

Data Protection policy

1. Introduction

- 1.1. The Parent Infant Clinic and the School of Infant Mental Health Limited ("The Parent Infant Centre" or "the Centre") is committed to ensuring that the privacy is protected of everyone associated with the Centre, including, but not limited to, patients, trainees, purchasers, and website and social media users.
- 1.2. This policy explains how personal information is collected and the procedures that are in place for it to be safeguarded.
- 1.3. The Centre only uses personal information in accordance with any relevant legislation, including the General Data Protection Regulation.

2. Definitions

- 2.1. Personal information is any information related to a person who can be identified either directly or indirectly through that information.

3. Individual rights

- 3.1. Under data protection legislation, individuals have the right;
 - a. To have their information kept confidential.
 - b. To view and have a copy of information held about them.
 - c. To request the amendment of any inaccuracies in the information held about them.
 - d. To request the erasure of any information held about them.
 - e. To withdraw any previously given consent for the Centre to hold any personal information.
- 3.2. The Centre complies with any of the above requests unless it considers that there are compelling reasons not to do so. In that case, the individual is informed of this decision and of the steps that they can take to appeal against the decision.

4. The basis for the holding of personal information

- 4.1. The Centre holds personal information on the following bases:
 - a. That the information relates to an individual who has newly contacted the Centre, in which case explicit consent has been given by the individual for the information to be held. (The 'consent' basis.)
 - b. That the information relates to an individual with whom the Centre has had an ongoing relationship and there is a reasonable belief that the individual would expect that ongoing relationship to include the holding of personal information. (The 'legitimate interest' basis.)

- 4.2. In either of the above cases, further consent will be sought if there is a significant change in the nature of the information held or the use to which it is being put.
- 4.3. Where consent is refused or withdrawn, then the Centre will still provide a service if it is possible to do so safely and effectively. However, some services cannot be provided in this way without some level of personal information.
- 4.4. Where personal information is held on the basis of a legitimate interest, then a Legitimate Interest Assessment is carried out and reviewed annually.

5. Children and parental consent

- 5.1. This policy applies both to children and to adults.
- 5.2. Where consent is relied upon as the basis for processing personal information and the individual is under 16 years of age, then parental consent will be required.
- 5.3. The centre's privacy statement is available in a child-friendly form.

6. Sharing information

- 6.1. With the exceptions noted below, the Centre does not share personal information with any third party.
- 6.2. However, the Centre will share personal information with a third party if:
 - a. The individual requests this.
 - b. The Centre has an immediate concern about an individual's safety.
 - c. The Centre has a safeguarding concern.
 - d. The Centre requests and receives specific permission from the individual to share their personal information, for example, in order to process a purchase.
 - e. There is a requirement by law to share this information.

7. Immediate concerns about an individual's safety

- 7.1. The Centre will consider sharing personal information without the individual's permission if there is a serious and immediate concern that the individual is at risk of committing suicide.
- 7.2. This sharing might be with the person holding medical responsibility for the individual or, in the case of a child, with the parent or carer.
- 7.3. Wherever possible this will be discussed with the individual before this step is taken.

8. Safeguarding concerns

- 8.1. Every child and adult has the right never to receive abuse of any kind. As an agency that works with children and young people, the Centre has a particular responsibility to promote their welfare and to keep them safe.
- 8.2. For this reason, the Centre will consider sharing personal information with a relevant third party, such as social services or the police. This step would never be undertaken lightly and, except in emergencies, only after careful consideration.
- 8.3. Wherever possible the Centre will attempt to address concerns without sharing personal information with a third party. This may take the form of discussing these concerns with the child's parents or carers. However, in some cases it may be necessary to share personal information without notifying the individual.
- 8.4. See the Centre's Safeguarding Policy for more details.

9. Processing a purchase

- 9.1. Some information needs to be collected when a purchase is made through the Centre's website. For example, it is necessary to know the purchaser's name, delivery address, credit or debit card number and expiry date, email address and telephone number. This information allows the transaction to be completed and the order fulfilled.
- 9.2. Payments are processed by a third party, PayPal, and any necessary details are passed on so that the payment can be processed. This third party has undertaken that they will protect that information, will not pass it on and will not use it for any purpose other than to process the payment.
- 9.3. Some personal information may also be passed on to a third party which fulfils order for the Centre. For example, Karnac Books fulfil some of the Centre's book orders. The Centre will only pass on personal information to third parties which can assure the Centre that they will treat that information with the same level of security.
- 9.4. The Centre does not store credit card details nor does it share customer details with any other third parties.

10. Security of personal information

- 10.1. The Centre follows strict security procedures in the storage and disclosure of personal information. Personal information is stored either:
 - a. In the form of paper records that are kept in a locked office.
 - b. In the form of local electronic records that are stored in a password-protected computer that is hidden behind a firewall.

- c. In online services that themselves have robust privacy measures. (Only minimal personal information is kept in online services.)

11. Retention

- 11.1. The length of time that personal information is kept varies according to the purpose of the information. For example, graduates of the School may need to refer back to their graduation portfolio. Patients of the Clinic may also expect the Centre to be able to refer back to previous treatment records.
- 11.2. Personal information that is no longer needed is destroyed. Electronic records are erased and paper records shredded.

12. Breaches

- 12.1. Breaches of data security that involve personal information are managed in accordance with the General Data Protection Regulation.
- 12.2. Any breach is recorded and steps taken to ensure any systemic failure is rectified in order to prevent future breaches.

13. Monitoring and review

- 13.1. This policy and its implementation is reviewed annually. A record is kept of these reviews.
- 13.2. A log is kept of incidents and actions taken as part of this policy. Examples of entries include requests made by individuals regarding their personal information, data breaches and the annual implementation review.

14. Privacy notice or statement

- 14.1. The Centre will display a privacy notice or statement:
 - a. On its website and on any other similar public setting.
 - b. On application forms.
 - c. On any other relevant document that will be seen by individuals whose personal information may be collected or used.
- 14.2. The notice or statement summarises the contents of this policy, in a shorter or longer form according to the nature of the setting in which it is displayed.
- 14.3. The notice or statement is displayed prominently and in an easy-to-read form.