

## Privacy Policy

This privacy policy was created 28.05.21 and last updated 01.08.23. Please note that information in this document is subject to change, but an up-to-date version will always be saved on the Glimmer Psychology Services (GPS) [website](#). This policy is based on the following information:

- The Data Protection Act (1998).
- General Data Protection Regulations (2016).
- The UK Data Protection Bill (2018).
- The Information Commissioner's Office (ICO) - the UK supervisory authority for data protection. As the GPS lead, I (Dr Alexandra Gregory) am registered with, and pay a data protection fee to, the ICO (registration number: ZB074409).
- Regular data protection training e.g. through West Sussex County Council.

At GPS, protecting your personal data is extremely important to us, and we want to reassure you that we take our data protection responsibilities very seriously. We hope this policy gives you confidence that any personal information is processed in a transparent and lawful manner.

### What is a privacy policy?

A privacy policy outlines what data we collect and why, as well as how we 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. Special category data is personal data that requires an increased level of protection, due to it being more sensitive e.g. a child/young person's health status.

As a 'data controller', GPS determines the purpose and means of processing any data through our service. Data protection laws require data processors and controllers to meet certain conditions when processing personal data. This policy complies with all laws and legislation concerning the protection and privacy of personal data, which ensures that your information is processed securely, protected, and kept for no longer than necessary.

### What information do you process through your website?

The GPS website does not involve collection or storage of personal data. Professionals and/or family members may decide to make contact through the website (via the 'contact' page) or they may wish to provide a testimonial through the website (via the 'testimonials' page). However, both pages make clear – *"please do not record any identifiable information about children and young people in the form below e.g. their full names. Please send any individual casework referrals/requests via email."*

### What information might you process through school training?

Through emails and training documentation, we typically store details such as the school's name and key points of contact. Other than this, we do not collect or store any personal data through training. Any feedback forms do not ask for staff members' names (just their roles).

### What information might you collect within EP assessments/casework?

In order to carry out an effective psychological service, the nature of psychology input involves the collection of a range of personal and special category data. For example:

- **Consent:** Upon the start of involvement with a child/young person, all those with parental responsibility have to sign a written consent form to consent to our involvement (e.g. parents/carers or the child's social worker). Additionally, school also need to consent to our work in their school, and informed assent needs to be sought from the child. Without this written consent, children/young people will not be able to be discussed with our service. The consent form collects information on the child/young person's name, age, year, and date of birth (required for the EP report); their parent/carer's name, email address, and phone number (for contact purposes); and a key staff member's name, email address, and phone number (for contact purposes).
- **Names:** We have to be able to access a child/young people's full name in order to write an EP report. We prevent using full names in emails wherever possible, but may use a child/young person's first name or initials so it is clear who we are referring to (e.g. when communicating with schools and families).
- **Email addresses:** Parent/carer and school email addresses are required for organising school visits, sharing information, sending invoices, ongoing liaison/communication, and sending out the EP report and any handouts. Parents/carers and schools agree to provide this information through the consent form.
- **Phone numbers:** Contact numbers are required from schools and families so we have details to arrange any school visits/assessment work and for ongoing consultations. Again, parents/carers and schools agree to provide this information in the consent form.
- **Consultation:** To gain an understanding of a child's strengths and needs, certain information-gathering is required in order to inform the current situation and provide an in-depth psychological assessment. Only data relevant to the agreed EP involvement will be collected. However, inevitably, this may include special category data e.g. information related to health/mental health, as well as family health and mental health history.
- **Reports:** EP reports/records are typically written as part of an EP assessment. These documents typically provide a summary of involvement, including background information, identified strengths and needs, and discussed or recommended support to meet needs. Reports will include the child/young person's name and date of birth to identify them, as well as their school and year group. No home address is collected or recorded, as this is not felt to be required/relevant (reports are emailed not posted). Reports will identify the EP as the author (e.g. Dr Alexandra Gregory) and GPS as the organisation, unless the work is commissioned through another organisation we work with (e.g. [Sussex Psychology](#) or [Psychology First](#) – please refer to their own privacy policies for relevant information).

### **How do you access personal data?**

The personal information we access and process will be volunteered by the school, family, and/or child/young person e.g. through consultation, observation and/or one-to-one work. Where this would be helpful and relevant (e.g. in understanding the child's needs, formulating a shared understanding/narrative, and promoting collaborative working) schools and families may send copies of reports from other involved professionals e.g. a report from another psychologist. Verbal or written consent from parents/carers to access this information will always be sought in these instances – with reports typically sent from parents/carers directly.

### **What is the lawful basis with which you can process my personal information?**

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

- **Consent:** At the start of any involvement with children/young people, we obtain consent to ensure agreement to process personal data for a specific purpose e.g. for psychological assessment, consultation and/or report writing.
- **Contract:** The GPS consent form forms part of the contract with the school and family. Following receiving written consent, collecting and processing this data is typically necessary to fulfil my contractual obligations, as agreed by all parties e.g. to facilitate a problem-solving consultation and/or undertake a psychological assessment.
- **Legitimate interests:** The processing of this data is necessary for our legitimate interests as a psychology service, in order to perform our 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:** We ensure we gain verbal or written parent/carer consent before processing any special category data e.g. recording this information in reports.

