

Privacy Policy



Connecting - Mental Health Solutions in Education Privacy Policy Connecting - Education Mental Health Solutions customer privacy notice

This privacy notice tells you what to expect us to do with your personal information.

- Contact details
- What information we collect, use, and why
- Lawful bases and data protection rights
- Where we get personal information from
- How long we keep information
- Who we share information with
- How to complain

Contact details

Registered Office:

16 Elliot Close, Whetstone, LEICESTER, LE8 6QX, GB

Email:

cclay@educationmentalhealthsolutions.co.uk

2. What information we collect, use, and why

We collect or use the following information **to provide counselling, therapies, mentoring, supervision, and other services.**

- Name, address and contact details
- Gender
- Pronoun preferences
- Date of birth
- National Insurance number
- Emergency contact details
- Photographs
- Health information (including medical conditions, allergies, medical requirements and medical history)
- Test results (including psychological evaluations, scans, bloods, x-rays, tissue tests and genetic tests)

We collect or use the following information **for safeguarding or public protection reasons:**

- Name, address and contact details
- Emergency contact details
- Health information (including medical conditions, allergies, medical requirements and medical history)
- Test results (including psychological evaluations)
- Records of meetings and decisions

We collect or use the following personal information **to comply with legal requirements:**

- Name
- Contact information
- Identification documents
- Any other personal information required to comply with legal obligations
- Right to work
- Insurance details
- Tax information
- Safeguarding information
- Criminal offence data

We collect or use the following personal information **for recruitment purposes:**

- Contact details (e.g. name, address, telephone number or personal email address)
- Date of birth
- National Insurance number
- Copies of passports or other photo ID
- Employment history (e.g. job application, employment references or secondary employment)
- Education history (e.g. qualifications)
- Social media
- Right to work information

- Details of any criminal convictions (e.g. Disclosure Barring Service (DBS), Access NI or Disclosure Scotland checks)

We also collect the following special category information **for recruitment purposes**:

This information is subject to additional protection due to its sensitive nature:

- Health information

We collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details
- Addresses
- Service history
- Customer or client accounts and records
- Correspondence

3. Lawful bases and data protection rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible [lawful bases](#) in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights, which are set out briefly below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

- **Your right to access** - You have the right to ask us for copies of your personal information. You can request other information, such as details about where we get personal information from and who we share personal information with. There are some exemptions, which means you may not receive all the information you ask for. [Read more about the right of access.](#)
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [Read more about the right to rectification.](#)
- **Your right to erasure** - You have the right to ask us to delete your personal information. [Read more about the right to erasure.](#)
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. [Read more about the right to restriction of processing.](#)
- **Your right to object to processing** - You have the right to object to the processing of your personal data. [Read more about the right to object to processing.](#)

- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. [Read more about the right to data portability.](#)
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. [Read more about the right to withdraw consent.](#)

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

4. Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information **to provide counselling, therapies, mentoring, supervision and other services** are:

- **Consent** - we have permission from you after we give you all the relevant information. All your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- **Contract** – we must collect or use the information so we can enter or carry out a contract with you. All your data protection rights may apply except the right to object.
- **Legal obligation** – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object, and the right to data portability.
- **Legitimate interests** - we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All your data protection rights may apply, except for the right to portability.

For more information on our use of legitimate interests as a lawful basis, you can contact us using the contact details set out above.

- **Vital interests** – collecting or using information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing, and shelter. All of your data protection rights may apply, except for the right to object and the right to portability.

Our lawful bases for collecting or using personal information **for safeguarding or public protection reasons** are:

- **Consent** - we have permission from you after we give you all the relevant information. All your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object, and the right to data portability.
- Public task – we must collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except for the right to erasure and the right to portability.

Our lawful bases for collecting or using personal information **to comply with legal requirements** are:

- Consent - we have permission from you after we give you all the relevant information. All data protection rights may apply, except for the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we must collect or use the information so we can enter or carry out a contract with you. All your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object, and the right to data portability.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All your data protection rights may apply, except for the right to portability.

For more information on our use of legitimate interests as a lawful basis, you can contact us using the contact details set out above.

- Vital interests – collecting or using information needed when someone’s physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing, or shelter. All of your data protection rights may apply, except for the right to object and the right to portability.
- Public task – we must collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except for the right to erasure and the right to portability.

Our lawful bases for collecting or using personal information **for recruitment purposes** are:

- Consent - we have permission from you after we give you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object, and the right to data portability.

- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All your data protection rights may apply, except for the right to portability. For more information on our use of legitimate interests as a lawful basis, you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information **for information updates, marketing or market research purposes** are:

- Consent - we have permission from you after we give you all the relevant information. All your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object, and the right to data portability.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All data protection rights may apply, except for the right to portability. For more information on our use of legitimate interests as a lawful basis, you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- Consent - we have permission from you after we give you all the relevant information. All data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object, and the right to data portability.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All data protection rights may apply, except for the right to portability. For more information on our use of legitimate interests as a lawful basis, you can contact us using the contact details set out above.
- **Public task** – we must collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except for the right to erasure and the right to portability.

5. Where we get personal information from

- Directly from you
- Family members or carers
- Other health and care providers
- Social services

- Charities or voluntary sector organisations
- Schools, colleges, universities or other education organisations

6. How long we keep information

Type of records	Retention Period
Counselling & Therapy – Adults	7 years
Counselling & Therapy – Children & Young Person	Until the client reaches their 25th birthday (or 26th if treatment ended when they were 17)
Mentoring	6 years after relationship ends
Recruitment – unsuccessful applicants	6 months
Staff personnel records – general data	7 years after employment ends
Staff personnel records – tax & payroll data	7 years
Health & Safety – accident books	3 years
Child Protection – Children & Young People	Until the child, or Young Person is 25 <i>(Information and Records Management Society (IRMS), 2019).</i>
Child Protection – Adults (Staff & Volunteers)	Their normal retirement age or for 10 years – whichever is longer. Information should be retained even if the person stops working or volunteering for Connecting. <i>(IRMS, 2019; Department for Education, 2022)</i>

Exceptions

There are some situations where records need a longer retention period.

For example, if:

- the records provide information about a child's personal history, which they might want to access later
- the records have been maintained for the purposes of research
- the information in the records is relevant to legal action that has been started but not finished
- the records have been archived for historical purposes (for example if the records are relevant to legal proceedings involving the organisation).

they involve:

- children who have been 'looked after' by the local authority
- adopted children
- registered foster carers
- residential children's homes

Advice will be sought from our legal representatives and/or the relevant Local Authority as necessary.

7. Who we share information with

Others we share personal information with:

- Other health providers (e.g. GPs and consultants)
- Care providers
- Organisations we need to share information with for safeguarding reasons
- Professional advisors
- Local authorities or councils
- Organisations we're legally obliged to share personal information with

8. Duty of confidentiality

We are subject to a common law duty of confidentiality. However, there are circumstances where we will share relevant health and care information. These are where:

- you've provided us with your consent (we have taken it as implied to provide you with care, or you have given it explicitly for other uses);
- we have a legal requirement (including court orders) to collect, share or use the data;
- on a case-by-case basis, the public interest to collect, share and use the data overrides the public interest served by protecting the duty of confidentiality (for example sharing information with the police to support the detection or prevention of serious crime);
- If in England or Wales – the requirements of The Health Service (Control of Patient Information) Regulations 2002 are satisfied.

9. How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

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

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>