**Privacy Policy: Not The Easy Way**

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| Business Example: Adapt | Ed Psych Example Adapt |
| **Managing your personal information**  Whilst browsing this website we ask you to provide information that will enable us to contact you or provide information relating to the services we provide.  If you have any questions about the way in which we use your personal data please contact us by email at info@zealsolutions.co.uk.  We collect personal data about you from a number of different sources, including information:  that you provide to us when you complete our online forms or register with our website; or sign-in to use our online tools.  provided to us by third parties, including organisations with whom you are engaged or employed.  we automatically collect about your visits to our website to enable us to maintain and improve our services and website.  on behalf of third parties. Where personal information is collected through our online tools (available by registration only), we do this as a data processor on behalf of the organisation that has directed you to our website and services, and this data is managed in accordance with our contractual obligation with that organisation and its own privacy notices, and not our own.  We use this personal data for a number of different lawful purposes including:  to provide information and services to you, or your Organisation under the terms of a contract with you;  for our legitimate business interests to maintain and improve our website and services including analysis to develop and improve our software, testing, research and surveys.  to comply with any legal obligations that we may have;  for our legitimate interests to keep in touch with you for marketing purposes and let you know about developments in the field of business psychology.  In order to protect your privacy, we do not routinely share personal data with third parties. We may share your personal data with:  our suppliers and contractors who enable us to provide the website and our online tools and materials;  our third party partners for analysis and reporting, and where possible we try to do this with anonymous information;  if we have a legal duty or obligation to disclose your personal information.  We may disclose personal information if we buy or sell relevant business assets which may include your personal information.  You have the right to request that we do not use your personal data for marketing. You can exercise this right by contacting us at zealsolutions.co.uk. Even if you chose not to receive marketing information, we may still contact you to advise you of changes to our website, policies, security concerns or where permitted by law.    Protection of your information  The information you provide will be kept confidential. We have in place administrative, technical and physical measures on our website and internally designed to guard against and minimise the risk of loss, misuse or unauthorised processing or disclosure of the personal information that we hold.  We do not store your information longer than we need to provide services to you or to ensure we have appropriate and auditable records. We generally hold appropriate records for the duration of your engagement with Zeal Solutions Ltd for up to 2 years after.  You have various legal rights under data protection legislation:  the right to request access to your personal information (known as a subject access request);  the right to request inaccurate information is corrected;  the right to request information is deleted in certain situations;  the right to request we stop using your information for certain purposes, including for marketing;  the right for decisions not to be made by wholly autonomous means.  These rights may not be available in all circumstances, and we will tell you if this is the case. Where you wish to exercise your rights, please contact us via zealsolutions.co.uk and we will respond within the applicable statutory time period. If we are not sure of your identity, we may require you to provide further information in order for us to confirm who you are.  We will respect your personal information and endeavour to comply with all applicable UK data protection legislation, both in respect of the personal information supplied by you or our organisation.  Further details of our and your legal obligations and duties, including details of how to make a complaint, can be found at the Information Commissioner’s website at www.ico.gov.uk.    Linking to external websites  We provide links to third-party sites. As we do not control these websites, we cannot advise you on the content or nature of their privacy policies. We, therefore, encourage you to look at the relevant privacy policy posted on any third party sites.  We do not have any control over the content on these websites and we do not accept any liability arising from your use of any links.    Changes to this policy  We may make changes to this policy from time-to-time as our business and internal practices and/or applicable laws change. We will not make any use of your personal information that is inconsistent with the original purpose(s) for which it was collected, obtained or is permitted by applicable law.    Cookies  By using the site the user agrees to the use of cookies.  A cookie is a small data file that certain websites write to your hard drive when you visit them. A cookie file can contain information such as a user ID that the site uses to track the pages you visit. The only personal details a cookie can contain is information you supply yourself.  We use cookies to determine what visitors to our website find useful. We are interested in which pages are most popular and were visitors stay longest. We will use this information to help users to reach these pages quickly and to improve our website.  If you do not want to receive cookies, you can set your browser to warn you before the file is sent. You can refuse a cookie when your browser alerts you to its presence, and you can also choose to refuse all cookies by turning them off in your browser. If you are unsure how to do this, you can find more information on the website of your browser manufacturer.    How to contact us  If you have any questions or comments about this policy, or if you would like us to update information we have about you or your preferences, please contact us by email at info@zealsolutions.co.uk.  Alternatively please write to us at the following address: Zeal Solutions Ltd, 15 Beck St, Nottingham NG1 1EQ. | **Introduction**  ​  The new EU data protection law, called the General Data Protection Regulation (EU Regulation 2016/679) (the ‘GDPR’), came into force on 25 May 2018.  The Data Protection Act 2018 is the UKs implementation of GDPR and replaces the Data Protection Act 1998.    Mosaic Psychology directors, Dr Sarah Modi and Dr Craig Allen (‘the educational psychologists’) are committed to protecting and respecting your privacy.    **Purpose**  This Privacy Notice explains how the educational psychologist uses your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.    Personal data is defined by the GDPR as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’. This includes contact information that is used to communicate with individuals and organisations, as well as client confidential data collected or generated by the educational psychologist. Guidance from the British Psychological Society (BPS) has also been used when developing this Privacy Notice. Further information about data protection law can be found by contacting the Information Commissioner’s Office (ICO) <https://ico.org.uk/>    **Scope**  This Privacy Notice applies to any personal data collected by Mosaic Psychology Limited.    **Why is personal information collected by the educational psychologist?​**  Personal information is collected to deliver an educational psychology service that has been commissioned by a parent, school or other education setting. The specific work carried out will vary according to the child/young person’s individual needs and the concerns being explored.  ​​  The educational psychologists have a legitimate interest to collect personal information about a child/young person and where appropriate parents/carers. This information is gathered for the purpose of forming a professional opinion or psychological formulation.  In so doing, the educational psychologists only collect information that is relevant to the purpose of undertaking that work and the associated reporting and advising.  ​  **What personal information is collected?​**  Personal information is only obtained with written consent from parents/carers/legal guardians.  ​  The educational psychologists will collect personal information including name of the child/young person, date of birth, gender, contact address and telephone number. Educational psychology assessments often involve the processing of special category data, including information about health, educational achievements, cognitive functioning, personality, interests, and family history.  ​  Personal information about a child/young person may be obtained from a third party including their school/education setting and other professionals/agencies (e.g. health services). This might include school reports and assessment data.  ​  **How is the information that has been collected then used and processed?**​  The information collected is used to form a professional opinion or psychological formulation of the child/young person’s strengths and needs, and advice on appropriate support. This is recorded in an educational psychologist report or other summary of involvement.  ​  Reports and/or letters are predominantly shared with the child/young person’s parent/carer and the school/education setting through end-to-end encrypted email (e.g. Egress). The report or summary may also be shared with other professionals/agencies who are involved with the child/young person with parents’ consent.  ​​  **How and where is personal information stored and kept safe?**​  We take the storage of personal data and special category data very seriously and have safeguards in place to protect against unlawful or unauthorised processing or accidental loss or damage.    Referral information and consent forms are stored securely in an electronic folder on a password protected laptop and online cloud. Paper copies are then destroyed.  ​  Paper records (e.g., handwritten notes and test forms) are stored in a locked filing cabinet and are securely destroyed when no longer needed (e.g. when psychological formulation and reports have been completed).  ​  Reports/summaries are stored on an encrypted password protected laptop and online cloud.  ​  Electronic information is backed up and stored securely on an external hard drive.  ​  If transported, the laptop will remain either in a locked environment or in the personal possession of the educational psychologists.  ​  **For how long will personal information be stored?**  ​  Personal data on clients is retained for 7 years, following guidelines from the British Psychological Society, Practice Guidelines, Third Edition, August 2017. During the 7th year, any electronic information and remaining paper records (e.g., test forms) will then be deleted/destroyed.  ​  This data is retained for the purposes of information if the client/data subject were re-referred to our service.  ​​  You have the right to access information and/or records that the educational psychologist holds about you. You can make a ‘subject access request’ (SAR) by contacting the Data Protection Officers (Dr Sarah Modi and/or Dr Craig Allen) in writing.  ​  Client access to records will be restricted to information about themselves, or a child where they are the parent/legal guardian. Restrictions will apply when disclosure would violate the child/young person’s vital interests.  ​  There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover administrative costs in responding.  The educational psychologists will respond to your subject access request within one month of receipt. Normally, the educational psychologists will provide a complete response, including a copy of your personal information within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date received.  ​​​  Under article 17 of the GDPR individuals have the right to have personal information erased. This is known as the ‘right to be forgotten’. The right is not absolute and only applies in certain circumstances. In each situation, the educational psychologist will have to decide what information should be deleted. This will be based on the protection of the child/young person’s vital interests.    **Data Breach Procedure**  Any data breeches will be reported to the data subject(s) within 72 hours of the educational psychologist becoming aware of the breach.  Where appropriate, the Information Commissioner’s Office (ICO) will also be informed of the breach.  ​  **Contact Details**​  To contact the educational psychologists about anything to do with your personal information and data protection, including to make a subject access request, please use the following details (for the attention of Dr Sarah Modi/Dr Craig Allen Educational Psychologists/Data Controllers).  ​  Email address: [info@mosaicpsychology.co.uk](mailto:info@mosaicpsychology.co.uk)  ​  Telephone number: 07818991738  ​  **Changes to this Privacy Notice**​  This Privacy Notice is regularly reviewed. It may be necessary to update or amend this Notice from time to time, for example if the law changes or if the educational psychology service delivery changes in a way that affects your privacy.    Revision History  ​  Notice published  2.0  May 2021  ​  Notice reformatted  Next review date – May 2023  ​  Please contact us for a copy of our Data Protection Policy at [info@mosaicpsychology.co.uk](mailto:info@mosaicpsychology.co.uk) |

<https://www.edpsyched.co.uk/privacy-policy>