

Data Management, Protection and Privacy Policy

A Privacy Policy is a statement issued by an organisation which explains how personal and confidential data about individuals is collected, used and shared.

Psychology4Learning Ltd will act as a “Data Controller” for any personal data that you provide us. We will ensure that the data given to us is processed in line with the Data Protection Act 2018 (DPA 18) and the UK General Data Protection Regulations (GDPR).

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).

Why do we need your personal information?

We use the data we collect from you in the following ways:

- To communicate with you. For example we use your name and contact details (telephone number, email address and/or postal address) so that we can inform you about your appointments with us.
- To deliver the correct service to you and/or your child. For this purpose we use details such as your name, your child's name, your contact details, details about the services you have purchased and the information you have provided about your child's educational and developmental history.
- To create your invoice we use your name and email address

Collecting contact details

In order to deliver our services, and contact clients and prospective clients, we collect personal information and store it in our contact database (Microsoft Outlook 365 and Excel spreadsheet).

Contact details are collected from forms completed on our web site (www.psychology4learning.com), by corresponding with us by phone, email or letter, or by using publicly 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

What data do we collect?

Psychology4Learning Ltd provide Educational Psychology Services to schools and educational settings, and parents/carers regarding children and young people (CYP). We collect a range of data about parent/carers, schools and CYP, for the purposes of Educational Psychology involvement.

This includes:

- Name, postal address, telephone number, email address
- CYP name and date of birth
- CYP school/setting
- Special category characteristics e.g. ethnicity, language
- Other services/agencies involved with you or your child
- The name and contact details of any other individual with parental responsibility
- Details of you / your child's special educational psychology needs, safety and wellbeing

- School attainment and progress data, attendance, exclusion information, child support plans, Education and Health Care Plans
- Images, video and audio recordings, digital and paper records that support our work with you

We may collect this information in some or all of the following ways:

- Parental/carer consent form
- Parent and school questionnaires
- Discussion with you and your child
- Discussion with schools staff and other professionals
- Observation of your child in their school / setting or home
- Direct work with you / your child

Information is generally collected from you directly or it may be via a third party, for example if we need to collect information from another health professional to provide a complete assessment. We will always seek your permission before contacting another professional about your or your child.

How do we process your personal data?

Psychology4Learning Ltd complies with its obligations under the GDPR by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, or unauthorised access and disclosures and by ensuring that appropriate technical measures are in place to protect personal data.

Personal data is recorded in:

1. **Consent Forms:** Informed consent has to be provided before an Educational Psychologist (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.
2. **Master database:** 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 stores CYP and parent / carer information.
3. **School Planning Notes:** All new work is discussed between EP and School during a planning conversation (via phone or in person). A summary record may be kept of the planning meeting.
4. **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.

Confidentiality statement

All work undertaken by Educational Psychologists 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.

How the law allows us to use your information

There are a number of legal, legitimate or lawful reasons why we need to collect and use your personal information. We collect and use personal information in circumstances where:

- You have given your consent for involvement with an Educational Psychologist
- It is necessary to protect someone in an emergency
- It is necessary to keep a child or young person 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.

How do we protect your information?

We will always ensure we hold records about you (on paper and electronically) in an appropriately secure way, and we will only make them available to those who have a right to see them.

Examples of our appropriate security include:

- 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
- Educational psychology reports are sent via Egress, a secure email system
- Training of staff to make them aware of how to handle information and when to report when something goes wrong
- Educational psychologists may use paper copies of information that they need to carry out work with children or young people. EPs will take necessary precautions to ensure the documents are as secure as possible. When paper copies are scanned and stored electronically, paper copies are shredded.
- 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).

How long do we keep your personal information?

Psychology4Learning Ltd will keep CYP records and related information in the CYP electronic folder, until the CYP turns 25 years of age. In their 25th year, Psychology4Learning Ltd will delete the CYP electronic folder, related documentation, and remove them from the CYP master database.

If an EP works with a client who is aged 18 years or over, their records will be kept for 8 years. In the 8th year following the work, Psychology4Learning Ltd will delete the clients electronic folder, related documentation, and remove them from the client master database.

What can you do with your information?

Unless subject to an exemption under GDPR you have a number of rights with respect to your personal data. You can:

- Access and obtain a copy of your data on request
- Request that Psychology4Learning change incorrect or incomplete data
- Require that Psychology4Learning delete or stop processing your data
- **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.

If you believe Psychology4Learning has not complied with your data protection rights, you can contact us directly at Info@psychology4learning.com and we will investigate your complaint. If you are still dissatisfied with the response, you can also complain to the Information Commissioner at www.ico.org.uk.

Online Assessment Software

Some assessments carried out by P4L Educational Psychologists are done so using the Pearson Education Ltd Q-interactive Assessment system, through which assessments are carried out digitally via i-Pad. Pearson Education Ltd Q-interactive Assessment system have a central database in which they hold information about individual children or young people upon whom assessments have been carried out with the P4L EP. This information includes the child or young person's name, their date of birth, their assessment responses and their raw, standardised and percentile scores. The central database system is able to carry out statistical analyses using this assessment information. The EP will have a license agreement with Pearson Education Ltd. The EP is therefore the only individual able to access and export assessment data pertaining to the individual children and young people upon which assessments from the Q-interactive Assessment system have been carried out. Any personal and assessment information that has been temporarily stored on the iPads that have been used to carry out assessments, is permanently deleted from the device after the EP record of involvement has been written. Information and data relating to individual children or young people is then archived within the Q-interactive Assessment system under the EP's specific license. When the child or young person turns 25 years of age, the EP will ensure that this information and data is deleted permanently. For further information about Pearson Education Ltd's privacy policy, please see <https://www.pearson.com/uk/pearson-privacy-and-you/privacy-policy.html>.

Data protection and Psychology4Learning Ltd websites, reports and guidance documents

1. **Cookies** on our website 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 or 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, reports and guidance documents 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