Birmingham Community Healthcare NHS Foundation Trust is committed to protecting the privacy and security of your personal information.

This Privacy Policy provides you with information on how we collect, store and use your information as a result of your participation in the feasibility testing of the MoveMore App (Full Project Title: Feasibility of the MoveMore digital intervention: reducing sedentary behaviour in non-ambulant young people with long term disabilities (MoveMore); IRAS Project ID: 327188).

The information contained within this Privacy Policy only applies to you if any of the following circumstances apply:

* You have expressed an interest in taking part in the testing of the MoveMore App
* Someone who has obtained your consent has passed us your details so that we can seek your consent to recruit you to our study
* You have consented to take part in the study

# Our Commitment

We are committed to ensuring the fair, lawful and transparent processing of your information, and our compliance with relevant legislations (e.g. the UK General Data Protection Regulation (GDPR) and the Data Protection Act). We want you to feel comfortable that you understand how we use your information.

We have appropriate policies and procedures in place that ensure that-

* Your personal information collected as part of this project will only ever be used as described within this Privacy Policy and the Patient Information Sheet you have received.
* We will only keep your personal information for as long as necessary.
* You are able to exercise your rights in relation to your personal information
* Appropriate measures are in place to ensure the security and confidentiality of your information
* All individuals who have access to your information are appropriately trained in data protection
* You are able to stop participating in the study at any time
* Your information will at no point be transferred to a third party not referenced within this Privacy Policy
* No information that identifies you will be transferred outside of the UK

If you have any questions about how we are processing your information, please don’t hesitate to reach out to us at bchc.movemore@nhs.net.

# The MoveMore App

Previous research has shown that young people with disabilities do less physical activity than able-bodied young people. Birmingham Community Healthcare NHS Foundation wants to help young people who use a wheelchair and are unable to walk due to their disability spend less time being sedentary.

To support us in achieving this we have co-designed the MoveMore app with Health and Care Innovations Limited. We want you to help us to test this app before we do further research to find out how the use of the App may help young people with disabilities move more regularly.

# What We Process Your Information For

## Seeking your consent and communicating with you

We will process your name and email address so that we contact you to seek your consent for you to join the study. We obtain your name and email address directly from you, or from another person who, with your consent, has shared your details with the study.

Should you consent to be in the study we will continue to process this information to communicate with you regarding the study.

Where we process your name and contact information for this purpose, Birmingham Community Healthcare NHS Foundation Trust is the sole controller, meaning that they alone determine how and why your information is used in relation to this purpose.

## Feasibility Testing of the MoveMore App

We process information relating to you to support our aim to test the MoveMore App before we carry out further research into whether the app may help young people with disabilities move more. We are the controller for the information collected unless otherwise stated.

### Data Collected Via The MoveMore App

The MoveMore App will be used to collect the information that you and others upload to the app.

We have co-designed the MoveMore app with Health and Care Innovations Limited.

The app is supported by ConnectPlus, a system developed by Health and Care Innovations Limited. To sign up to ConnectPlus you will be required to provide your name, email address and date of birth. Health and Care Innovations Limited will be controller of the information you provide during the sign-up process to ConnectPlus, details of how they process your information can be found on [their privacy policy](https://hci.digital/privacy-notice/).

For other information that you provide via the MoveMore App, beyond the initial sign up process, we are the controller. This is because the purpose of the processing, and the means by which your information is processed, has been determined by Birmingham Community Healthcare NHS Foundation Trust.

This includes information such as:

* Your Personal Information (e.g. Name, DOB, email) collected outside the context of the sign-up process
* Fitness Metrics
* Images
* Videos

Health and Care Innovations Limited, as the owners of the ConnectPlus system, processes this information in line with the instructions we have given them.

### Data Collected Via FitBit

To help us test the MoveMore App we require that the young person wears a FitBit (Branded Fitness Tracker).

To protect your identity as much as possible we ask that you sign up to FitBit using a pseudonym, FitBit will ask for other information from you when you sign up to the app including (but not limited to) email address and date of birth.

FitBit will also collect other information about you should you sign up, including your daily metrics (steps taken, distance travelled, heart rate) and locations.

