



PRIVACY NOTICE

Adapt & Bloom Ltd

Last updated: 6 September 2026

1. Who we are

Adapt & Bloom Ltd provides independent occupational therapy assessments, advice and recommendations.

We take your privacy seriously and are committed to protecting your personal information. This Privacy Notice explains what information we collect, why we collect it, how we use and protect it, who we may share it with, how long we keep it and your rights.

We process personal information in accordance with applicable UK data protection legislation, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Adapt & Bloom Ltd

Registered office: 124 City Road, London EC1V 2NX

Email: mel@adaptandbloom.co.uk

ICO Registration Number: ZC179477

Throughout this Privacy Notice, "we", "us" and "our" mean Adapt & Bloom Ltd.

Private clients

Where you contact or engage Adapt & Bloom directly for occupational therapy services, Adapt & Bloom Ltd will normally be the data controller for your personal information. This means that we determine why and how your personal information is used.

Assessments commissioned by another organisation

We also provide occupational therapy services on behalf of other organisations, which may include local authorities, housing providers, independent assessment organisations and other health or social care organisations.

Where another organisation has referred you to us or commissioned your assessment, that organisation will usually have its own privacy notice explaining how it uses your personal information.

In some cases, the commissioning organisation will be the data controller and Adapt & Bloom Ltd will act as a data processor on its behalf.

Where we act as a data processor, we will process your information only in accordance with the commissioning organisation's instructions and data protection requirements. This may include requirements concerning how information is collected, accessed, stored, transferred, returned or securely deleted.

The precise data protection arrangements will depend on the service and the agreement between Adapt & Bloom Ltd and the commissioning organisation.

Regardless of the particular arrangement, your personal and health information will be treated confidentially and securely.

2. What information we collect

The information we collect will depend on the service we are providing, but may include:

- your name, address and contact details;
- your date of birth;
- details of people involved in your care or support;
- referral information;
- information about your home and living arrangements;
- information about your daily activities, mobility and functional abilities;
- details of equipment, adaptations or support you currently use;
- photographs or measurements of your home where relevant to an assessment;
- correspondence between you, Adapt & Bloom and other people or organisations involved in your assessment;
- assessment notes, recommendations and occupational therapy reports;
- billing and payment information; and
- other information that is reasonably necessary to provide our services.

Health and disability information

As part of an occupational therapy assessment, we may need to collect information about your:

- physical or mental health;
- medical conditions and diagnoses;
- disability;
- medication, where relevant;
- mobility;
- cognition;
- sensory needs;
- falls or other risks;
- personal care needs; and
- other health or social care information relevant to your assessment.

Information about your health and disability is classed as special category personal data under UK data protection law and receives additional protection.

We will only collect health information that is relevant and necessary for the occupational therapy service being provided.

3. Where we obtain your information

We may obtain information:

- directly from you;
- from a family member, carer, advocate or representative, where appropriate;
- from the organisation that referred or commissioned your assessment;
- from health or social care professionals involved in your care;
- from a local authority, housing provider or other organisation involved in meeting your needs; or
- from documents or information provided by you or by an authorised third party.

Where information has been provided to us by someone else, we will normally explain this to you as part of the assessment process.

4. Why we use your information

We may use your personal information to:

- respond to enquiries about our services;
- arrange appointments;
- establish whether our services are appropriate for you;
- carry out occupational therapy assessments;
- understand your needs, abilities, risks and circumstances;
- provide professional advice and recommendations;
- recommend equipment, adaptations or other interventions;
- prepare occupational therapy reports;
- communicate with you and, where appropriate, people or organisations involved in your care, housing or assessment;
- provide follow-up advice;
- maintain appropriate clinical and professional records;
- manage our relationship with clients and organisations commissioning our services;
- process invoices and payments;
- meet our professional, regulatory, insurance, accounting and legal obligations;
- manage complaints or concerns; and
- establish, exercise or defend legal claims where necessary.

We will not use your information for purposes that are incompatible with those for which it was collected unless there is a lawful reason to do so.

Where we act as a data processor for another organisation, we will only use the information for the purposes instructed by that organisation and necessary to provide the agreed occupational therapy service.

5. Our lawful basis for using your personal information

Where Adapt & Bloom Ltd acts as the data controller, we must have a lawful basis under UK GDPR for processing personal information.

Depending on the circumstances, we may rely on one or more of the following.

Contract

Where you engage Adapt & Bloom directly, we may need to process your personal information in order to take steps at your request before entering into a contract and to provide the occupational therapy service you have asked us to provide.

Legitimate interests

In some circumstances, we may process personal information where this is necessary for our legitimate interests or those of another organisation.

These interests may include providing and administering appropriate occupational therapy services, maintaining professional records, communicating with relevant parties and operating our business effectively.

