



## **Parental Minds C.I.C Privacy Policy (GDPR)**

Parental Minds (PM) is committed to providing a confidential service to its parent caregivers. No information given to PM will be shared with any other individual or organisation without the parent caregiver's expressed permission.

For the purposes of this policy, confidentiality relates to the holding and/or transmission of personal, sensitive or identifiable information about individuals or organisations (confidential information), which comes into the possession of PM through its work.

PM holds personal data about its staff, volunteers, directors, counsellors and parent caregivers which will only be used for the purposes for which it was gathered for PM and will not be disclosed to anyone outside of PM without prior permission.

All personal data will be dealt with sensitively and in the strictest confidence internally and externally.

### **1 Purpose**

1.1 The purpose of this policy is to ensure that all staff, volunteers, directors, counsellors and parent caregivers understand the PM requirements in relation to the disclosure of personal data and confidential information

### **2 Principles**

2.1 All personal paper-based and electronic data must be stored in accordance with the Data Protection Act 2018, the UK implementation of the General Data Protection Regulation GDPR and must be:

- used fairly and lawfully and transparently
- used for the specific purpose that it was collected and relevant for PM service provision
- parent caregivers will be reminded that this will need to be kept up to date
- personal data will be collected and stored in a secure manner, with protection against unlawful or unauthorised processing, access, loss or damage

2.1.2 All personal paper-based and electronic data must only be accessible to those individuals authorised to have access due to providing support on behalf of the work of PM

### **3.0 Statistical Recording**

3.1 PM is committed to effective statistical recording of the use of its services in order to monitor usage and performance, to in turn enhance the effectiveness of service provision

3.2 All statistical records and/or feedback, given to third parties, such as to support future service delivery, funding applications or monitoring reports for statutory services and agencies shall be produced in anonymous form, so individuals cannot be recognised

3.3 All data information collated to aid the performance of PM is discussed and produced in an anonymous format, only by those staff and/or volunteers who have contact with the individual case or PM support strand

### **4.0 Records**

4.1 Central Records are securely kept at the registered address of PM, which includes notebooks, copies of correspondence and any other sources of information.



4.1.1 Personal data will be collected via an on-line registration form, emails and personal conversations

4.1.2 The personal data we collect and store may include, but not restricted to:

- full name
- home address
- email address
- contact phone number
- emergency contact and phone number

4.1.3 Personal data will be stored on central electronic databases and only visible to those PM staff directly providing support to that parent caregiver

4.1.4 Any notebooks holding personal information, held by staff during use with individual parent caregivers are safely and securely stored, with necessary entries made electronically to central records and paper copies securely destroyed

4.2. An individual parent caregiver's personal data is available to staff, volunteers and counsellors that need that information to further the progress of the work of PM and therefore the ability to support that parent caregiver

4.2.1 Parent caregivers are asked on their on-line registration form, if they agree for members of PM's to pass information to third party agencies that work with PM, who may be able to offer additional support

4.3 If PM wish to use personal data collected for any new purposes other than that originally collected, the individual will be contacted prior to use and advised, in accordance with current data protection legislation.

4.4 PM will hold an individual's personal data for as long as deemed necessary, in line with the use of PM services and Data Protection guidance

4.5 Parent caregivers are invited to join an appropriate WhatsApp stream, as assessed by PM staff, with other parent caregivers.

4.5.1 Parents caregivers who take the opportunity to join this WhatsApp, do so on the understanding that the WhatsApp is a confidential stream and that they are taking responsibility and accountability for their own content entered into the WhatsApp, and to offer respect to other parent caregivers within that WhatsApp stream

4.5.2 PM reserves the right to take out from the WhatsApp stream a parent caregiver that does not show respect and dignity to other parent caregivers in the WhatsApp stream; or to suggest another WhatsApp stream which may be appropriate depending upon the support required

5.0 Research

5.1 Where personal data has been collected and collated for research information with a third party, this data has been provided by and agreement given, by the parent caregiver for the express research purpose explained to them

5.1 Those providing this personal data are advised that they are able to withdraw this information at any time



## 6.0 Access to personal records

6.1 Data Protection Legislation gives the right for an individual to obtain a copy of the personal data held by PM through a Subject Access Request (SAR).

## 7.0 Breaches of Confidentiality

7.1 PM recognises that occasions may arise where individual staff feel they need to breach confidentiality. Confidential or sensitive information relating to an individual may be divulged where there is risk of danger to the individual, a volunteer or staff member or the public at large, or where it is against the law to withhold it. In these circumstances, information may be divulged to external agencies e.g. police or social care on a need to know and individual basis.

7.1.2 In this instance the PM Safeguarding Policy and procedures would be followed (Safeguarding Vulnerable Groups Act 2006 and Children Act 1989 & 2004)

## 8.0 Legislative Framework

8.1 PM will monitor this policy to ensure it meets statutory and legal requirements including the Data Protection Act, EU GDPR Children's Act, Vulnerable Groups Act; Rehabilitation of Offenders Act and Prevention of Terrorism Act.

## 9.0 Training

9.1 All staff, volunteers, directors and counsellors will receive training on and receive a copy of this PM policy during their induction and then periodic reviews. Statutory services and agencies may require a copy of this policy.

9.1.2 All staff undertake Devon County Council's Data Protection for non-employed staff during the first six months of employment

9.1.3 All staff, volunteers, directors and counsellors are reminded that everyone has a responsibility for the data which they have access to, to follow the Principles and that efforts should be taken to ensure this data is securely and timely stored

## 10.0 Policy Review

10.1 The policy will be reviewed annually and amendments will be proposed to and agreed by the PM Directors

## 11.0 Non-adherence

11.1 Breaches of this policy will be dealt with under the PM Disciplinary or Grievance Policy and Procedures

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