

How we use your information in **Spinning World**

Our Privacy Notice for people
who use services



At PSS we know that your privacy is very important to you. We can assure you that it is even more important to us. That's why we want to tell you how we plan to respect and look after your personal information. This is the 'privacy notice' which tells you how we do this.



1. How we collect personal information about you



When you give it to us directly

We will collect personal information directly from you when we meet with you to discuss your situation and your needs. We will also gather information from an ongoing basis while we work with you, including counselling notes.



When you give permission to other organisations to share it

We may have received information on your behalf from another professional who may have referred you to us (with your consent). We may also ask for permission to get information from other organisations if needed.



Children's Data

This service works with children and young people, who are classed as 'vulnerable individuals' and require specific protection under the law. We will always make sure we have a good reason to collect children's information. Children have the same right over their information as adults.

2. What personal information do we collect?

The personal information we collect would include details such as your name, date of birth, email address, postal address and, phone number. We may also collect information about your experiences, your background and you children and your relationship with them.

Some information such as ethnicity, religion, health information and sexual orientation is called 'special category data'. If we collect this (health data for example) we have a **legitimate interest** to collect this; but also to ensure that we don't discriminate against you and can make any reasonable adjustments while we work with you to ensure you stay well.

We will only collect the information we absolutely need to provide your service.



3. Why we need your information?

Our legal basis for having your information, is that we have a **legitimate interest** to do so. We require your personal information to work with you, and will only use your information in a way that you would reasonably expect us to do. Specific reasons are::

- To ensure that we understand what your needs and situation are to understand how best we can support you.
- To ensure we are aware of any health conditions or personal circumstances which could influence the advice or information we give you, or the therapeutic services that we provide.
- To be able to contact you and the important people in your life
- To manage our relationship with you during your time with Spinning World including understanding if your situation changes or you have any further needs.
- To ensure that we are fair and don't discriminate against you in any way; and can respond to any concerns that you might have
- To keep you safe and protect you and your children from any potential harm or injury as much as we can

As well as to:

- Keep you updated with information about changes to your service or PSS as a whole
- Contact you for feedback to improve your service
- Produce annual reports and statistics about what we do at PSS
- Provide you with important advice and support relating to your service that might have an impact
- Inform you of any activities going on within the service or at PSS.
- To help us to identify you when you contact us and make sure that we can keep our records up to date.



We may also need to receive written consent from you to hold special category data, and to use your information for a more specific purpose, and will always ensure we get this consent and explain why it is needed (e.g. consent to take photographs or videos). Under the new law in the UK, children over the age of 13 can give consent for us to handle their information; otherwise we will seek consent from a parent or guardian where possible and appropriate. You will have the right to withdraw this consent at any time. Children have the same right to access their files and notes as adults, where they are competent.

If you don't think we have a good reason to use your data in the ways explained above, you have a right to object. Please see section ten of this leaflet, or the 'My Information, My Rights' leaflet available at psspeople.org.uk. This includes more detail on your rights, as well as how these apply to adults, children and where required, their parents or guardians.

4. What we will and won't do with your personal information



- ✓ We will always **work hard to keep your information safe**.
- ