

# Privacy Policy



## Our Privacy Policy Explains:

- What information we collect and how we collect it
- Why and how we use your information
- How long we keep your information
- How we may share your information
- Your rights on the information we hold about you
- Security-how we keep your information safe
- Changes to this Privacy Policy

How to contact us: The Data Controller is Purple Elephant in the Room Ltd

## Information We Collect

In order to provide our services and for the other purposes set out in Use of Information below, we collect and process Personal Data from the users of our Contact & Therapy Centre. We may collect the following information:

- Personal information (for example, your name, email address, mailing address, phone numbers, date of birth and address)
- Sensitive Personal Data
- Attendance information (such as attended, number of absences and absence reasons)
- Observation report from a contact session
- Reports from therapy sessions
- Safeguarding incidents

From time to time and as permitted by applicable law(s), we may collect Personal Data about you and update any existing Personal Data that we currently hold from other third-party sources.

We collect your information from:

- Self-Referral Forms
- Court orders
- Where applicable Childrens Services or other professionals working with the family
- Referrals from organisations e.g. Cafcass, Family Solicitors
- Pre-contact meetings checklist

We may also collect information from telephone conversations, emails and written and verbal communications and from records and reports of the Contact & Therapy sessions.

### **How we Use Information**

Your Personal Data may be used in the following ways:

- To provide our services to you,
- To respond to your requests and inquiries,
- To improve our services, for example; Questionnaires and evaluation sheets,
- To request your participation in surveys, or other initiatives which help us to gather information used to develop and enhance our services,
- To comply with applicable law(s) (for example, to comply with a search warrant or court order) or to carry out professional ethics/conduct investigations,
- To enable us to provide, to maintain our own accounts and records and to support and manage our employees.

Consent and lawful Processing of Data.

Our legitimate interests, which include processing such Personal Data for the purposes of:

- providing and enhancing the provision of our services.
- administration and programme delivery
- for dealing with medical needs-any information you provide we must have had explicit consent to use.
- all other cases: that it is necessary for our legitimate interests which are to run the contact/therapeutic centre

### How long will we keep your information?

File Type	Retention Period
<b>HR files</b> Employment references Redundancy details	<b>6 years</b> after employment/volunteering ceases
<b>Parental leave</b>	<b>5 years</b> from birth/adoption or <b>18</b> if child receives a disability allowance
<b>Disclosure and Barring Service Certificate</b> (formerly Criminal Records Bureau disclosures certificates) obtained as part of the vetting process.	The actual disclosure form must be <b>destroyed after 6 months</b> . However, it is advisable that organisations keep a record of the date of the check, the reference number, the decision about vetting and the outcome.
<b>Finance records</b> Income tax, NI returns, income tax records and correspondence with IR, Parental leave, Wages and salary records	HMRC advise you must keep records for <b>6 years</b> from the end of the last company financial year they relate to, or longer if: they show a transaction that covers more than one of the company's accounting periods.

<b>Supported contact only</b> – Referrals, with court orders or CAFCASS involvement, pre- visit forms, attendance records	Securely <b>disposed of after three years</b> unless a safeguarding or child protection issue
<b>Supported contact only</b> – Self-referrals with <b>NO</b> court order or CAFCASS involvement, pre- visit forms, attendance records	Securely <b>disposed of after one year</b> unless a safeguarding or child protection issue
<b>Supervised contact and therapy sessions only</b> – Referrals, with court orders or CAFCASS involvement, pre- visit forms, attendance records	Securely <b>disposed of after three years</b> unless a safeguarding or child protection issue
<b>Supervised contact and therapy sessions only</b> – Self-referrals with <b>NO</b> court order or CAFCASS involvement, pre- visit forms, attendance records	Securely <b>disposed of after one year</b> unless a safeguarding or child protection issue
<b>Supervised contact and therapy sessions only – Reports</b>	Should be <b>kept indefinitely</b> (So long as the company is trading) as children can request this <b>information up to the age of 25 years</b> by Local Authorities.
Information relating to paid/unpaid staff not covered above that are not used for three years should be treated as confidential waste and disposed of as such.	Securely disposed of after three years.
<b>Accident books and paperwork relating to safeguarding or child protection issues about a specific child</b>	Should be <b>kept indefinitely</b> as children can request this <b>information up to the age of 25 years</b> by Local Authorities.
<b>CCTV footage</b>	Certain pieces of CCTV footage for one year – these are pieces which have been shared with the Local Authority, pieces used for Guided Footage Sessions, Care-Index Footage and anything else your family's

	<p>report writer thinks is very important to keep. All other footage will be deleted after your assessment ends.</p>
<p><b>Parenting Assessments</b></p>	<p>We will keep parenting reports, weekly summaries, family guidance, referral forms, letters of instruction and SOS review meeting notes for 15 years after your assessment ends. We will also keep any other documents which the Social Worker feels are especially important to your assessment and may be required after the Final Hearing. These will be held securely on our computer system. All other information we have collected and received from other professionals about you and your family will be securely destroyed one year after the end of your assessment, unless we have a need to keep it for longer</p>

### Sharing and Disclosure to Third Parties

Contact Reports are available upon request to the resident and non-resident parent/s. Reports will be sent by secure email (only). If the contacts are funded by the Local Authority, then reports will be sent directly to the social worker and it is the responsibility of the social worker to share the contents of the reports with the parent/relative involved.

We may disclose your Personal Data to third parties from time-to-time under the following circumstances:

- You request or authorise the disclosure of your personal details to a third party.
- The information is disclosed as permitted by applicable law(s) and/or in order to comply with applicable law(s) (for example, to comply with a search warrant or court order).
- The information is provided to service providers who perform functions on our behalf.
- Hosting providers for the secure storage and transmission of your data
- Legal and compliance consultants, such as external counsel, external auditors
- Technology providers who assist in the development and management of our web properties

### **Subject Access/User Rights**

As a user, you are subject to the following rights:

- The right to be informed of the use of your Personal Data
- The right to access and/or to require the correction or erasure of your Personal Data
- The right to block and/or object to the processing of your Personal Data
- The right to not be subject to any decision based solely on automated processing of your Personal Data
- In limited circumstances, you may have the right to receive Personal Data in a format which may be transmitted to another entity.

If you have a complaint in relation to the processing of your data carried out under this Privacy Policy, you have the right to lodge a complaint with the Information Commissioner Office.

You may seek to exercise any of these rights by updating your information online (where possible) or by sending a written request to Purple Elephant in the Room, PO BOX 359 Gloucestershire, GL7 9LP.

## Information Security

We are working to protect your personal information that we hold, its confidentiality, integrity and availability:

- We review our information collection, storage and processing practices, including physical security measures, to guard against unauthorized access to systems.
- We restrict access to personal information to staff and volunteers subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.
- We have Security Information Policy in place which defines the measures we take to protect your personal information. We use a combination of technology and procedures to ensure that our paper and computer systems are protected, monitored and are recoverable.
- We only use third party service providers where we are satisfied that they provide adequate security for your personal data.

## Compliance and cooperation with regulatory authorities

We regularly review our compliance with our Privacy Policy. If we receive formal written complaints, we will contact the person who made the complaint to follow up. We work with the ICO to resolve any complaints regarding the transfer of personal data that we cannot resolve with our users directly.

## Changes

Our Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent.

## How to Contact Us

Purple Elephant in the Room Ltd

PO Box 359

Gloucestershire

GL7 9LP