



Place2Be Information sheets and Privacy Notice

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Information sheet for parents and carers / Privacy Policy

Place2Talk

Frequently asked questions by parents and carers

1. What is Place2Talk?

One of the most popular aspects of Place2Be's support is called 'Place2Talk'. It's open to all pupils, and they can make an appointment to spend 15 minutes with a trained counsellor, either by themselves or with a friend. On average, about a third of pupils who access the service in schools take advantage of this service every year. Pupils often talk about friendships or any worries they may have.

2. Who conducts the Place2Talk sessions?

Place2Be School Project Managers (SPM) and Place2Be Counsellors¹.

Place2Be is an organisational member of the British Association of Counselling and Psychotherapy. This means our SPMs and Place2Be Counsellors are committed to the highest standards of personal and professional practice and work in line with its Ethical Framework and Ethical Guidelines.

3. Who will your child's counsellor talk to about the Place2Talk sessions?

Place2Be has a responsibility to keep children safe and follow safeguarding procedures as and when required, but otherwise we will never disclose your child's data to third parties.

4. What is Place2Be's evaluation and why is it important?

Place2Be's evaluation provides an *overall* picture of children we support – your child cannot be identified in any report.

¹ These may be an Assistant School Project Manager or a Mental Health Practitioner

Place2Be collects information to evaluate our effectiveness and learn about how to give the best possible service to children and families. For Place2Be to work well, we need to find out how the support we provide helps children's emotional wellbeing and their learning and academic progress and so we can learn and develop our service.

Every year Place2Be reports on the numbers of children supported through its services, the needs of the children who come to Place2Be and the impact the service has made on children's wellbeing and learning. These reports are published on our website:

<http://www.place2be.org.uk/impact-evidence/our-impact/>

5. What information about your child is included in Place2Be's evaluation?

Place2Be collects the following information from the school/location: child's name, date of birth, year group, gender and ethnicity. We collect ethnicity data for the purpose of identifying and keeping under review equality of opportunity with a view to enabling equality to be promoted or maintained. We then record brief details of children's appointments and the matters discussed, as well as any action recommended as a result of the session.

If your child is referred to a Place2Be targeted service additional information will be collected as part of the referral. You can see full details of the sort of information we collect on our website <https://www.place2be.org.uk/impact-evidence/how-we-measure-impact.aspx>.

We keep the information for 6 years and it is then destroyed.

6. Is your child's information confidential?

Yes. Your child's name will *not* be in our research data. Your child's information will be stored securely.

7. What is the Data Protection Act 2018 (DPA) and the General Data Protection Regulation (GDPR)?

The UK General Data Protection Regulation and the Data Protection Act 2018 (DPA) gives people control over their personal information (data) and requires organisations who have people's personal information to act in a lawful and transparent way. Place2Be works within the GDPR and DPA 2018 to ensure that personal data, for example, name or date of birth, are lawfully collected, kept securely and not passed to other people or agencies without permission.

8. How do we safeguard your child's information?

We care about protecting your child's information. Our policies and systems make sure that the information cannot be accessed by anyone who should not see it. They also protect against loss or misuse of the information.

We are committed to taking all appropriate steps to protect the personal information that we hold. We do this by having in place a range of measures, including the information being held in a secure, password protected database that can only be accessed by those who need to see the information to deliver the service for your child.

9. Why haven't we asked for consent to collect information about your child?

We aim to have a service that any child in the school/ location can access when they wish. Place2Talk is a

valuable self-referral support service that reduces stigma by being accessible. Any child whose parent/carer has agreed that their child can use Place2Talk can attend. In those circumstances, parental consent is not required to record or store or assess a child's information, because other legal safeguards kick in to ensure the minimal information is collected and used in a way that respects and protects the children who use the service.

10. What is our legal basis for collecting information about your child?

Under the GDPR we are required to identify 1 of 6 legal bases for processing personal data. We have identified our legal basis as "Legitimate Interest" as explained below, accordingly we do not need to rely on consent (or parental consent) to process your child's information, especially because we are offering counselling services direct to a child. This is in line with guidance from the Information Commissioner's Office (ICO) who enforce the data protection legislation in the UK. It is also in line with guidance from the British Association of Counselling and Psychotherapy (BACP).

