

Just Psychology

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BSc, PGCE, D. Ed Psychology

Just Psychology Privacy Policy

The new EU data protection law, called General Data Protection Regulation (GDPR), came into force on 25 May 2018 and replaces the Data Protection Act 1998 in its entirety.

Just Psychology are committed to protecting and respecting your privacy. We have reviewed and updated our privacy policy to ensure it meets GDPR guidelines / GDPR compliance.

This policy sets out how we process any personal data we collect from you or that you provide to 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).

The legal basis in which we process and keep your personal and sensitive data

Just Psychology sell Educational Psychology Services to schools, educational settings, services and families. Just Psychology need to process families and children and young peoples (CYP) personal and sensitive data to fulfil our contractual obligations to undertake a psychological assessment, which consent will have been provided to do so. We will process all personal and sensitive data that is shared with us for the purpose of our assessment and will do so lawfully, fairly and in a transparent manner.

The intended purpose for processing personal and sensitive data is to conduct a psychological assessment, which may include psychometric profiling. Inevitably, educational psychology assessments involve the processing of special category data, including information, for example about, the CYP, their family and their health, educational achievements, cognitive functioning, personality, interests and family history. Depending upon the nature of the contract with the CYP's school and/or the family, we have a legitimate interest to collect such personal and sensitive data for the purpose of forming a professional opinion or diagnosis. In so doing, we will only collect information that is relevant to the purpose of undertaking that assessment and the associated and expected reporting, profiling and advising. We do not sell or give your contact details to any third parties for marketing purposes.

Our processing of CYP and their family's personal and sensitive data is, therefore, necessary if we are to fulfil our contract with the CYP's school and/or the family.

How we process and keep your personal and sensitive data

The following explains what data is held in relation to the delivery of Educational Psychology (EP) Services:

Consent form

Informed consent has to be provided before an EP will work with a CYP. The parents or legal guardians must sign a consent form (issued by Just-Psychology) before the EP can work with the child. Copies of the signed consent form are kept in the CYP electronic folder indefinitely and paper copies kept with the child's paper file in a securely locked cabinet for the duration

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of the piece of work. The consent form contains; first name, last name, date of birth, gender, school, year group, care status, parents / legal guardians name, parents / legal guardians postal address, parents / legal guardians phone number, parents / legal guardians email address, school attendance details, whether the child holds a statutory education plan, details of other professional involvement and educational attainment data.

Related CYP documentation

School and parents / legal guardians may provide additional documents to support the EPs work with the CYP e.g. SEN Support Plans, School Attendance data, Education Health and Care Plans, reports by other health professionals etc. All documents are stored electronically in the CYPs electronic folder and /or paper copies in a securely locked cabinet.

Gillick Competence

Is a term used in medical law to decide whether a child (under 16 years of age) is able to consent to his or her own medical treatment, without the need for parental permission or knowledge. If the EP decides that a CYP under the age of 16 is Gillick Competent, they can provide support without first requiring parent / legal guardian consent.

Confidentiality

All work undertaken by EPs on behalf of Just Psychology is confidential. Information is only shared with the specific consent of the CYP's parent / legal guardian or them (if age appropriate).

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.

Withdrawal of consent

The parent / legal guardian may withdraw consent for EP involvement at any time. If consent is withdrawn Just Psychology will ensure that the CYP's electronic folder will be deleted and any paper copies of reports or information that Just Psychology hold will be shredded and destroyed.

EP Report / Record & Retention of CYP and Adult Information

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 will be sent to the school (where the school has purchased the EP time), to the parents / legal guardians and to any other professionals that the parents / legal guardians and/or CYP (if age appropriate) have provided consent to share with.

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After the assessment we will actively keep data in two forms: (a) a hard paper file for the duration of the piece of work and (b) an electronic copy of your test scores and report indefinitely, as advised by the Association of Educational Psychologists (AEP) and the Department of Health (DoH) following the completion of a piece of work. It is in our legitimate interests to retain our reports and test scores indefinitely; for example our report may be mislaid from an assessment completed ten years ago, but the individual may now need a copy to support their request for reasonable adjustments in the workplace under the terms of the Equality Act, 2010. We might also want to hold data to support our decision making if ever that is questioned or there is a follow-up assessment in the future. Once work has been fully completed with a CYP and no further work has been planned, any hard paper copies of produced reports and associated information will be shredded. The shredding of paper documents will take place once every academic year and relevant information will be transferred to the CYP electronic file at this time. The above will also apply to any work completed with clients over the age of 18 years.

Where we store your personal and sensitive data

We use an electronic IT system, to store all electronic files and for email. The information that is kept electronically is password protected and encrypted and can only be accessed by Just Psychology. Further information regarding how Microsoft are complying with GDPR can be found here: <https://www.microsoft.com/en-us/trustcenter>

Hard, paper copies of personal and sensitive data are kept in a securely locked filing cabinet.

Locum Work for Local Authorities and Councils

The Local Authority/Council will continue to act as the data controller during the work that they commission Just Psychology to carry out. During the period of locum work, personal and sensitive data will be kept in two forms: (a) a hard paper file for the duration of the piece of work and (b) an electronic copy for the duration of the piece of work. Once work with the young person and family has ceased, electronic information will be deleted and hard, paper copies shredded. Just Psychology will not retain hard, paper or electronic copies of reports or information once the period of locum work with a Local Authority/Council has ceased. The Local Authority/Council will be responsible for retaining the information and reports provided to them by Just Psychology safely and securely and for an appropriate period of time, in accordance with the GDPR regulations. The Local Authority/Council will need to operate with their own privacy policy which all parents/carers and/or young people should be made aware of at the time consent is obtained.

Your Right to Access, Correct or Amend Your Personal and Sensitive Information

You have the right to access information and / or records that we hold about you. Please contact Just Psychology 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.

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If you would like to: access, correct, amend or delete any personal information we have about you, you are invited to contact us at sarahsidaway@just-psychology.co.uk.

Just Psychology Website and Personal Data

We receive, collect and store any information you enter on our website or provide us in any other way. In addition, we collect the Internet protocol (IP) address used to connect your computer to the Internet; e-mail address and connection information and names entered into our contact form. We may use software tools to measure and collect session information, including page response times, length of visits to certain pages, page interaction information and methods used to browse away from the page. We also collect personally identifiable information via our contact form such as name and email address. We collect such non-personal and personal Information for the purposes of providing and operating this service. Your personal information will be used for the specific reasons stated above only. We do not sell or give your contact details to any third parties for marketing purposes.

The Just Psychology website is hosted on the Wix.com platform. Wix.com provides us with the online platform that allows us to sell our service. Your data may be stored through Wix.com's data storage, databases and the general Wix.com applications. They store your data on secure servers behind a firewall. Cookies are implemented in every site built by Wix.

We may contact you to send updates about our company or as otherwise necessary to contact you to enforce our User Agreement, applicable national laws, and any agreement we may have with you. For these purposes we may contact you via email.

Changes to our Privacy Policy

We reserve the right to modify this privacy policy at any time, so please review it frequently on the Just Psychology website. Changes and clarifications will take effect immediately upon their posting on the website. If we make material changes to this policy, we will notify you here that it has been updated, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we use and/or disclose it.

Contact details for Just Psychology

The data controller at Just Psychology is Sarah Sidaway. Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to sarahsidaway@just-psychology.co.uk or 07960715181