Where we rely on legitimate interests, we consider your rights and interests and will not rely on this basis where your rights and freedoms override those interests.

Legal obligation

We may process information where this is necessary to comply with a legal, regulatory, tax, accounting or professional obligation.

Vital interests

In exceptional circumstances, we may process or disclose information where this is necessary to protect someone's life or physical safety.

Where Adapt & Bloom Ltd acts as a data processor on behalf of another organisation, the commissioning organisation is responsible for determining the lawful basis on which the information is processed.

6. Our lawful basis for health and disability information

Health and disability information is special category personal data and requires an additional legal condition before it can be processed.

Where Adapt & Bloom Ltd is acting as the data controller and processes health, disability or other relevant special category information as part of an occupational therapy service, we will generally rely on:

Article 9(2)(h) of the UK GDPR - processing necessary for the provision or management of health or social care, together with the relevant provisions of the Data Protection Act 2018.

Occupational therapists are regulated health professionals and are subject to professional duties of confidentiality.

Where another special category condition is more appropriate in particular circumstances, we may rely on that condition instead.

Where we act as a data processor for another organisation, the commissioning organisation determines the lawful basis and special category condition for the processing.

Your consent to participate in an occupational therapy assessment and your choices about who information may be shared with remain important aspects of professional practice and confidentiality, even where consent is not the legal basis relied upon under data protection law.

7. Sharing your information

We treat information about you as confidential and will only share it where there is an appropriate reason to do so.

Depending on the circumstances, information may be shared with:

- you;
- a family member, carer, advocate or representative where you have authorised this or another lawful basis applies;
- the organisation that commissioned your assessment;
- local authorities;
- housing providers;
- healthcare or social care professionals;
- equipment or adaptation services;
- contractors or other professionals involved in implementing recommendations, where appropriate;
- professional advisers such as accountants, insurers or legal advisers where necessary;
- organisations providing secure IT, email or document-storage services to Adapt & Bloom; and
- regulators, courts or public authorities where we are legally required to provide information.

Where another organisation has commissioned your occupational therapy assessment, an occupational therapy report and recommendations may be provided to that organisation where this forms part of the agreed purpose of the assessment. This will normally be explained to you.

Where Adapt & Bloom is acting as a data processor, information will only be shared in accordance with the instructions and requirements of the commissioning organisation, unless disclosure is required by law.

We will only share information that is relevant and necessary for the purpose concerned.

We do not sell your personal or health information.

8. Contacting other health or care professionals

As part of your occupational therapy assessment, it may sometimes be helpful for us to contact another professional involved in your health, care or support, such as your GP, physiotherapist, social worker or another health or social care professional.

We will normally discuss this with you first and obtain your consent before contacting another professional or sharing identifiable information about you.

We will explain why we believe the contact is necessary and what information we intend to request or share.

We will only request or disclose information that is relevant and necessary for your assessment or the service being provided.

Where consent is obtained for information to be shared, this will normally be recorded in your occupational therapy records.

If you choose not to give permission for us to contact another professional, we will normally respect your decision and will explain if this may affect the advice, recommendations or service we are able to provide.

Where an assessment has been commissioned by another organisation, we will also comply with that organisation's instructions and information-sharing arrangements.

There may be exceptional circumstances where information can be disclosed without your consent, for example where:

- disclosure is required by law;
- it is necessary to protect you or another person from serious harm;
- there is a safeguarding concern;
- disclosure is in your best interests where you are unable to make the relevant decision yourself; or
- disclosure is otherwise justified in the public interest or permitted under our professional obligations.

9. Confidentiality

The occupational therapist providing your assessment is registered with the Health and Care Professions Council (HCPC) and is required to comply with professional standards relating to confidentiality, privacy and secure record keeping.

Your information will not normally be disclosed to others without an appropriate reason.

There may, however, be exceptional circumstances in which information needs to be disclosed without your consent, for example where required by law or where disclosure is necessary to protect you or another person from serious harm.

10. How we store and protect your information

We take appropriate steps to protect personal and health information against loss, unauthorised access, inappropriate disclosure, alteration or destruction.

Measures may include:

- password-protected and access-controlled systems;
- secure email and electronic document storage;
- encryption where appropriate (e.g. device encryption / FileVault);
- limiting access to personal information to those who need it;
- keeping devices and accounts appropriately secured with two-factor authentication; and
- securely deleting or disposing of records when they are no longer required.

Electronic information relating to Adapt & Bloom's own clients may be stored using reputable business IT and cloud-storage providers, including Google Workspace.

Where an organisation processes personal information on our behalf, we take reasonable steps to ensure that appropriate data protection and confidentiality arrangements are in place.

Where we are acting as a processor for another organisation, we will follow that organisation's requirements regarding the systems on which information may be accessed or stored.

