# **Privacy Policy**

Rebecca Brown Psychology Ltd aims to be as clear as possible about how and why we use information about you, so that you can be confident that your privacy is protected.

This policy describes the information that Rebecca Brown Psychology Ltd collects when you use our services. This information includes personal and sensitive information as defined in the General Data Protection Regulation (GDPR) 2018 and the subsequent UK Data Protection Bill that is expected to be enacted in 2018.

The policy describes how we manage your information when you use our services. Rebecca Brown Psychology Ltd uses the information we collect in accordance with all laws concerning the protection of personal data, including the Data Protection Act 1998 and the GDPR 2018. As per these laws, Rebecca Brown is the data controller.

## **Why do we need to collect your personal data?**

 We need your personal data to provide a service, including:

* To communicate with you, contact you about appointments, send reports to you, provide feedback after an assessment, and to send invoices to you.
* To deliver a service we have been contracted to do, either by yourself or by your child’s school or educational setting.
* To complete a psychological assessment of the child, young person or student.
* To take details of an initial enquiry whilst a decision is made whether to use the services of Rebecca Brown Psychology Ltd.

**What personal information do we collect and when do we collect it?**

Given the nature of the service, the purpose for collecting and processing personal data is to conduct a psychological assessment. Therefore, we have a legitimate interest to collect data relevant to the process of forming a professional opinion. This information can include:

* Your name and the name of the individual for whom the service is being accessed.
* Your contact details including a postal address, telephone number(s) and electronic contact such as email address.
* Background information provided by you via the Family or Student Questionnaire, email and telephone contact, and face to face discussion. This might include date of birth, medical information, developmental history, family circumstances, strengths and difficulties, previous assessment reports.
* Information collected from the School Questionnaire, which might include current attainments and teachers’ viewpoints on your child’s strengths and difficulties in school. We collect this information only with your consent, providing you with the questionnaire to forward to school.
* Information collected as part of an Educational Psychology assessment.

## **How do we use the information that we collect?**

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

* To communicate with you and so that we can inform you about your appointments with us.
* To deliver the correct service to you.
* To create your invoice.
* To complete the service requested, such as developing hypotheses, interpreting data, providing verbal feedback and a written record or report of involvement.

## **Where do we keep the information?**

Paper-based notes, questionnaires and assessment materials are held in a secure home office and are destroyed by shredding on completion of the written report or record of involvement; the written report will contain all the relevant information gathered, assessment findings and conclusions.

Electronic-based notes, reports, invoices and emails are held on a personal computer that is located in the secure home office; the computer is password protected and the hard drive encrypted, and the computer has up-to-date firewall and anti-virus software.

To aid transfer of information, electronic records and emails are also stored in the One Drive cloud-based system provided by Microsoft Office 365. This is password protected and Microsoft confirm the system meets GDPR requirements. Further information about how Microsoft are complying with GDPR can be found here: <https://www.microsoft.com/en-us/trustcenter>

Q-Global is an online scoring system from Pearson Clinical and this is used when completing an assessment; access is via a password and dual authentication process. The information stored includes the individual’s first name, initial of surname, date of birth and date of assessment. Pearson are not given permission to collect any data. Once the assessment report has been completed the individual’s details are deleted.

Reports are backed up on a password protected and encrypted portable hard drive, which is stored in a locked filing cabinet.

Invoices include the client’s name and the name of the individual being assessed; no other personal information is included. Invoices are printed and shared with the company accountant who also follows GDPR, then stored for 7 years to comply with requirements from HMRC, before being shredded and disposed of. A copy is also kept on the password protected desktop computer.

Reports are emailed to clients using an encrypted email service called Egress Switch, which clients access via a web-based and password protected site. An alternative method used when Egress Switch is not an option is a password protected zip file using WinZip. Egress Switch and WinZip are GDPR compliant.

Once reports have been received by the client, it is their responsibility to store it and share it as they see fit. In the case of an organisation like a school, university or assessment centre, this will be within the context of their own GDPR policy.

## **How long do we keep the information?**

Any papers associated with the assessment are shredded and disposed of soon after the completion of the assessment report.

Written reports are stored electronically for a period of 7 years for those aged 18 and under; this enables a copy to be available to Rebecca Brown and the client should further assessment work be required. For example, a progress check, an assessment for examination arrangements or for accessing support at university might be requested, and retention of the previous assessment report enables a check on the previous conclusions and a comparison between assessment scores to be made, and provides information about previous suggested interventions.

Written reports are stored electronically for a period of 7 years for those aged over 18 years; this enables any follow-up work to be completed, such as requests for further clarification of or persistence of difficulties when students are applying for future educational courses.

## **Who do we send the information to?**

When the service is commissioned by a parent or student, we send the report directly to the parent or student, via a secure email system called Egress Switch, which is GDPR compliant. When the service is commissioned by a school, university or assessment centre, we send the report to the commissioning organisation as the client’s contract is with them; these organisations will be working within the confines of their own GDPR policy. We still use the secure email system Egress Switch or occasionally a password protected zip file, using WinZip, which is also GDPR compliant. Very rarely we may be required by law to provide the report to a third party.

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## **How can I see all the information you have about me?**

You can make a subject access request (SAR) by contacting the Data Protection Officer, Rebecca Brown. We may require additional verification that you are who you say you are to process this request.

We may withhold such personal information to the extent permitted by law. In practice, this means that we may not provide information if we consider that providing the information will violate your or your child’s vital interests

## **How can I have my information removed?**

If you want to have your data removed we have to determine if we need to keep the data, for example in case HMRC wish to inspect our records. If we decide that we should delete the data, we will do so without undue delay.

## **Will we send emails and text messages to you?**

As part of providing our service to you, we will send your report to you via email. The report will be encrypted, and password protected. Also, as part of the service, we need to send details of your appointments to you. We will not send marketing emails and text messages to you.

**Data Protection and Rebecca Brown Psychology Ltd website**

## **What is a cookie?**

Cookies 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.allaboutcookies.org](http://www.allaboutcookies.org) or [www.aboutcookies.org](http://www.aboutcookies.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. Please note we only use cookies for the purpose of enhancing your online experience and no personal data is collected from you through this process.

**Third Party Websites**

Our websites 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 date to these websites.

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