connected-devices | [YouTube](https://policies.google.com/privacy) | Stores the user's video player preferences using embedded YouTube video | Persistent | HTML Local Storage |
| yt-remote-device-id | [YouTube](https://policies.google.com/privacy) | Stores the user's video player preferences using embedded YouTube video | Persistent | HTML Local Storage |
| yt-remote-fast-check-period | [YouTube](https://policies.google.com/privacy) | Stores the user's video player preferences using embedded YouTube video | Session | HTML Local Storage |
| yt-remote-session-app | [YouTube](https://policies.google.com/privacy) | Stores the user's video player preferences using embedded YouTube video | Session | HTML Local Storage |
| yt-remote-session-name | [YouTube](https://policies.google.com/privacy) | Stores the user's video player preferences using embedded YouTube video | Session | HTML Local Storage |