We record, store and assess information about your child if they come to counselling sessions for two reasons:

- we are protecting the interests of your child in accessing counselling support and only necessary information is collected (this is called the "**Legitimate Interests**" legal basis for processing personal information); and
- recording the information means your child can access a service for their **Health and Social Care** (this is a further lawful basis for any sensitive or "special category" personal information).

Place2Be is an organisational member of the BACP. This means our staff work in line with its Ethical Framework and Ethical Guidelines, so they will make sure your child's information is confidential. In addition, we are also able to use some of your child's information for research and statistical purposes, as we use pseudonymised (i.e. coded) information and remove your child's name. We also use some of the information for equality of opportunity and monitoring their counselling.

11. Can you request that your child does not attend Place2Talk?

Yes. You can ask us not to see your child by completing and returning the slip that accompanies this information to the Place2Be School Project Manager or Place2Be Counsellor. If a child is aged 12+ and wishes to attend Place2Talk, we will consider that request in line with their Gillick competence to ascertain whether they are able to request this and discuss with the school/location.

You can withdraw your agreement at any time by speaking to the Place2Be School Project Manager or Place2Be Counsellor, or by sending an email to privacy@place2be.org.uk.

Once we receive your email, we will cease to carry out Place2Talk support.

12. Can you request for the information held about your child?

You may ask us to confirm what information we hold about your child at any time, and request us to modify, update or delete such information. This is known as a Subject Access Request and we will ensure all request are handled in line with the UK GDPR and DPA 2018. It is important to note that even if a child is too young to understand the implications of subject access rights, data about them is still their personal data and does not belong to anyone else, such as a parent or guardian. As such, we assess on a case by case basis whether it is in the best interests of the child. In the case of young children these rights are likely to be exercised by those with parental responsibility for them. If you request your child's data, proof of parental responsibility will be required.

We will consider whether the child is mature enough to understand their rights. If they are considered to be competent we will respond to or consult the child or seek the child's consent for disclosure to you (with parental responsibility).

You can make a Subject Access Request by speaking with the Place2Be School Project Manager or Place2Be Counsellor who will ask you to complete a form or by sending an email to Privacy@place2be.org.uk.

13. How long will we store your child's information for?

We store your child's information securely for 6 years, and then it is destroyed.

14. What can you do if you are unhappy with our service?

If you are unhappy with any aspect of our service, you can make a complaint in writing to the Chief Financial Officer at Enquiries@Place2be.org.uk.

If you are unhappy with how your child's data is handled, you may complain to the Data Protection Officer in the first instance by sending an email to privacy@place2be.org.uk.

If you remain unhappy, you can complain to the Information Commissioner at: The Information Commissioner's Office (ICO), Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF (telephone: 0303 123 1113; website www.ico.org.uk).

We assume that parents/carers will discuss this letter with their children, so that they also understand how and why their information is being collected. Copies of this sheet will also be available to children at Place2Talk sessions.



Information sheet for parents and carers / Privacy Notice

Place2Be targeted support

Frequently asked questions by parents and carers

1. Why do we ask for parent / carer agreement to offer our counselling service?

We believe it is important to work in partnership with parents and carers to achieve the best outcomes for children and their families. We also have an ethical responsibility to ask for agreement to provide counselling support for children.

2. Why do we ask for information about your child and family?

Information from parents, carers and teachers is essential in helping us to find out about and understand your child and family circumstances better. It enables us to gain a good picture of your child's needs and helps us consider what support may be required for you and your child.

3. What is Place2Be support?

We will use the information from parents, carers and teachers, and meet with you and your child, to make an assessment of their needs. After these meetings, we will decide what support we can offer to you and / or your child, or we will contact you to discuss other options. This support could include any of the support services listed below, where available. Please note: not all services are available in all locations and the Place2Be Lead in your school / location will inform parents / carers which services are available.

- **Support for children and young people**

- *One-to-one counselling*

These sessions are offered once a week for about 50 minutes and will be on the same day and at the same time in school / location every week. These sessions give your child the opportunity to express their feelings using play and art. One-to-one sessions usually continue for up to 10 weeks, but very occasionally longer, depending on each child's needs.

