



Precious Hands  
SEND Support & Therapies

# **Confidentiality, Privacy and Data Policy**

## **This document is our GDPR Policy**

**Author: Melanie Jones**

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## **Confidentiality, Privacy and Data Policy This document is our GDPR Policy**

When you visit our website [www.precioushands-sendsupport.co.uk](http://www.precioushands-sendsupport.co.uk) , and In carrying out our day-to-day activities Precious Hands SEND Support & Therapies processes and stores personal data relating to the families we work with and the parents, carers and professionals who attend our training courses. We take your privacy very seriously. Therefore, we are required to adhere to the requirements of the General Data Protection Regulation (which replaces the Data Protection Act 1998) and is supported by the UK's Data Protection Act 2018. We take our responsibilities under the act very seriously and we are committed to protecting your personal data and as such this privacy policy explains when and why we collect personal information about people who visit our website, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

If you have any questions or concerns about this privacy notice, or our practices with regards to your personal information, please contact us at [precioushands.send@gmail.com](mailto:precioushands.send@gmail.com).

### **DATA PROTECTION**

We adhere to the Principles of the Data Protection Act 1998.

#### **Principles of the Data Protection Act 1998**

Specifically, the Principles require that personal information:

- shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met,
- shall be obtained only for one or more of the purposes specified in the Act, and shall not be processed in any manner incompatible with that purpose or those purposes,
- shall be adequate, relevant and not excessive in relation to those purpose(s)
- shall be accurate and, where necessary, kept up to date,
- shall not be kept for longer than is necessary
- shall be processed in accordance with the rights of data subjects under the Act,
- shall be kept secure by the Data Controller who takes appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal information,
- shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal information.

#### **Changes to our Privacy Policy**

We may update this policy from time to time to reflect changes in how we use your information. Where appropriate, we will notify you of any significant changes to how

we use your information. You can request a copy at any time.

### **Who we are**

Precious Hands SEND Support & Therapies is a therapy service based in Maisemore, Gloucester. We specialise in providing assessment and treatment services for children who have mental health difficulties as well as providing support to adoptive parents, special guardians, kinship carers or foster carers. We also offer SEND advice both online and in person. Full details can be found on our website.

### **What personal information do we collect?**

Personal information is any information that can be used to identify you. It may include:

- Full name of child, caregivers and significant family members
- Dates of birth
- Gender, religion, ethnicity
- Address, telephone number and email address
- School details and contact details
- Family history
- Reason for the referral
- Current behaviours presentations
- Medical information
- Support networks, strengths, and interests
- Convicted offences/alleged offences
- Physical and mental health details
- Occupation
- Contact details
- History

Ongoing contact with you is recorded- for example, we make a short record of the content of each appointment and record email exchanges and telephone calls. If another professional contacts us we will record this too.

If you share any sensitive information with us, the information you provide will be kept by Precious Hands SEND Support & Therapies and will be treated with the strictest of confidence. It will not be shared with a third party without your consent unless we have a statutory obligation to do so, or there are concerns for your safety which Precious Hands SEND Support & Therapies has a duty to report to the relevant authority in order for appropriate action to be taken.

### **Marketing**

For marketing purposes, we will keep the following personal data where the subscriber has opted in to receive updates from us:

- First name
- Last name,
- Email address,
- Job role (e.g. Adoptive parent, professional),

- Source (where you heard about us) and
- mailing preferences.

This data will be collected via sign up on our website. In addition, if you have attended a training event or have asked us to tell you about upcoming training events and other service developments, we store your details outlined above in our digital mail system. If you no longer want to receive this information or would like to change the kind of information we send you, please click the link at the bottom of any of our emails to unsubscribe.

### **Training courses**

For training/events purposes, personal details will be collected that are required for the administration of booked training courses and other events such as conferences or book launches. (i.e. name, job title, organisation, dietary preference, special requirements, fee paid, date/course attended.)

If you have attended a training event, we will store a record of your booking so that we can communicate any necessary information with you. We store this information for up to seven years. This forms part of our contract to delivering training. Please let us know if you would like us to delete this information by emailing: [precioushands.send@gmail.com](mailto:precioushands.send@gmail.com).

