**Partners in Psychology**

**Data Protection Policy**

**May 2018**

**Statement of information security policy:**

All of the directors of Partners in Psychology are responsible for information security according to the General Data Protection Regulations May 2018 and taking into account guidance from the British Psychological Society.

**Data Controllers**

All 4 directors, Leanne Cort, Emma de Ternant, Gabby Newman and Unity Harding are Data Controllers and Data Processors. We can be contacted on info@partnersinpsychology.co.uk and on telephone number 0748047166.

We do not use personal data for any marketing purposes and only share information with other agencies who are professionally involved with our clients, the data subjects, and only with their written consent.

**Information we hold**

The personal data we hold on our clients is as follows:

* While a case is active, including when a review is pending:
	+ Request for involvement form which is completed by the commissioner and signed by the person holding parental responsibility for children under the age of 16 years and/or the young person who is the focus of our work (referred to as client/data subject for the purposes of this policy). This includes name, date of birth, address and sensitive information about the child and their parent
	+ Process notes or reports collated for the purposes of assessment or intervention
	+ Any reports provided by the person holding parental responsibility or the educational setting about the child or young person who is the focus of our work
	+ Any completed assessment forms such as Psychometric Test Forms
* When a case is complete
	+ Request for involvement form (as above)
	+ Completed reports we have written
	+ Completed assessment forms

The personal data we hold on staff is as follows:

Name, address, contact details, DOB and bank details of all 4 directors

Name, address, contact details and bank details of other Educational Psychologists we may periodically hire.

How we collect data:

We collect this personal data from those parties who commission our work, with the consent of the client/data subjects.

**Privacy notices**

Our Privacy Notice is on our website [www.partnersinpsychology.co.uk](http://www.partnersinpsychology.co.uk) but is also available on request by telephoning us on 07548 047166 or emailing us on info@partnersinpsychology.co.uk. Client/data subjects are made aware of this when they sign our consent form or our Service Level Agreement.

**Individual’s rights**

We recognise data subject’s rights and understand that the following are relevant to our work:

* the right to be informed;
* the right of access;
* the right to rectification of personal data;
* the right to erasure of personal data;

We do not use data for marketing or process data using automated means.

Right to be informed:

We recognise data subject’s rights to be informed who the Data Controllers are and inform them via our Privacy Notices and website.

We provide our contact email on consent forms and Privacy Notices

We identify their right to informed of the purpose and lawful basis for processing their personal data on our Privacy Notices.

Right of access:

We do charge for complying with an access request.

We comply within a month.

We only refuse or charge for requests that are manifestly unfounded or excessive.

If we refuse a request, we inform the individual why and that they have the right to complain to the supervisory authority and to a judicial remedy. We do this without undue delay and at the latest, within one month.

Right to rectification of personal data:

We recognise data subject’s rights to rectification.

When a request is made verbally we record it and save that record in the client/data subject’s file.

We respond without undue delay and within a month to the request.

When personal data is inaccurate as a matter of fact we rectify it and keep a record of the rectification in the file.

When we agree to a request for rectification we inform any recipient of the personal data of that request and rectification.

Right to erasure of personal data:

We recognise data subject’s rights to erasure under certain circumstances, including withdrawal of consent.

We understand that there is a particular emphasis on the right to erasure if the request relates to data collected from children.

When a request for erasure is made verbally we record it and save that record in the client/data subject’s file.

We respond to requests within a month.

We are aware that we can refuse a request to erasure under certain circumstances; the most likely for us we see as Safeguarding of vulnerable clients.

When we agree to a request for erasure we inform any recipients of the personal data of that request and erasure.

**Retention of personal data policy**

* The minimum personal data will be retained
* We retain this personal data on clients for 7 years, following guidelines from the British Psychological Society, Practice Guidelines, Third Edition, August, 2017
* We retain this data for the purposes of information if the client/data subject were re-referred to our service

**Controlling Physical Security:**

* All active, pending and archived files are kept in locked filing cabinets
* All working files are kept within lockable premises and out of sight from individuals not employed by Partners in Psychology
* All computers used are encrypted and mobile phones password protected
* All active files are kept in a locked cabinet or room or with the Educational Psychologist when working away from their secure base

**Controls on Access to Information:**

* All those working for Partners in Psychology have individual computer log on and password protection for shared computers
* All those working for Partners in Psychology use email accounts with password protection
* Documents including personal data sent electronically are encrypted or anonymous
* We change individual passwords on an annual basis to avoid security breaches

**Business Continuity Plan:**

An electronic and hard copy of Partners in Psychology information is kept in the event of a disaster.

**Training staff on security system and procedures:**

Partners in Psychology have an annual review of data protection issues. Induction training is offered to any Educational Psychologists working for the company. All Educational Psychologists employed by Partners in Psychology are trained and follow our Data Protection Policy.

**Detecting and Investigating breaches of security when they occur:**

In the event of a data breach, we inform the ICO within 72 hours and the police if necessary and follow recommendations and advice given. We notify the ICO of a breach where it is likely to result in a risk to the rights and freedoms of individuals – if, for example, it could result in discrimination, damage to reputation, financial loss, loss of confidentiality or any other significant economic or social disadvantage.

Where a breach is likely to result in a high risk to the rights and freedoms of individuals, we also notify those concerned directly.

Date: May 2018, to be reviewed April 2019.