- *Knowledge, Insight and Tools (KIT) (secondary schools only)*

Young people are offered up to 10 sessions, 1 session per week for about 50 minutes. KIT is a CBT informed one-to-one intervention to support young people who have anxiety and / or low mood.

- *Journey of Hope*

Journey of Hope is a structured group therapy programme to help children and young people learn positive coping mechanisms to challenging life circumstances and develop confidence and resilience.

Group sessions run from six to eight weeks and consist optimally of six to eight children. Each session lasts for 45-60 minutes. In the case of groups run with young children in reception classes, group size and length of sessions may be less than for older children.

- **Support for parents and carers**

- *Parent Partnership*

The Place2Be Parent Partnership service is a listening, consultation and guidance service offered to parents and carers in Place2Be schools.

We will meet with parents and carers in Parent Partnership meetings before during and after their child's Place2Be intervention to review their child's progress. We are also available to all parents who wish to discuss a particular issue or concern about their child, even if they are not receiving targeted support from Place2Be.

- *Personalised Individual Parenting Training (PIPT)*

Parenting training works by directly coaching parents / carers in how to interact differently with their children in order to increase their child's friendly and cooperative behaviours and reduce undesirable behaviours. Parents / carers are offered between 6-10 sessions and their child will join them for some of each session.

4. **Who conducts the Place2Be sessions?**

School Project Managers and Place2Be Counsellors¹ are qualified therapists, employed by Place2Be to manage / deliver Place2Be projects in schools / locations.

KIT counselling and Group sessions are conducted by the Place2Be School Project Manager or Place2Be Counsellor, together with an assistant facilitator for groups.

One-to-one counselling sessions are conducted by Place2Be Counsellors or, in schools / locations that have a School Project Manager, one-to-one counselling sessions are conducted by a Counsellor on Placement.

Counsellors on Placement are managed and supervised by School Project Managers. Some have already completed their qualification as adult or child counsellors, and some are at a stage of their training where they need to have a work placement.

Family Practitioners are qualified therapists employed by Place2Be to deliver specialist, targeted support for parenting issues.

All of our Counsellors are committed to the highest standards of personal, professional and ethical practice. This means they have to keep their skills up to date. All of our Counsellors are offered a thorough programme of Continuous Professional Development training and support through Place2Be as part of their employment / placement.

¹ These may be an Assistant School Project Manager or a Mental Health Practitioner.

5. Who will the School Project Manager or Place2Be Counsellor talk to about the sessions?

Parents and carers will have the opportunity to meet with the School Project Manager or Place2Be Counsellor before, during and after counselling. The child's Counsellor on Placement will share information with the School Project Manager. The School Project Manager or Place2Be Counsellor will give parents, carers and teachers some feedback on how their child / pupil is using the sessions and any general themes arising from them. Place2Be has a responsibility to keep children safe and to follow safeguarding procedures and information sharing as and when required. This may mean sharing any relevant record of the work with designated safeguarding staff as appropriate. The School Project Manager or Place2Be Counsellor may share information and consult with their line manager.

6. Are the sessions recorded?

Some clinicians are required to present an account of the work undertaken as part of their training and / or professional development.

This written, audio or video taped account will remain confidential to the Place2Be supervisor and Learning Provider. This account is used only for learning and development purposes, except as necessary for any safeguarding disclosures. In the case that sessions will be recorded, you will be provided with an additional information sheet and permission slip to sign.

7. How can you withdraw your agreement for you or your child to attend Place2Be sessions?

You can withdraw your agreement at any time by speaking to the Place2Be School Project Manager or Place2Be Counsellor at your school / location, or by sending an email to privacy@place2be.org.uk.

Once we receive your email, we will cease to carry out counselling support.

Place2Be's evaluation

8. What is Place2Be's evaluation and why is it important?

Place2Be's evaluation provides an *overall* picture of children we support – you and your child cannot be identified in any report.

Place2Be collects information to evaluate our effectiveness and learn about how to give the best possible service to children and families. For Place2Be to work well, we need to find out how the support we provide helps children's emotional wellbeing and their learning and academic progress and so we can learn and develop our service.