### **How will my personal data be stored?**

All documents related to children/young people (e.g. consent forms and EP reports) are stored securely on a password-protected work-specific computer, which only the individual EP working with the school/family has access to. All reports are saved as password-protected PDFs before being shared. No paper copies of documents related to children/young people are printed. However, the school may retain a hard-copy of the consent form and report in the child/young person's school file, in line with their own GDPR/privacy policy.

During school visits, notes are typically recorded on a password-protected iPad. If handwritten notes are required or hard copies of assessments/questions, no identifiable information is recorded e.g. the names of children and young people (only initials). These notes are always kept on our person, not left unattended, and not left overnight in any vehicle. Any handwritten notes are written up as soon as possible, and then destroyed confidentially through a shredding machine. In any instance where handwritten notes are unable to be written up straight away, they are kept in a secure lockable filing cabinet within a locked office space.

### **How long will my personal data be stored for?**

We ensure we do not hold any information for longer than is reasonably necessary. In the school summer holidays at the end of each academic year (every August), all files related to children and young people are reviewed. If we have not been involved with the child/young person for a full academic year, all documentation related to them is deleted (e.g. consent forms and reports). After this time, it is then the school and parent/carer's responsibility to retain copies of our reports.

We will only keep information related to children and young people after this period if there is a legitimate reason to do so. For example, if we are still working with the child/young person, family and/or school, as there may be future work involved such as follow-up or review meetings.

## Who do you share information with?

We respect your right to privacy and typically only share our EP reports with the child/young person's family and school setting (e.g. key members of staff who work with the child). Where other professionals, agencies or parties are involved or seek access to the report, whether or not it would be helpful to share my report will be discussed and agreed with the family first. Reports will always identify all those who will receive copies of the document. Alternatively, those with parental responsibility (e.g. family) are welcome to forward our EP reports to other relevant professionals as they see appropriate.

In certain circumstances, such as when safeguarding concerns arise, we may have a legal duty to share certain information we hold about the child/young person, family and/or school. In these instances, data may need to be shared with the school's safeguarding lead, social care, or the police. We always aim to be transparent with regard to sharing this type of information, and seek parental consent to do so wherever possible. However, there are instances where we do not need to ask for consent to share data with a third party, such as if we identify an immediate risk to the child/young person or others' safety, or if we are required to do so by law e.g. due to court orders or police matters. In these rare circumstances, data may need to be disclosed without permission.

## How will the reports be shared?

Reports are sent as password-protected PDFs via email to the school and family – each child/young person will have a unique password. Reports will not be printed and posted. If this is requested by the family, school will be asked to do this so that we do not need to access the family's address.

## What are my data protection rights?

Under law, you have a range of data protection rights, such as the:

- [Right to be informed](#): You have the right to be informed about the collection and use of your personal data, which this privacy policy aims to do.
- [Right of access](#): You can request to view the personal data that we hold about you.
- [Right to rectification](#): If you believe we are holding inaccurate or misleading information about you, you have the right to ask us to rectify personal information or 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](#): In certain circumstances, you have the right to ask us to erase your personal information.
- [Right to restrict processing](#): In certain circumstances, you have the right to ask us to restrict the processing of your personal information.
- [Right to object](#): In certain circumstances, you have the right to object to the processing of your personal information.
- [Right to data portability](#): In certain circumstances, you have the right to ask us to transfer your personal information to you or another Educational Psychologist.
- [Right to withdraw consent](#): You have the right to withdraw consent to EP involvement at any time.

If you wish to make any of these requests, please make contact in writing to [alex@glimmerpsychology.co.uk](mailto:alex@glimmerpsychology.co.uk). You are not required to pay any charge for exercising these rights. If you make a request, we are legally given one month to respond, but we always aim to respond as soon as is possible.

Please note that parents/carers can exercise these responsibilities and rights on their child's behalf. However, from the age of 12 years, 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 (please see the 'who do you share information with?' section).

### **How do you prevent data security breaches from occurring?**

We have procedures in place to avoid any data breaches, such as taking extra care and attention when sending emails e.g. by checking all email addresses, ignoring 'autofill' options on emails, checking any documents attached, not including personal/identifiable information in emails, anonymising information where required, password-protecting reports, and not printing any documents containing personal information.

### **What if a data security breach occurs?**

In the rare eventuality that a data breach occurs, if this is deemed to be high-risk for the rights and freedoms of the data subject, the breach will be reported to the ICO. All those affected will be notified as soon as the breach is made aware. The nature of the breach will be explained, along-with the steps we are taking to deal with it. Please be reassured that if we send a report to an incorrect email address, recipients will not be able to access the report due to password protection. However, we will immediately use the 'recall email' function and send an urgent email asking for it not to be read and deleted as soon as possible.

### **What about other websites you might link to?**

Our website and reports may contain links to separate websites of interest, which are not covered by this privacy policy. Please note that we do not have any control over other websites, except our own, so cannot be held responsible for the protection and privacy of these links, and of any information you provide whilst visiting these sites.

### **What if I still have questions?**

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

### **How do I make a complaint?**

If you have any concerns about the use of your personal information, you can make a complaint in writing to [alex@glimmerpsychology.co.uk](mailto:alex@glimmerpsychology.co.uk). We will have a discussion with you to try and resolve the issue, and come up with a satisfactory solution/resolution. If you are not satisfied with the answers we provide and/or are unhappy with how we have used your data, you can submit a complaint directly to the ICO via their website [www.ico.org.uk](http://www.ico.org.uk) or helpline 0303 123 1113.

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