

# Place2Be Information sheets and Privacy policy

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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 Counsellors<sup>1</sup>.

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.

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<sup>&</sup>lt;sup>1</sup> 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 <a href="https://www.place2be.org.uk/impact-evidence/how-we-measure-impact.aspx">https://www.place2be.org.uk/impact-evidence/how-we-measure-impact.aspx</a>.

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

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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 <a href="mailto:privacy@place2be.org.uk">privacy@place2be.org.uk</a>.

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.

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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 <a href="mailto:Privacy@place2be.org.uk">Privacy@place2be.org.uk</a>.

## 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 <a href="mailto:privacy@place2be.org.uk">privacy@place2be.org.uk</a>.

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.

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# Information sheet for parents and carers / Privacy Policy

# 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 help 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 following, 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.

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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.

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 Counsellors<sup>1</sup> 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.

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<sup>&</sup>lt;sup>1</sup> These may be an Assistant School Project Manager-or a Mental Health Practitioner.

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.

#### 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.

## Place2Be's evaluation

## 7. 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.

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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/

## 8. What information about you and your child is included in Place2Be's evaluation?

Place2Be collects information about your child from the school/location including their name, date of birth, year group, gender and ethnicity. We also collect information about your child's wellbeing and learning and attendance at school. From this, we 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 record your child's Unique Pupil Number/Scottish Candidate Number (see 10). This helps us look in the National Pupil Database to evaluate children's progress over time to see how Place2Be helps over the longer term.

In order to contact you about the support we are providing for your child, we will collect your name and contact details.

If parenting support is being considered, Place2Be will collect information about you including your name, gender, ethnicity and employment status in order to refer you to one of our parenting services (see point 3 above). 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. You can see full details of the sort of information we collect on our website <a href="https://www.place2be.org.uk/impact-evidence/how-we-measure-impact.aspx">https://www.place2be.org.uk/impact-evidence/how-we-measure-impact.aspx</a>.

We keep the information for 6 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 rule does not apply in respect of any safeguarding data.

#### 9. Will the information Place2Be collects be shared with anyone?

To understand how Place2Be compares to other services and to learn how we can improve, Place2Be sometimes shares 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 or in any reports that are written.

## 10. What is the Unique Pupil Number (UPN)/Scottish Candidate Number (SCN)?

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.

## 11. How does Place2Be protect and safeguard children and parents' 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. Yours and your child's name will *not* be in our research data and all personal information will be stored securely.

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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 you and your child.

# 12. 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.

## 13. What is our legal basis for collecting information about you and your child?

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, 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.

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 yours or your child's information, especially because we are offering direct counselling services. 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 you and your child if they come to counselling sessions for two reasons:

- we are protecting the interests of you and 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 you and 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.

#### 14. 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 <a href="mailto:privacy@place2be.org.uk">privacy@place2be.org.uk</a>

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

## 15. Can you request to see the information held about you and 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 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. 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 <a href="mailto:Privacy@place2be.org.uk">Privacy@place2be.org.uk</a>

## 16. 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 yours or your child's data is handled, you may complain to the Data Protection Officer in the first instance by sending an email to <a href="mailto:privacy@place2be.org.uk">privacy@place2be.org.uk</a>.

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 <a href="https://www.ico.org.uk">www.ico.org.uk</a>).

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# Information sheet for young people / Privacy Policy

# 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 Counsellor 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.

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#### 3. Who conducts the Place2Be counselling sessions?

School Project Managers and Place2Be Counsellors<sup>1</sup> 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.

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<sup>&</sup>lt;sup>1</sup> These may be an Assistant School Project Manage or a Mental Health Practitioner

## Place2Be's evaluation

## 6. 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/

## 7. What information about you is included in Place2Be's evaluation?

Place2Be collects information about you from the school/location including your name, date of birth, year group, gender and ethnicity. We also collect information about your wellbeing and learning if you attend school. From this, we provide a summary of parents/carers' (if you have agreed), young people's and teachers' views about how young people feel and behave in different situations, and how they feel about learning and their attendance at school, if applicable. You can see full details of the sort of information we collect on our website <a href="https://www.place2be.org.uk/impact-evidence/how-we-measure-impact.aspx">https://www.place2be.org.uk/impact-evidence/how-we-measure-impact.aspx</a>.

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

Place2Be will record your Unique Pupil Number/Scottish Candidate Number (see section 10). This helps us look in the National Pupil Database to evaluate children's / young people's progress over time to see how Place2Be helps over the longer term.

We are also able to use some of your information for research and statistical purposes, as we use coded information and remove your name and we use some of the information for equality of opportunity and monitoring your counselling.

We keep the information for 6 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 rule does not apply in respect of any safeguarding data.

## 8. Will your information be shared with anyone?

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

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## 9. What is the Unique Pupil Number (UPN)/Scottish Candidate Number (SCN)?

The UPN/SCN is a number allocated by the education authorities that identifies each pupil in school. This number remains with you throughout your school career, even if you change school. UPN/SCNs are designed to track student progress and are part of the procedures used for target setting and monitoring in each school.

## 10. How do we safeguard your information?

We care about protecting your 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. Your name will *not* be in our research data and all personal information will be stored securely.

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 you.

## 11. What is the Data Protection Act (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.

#### 12. What is our legal basis for collecting information about you and your child?

We aim to have a service that any young person in the school/location can access when they are referred. When you agree to attend Place2Be sessions your consent is not required to record or store or assess your information, because other legal safeguards kick in to ensure the minimal information is collected and used in a way that respects and protects our service users.

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 to process your information, especially because we are offering direct counselling services. 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 you if you agree to come to counselling sessions for two reasons:

- we are protecting your interests 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 you 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 information is confidential. In addition, we

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are also able to use some of your information for research and statistical purposes, as we use pseudonymised (i.e. coded) information and remove your name. We also use some of the information to monitor equality of opportunity in our services.

#### 13. 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 <a href="mailto:privacy@place2be.org.uk">privacy@place2be.org.uk</a>.

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

## 14. Can you request the information held about you?

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 data about you is your personal data and does not belong to anyone else, such as a parent or guardian.

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 <a href="mailto:Privacy@place2be.org.uk">Privacy@place2be.org.uk</a>

#### 15. 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 addressed to the Chief Financial Officer at <a href="mailto:Enquiries@Place2be.org.uk">Enquiries@Place2be.org.uk</a>.

If you are unhappy with how your data is handled, you may complain to the Data Protection Officer in the first instance by sending an email to <a href="mailto:privacy@place2be.org.uk">privacy@place2be.org.uk</a>.

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 <a href="https://www.ico.org.uk">www.ico.org.uk</a>).

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