Every year Place2Be reports on the numbers of children supported through its services, the needs of the children who come to Place2Be and the impact the service has made on children's wellbeing and learning. These reports are published on our website: <http://www.place2be.org.uk/impact-evidence/our-impact/>.

Privacy Notice

9. What is the purpose of this Privacy Notice?

The UK General Data Protection Regulation (UK GDPR) gives people control over their personal data and requires organisations who have people's personal data to act in a lawful and transparent way. Place2Be works within the requirements of the UK GDPR to ensure that personal data is lawfully collected, kept

securely and only passed to other people or organisations where legally permissible.

This Privacy Notice will inform you of how we collect, process and share your (and your child's) personal data when we offer our counselling and mental health support services to schools and other locations. "Personal data" is any information relating to a living individual (e.g. name, date of birth, contact details and ethnicity).

Place2Be is the controller of your (and your child's) personal data and is responsible for it.

10. What personal data do we collect about you and your child?

Place2Be collects certain types of personal data about your child including:

- **personal details:** name, date of birth, gender and ethnicity;
- **academic details:** Unique Pupil Number (**UPN**) or Scottish Candidate Number (**SCN**) and year group. The UPN / SCN is a number allocated by the education authorities that identifies each pupil in school. This number remains with the child throughout their school career, even if they change school. UPN / SCNs are designed to track pupil progress and are part of the procedures used for target setting and monitoring in each school. Collecting your child's UPN / SCN helps us look in the National Pupil Database to evaluate the progress of children over time to see how Place2Be helps over the longer term; and
- **mental health:** information about your child's wellbeing, learning and school attendance. This information allows us to provide a summary of parents' / carers', children's and teachers' views about how children feel and behave in different situations, how they feel about learning and their attendance at school.

Place2Be will also collect the following information about you:

- **personal details:** name, gender and ethnicity;
- **contact details:** your home contact, mobile number and email address (in order to contact you about the support we are providing for your child); and
- **employment information:** employment status (e.g. full or part-time) (in order to understand the demographics of individuals we are able to reach with our services).

We collect gender and ethnicity data for the purpose of identifying and keeping under review equality of opportunity, with a view to enabling equality to be promoted or maintained.

You can see full details of the personal data we collect on our website: <https://www.place2be.org.uk/impact-evidence/how-we-measure-impact.aspx>.

11. How do we collect your personal data?

We will normally collect your or your child's personal data directly from you / your child. This will include where you or your child participate in counselling sessions or use our services, or when you communicate with us.

We may also collect your or your child's personal data from other sources, such as the school or location where you / your child are receiving services, or from other third parties that have referred you or your child to us (e.g. social services).

12. How long do we keep your information for?

We keep the information for six years and it is then anonymised (which means that any personal data is stripped so that the relevant individual can no longer be identified) or destroyed. Please note that this does not apply in respect of any safeguarding data.

13. Will the information Place2Be collects be shared with anyone?

We may disclose and transfer your (and your child's) personal data to the following third parties for the purposes described in this Privacy Notice:

- schools and other locations where we are providing our services;
- the service provider that provides our School Services System (SSS) (i.e. the IT platform) on which our information and data is stored;
- our legal advisers (where necessary in order for us to obtain legal advice); and
- government authorities, law enforcement agencies, and courts (where necessary in order for us to comply with our legal or regulatory obligations).

We require all third parties with whom we share your personal data to respect its security and to treat it in accordance with the law.

To understand how Place2Be compares to other services and to learn how we can improve, Place2Be sometimes shares pseudonymised data with research partners, including universities and their students. It will never be possible to identify you or your child in the data we share with research partners or in any reports that are written by us.

14. How does Place2Be protect and safeguard children and parents' personal data?

We care about protecting your and your child's personal data, and we are committed to taking all appropriate steps to achieve this. We have implemented policies and systems to ensure that the personal data cannot be accessed by anyone who should not see it, and to protect it against accidental or unlawful loss, misuse alteration or destruction. This includes implementing a range of technical and organisational measures that are consistent with applicable data protection laws, including ensuring that personal data is held in a secure, password protected database. In addition, we limit access to your personal data to those employees, volunteers and other third parties who have a need to see it for the purpose of delivering the service for you and your child. Those individuals will only process your information on our instructions and are subject to a duty of confidentiality.

