

GPS Privacy Policy

This privacy policy was created 28.05.21 (last updated 03.06.21) based on information from the following:

- The Information Commissioner's Office (ICO) - the UK supervisory authority for data protection. I am registered with, and pay a data protection fee to, the ICO (my registration number is A8960695).
- Regular data protection training through my Local Authority Educational Psychology role (last training session – 06.05.21).
- General Data Protection Regulations (2016).
- The Data Protection Act (1998).
- The UK Data Protection Bill (2018).

Please note that this policy may be subject to change, but an up-to-date privacy policy will always be stored on my website.

What is a privacy policy?

A privacy policy outlines what data I am collecting and why, as well as how I use, manage, store, and disclose any personal or special category data. Personal data refers to any information that may be used to identify an individual e.g. a child/young person's name and parent/carer's email address. Special category data is personal data that requires an increased level of protection due to being more sensitive e.g. a child's health status. As a 'data controller', I determine the purpose and means of processing any data through my services.

Data protection laws require professionals to meet certain conditions and I want to reassure you that I take these responsibilities very seriously. Accordingly, this policy complies with laws and legislation concerning the protection of personal data, which ensures that your privacy is protected, processed securely, and is kept for no longer than is necessary. Protecting your personal information is extremely important to me, and I hope this policy promotes your confidence that any personal information is processed in a lawful and transparent manner.

What information do you collect through your website?

My website does not include storage of personal data. Any testimonials provided on my website for my own service evaluation purposes will not include personal data. My website makes clear that by writing a testimonial, service users are consenting to their comments potentially being shared on my website. For example, it states on my website before recording a testimonial; 'in writing this testimonial, you are giving permission for your anonymised feedback to be shared on this website. Please do not record any identifiable information e.g. the names of children/young people.'

What information do you collect through school training?

My sibling events do not involve storage of personal data. The NME training programme also does not involve storage of personal data, but does involve the processing of anonymised data for the scoring of a questionnaire. This is anonymised by the school before sending to us and so will be covered by the school's own GDPR policy.

What information do you collect in Educational Psychology casework/assessment?

Due to the nature of psychology involvement, in order to carry out an effective psychological service, a range of personal and special category data may need to be collected, including the following:

- Email addresses: Parent/carer and school email addresses are required for; ongoing liaison/communication during my involvement (e.g. meeting arrangements), sending out EP reports, and sending invoices. I ensure I prevent including identifiable information in emails wherever possible but may use a child/young person's initials during liaison.
- Phone numbers: Phone numbers may be required for contact with schools, but this will be information in the public domain, which will be accessed from the school website or passed on by a member of school staff.
- Consent: A written consent form signed by those with parental responsibility is required for EP involvement. This includes data on the child/young person's name, age, and date of birth; their parent/carer's name and email address; and a staff member's name and email address. A blank consent form will be sent to the child/young person's school, who will be responsible for receiving parent/carer consent. It is important to note that children/young people will not be discussed without consent of those with parental responsibility (e.g. a parent/carer or social worker).
- Information-gathering: Information to gain a holistic understanding of a child's strengths and needs is required in order to provide a psychological service and assessment, which will have been agreed by all parties beforehand (school, family, and the child/young person where appropriate). Only data relevant to the agreed EP involvement will be collected, but inevitably, this may include special category data. This may be required to help form a more in-depth psychological understanding of the child's needs and any contributing factors to their current presentation.
- Reports: Reports may be written as part of EP involvement, which provide a summary of involvement e.g. an outline of strengths and needs, and discussed or recommended support to meet those needs. The start of reports will always include the child/young person's name, date of birth and year group in order to identify them, but it is important to

note that no home address is collected or recorded. The report will identify myself as the author and GPS as the organisation.

How do you access this personal data?

The personal information we access and process will be provided to us by the school, family, and/or child/young person e.g. through consultation, observation and one-to-one work. We may ask to be sent copies of reports from other involved professionals where we feel this would be helpful e.g. another psychological report, in order to formulate a shared understanding and promote multi-disciplinary/collaborative working. Consent from parents/carers will always be sought in these instances to access this information.

What is the lawful basis in which you can process my personal information?

Under GDPR, we must have a lawful basis in order to process personal data, in which the processing must be 'necessary' for a specific purpose. The lawful bases I rely on for processing this information include:

- Consent: I obtain consent to ensure agreement to process personal data for a specific purpose e.g. for EP involvement, and the purposes of a psychological assessment and report.
- Contract: My consent form forms part of the contract with the child/young person, family and school. Following consent, processing this data is necessary to fulfil my contractual obligations to undertake a psychological assessment, as agreed by all parties.
- Legitimate interests: The processing of this data is necessary for my legitimate interests as a psychologist in order to perform my job role.

As special category data is more sensitive, the above lawful bases still apply, but the following separate condition is also required for processing this type of data:

- Explicit consent: I will ensure I gain verbal parent/carer consent before recording and therefore processing special category data.