### **Publications, DVDS and downloads**

For sales of publications and downloads via the website, personal details for processing the purchase will be collected and stored securely. We may also collect details of your visits to our website, for example your location data, other sites you've visited and the resources that you access. We use this to provide you with the information, services, or products that you're interested in and are most relevant to you. To understand how we use information about the communications devices you use, such as IP address (the location of the computer on the internet) and cookies, please see website privacy policy.

### **Why we use/store your personal information**

The General Data Protection Regulations define specific legal bases for storing information. Several of these apply to the information which we store about our clients and their families:

- We ask clients and/or parents to consent to us storing and using this information
- We only store the information which we need to provide the therapy which you have asked us for
- In some cases, we need to use the information we have collected in order to protect vulnerable children and young people (Safeguarding)

Information and records relating to children and their families will be stored securely and will only be accessible to authorised staff. Information will be stored for only as long as it is needed or required statute and will be disposed of appropriately. Precious Hands SEND Support & Therapies will only collect and use your personal information where we have a legal basis to do so and will always respect your

rights. We may process your personal data for a number of reasons, such as:

- You have given us your explicit consent to use the information for a specified purpose, for example to receive our e-newsletter or a referral
- For invoicing purposes
- You have expressed interest in the organisation by a positive action, for example
- by completing a registration form, or by completing an enquiry form enquiring about an event
- We have a legal obligation to use your information
- We also reserve the right to apply our legitimate interest wherever we believe it is appropriate but we promise that we will always obtain your consent and respect your rights and freedoms when doing so. Some examples of when we would rely on our legitimate interest include:

1. To pursue our organisational aims and objectives
2. To ensure we meet our regulatory requirements
3. To manage our ongoing relationship with anyone we work with
4. To manage our financial transactions and prevent fraud.

#### **How we use your personal information:**

Precious Hands SEND Support & Therapies keeps records of our work with young people and families. These are to help your therapist in their work. They also help us to check that we are offering a good service and that our work is effective. We collect some basic information when we arrange to work with you, and your therapist will keep a brief written record of each session with you and copies of any letters sent or received in relation to our work.

Records of work are stored digitally in password protected, cloud-based storage. This can be accessed by your individual therapist and the owner. If you arrange appointments with more than one practitioner, your records will be stored in one folder and may be accessed by all Practitioners currently working with you.

The ways that we may use your personal information are as follows:

- to provide you with the services or information you have requested;
- to process any orders that you have submitted e.g. bookings of training courses
- or the purchase of publications and downloads via the website;
- to process any donation(s) we may receive from you;
- to provide you with information about our work or our activities, that you have asked to receive;
- to send you the items you have ordered through our website;
- for administration purposes e.g. we may contact you about an event you have expressed an interest in or registered for;
- for internal record keeping, such as the management of feedback or complaints
- or to maintain a list of delegates who have paid for and attended our training courses;
- to analyse and improve the services we offer;

- to use data analytics to improve our website, products/services, marketing,
- customer relationships and experiences and where it is required or authorised by law;

### **Confidentiality Statement**

*We will keep therapy sessions confidential to the child and their families unless they disclose information which means they or others are in danger or being harmed or unless otherwise agreed for example, in most cases, we are commissioned to complete reports as part of the therapy, therefore details will be shared in the reports. Child/families will always receive a copy of any reports completed.*

### **The legal basis for collecting information about you**

By law we need to have a lawful basis for processing your personal data. We process your data because:

- It is necessary for our legitimate interests for running the organisation, provision of administration and IT services, network security and to prevent fraud
- Necessary for legitimate interests to keep our site updated and relevant, to develop our business and to inform our marketing strategy
- You have consented to us emailing you by opting in to receiving our newsletter and providing us with your email address to do so about Precious Hands SEND Support & Therapies work, assessment and therapy services, events, training, publications, campaigns and & fundraising.
- We are required to do so in order to fulfil a contract that we have with you
- It is necessary to comply with a legal obligation
- Where we process your special category data, i.e. via the registration form, we do so because it is necessary for us to provide and manage social care services and to provide our treatment service
- We may also process your data with your consent. If we need to ask for your permission, we will offer you a clear choice and ask that you confirm to us that you consent. We will also explain clearly to you what we need the data for and how you can withdraw your consent.

### **Confidentiality**

Clients have the right to share whatever they like from their experience of therapy with anyone they choose. We encourage parents / carers not to ask children what they have done or talked about in therapy but allow the child to share. We offer regular review meetings to parents / carers, and we will also discuss reviews in advance with the child or young person and agree what information they would like shared.