15. What is our legal basis for collecting personal data about you and your child?

Place2Be can only use your or your child's personal data where we have a legal basis to do so under data protection law.

We aim to have a service that any child in the school / location can access when they are referred. Any child whose parent / carer has agreed that their child can come to a Place2Be service can attend. In those circumstances, as we are providing direct counselling services to the child, parental consent (or the child's consent) is not required by us to record, assess or process a child's personal data, because we are able to rely on our "legitimate interest" (as our legal basis, as explained below), in line with guidance from the Information Commissioner's Office (ICO), the UK supervisory

body for data protection issues. This approach is also in line with guidance from the British Association of Counselling and Psychotherapy (**BACP**). Place2Be is an organisational member of the BACP. This means our staff work in line with the BACP's Ethical Framework and Ethical Guidelines, so they will make sure your child's information is confidential.

When we provide our services to you or your child, we rely on the legal basis, and sensitive personal data processing conditions, specified below to record, assess and process personal data about you and your child:

- **legal basis:** we are able to rely on our legitimate interests (providing you and your child with counselling services, conducting research, and ensuring equality of opportunity and treatment) to process yours and your child's personal data, provided this is not outweighed by your or your child's rights and interests; and
- **processing condition:** where we process sensitive personal data (e.g. mental health, sexual orientation or ethnicity information) about you or your child, in addition to satisfying a legal basis (as explained above) we also need to satisfy a processing condition (as set out in data protection law) for sensitive personal data. We rely on the following processing conditions to process your and your child's sensitive personal data:
 - **health and social care:** where we are providing you or your child with our services, we are able to process your or your child's sensitive personal data on the basis that it is necessary for us to provide our health and social care services;
 - **equality monitoring:** we use your and your child's sensitive personal data to monitor equality of opportunity of treatment in our counselling services; and
 - **research:** we may use some of your child's personal data for research and statistical purposes (e.g. as part of Place2Be's evaluation reports (see question 8 above)). When we use personal data for this purpose (including sharing it with research partners), we ensure that it is pseudonymised (i.e. coded) by removing your child's name so that they cannot be identify from the data.

16. *Where do we collect, store or process your personal data?*

Place2Be does not collect, transfer, store or process your or your child's personal data outside the UK. All of our data is stored on secure servers located in the UK and we only use service providers who comply with UK data protection law. Where we do need to transfer or process your personal data outside the UK, we will ensure that we do so in accordance with data protection law, including: (i) by ensuring that the personal data is transferred to a country that offers an adequate level of data protection; or (ii) by using standard contractual clauses approved by the ICO.

17. *Your rights regarding the personal data we hold about you and your child*

Under data protection law, you and your child have certain rights in relation to the personal data that we hold about you / your child. These rights include:

- **access:** you have the right to request a copy of the personal data we hold about you or your child, and obtain certain other information about how we process your or your child's personal data, this is known as a Subject Access Request;
- **rectification:** you have the right to request that we correct any personal data you believe is inaccurate or incomplete;

- **erasure:** you have the right to request that we erase your or your child's personal data, in certain circumstances;
- **restriction:** you have the right to request that we restrict the processing of your or your child's personal data, in certain circumstances;
- **objection:** you have the right to object to our processing of your or your child's personal data, in certain circumstances; and
- **portability:** you have the right to request that we transfer your or your child's personal data to you or a third party (in certain circumstances), in a commonly used machine-readable format.

It is important to note that even if a child is too young to understand the implications of their subject access rights, data about them is still their personal data and does not belong to anyone else, such as a parent or guardian. As such, we assess on a case by case basis whether it is in the best interest of the child to comply with any Subject Access Request that may be made to obtain access to a child's personal data. In the case of young children these rights will normally be exercised by those with parental responsibility for them. If you request access to your child's personal data, proof of parental responsibility and identity will be required.

We will also consider whether the child is mature enough to understand their rights (i.e. if they are competent). If they are considered to be competent, we will respond to, or consult, the child or seek the child's consent for disclosure of personal data to any person with parental responsibility.

You can exercise any of your (or your child's) rights, including making a Subject Access Request by speaking with the Place2Be School Project Manager or Place2Be Counsellor who will ask you to complete a form, or by sending an email to Privacy@place2be.org.uk.