Information may sometimes be temporarily stored on a secure device where this is necessary to carry out an assessment or prepare a report and where this is permitted by the relevant data protection arrangements.

Temporary copies will be securely deleted when they are no longer required.

11. International transfers

We do not intentionally transfer personal or clinical information outside the UK as part of providing occupational therapy services.

Where third-party business cloud providers (such as Google Workspace) process or store data outside the UK, we ensure appropriate legal safeguards required by UK data protection law are in place, including Google's Cloud Data Processing Addendum and the UK International Data Transfer Agreement (IDTA) framework.

Where we act as a processor for another organisation, we will comply with that organisation's requirements regarding international transfers. Where the applicable agreement prohibits personal information from being transferred outside the UK, we will not make such a transfer.

12. How long we keep your information

We do not keep personal information for longer than is reasonably necessary.

Occupational therapy records for Adapt & Bloom clients

Adapt & Bloom provides services exclusively to adult clients. As a general rule, records relating to adult occupational therapy assessments for which Adapt & Bloom Ltd is responsible will be retained for **8 years** after our involvement with you has ended, in accordance with NHS record management standards, unless a longer period is required for legal, regulatory, or insurance reasons.

At the end of the applicable retention period, records will be securely deleted or destroyed unless there is a lawful reason to retain them for longer.

Records relating to commissioned services

Where Adapt & Bloom acts as a data processor for another organisation, information will be retained, returned or securely deleted in accordance with that organisation's instructions and the relevant contractual arrangements.

Enquiries that do not proceed

If you contact Adapt & Bloom directly about our services but do not proceed with an assessment, we will normally delete information relating to your enquiry once it is no longer required, and ordinarily within 12 months, unless there is a reason to retain it for longer.

Financial and business records

Invoices, payment records and other accounting information will be retained for the period required by tax and company law, normally for at least six years.

13. Your data protection rights

Depending on the circumstances and the lawful basis on which your information is processed, you may have the right to:

- access personal information held about you;
- ask for inaccurate or incomplete information to be corrected;
- ask for your information to be erased in certain circumstances;
- ask for the way your information is used to be restricted;
- object to certain types of processing;
- receive certain information in a portable format; and
- withdraw consent where processing is specifically based on consent.

These rights are not absolute and may not apply in every circumstance.

For example, a request for deletion does not necessarily mean that a clinical record can immediately be destroyed where there is a professional, regulatory or legal reason for retaining it.

Where Adapt & Bloom Ltd is the data controller, you can contact us about your rights at:

mel@adaptandbloom.co.uk

We may need to confirm your identity before releasing or making changes to personal information.

Where your information is being processed by Adapt & Bloom on behalf of another organisation, requests relating to your data protection rights may need to be handled by the commissioning organisation as the data controller. If you contact us about such a request, we will forward or assist with it as required.

14. Your right to object

Where Adapt & Bloom relies on legitimate interests as its lawful basis, you have the right to object to that processing in certain circumstances.

If you wish to object to the way we are using your information, please contact us using the details above.

We will consider your request in accordance with data protection law.

15. Automated decision-making

Adapt & Bloom does not use your personal or health information to make decisions about you solely by automated means and does not carry out automated profiling that produces legal or similarly significant effects.

Occupational therapy recommendations are based on professional assessment and clinical reasoning.

16. Website enquiries

If you contact Adapt & Bloom through our website, by email or by telephone, we will use the information you provide to respond to your enquiry and, where appropriate, arrange or provide our services.

Please avoid submitting unnecessary detailed medical information through a general website contact form. Where more detailed health information is required, we will advise you how this can be provided appropriately.

17. Cookies and website analytics

Adapt & Bloom does not currently use analytics, advertising or marketing cookies to track visitors to the website.

The website provider may use strictly necessary cookies or similar technologies that are required for the website to operate securely and correctly.

If we introduce analytics, advertising or other non-essential cookies in the future, this Privacy Notice and any cookie information or consent mechanism will be updated as required.

18. Marketing

We will not use your clinical or health information for marketing purposes.

If we send electronic marketing communications, we will only do so where permitted by law.

You can ask us to stop sending marketing communications at any time.

19. Complaints

If you have concerns about how your information has been collected or used by Adapt & Bloom, please contact us first so that we have an opportunity to investigate and respond:

mel@adaptandbloom.co.uk

You also have the right to complain to the Information Commissioner's Office (ICO), the UK's independent regulator for data protection.

Information about your rights and how to make a complaint is available at www.ico.org.uk.

Where another organisation is the data controller for your information, you may also wish to contact that organisation directly using the details in its own privacy notice.

20. Changes to this Privacy Notice

We may update this Privacy Notice from time to time, for example if our services, systems, contractual arrangements or legal obligations change.

The latest version will be published on our website together with the date it was last updated.