



PRIVACY NOTICE
for
Service users of Ripple Psychological Services

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1.0	24 May 2018	JO HEWITT
1.1	28 May 2018	JO HEWITT
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Ripple Psychological Services

PRIVACY NOTICE

ABOUT US

Dr Jo Hewitt, Ripple Psychological Services is the data controller of the personal information I hold about service users. This means that I am responsible for deciding how I hold and use the personal information that I collect.

I am required under the General Data Protection Regulation (GDPR) to notify you of the information contained in this privacy notice.

I collect and use service users information under the Education Act (Northern Ireland) 2014 and other legislation.

When collecting information from you I will inform you whether you are required to provide certain information or if you have a choice in this. I may update this notice at any time but if I do so, I will inform you as soon as reasonably practicable.

It is important that you read and retain this notice, together with any other privacy notice I may provide on specific occasions when I am collecting or processing personal information about you, so that you are aware of how and why I am using such information and what your rights are under the GDPR.

If you have any questions about this privacy notice or how I handle personal information, please contact Dr Hewitt who will deal with your query. Dr Hewitt can be contacted on jo@ripple.services, her Facebook page RippleServices and number 07933212122. She is the Data Protection Officer and monitors Ripple Psychological Services' data protection procedures to ensure they meet the standards and requirements of the GDPR. Please contact her using the above details.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. The ICO's details are as follows:

The Information Commissioner's Office – Northern Ireland

3rd Floor
14 Cromac Place,
Belfast
BT7 2JB

Telephone: 028 9027 8757 / 0303 123 1114

Email: ni@ico.org.uk



HOW DO I COLLECT AND HOLD PERSONAL INFORMATION?

I collect some personal information about our service users during a referral to the service.

I will sometimes collect additional information from third parties such as the Education Authority, schools, therapists (speech and language, occupational, physiotherapy etc), social workers, family support workers involved with service users.

I mainly collect personal information about my service users throughout the course of the assessment, intervention or training, for example through assessment or consultation, and in my relationship with service users during intervention.

WHAT PERSONAL INFORMATION DO I COLLECT, STORE AND USE ABOUT MY SERVICE USERS?

Personal information is information that identifies you and relates to you. I will collect, store and use the following categories of personal information about my service users:

- Personal information (such as name, age, date of birth, photographs)
- Contact information (such as address, emergency contact information and telephone number)
- Attendance information (such as sessions attended, number of absences and absence reasons)
- Assessment information (such as standardised tests or assessment results from school examinations)
- Film captured as part of intervention or training
- Special categories of data (such as ethnicity, language, country of birth, nationality, information regarding health, special educational needs, allergies and disability).

WHY DO I COLLECT, STORE AND USE THIS INFORMATION?

I will only use personal information when the law allows ME to. Most commonly, I will use personal information relating to service users where I need to comply with my contractual obligations to provide a service as agreed with the service users.

In some cases I may use personal information where it is necessary for my legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. For example, I have a legitimate interest in safeguarding and promoting service user welfare.

I keep personal information electronically on an encrypted laptop, encrypted memory storage device and iPad, all of which are stored in a secure location when possible. Some personal information is also kept in manual folders in a secure location.

Situations in which I will use personal data, including special category data, include:

- **Training**

For example:

- to support training of professionals and parents

- **Assessment**

For example:

- to provide an informed assessment of a child or young person



- **Safeguarding & Child Protection**

For example:

to safeguard service users

- **Security**

For example:

- to comply with health and safety obligations
- to comply with the law regarding data sharing

- **Business Continuity**

For example:

- to assess the quality of my services

- **Communications**

For example:

to foster links between organisations, support services and families

CONSENT

The majority of the personal data provided to me is provided on a voluntary basis through parental or professional consent (namely, a service user's express agreement). A service user aged 13 or over is typically considered capable of giving consent themselves and will not necessarily require express agreement from a parent/carer/legal guardian.

Where I need consent, I will provide the service user with a specific and clear notice that explains the reasons why the data is being collected and how the data will be used. You should be aware if you do not consent to our collection of this type of data, this may affect the standard/extent to which I am able to fulfil our contractual agreement.

If we ask for your consent to use personal information, you can take back this consent at any time. Please contact Jo Hewitt if you would like to withdraw any consent you have given.

HOW LONG IS DATA STORED FOR?

I will only keep personal information for as long as necessary to fulfil the purposes I collected it (for example, carry out an intervention or assessment) and including for the purposes of satisfying any legal, accounting, or reporting requirements.

I do not store personal data forever; we only hold data for as long as I am legally able to do so. You will always have a right to ask for it to be destroyed.

In determining the appropriate retention period for personal information, I consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which I process your personal data and whether I can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances I may anonymise your personal information so that it can no longer be associated with you, in which case I may use such information without further notice to you.



DATA SECURITY

I have put in place appropriate security measures to prevent personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, I limit access to your personal information to those employees, agents, contractors and other third parties who have a need to know. They will only process personal information on my instructions. In the instance when your data is being sent to the Association of Video Interaction Guidance UK (AVIGUK), they will collect your personal data only from the data you/ I provide to them. I will pass the required elements to AVIGuk solely for the purposes of registration. I will not pass it to anyone else. When your contract with us has come to an end, I will delete the data. For details about how AVIGuk deal with your data, see videointeractionguidance.net/privacy.

I have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator (currently the Information Commissioner's Office) of a suspected breach where I am legally required to do so.

WHO I SHARE SERVICE USER WITH

I may have to share service user's data with third parties, including third-party service providers and other bodies such as:

- Social workers;
- Schools attended by children and young people;
- Association of Video Interaction Guidance UK (AVIGuk);
- General Teaching Council for Northern Ireland;
- Therapists (Speech and language, physiotherapy, occupational etc)
- Commercial standardised test providers.

Why I share service user information

I do not share information about my service users with anyone without consent unless the law and our policies allow us to do so. I only permit access to personal data for specified purposes and in accordance with my instructions.

TRANSFERRING DATA OUTSIDE THE EU

I will not transfer the personal information we collect about you to any country outside the EU without telling you in advance that I intend to do so and what steps I have taken to ensure adequate protection for your personal information in those circumstances.

YOUR RIGHTS OF ACCESS, CORRECTION, ERASURE AND RESTRICTION

Under GDPR, service users have the right to request access to information about them that I hold. To make a request for your personal information, contact Dr Hewitt at jo@ripple.services, Facebook page RippleServices, or telephone 07933212122.

I may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Under certain circumstances, by law a service user over the age of 13 has the right to:



- **Request access** to personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and your child and to check that we are lawfully processing it. You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, I may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, I may refuse to comply with the request in such circumstances.
- **Request correction** of the personal information that I hold about you. This enables you to have any incomplete or inaccurate information I hold corrected.
- **Request erasure** of personal information. This enables you to ask us to delete or remove personal information where there is no good reason for me continuing to process it. You also have the right to ask me to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of personal information I am relying on a legitimate interest (or that of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where I am processing you and your child's personal information for direct marketing purposes.
- **Request the transfer** of your personal information to another party, for instance a school.