18. *What can you do if you are unhappy with our service or if you have questions about how we handle your (or your child's) personal data?*

If you are unhappy with any aspect of our **service**, you can make a complaint in writing to the Chief Financial Officer at Enquiries@Place2be.org.uk.

If you have any questions about this **Privacy Notice**, or if you are unhappy with **how your (or your child's) personal data has been handled by us**, you can contact our Data Protection Officer by email to privacy@place2be.org.uk.

If you remain unhappy, you also have the right to complain to the Information Commissioner's Office (ICO). The ICO can be contacted using the following details:

Information Commissioner's Office
 Wycliffe House
 Water Lane
 Wilmslow
 Cheshire
 SK9 5AF
Tel: 0303 123 1113
Web: www.ico.org.uk

We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.



Information sheet for young people / Privacy Notice Key Stage 5 + Senior Phase (Scotland)

Place2Be targeted support

Frequently asked questions by young people

1. Why do we ask for your agreement to offer our counselling service?

We have an ethical and legal responsibility to ask for your agreement to provide counselling support.

2. What is Place2Be support?

Place2Be uses information from teachers or other people we speak to and meet with you to make an assessment of your needs. After these meetings, we will decide what support we can offer to you, or we will contact you to discuss other options. This support could include any of the following, where available. Please note: not all services are available in all locations and the Place2Be Lead in your school will inform parents/carers which services are available.

One-to-one counselling

These sessions are offered once a week for about 50 minutes and will be on the same day and at the same time in the school/location every week. These sessions give you the opportunity to express your feelings. One-to-one sessions usually continue for up to 10 weeks, but very occasionally longer, depending on the individual's needs. Your School Project Manager / Place2Be Counsellor¹ will talk to you about how many sessions you want to attend.

Knowledge, Insight and Tools (KIT) (secondary schools only)

Knowledge, Insight and Tools (KIT). Young people are offered up to ten sessions, 1 session per week for about 50 minutes. KIT is a CBT informed one-to-one intervention to support young people who have anxiety and/or low mood.

¹ These may be an Assistant School Project Manager or a Mental Health Practitioner

3. *Who conducts the Place2Be counselling sessions?*

School Project Managers and Place2Be Counsellors are qualified therapists, employed by Place2Be to manage / deliver Place2Be projects in schools/locations.

KIT counselling sessions are conducted by the Place2Be School Project Manager or Place2Be Counsellor.

One-to-one counselling sessions are conducted by Place2Be Counsellors or, in schools/locations that have a School Project Manager, one-to-one counselling sessions are conducted by a Counsellor on Placement.

Counsellors on Placement are managed and supervised by School Project Managers. Some have already completed their qualification as adult or child counsellors, and some are at a stage of their training where they need to have a work placement.

All of our Counsellors are committed to the highest standards of personal, professional, and ethical practice. This means they have to keep their skills up to date. All of our Counsellors are offered a thorough programme of Continuous Professional Development training and support through Place2Be as part of their employment / placement.

4. *Who else will we speak to?*

We may need to talk to teachers or other people about you so we can work out how best to support you. We will talk to you if we need to do this.

If you are working with a Counsellor on Placement, they may share information with the School Project Manager.

Place2Be has a responsibility to keep young people safe and follow safeguarding procedures as and when required and your School Project Manager / Place2Be Counsellor will talk to you about this.

The School Project Manager / Place2Be Counsellor may share information and consult with Educational Psychologists at Place2Be to inform a personalised approach to your support.

5. *Are the sessions recorded?*

Some clinicians are required to present an account of the work undertaken as part of their training and/or professional development.

This written, audio or video taped account will remain confidential to the Place2Be supervisor and Learning Provider. This account is used only for learning and development purposes, except as necessary for any safeguarding disclosures. In the case that sessions will be recorded, you will be provided with an additional information sheet and permission slip to sign.

6. *How can you withdraw your agreement to attend Place2Be sessions?*

You can withdraw your agreement at any time by speaking to the Place2Be School Project Manager or Place2Be Counsellor at your school/location, or by sending an email to privacy@place2be.org.uk.

