

## Privacy Policy

The new EU data protection law, called General Data Protection Regulation (GDPR), comes into force on 25 May 2018 and will replace the Data Protection Act 1998 in its entirety.

Psychology4Learning Ltd are committed to protecting and respecting your privacy. We have reviewed and updated our privacy policy to ensure it meets GDPR guidelines.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. This includes contact information that is used to communicate with individuals and organisations, as well as client confidential data collected or generated by an Educational Psychologist (EP).

### Collecting contact details

In order to deliver our services, and contact clients and prospective clients, we collect name, postal address, email address, phone number, and organisation name, and store it in a contact database (Microsoft Outlook 365 and Excel spreadsheet).

Contact details are collected from forms completed on our web sites ([www.psychology4learning.com](http://www.psychology4learning.com) and [www.p4ltraining.com](http://www.p4ltraining.com)), by corresponding with us by phone, email or letter, or by using publically available sources (e.g. school websites).

We do not sell or give your contact details to any third parties for marketing purposes.

You have the right to ask us not to process your personal data for marketing purposes. You can exercise this right at any time by contacting us at [Info@psychology4learning.com](mailto:Info@psychology4learning.com)

### Educational psychology services and data protection

Psychology4Learning Ltd sell Educational Psychology Services to schools and educational settings. The following explains what data is held in relation to the delivery of EP Services:

- School Planning Notes:** The EP will hold a planning meeting with the primary school contact where a child / young person (CYP) may be discussed. The school contact is asked to confirm that verbal consent has been given by the parents / legal guardian of the CYP before specifically naming the child. If no verbal consent has been given, the child will be referred to by their initials. A copy of the school planning record (with the CYP either referred to by name or initials) is kept in the school electronic folder, and a copy is sent to the school primary contact. Paper copies are not kept by Psychology4Learning Ltd.
- Consent:** Informed consent has to be provided before an EP will work with a CYP. The parents or legal guardians must sign a consent form (issued by

Psychology4Learning Ltd) before the EP can work with the child. Scanned copies of the signed consent form are kept in the CYP electronic folder. Paper copies are shredded.

All CYP that are issued a consent form are recorded on the CYP master database (Excel spreadsheet) and given a unique reference number. This spreadsheet includes: first name, last name, date of birth, first language, gender, ethnicity, school, year group, parents / legal guardians name, parents / legal guardians postal address, parents / legal guardians phone number, parents / legal guardians email address.

3. **Gillick Competence:** Is a term used in medical law to decide whether a child (under 16 years of age) is able to consent to his or her own medical treatment, without the need for parental permission or knowledge. If the EP decides that a CYP under the age of 16 is Gillick Competent, they can provide support without first requiring parent / legal guardian consent.
4. **Withdrawal of consent:** The parent / legal guardian may withdraw consent for EP involvement at any time. If consent is withdrawn the CYP's electronic folder will be deleted, including any documents related to the CYP, and the CYP will be deleted from the CYP master database (Excel spreadsheet). If the Planning Record names the CYP, this will be kept in the school file as a record of the conversation between the EP and School Contact.
5. **EP Report / Record:** After working with an individual CYP, the EP will produce a report or record of involvement. This will include personal, and confidential, information related to the CYP and their family. A copy of this report is kept in the CYP electronic folder. A copy will be sent to the school (where the school has purchased the EP time) and to the parents / legal guardians.
6. **Related CYP documentation:** School and parents / legal guardians may provide additional documents to support the EPs work with the CYP e.g. SEN Support Plans, School Attendance data, Education Health and Care Plans, reports by other health professionals etc. All documents are stored electronically in the CYPs electronic folder. All paper copies are shredded.
7. **Retention of CYP records:** Psychology4Learning Ltd will keep CYP records and related information in the CYP electronic folder, until the CYP turns 25 years of age. In their 25<sup>th</sup> year, Psychology4Learning Ltd will delete the CYP electronic folder, related documentation, and remove them from the CYP master database.
8. **Retention of adult records:** If an EP works with a client who is aged 18 years or over, their records will be kept for 8 years. In the 8<sup>th</sup> year following the work, Psychology4Learning Ltd will delete the clients electronic folder, related documentation, and remove them from the client master database.
9. **Paper Records:** Associate EPs, working on behalf of Psychology4Learning Ltd, may choose to keep paper records of work they have undertaken. Associate EPs will ensure all paper records are stored securely, and are shredded when no longer needed (in accordance with this Privacy Policy).

## Confidentiality statement

All work undertaken by EPs on behalf of Psychology4Learning Ltd is confidential. Information is only shared with the specific consent of the CYP's parent / legal guardian.

If disclosure of information is deemed necessary, EPs will aim to obtain specific informed consent from their clients, making the consequences of disclosure as clear and unbiased as possible. There are a number of circumstances where this might not be possible or may not apply: for example where the health, safety, security or welfare of the client or someone else may otherwise be put at risk; and if there are legal or safeguarding responsibilities.

Further information regarding confidentiality can be found in The British Psychological Society, Practice Guidelines, August 2017.

## Where we store your personal data

We use Microsoft Office 365, a Cloud based IT system, to store all electronic files, and for email. Further information regarding how Microsoft are complying with GDPR can be found here: <https://www.microsoft.com/en-us/trustcenter>

Every 3 months all Psychology4Learning Ltd files are backed up on an encrypted external hard disk, and kept in a password protected safe.

## Your rights to access information

You have the right to access information and / or records that we hold about you. Please contact Psychology4Learning Ltd directly to request access.

Client access to records will be restricted to information about themselves, or CYP where they are the parent / legal guardian. Restrictions will apply when disclosure would place the clients or others at risk of serious harm.

## Data protection and Psychology4Learning Ltd websites

1. **Cookies** are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity. For further information visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org). You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. However, in a few cases some of our website features may not function as a result.
2. **Third Party Web Sites:** Our websites may contain links to and from other websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy policy.

## Contact details for Psychology4Learning Ltd

The data controller at Psychology4Learning Ltd is Claire Olliffe. Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to [Info@psychology4learning.com](mailto:Info@psychology4learning.com) or phone 07933 394127