All therapists receive professional, external supervision, which is also kept confidential.

We may have to break confidentiality when:

- When a therapist is concerned that a child, young person, or someone else would be at serious risk if we did not pass on information.
- When we have information relating to acts or potential acts of terrorism or money laundering, we are legally obliged to report this.

If at all possible, we will discuss our concerns with the client first and come to an agreement about what is best to do. We will tell the client what information we are going to share, and who we are going to tell. If the client is under 18, the therapist will also discuss the situation with parents /carers before sharing information, as long as it is safe to do so. If the child is in foster care, any concerns will be shared with the child's social worker first.

If a therapist does need to share information without the clients consent they will consult Melanie Jones before doing so, unless they are unavailable and waiting to do so would increase risk. We will write down what information has been shared and why we breached confidentiality. We will analyse this and learn from this.

Clients written and art work.

We provide storage for art and craft work which clients produce during face-to- face therapy sessions. Clients can decide whether to take the work home or whether they would prefer us to destroy it. If we lose contact with a client before the planned end of their therapy, we will store artwork for up to three months, during which time they can arrange to come and collect it from the centre. After three months any work which has not been collected will be disposed of.

### **Sharing your information with third parties**

In general, the third-party providers we use only collect, use and disclose your information to the extent necessary to allow them to perform the services they provide to us. Precious Hands SEND Support & Therapies does not share any mailing lists or data that has been collected for marketing purposes with any third parties. The data is held securely on a password protected email management system.

However, certain third-party service providers, such as payment gateways and other payment transaction processors, have their own privacy policies in respect to the information we are required to provide to them for your purchase-related transactions. For these providers, we recommend that you read their privacy policies so you can understand how your personal information will be handled by these providers.

We may disclose your personal data to third parties if we are legally obliged to; or in order to enforce or apply our terms of use for this website or other agreements; or to protect the rights, property or safety of Precious Hands SEND Support & Therapies or others. This includes exchanging information with other companies and organisations for the purposes of fraud detection and protection, or with local authorities or social services for the purposes of the provision of health, legal or social care or treatment.

By law we have to keep basic information about our customers (including contact, identity, financial and transaction data) for six years after they cease being customers for tax purposes. Financial and transactional data is held by PayPal rather than us. Once you leave our store's website or are redirected to a third-party website or application, you are no longer governed by this Privacy Policy or our

website's Terms and conditions.

### **Transferring your information outside of Europe**

The General Data Protection Regulation (GDPR) states that we must let you know if we send your information outside of the European Economic Area (the EEA, i.e. the 28 European Union Member States, as well as Iceland, Norway and Liechtenstein), which do not always provide the same level of data protection as the UK.

When we do make such transfers, we have provision in place with our providers, including suitable security measures, to ensure that your personal information is protected in accordance with EU GDPR standards.

### **Opting out and keeping your information up to date**

The opportunity to unsubscribe from the marketing mailing list will be given on every marketing email sent out via an 'unsubscribe' link. Preferences are recorded on a master list used for all marketing. We hold the list on our website host Reg123 to ensure mailing preferences are adhered to and to avoid duplication of records.

Any requests to 'unsubscribe' which do not come through the automated link to the mailing list, should be forwarded to [precioushands.send@gmail.com](mailto:precioushands.send@gmail.com). Any other 'unsubscribe' requests (verbal or written) that any member of the team are made aware of will be forwarded to the director to action.

### **How long will we keep your personal information?**

We always have your best interests at heart and your personal information will not be retained by Precious Hands SEND Support & Therapies for longer than necessary in relation to the purposes for which it was originally collected, or for which it was further processed, subject to certain legal obligations mentioned below:

We review our data retention periods for personal information on a regular basis.

We hold personal information relating to:

- purchasing services, like training for 7 years
- subscribing to a newsletter, you can unsubscribe at any time
- making an enquiry via the website. This is emailed directly to the relevant member of staff's inbox who will then deal with or pass on your query. The information is not stored on our website.
- We are legally required to hold some personal data to fulfil statutory obligations or to support certain financial transactions.
- We will also hold information about your details so that we can respect your preferences for being contacted by us.
- If your information has been collected for a service and that service is no longer going ahead, we will delete your data immediately.