Once we receive your email, we will cease to carry out counselling support.

Place2Be's evaluation

7. *What is Place2Be's evaluation and why is it important?*

Place2Be's evaluation provides an *overall* picture of young people we support – you cannot be identified in any report.

Place2Be collects information to evaluate our effectiveness and learn about how to give the best possible service to young people and families. For Place2Be to work well, we need to find out how the support we provide helps young people's emotional wellbeing and their learning and academic progress and so we can learn and develop our service.

Every year Place2Be reports on the numbers of children and young people supported through its services, the needs of those who come to Place2Be and the impact the service has made on their wellbeing and learning. These reports are published on our website:

<http://www.place2be.org.uk/impact-evidence/our-impact/>

Privacy Notice

8. *What is the purpose of this Privacy Notice?*

The UK General Data Protection Regulation (UK GDPR) gives people control over their personal data and requires organisations who have people's personal data to act in a lawful and transparent way. Place2Be works within the requirements of the UK GDPR to ensure that personal data is lawfully collected, kept securely and only passed to other people or organisations where legally permissible.

This Privacy Notice will inform you of how we collect, process, and share your personal data when we offer our counselling and mental health support services to schools and other locations. "Personal data" is any information relating to a living individual (e.g. name, date of birth, contact details and ethnicity).

Place2Be is the controller of your personal data and is responsible for it.

9. *What personal data do we collect about you?*

Place2Be collects certain types of personal data about your child including:

- **personal details:** name, date of birth, gender and ethnicity;
- **contact details:** your home contact, mobile number and email address (in order to contact you about the support you are receiving);
- **academic details:** Unique Pupil Number (**UPN**) or Scottish Candidate Number (**SCN**) and year group. The UPN / SCN is a number allocated by the education authorities that identifies each pupil in school. This number remains with a child throughout their school career, even if they change school. UPN / SCNs are designed to track pupil progress and are part of the procedures used for target setting and

monitoring in each school. Collecting your UPN / SCN helps us look in the National Pupil Database to evaluate the progress of young people over time to see how Place2Be helps over the longer term; and

- **mental health:** information about your wellbeing, learning and school attendance. This information allows us to provide a summary of your parents' / carers', teachers' and your own views about how you feel and behave in different situations, and how you feel about learning and your attendance at school.

We collect gender and ethnicity data for the purpose of identifying and keeping under review equality of opportunity, with a view to enabling equality to be promoted or maintained.

You can see full details of the personal data we collect on our website: <https://www.place2be.org.uk/impact-evidence/how-we-measure-impact.aspx>.

10. How do we collect your personal data?

We will normally collect your personal data directly from you. This will include where you participate in counselling sessions or use our services, or when you communicate with us.

We may also collect your personal data from other sources, such as your parents/carers and the school or location where you are receiving services, or from other third parties that have referred you to us (e.g. social services).

11. How long do we keep your information for?

We keep the information for six years and it is then anonymised (which means that any personal data is stripped so that the relevant individual can no longer be identified) or destroyed. Please note that this does not apply in respect of any safeguarding data.

12. Will the information Place2Be collects be shared with anyone?

We may disclose and transfer your personal data to the following third parties for the purposes described in this Privacy Notice:

- schools and locations where we are providing our services;
- the service provider that provides our School Services System (SSS) (i.e. the IT platform) on which our information and data is stored;
- our legal advisers (where necessary in order for us to obtain legal advice); and
- government authorities, law enforcement agencies, and courts (where necessary in order for us to comply with our legal or regulatory obligations).

We require all third parties with whom we share your personal data to respect its security and to treat it in accordance with the law.

To understand how Place2Be compares to other services and to learn how we can improve, Place2Be sometimes shares pseudonymised data with research partners, including universities and their students. It

will never be possible to identify you in the data we share with research partners or in any reports that are written by us.

13. How does Place2Be protect and safeguard your personal data?

We care about protecting your personal data, and we are committed to taking all appropriate steps to achieve this. We have implemented policies and systems to ensure that the personal data cannot be accessed by anyone who should not see it, and to protect it against accidental or unlawful loss, misuse alteration or destruction. This includes implementing a range of technical and organisational measures that are consistent with applicable data protection laws, including ensuring that personal data is held in a secure, password protected database. In addition, we limit access to your personal data to those employees, volunteers and other third parties who have a need to see it for the purpose of delivering the service for you and your child. Those individuals will only process your information on our instructions and are subject to a duty of confidentiality.

