

# SCHOOL COUNSELLING SERVICE PRIVACY NOTICE

*FOR PARENTS AND CARERS OF CHILDREN 4 – 12 YEARS OLD*

## **Important information**

With your agreement, the school has arranged for me to provide your child with counselling or support. I am employed by the Catholic Children's Society (Westminster) (**CCSW**), which is the organisation which the school has asked to provide counselling or support to its students through its ConnectEd service.

It is important that your child is able to trust me and they can have honest conversations with me during our sessions. For this reason, the details of what we discuss during our sessions is confidential and my file about them is handled securely. I will not share what they tell me with anyone outside CCSW except if further support is required, I believe there is a serious risk of harm to them or someone else, or where the law requires me to do so.

The law (General Data Protection Regulation and the Data Protection Act 2018) protects your child's information and gives them special rights, including the right to understand what we do with their information. This document explains to you what we (CCSW and I) do with their information.

If you have any questions about this document or your child's information, please let me know. Otherwise, you are welcome to contact Rosemary Keenan at CCSW on 020 8969 5305.

## **The information which we hold**

We hold the following information about your child

- **Identity and contact information** includes their name, date of birth, gender, form/year group, school, home address, telephone number, names and contact details of key family members or carers.
- **Professional contact information** includes details of other professionals, such as a GP or social worker, who looks after them or their family.
- **Counselling and support information** includes information shared by them or others (such as their school) for the purposes of providing them with counselling or support, including notes and documents I make for their file. This may include sensitive information about them.

The information which we hold comes from them, their family, their school and other professionals who may be assisting them or their family.

## **What we do with their information**

We may use their information for the purposes below:

- Providing them with counselling or other support
- Organising the counselling and support service we provide to their school,

- Making sure that we comply with our professional and legal obligations (including being supervised)
- Taking steps to ensure that them or anyone else is protected from harm if we believe them or others are at risk of significant harm
- Respond to complaints or legal proceedings

### **The lawful reasons for using their information**

We will only use their information where it is lawful for us to do so. This is when it is necessary to provide them with counselling or support, to organise our service, to comply with a legal obligation and to keep records about the service we provide.

When we use sensitive information about them (such as information about their race, religious beliefs, health), it will be where it is necessary for the purposes of providing a confidential counselling or support service, protecting them or anyone else from harm, complying with our professional obligations to ensure that counsellors practise safely or to deal with legal proceedings.

We do not rely upon their consent in using or holding their information.

### **Who we share their information with**

We will only share their personal information where it is necessary for the purposes above. We may need to share other information as follows:

- With another professional (such as their GP or social worker looking after them or their family) when we need to communicate with them for the purposes of their counselling or support. We would also discuss this with them beforehand where appropriate / possible.
- With their school in order to ensure that they are protected from harm and / or their wellbeing is protected.
- Our counsellors are members of a professional organisation (such as the Health and Care Professions Council), and therefore we may need to report potential breaches of ethical principles or codes of professional conduct.
- Where we are concerned that they or anyone else may be at risk of harm, we may need to report to the Designated Safeguarding Lead in the school, the Local Authority or police in accordance with our safeguarding procedures.
- We will disclose information if we are required to do so by law, such as a court order.

On occasion, we may need to seek the advice of professionals such as our lawyers about specific issues arise or IT consultants to assist in the management of our computer systems. for the purposes of managing our organisation.

We only share the minimum amount of information necessary for the purposes above.

## Communicating with you outside of a meeting room

We may also use on-line services to provide your child with counselling and support when it is not possible to arrange a meeting in person. For example, we may use Zoom / Skype for Business / RingCentral. We may also ask for your telephone number and email address and use them to communicate with you when necessary by telephone, email or instant messaging services for the purposes of providing your child with our services.

Where we use on-line meeting services, your child may be able to join the on-line meetings without creating an account. If you wish to create a user account, you may be required to provide your name and contact details for the purposes of setting up a user profile and using this service. As a user, the on-line service will keep information about you such as your account settings, contact details, user preferences, technical information, metadata and approximate location.

Any on-line meeting or messaging service may keep the contents of any on-line chat or messages, or voice mail messages. However, we will not enable the recording or transcription of the content of any meeting with you without your specific agreement.

Where we are not able to meet with you in person, we will take appropriate steps to ensure that any on-line meeting or other communication with your child is secure and confidential. We will rely upon you and your child to comply with the guidance we provide for this reason.

### **How long we keep their information**

We hold their information for a period of seven years after the end of the last meeting or until their 21<sup>st</sup> birthday, whichever is later, unless there is a specific reason why it is necessary to keep their information for longer. This may be because we believe that there is a risk of harm to them or someone else or there is the possibility of legal proceedings.

### **How we protect their information**

We make sure that their information is stored securely. When we do need to share their information for any of the reasons above, this is done securely.

### **Transferring your personal information outside of the European Union**

If we communicate with you by on-line meeting services (such as Zoom / Skype for Business / RingCentral) or on-line messaging services, your data may be stored by these services somewhere other than the European Union. As data protection standards are lower in some countries than within the European Union, we will ensure that protections are put in place to keep your personal information safe. For example, Zoom / Skype for Business / RingCentral are members of the US Privacy Shield programme.

## **Their information rights**

Your child has the right to:

- **Request access to your personal information.** They can request a copy of your personal information that we hold and information about how we use their information.
- **Request correction of the personal information** that we hold about them.
- **Request deletion of your personal information** where there is no good reason for us continuing to use it.
- **Object to processing of personal information** where they feel the impact upon their rights outweighs our interests in using this information.
- **Request restriction of processing of your personal information.** They can ask us to stop using their information for specific reasons.

These rights belong to your child. In certain circumstances, parents or those with parental authority may be able to exercise these rights on their behalf. However, this will depend upon the age of your child and a number of other factors such as their understanding of the issues and the consequences of disclosing their confidential information. We would always seek to discuss this issue with the child before making a decision.

These rights are limited and subject to various legal exceptions. If any of the requests above are made, we would explain in our response if we relied upon any of these exceptions.

Your child has the right to make a complaint at any time to the Information Commissioner's Office (ICO) if you are concerned about the way in which we use their information. Full details can be found on the ICO's website [www.ico.org.uk](http://www.ico.org.uk). If you have any concerns, we would be grateful for a chance to deal with these before you approach the ICO.

## **Changes to this privacy notice**

We keep this privacy notice under regular review. This privacy notice was last updated on 21<sup>st</sup> April 2020.