Information sheet for parents and carers / Privacy Notice (Place2Talk)

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 Place2Be 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 (**SPMs**) and Place2Be Counsellors[1] are qualified therapists who conduct the Place2Talk sessions in schools / locations.

Place2Talk sessions may be delivered / conducted solely by qualified and experienced Place2Be Counsellors on placement, provided this is authorised by the relevant Place2Be area manager and clinical supervisor.

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 placement.

Place2Be is an organisational member of the British Association of Counselling and Psychotherapy. This means our SPMs and Place2Be Counsellors 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. This may mean sharing any relevant record of the session with designated safeguarding staff as appropriate. The SPM or Place2Be Counsellor may share information and consult with their line manager.

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

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Place2Be's evaluation

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.

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. 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.

Privacy Notice

6. What is the purpose of this Privacy Notice?

The UK General Data Protection Regulation (**UK GDPR**) and the Data Protection Act 2018 (**DPA**) give people control over their personal data and require organisations who have people's personal data to act in a lawful and transparent way. Place2Be works within the requirements of the UK GDPR and DPA to ensure that personal data (for example, your child's name or date of birth) 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 child's personal data when we offer our Place2Talk 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 child's personal data and is responsible for it.

7. 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:** year group; and
- **appointment details:** Place2Talk appointments, the matters discussed, and any action recommended as a result of the session.

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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.

8. How do we collect your child's personal data?

We collect your child's personal data directly from your child when they make an appointment with us for the Place2Talk service, and when they participate in the Place2Talk sessions.

We may also collect your child's personal data from other sources, such as from members of the school's staff

9. How do we safeguard your child's personal data?

We care about protecting your child's personal data. We have implemented policies and systems to make sure that the information cannot be accessed by anyone who should not see it and to protect against accidental or unlawful loss, misuse, alteration or destruction of the data.

We are committed to taking all appropriate steps to protect the personal data that we hold. We do this by having in place 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 that can only be accessed by those who need to see the information to deliver the service for your child. Those individuals will only process your information on our instructions and are subject to a duty of confidentiality.

10. For what purposes do we use your child's personal data?

- **Place2Talk sessions**: we collect and use your child's personal data for the purposes of allowing them to participate in Place2Talk sessions and to communicate with them in respect of making appointments for these sessions. We may process your child's information for safeguarding reasons, which may mean sharing any relevant record of the session with designated safeguarding staff as appropriate;

- **research and statistics**: we use some of your child's personal data for research and statistical purposes, including as part of Place2Be's evaluation reports. 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 identified from the data; and

- **equal opportunities**: 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.

11. Why haven't we asked for parent / carer consent to process personal data 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 younger than 12 whose parent/carer has not declined for their child to use Place2Talk, can attend. Any child/young person age 12+ can agree to attend Place2Talk themselves.

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Parental consent is not required by us to record, assess or process a child's information, because we rely on other legal grounds (see question 12 below) to do so. We also implement safeguards to ensure only the minimal information is collected and that that information is used in a way that respects and protects the children who use the service and their personal data.

12. What is our legal basis for collecting personal data about your child?

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

Under the UK GDPR we are required to identify a legal basis for processing personal data. We have identified our legal basis as our "legitimate Interests" as explained below. Accordingly, as mentioned above, we do not need to rely on parent or carer consent (or the child's consent) to process your child's personal data, especially because we are offering counselling services direct to a child. This is in line with guidance from the Information Commissioner's Office (**ICO**), the UK supervisory body for data protection issues. It is also in line with guidance from the British Association of Counselling and Psychotherapy.

We rely on the legal basis, and sensitive personal data processing conditions, specified below to record, store, process and assess personal data about your child:

- **legal basis**: we are able to rely on our legitimate interests (providing our Place2Talk services to your child, conducting research, and ensuring equality of opportunity and treatment) to process your child's personal data, provided this is not outweighed by your child's rights and interests; and

- **processing condition**: where we process sensitive personal data (e.g. mental health, or ethnicity information) about 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 child's sensitive personal data:

    - **health and social care:** where we are providing your child with our services, we are able to process 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 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 4 above)).

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

If your child is aged under 12, you can ask us not to see your child by completing and returning the slip that accompanies this information to the Place2Be SPM or Place2Be Counsellor. You can withdraw your agreement at any time by speaking to the Place2Be SPM or Place2Be Counsellor, or by sending an email to privacy@place2be.org.uk. Once we receive your email, we will cease to provide Place2Talk support to your child.

If your child is aged 12 years or older it is assumed that they are able to independently agree to access Place2Talk and for their information to be recorded.

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14. Will the personal data Place2Be collects be shared with anyone?

We may disclose and transfer 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; we do not share issues discussed with the school unless they pertain to a safeguarding concern;
- 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 (were 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 your child in the data we share with research partners or in any reports that are written by us.

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

Place2Be does not collect, transfer, store or process 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.

16. Can you request for the personal data held about your child?

You may ask us to confirm what personal data we hold about your child at any time. This is known as a Subject Access Request (please also see question 17 below) and we will ensure all requests are handled in line with the UK GDPR and DPA.

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

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17. Rights regarding your child's personal data

Under data protection law, your child has certain rights in relation to the personal data that we hold about them. These rights include:

- **access:** the right to request a copy of the personal data we hold about your child, and obtain certain other information about how we process your child's personal data – this is known as a Subject Access Request;
- **rectification:** the right to request that we correct any personal data that your child believes is inaccurate or incomplete;
- **erasure:** the right to request that we erase your child's personal data, in certain circumstances;
- **restriction:** the right to request that we restrict the processing of your child's personal data, in certain circumstances;
- **objection:** the right to object to our processing of your child's personal data, in certain circumstances; and
- **portability:** the right to request that we transfer your child's personal data to them 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 rights, data about them is still their personal data and does not belong to anyone else, such as a parent or carer. 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 (please see question 16 above). 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 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. How long will we store your child's personal data for?

We store your child's personal data securely for six years, and then it is 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 which is retained for 10 years.

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

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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 **child's personal data** is handled by us, you may contact our Data Protection Officer in the first instance by sending an 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:

The 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.

If you are a parent/carer, please discuss this information sheet with your child, 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.

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