### **Access to records**

You have the right to see records that are kept about you. If you would like to do this, please email [precioushands.send@gmail.com](mailto:precioushands.send@gmail.com) making a formal request. The allocated Therapist or Director, Melanie Jones will explain anything in a record that is unclear.

There are two circumstances in which access may be refused to any part of your record. These are:

- Where we believe that it could be harmful to you
- Where information has been supplied confidentially
- Where information has been supplied confidentially by someone else. (Consent must normally be obtained from that person before sharing information with you.)

According to the General Data Protection Regulation (GDPR), parents and guardians do not have automatic access to information relating to their children. We have a duty to act in the best interests of the child or young person when deciding what information to share with parents and carers, and the law states that sharing details of therapy sessions will not usually be deemed to be in the child's best interest. Parents have the right to ask to see information which is stored about them, for example records of meetings where they were present.

### **Security precautions in place to protect the loss, misuse or alteration of your information**

We maintain the highest standards of data privacy and security to protect your personal details and other information about you because we want you to feel completely confident about engaging with us. We will not rent or sell your personal information to other organisations for use by them in any way. We regularly review our processes and procedures to protect your information from unauthorised access and use, accidental loss and/or destruction.

### **Monitoring and evaluation**

We evaluate all our work at Precious Hands SEND Support & Therapies, to ensure that all of the services we deliver are effective, to enable therapists to continue to grow and improve their practice, and to help us plan and develop our service.

We will ask you to complete an end Evaluation to both monitor and evaluate the therapeutic experience. Therapists may also record your comments in relation to your experience of therapy and its effects from a verbal conversation, but will ask your permission to do this. We will store this information. We will also post evaluations online but anonymised.

### **Links**

When you click on links on our store, they may direct you away from our site. We are not responsible for the privacy practices of other sites and encourage you to read their privacy statements

### **16 or under**

We are concerned to protect the privacy of children aged 16 or under. If you are aged 16 or under, please get your parent/guardian's permission beforehand whenever you provide us with personal information.

### **Recruitment**

If you have applied for a position at Precious Hands SEND Support & Therapies,

we will store a copy of your application form, cover letter and brief notes of the outcome of any discussions, interviews for up to five years. We may use this to inform you of future vacancies. Please let us know if you would like us to delete this information if you were not successful in the post by emailing: [precioushands.send@gmail.com](mailto:precioushands.send@gmail.com). If you were successful and work for us as an Associate, we will keep information relating to your recruitment and contracted work with us for up to seven years after this work ends.

Under data protection legislation, parents, carers and children have the right to request access to information about them that we hold. To make a request for your personal information contact [precioushands.send@gmail.com](mailto:precioushands.send@gmail.com) or if by post:

Data Protection Lead,  
Precious Hands SEND Support & Therapies, 2 New Court, The  
Steadings, Maisemore, Gloucester, GL2 8EY

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>

The data that we keep about you is your data, and we ensure that we keep it confidential and that it is used appropriately. You have the following rights when it comes to your data:

1. You have the right to request a copy of all of the data we keep about you. Generally, we will not charge for this service;
2. You have the right to ask us to correct any data we have which you believe to be inaccurate. You can also request that we restrict all processing of your data while we consider your rectification request;
3. You have the right to request that we erase any of your personal data which is no longer necessary for the purpose we originally collected it for. You may also request that we restrict processing if we no longer require your personal data for the purpose we originally collected it for, but you do not wish for it to be erased.
4. You can ask for your data to be erased if we have asked for your consent to process your data. You can withdraw consent at any time – please contact us to do so.
5. If we are processing your data as part of our legitimate interests as an organisation or in order to complete a task in the public interest, you have the right to object to that processing. We will restrict all processing of this data while we look into your objection.

You may need to provide adequate information for our team to be able to identify you, for example, a passport or driver's licence. This is to make sure that data is not shared with the wrong person inappropriately. We will always respond to your

request as soon as possible and at the latest within one month.

**It is against our Confidentiality, Privacy and Data Policy to record or video any meeting- in person or digitally with any member of the Precious Hands SEND Support & Therapies team. If this has been breached. All recordings are to be deleted immediately and not shared with any other party. We reserve the right to terminate our services with immediate effect.**

**Contact:**

If you would like to discuss anything in this Privacy & Data Policy, please contact Melanie Jones, Data Protection Lead, [precioushands.send@gmail.com](mailto:precioushands.send@gmail.com)