14. What is our legal basis for collecting personal data about you?

Place2Be can only use your personal data where we have a legal basis to do so under data protection law.

We aim to have a service that any young person in the school / location can access when they are referred. Any young person who has agreed to come to a Place2Be service can attend. In those circumstances, as we are providing direct counselling services to you, your consent is not required by us to record, assess or process your personal data, because we are able to rely on our “legitimate interest” (as our legal basis, as explained below), in line with guidance from the Information Commissioner’s Office (**ICO**), the UK supervisory body for data protection issues. This approach is also in line with guidance from the British Association of Counselling and Psychotherapy (**BACP**). Place2Be is an organisational member of the BACP. This means our staff work in line with the BACP’s Ethical Framework and Ethical Guidelines, so they will make sure your personal information is confidential.

When we provide our services to you, we rely on the legal basis, and sensitive personal data processing conditions, specified below to record, assess and process personal data about you:

- **legal basis:** we are able to rely on our legitimate interests (providing you with counselling services, conducting research, and ensuring equality of opportunity and treatment) to process your personal data, provided this is not outweighed by your rights and interests; and
- **processing condition:** where we process sensitive personal data (e.g. mental health, sexual orientation or ethnicity information) about you, in addition to satisfying a legal basis (as explained above) we also need to satisfy a processing condition (as set out in data protection law) for sensitive personal data. We rely on the following processing conditions to process your sensitive personal data:
 - **health and social care:** where we are providing you with our services, we are able to process your sensitive personal data on the basis that it is necessary for us to provide our health and social care services;
 - **equality monitoring:** we use your sensitive personal data to monitor equality of opportunity of treatment in our counselling services; and

- **research:** we may use some of your personal data for research and statistical purposes (e.g. as part of Place2Be's evaluation reports (see question 8 above)). When we use personal data for this purpose (including sharing it with research partners), we ensure that it is pseudonymised (i.e. coded) by removing your name so that you cannot be identified.

15. Where do we collect, store or process your personal data?

Place2Be does not collect, transfer, store or process your personal data outside the UK. All of our data is stored on secure servers located in the UK and we only use service providers who comply with UK data protection law. Where we do need to transfer or process your personal data outside the UK, we will ensure that we do so in accordance with data protection law, including: (i) by ensuring that the personal data is transferred to a country that offers an adequate level of data protection; or (ii) by using standard contractual clauses approved by the ICO.

16. Your rights regarding the personal data we hold about you

Under data protection law, you have certain rights in relation to the personal data that we hold about you. These rights include:

- **access:** you have the right to request a copy of the personal data we hold about you, and obtain certain other information about how we process your personal data, this is known as a Subject Access Request;
- **rectification:** you have the right to request that we correct any personal data you believe is inaccurate or incomplete;
- **erasure:** you have the right to request that we erase your personal data, in certain circumstances;
- **restriction:** you have the right to request that we restrict the processing of your personal data, in certain circumstances;
- **objection:** you have the right to object to our processing of your personal data, in certain circumstances; and
- **portability:** you have the right to request that we transfer your personal data to you or a third party (in certain circumstances), in a commonly used machine-readable format.

You can exercise any of your rights, including making a Subject Access Request by speaking with the Place2Be School Project Manager or Place2Be Counsellor who will ask you to complete a form, or by sending an email to Privacy@place2be.org.uk.

17. What can you do if you are unhappy with our service or if you have questions about how we handle your (or your child's) personal data?

If you are unhappy with any aspect of our **service**, you can make a complaint in writing to the Chief Financial Officer at Enquiries@Place2be.org.uk.

If you have any questions about this **Privacy Notice**, or if you are unhappy with **how your personal data has been handled by us**, you can contact our Data Protection Officer by email to privacy@place2be.org.uk.

If you remain unhappy, you also have the right to complain to the Information Commissioner's Office (ICO). The ICO can be contacted using the following details:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 0303 123 1113

Web: www.ico.org.uk

We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.