FitBit is the data controller for all information collected through use of their services. For further detail on information FitBit will collect on you and how they use your information please refer to their [privacy notice.](https://www.fitbit.com/global/uk/legal/privacy-policy#info-we-collect)

### Data Collected Via ActivPal

To help us test the MoveMore App we require that the young person wears an ActivPal™, this is a type of sensor that collects information about your movement.

You will return the ActivPal™ to us as instructed in the Information Sheet Provided. We will extract the information recorded by the device and retain this information for the purposes described within this Privacy Policy.

### Video Recording and Interviews

To better understand your experience of the MoveMore App we will conduct video interviews with each participant on Microsoft teams, these videos will be recorded and stored securely so that we can refer back to them.

## Inviting you to participate in future research

We may retain your contact information to invite you to participate in future research that you are eligible to participate in. We will only do this where you have specifically consented to us retaining your information for this purpose.

# Our Lawful Basis for Processing Your Data

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information as described above are:

* Your consent. You are able to remove your consent at any time. You can do this by contacting bchc.movemore@nhs.net. We use this lawful basis when processing your information so that we can invite you to future research.
* We need it to perform a public task in the public interest. We use this lawful basis to process your information in relation to the testing of the MoveMore App. This research has been deemed to be within the public interest because it could lead to improvements in health and care

As part of this work we also collect information that is deemed to be ‘[special categor](https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/lawful-basis/a-guide-to-lawful-basis/lawful-basis-for-processing/special-category-data/)y’, this includes information that concerns your health. Our lawful basis for processing this information is:

* We need it to perform research in the public interest. As referenced above this research has been deemed to be within the public interest because it could lead to improvements in health and care.

# Who Do We Share Data With?

### Sharing For Research Purposes

We will not share your information outside of our organisation for research purposes unless we are certain that it is anonymised, meaning that you could not reasonably be identified from the information shared.

We plan to share anonymised information with the University of Birmingham so that they can help investigate if our app helps young people with disabilities move more.

### Regulatory Authorities

There may be a requirement for regulatory authorities (such as the Care Quality Commission and the Health Research Authority) to view information that we hold and collect, this could include information that relates to you.

The purpose of them viewing this information is solely to assess our compliance with laws, policies, contracts and best practice guidance.

### Legal Obligations

In certain circumstances we are legally obliged to share information with external agencies where we think there is a risk of harm to yourself or others, or disclosures relating to criminal activity are made. Should this happen we will follow the Trust’s Safeguarding Policies and inform the appropriate authority.

# How Long Will We Keep Your Information

Information obtained about you will be retained for 5 years following the end of the study.

# Your Rights

Under data protection law, you have rights that you can exercise in regard to your personal information including:

[**Your right of access**](https://ico.org.uk/for-the-public/your-right-to-get-copies-of-your-data/) - You have the right to ask us for copies of your personal information.

[**Your right to rectification**](https://ico.org.uk/for-the-public/your-right-to-get-your-data-corrected/) - You have the right to ask us to correct your personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

[**Your right to erasure**](https://ico.org.uk/for-the-public/your-right-to-get-your-data-deleted/) \*\*- You have the right to ask us to delete your personal information in certain circumstances.

[**Your right to restriction of processing**](https://ico.org.uk/for-the-public/your-right-to-limit-how-organisations-use-your-data/) - You have the right to ask us to limit the processing of your personal information in certain circumstances.

[**Your right to object to processing**](https://ico.org.uk/for-the-public/the-right-to-object-to-the-use-of-your-data/) \*- You have the right to object to the processing of your personal information in certain circumstances.

[**Your right to data portability**](https://ico.org.uk/for-the-public/your-right-to-data-portability/) \*\*- You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at bchc.informationgovernance@bchc.net if you wish to make a request

\* Does not apply when we use your Consent as our lawful basis for processing

\*\* Does not apply when we use Public Task as our lawful basis for processing your information

# How to Complain

If you have any concerns about our use of your personal information, you can make a complain to us using the following details

Address:

Trust HQ

3 Priestly Wharf

Holt Street, Birmingham Science Park, Aston

Birmingham

B7 4BN

Email:

bchc.dpo@nhs.net

You can also complain to the Information Commissioners Office (ICO), an independent authority set up to uphold information rights and data privacy, if you are unhappy with how we have used your data.

The ICO’s address:

Information Commissioner’s Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

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