How will my personal data be stored?

All documents related to children/young people, such as consent forms and EP reports, will be stored securely as password-protected electronic files on a password-protected computer, which only myself has access to. It is important to note that there will be no paper copies printed or kept by myself in folders, but the school may retain a hard-copy of the consent form

for the child/young person's file in school (please refer to their own GDPR/privacy policy for more information).

Any notes and hard copies of assessments will be kept in a secure lockable filing box/cabinet for the duration of my involvement in my home office and shredded once written up (as soon as is possible). No hard copies of notes will be left unattended nor overnight in my vehicle. During school visits, my notes will always be kept on my person.

If personal data is received via email, any important information will be saved in a password protected document in the student's electronic file, and then the email will be deleted.

How long will my personal data be stored for?

I will ensure that I do not hold any information for longer than is reasonably necessary. All consent forms and reports will be reviewed at the end of each academic year in the school summer holidays (every August). If I am no longer involved with the child/young person, these files will be deleted. I will only keep your information after this period if there is a legitimate reason to do so, for example, if I am still involved with the child/young person. This means it is the school and parent/carer's responsibility to retain copies of my reports.

Who do you share information with?

I will always respect your right to privacy and only initially share my EP reports with the school and family. Where other professionals, agencies or parties seek access to my report, this will be discussed and agreed with the family first, or the family are welcome to forward my report to other relevant professionals as they see appropriate. The report will always outline all those who will receive copies of the report.

In certain circumstances, such as when safeguarding concerns arise, I may have a duty to share some of the information that I hold about you and therefore your data may need to be disclosed without permission e.g. to Social Care or the police. I will always aim to be open with you regarding sharing this type of information. However, there are instances where I do not need to ask for consent to share data with a third party, such as if there is a risk to your child/young person or others' safety in sharing this information, or if I am required to do so by law e.g. due to court orders or police matters.

How will the reports be shared?

Reports will be sent to school and family via a password-protected document through email. Passwords will be sent in a separate email. Documents will be sent as 'read-only' pdfs, so no

changes can be made. Reports will not be printed and posted by myself, but this may be completed through the school if requested by family.

What are my data protection rights?

Under law, you have a number of data protection rights, including:

- Right to access: You can request to view the personal data that I hold about you.
- Right to rectification: If you believe we are holding inaccurate information about you or information that is misleading, you have the right to ask us to rectify personal information or ask us to complete information that you think is incomplete. We will promptly correct any information found to be infactual as soon as is possible.
- Right to erasure: You have the right to ask us to erase your personal information, in certain circumstances (please see the ICO website for further information).
- Right to restriction of processing: You have the right to ask us to restrict the processing of personal information, in certain circumstances (please see the ICO website for further information).
- Right to object to processing: You have the right to object to the processing of your personal information, in certain circumstances (please see the ICO website for further information).
- Right to data portability: You have the right to ask that we transfer your personal information to you or another Educational Psychologist, in certain circumstances (please see the ICO website for further information).
- Right to withdraw consent: You, the school or the child/young person has the right to withdraw consent to EP involvement at any time.

Please note that parents/carers are able to exercise these responsibilities and rights on their child's behalf. However, from the age of 12 years, the consent of the child must be sought before disclosing their data. Please also note that there are some circumstances where your data protection rights may be overridden (see the 'who do you share information with?' section).

Please contact us in writing via the email address below if you wish to make any of these requests. 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, but we will aim to respond as soon as possible.

How do you prevent data security breaches from occurring?

I have procedures in place to avoid any data breaches, such as checking all email addresses, password-protecting reports, checking any documents attached, anonymising information

wherever possible, taking extra care and attention when sending emails, ignoring 'autofill' options on emails, not including personal/identifiable information in emails, and not printing off any documents containing personal information.

What if a data security breach occurs?

There is always a rare possibility that a data breach may occur. For example, the report may be sent to an outdated email address, which would breach GDPR. If a breach does occur and this is deemed to be a high risk for the rights and freedoms of the data subject, the breach will be reported to the ICO and all affected will be notified as soon as the breach is made aware. The nature of the breach will be explained, along-with the steps I am taking to deal with it. For example, if I notice a data breach by sending to an incorrect email address, I will immediately attempt to 'recall' the email.

What about other websites you might link to?

My website and reports may contain links to other websites of interest. However, I do not have any control over these websites, so cannot be held responsible for the protection and privacy of these links, and of any information you provide whilst visiting these sites. Other websites are not covered by this privacy policy.

What if I still have questions?

Should you have any further questions or concerns regarding the privacy of your data or feel there are areas not covered by this privacy policy, please do not hesitate to get in contact via the email address below.

How do I make a complaint?

If you have any concerns about the use of your personal information, you can make a complaint to me in writing via the email address below. If you are not satisfied with the answers I provide, you can put in a complaint to the ICO, particularly if you are unhappy with how I have used your data. You can do this via their website - www.ico.org.uk or helpline 0303 123 1113.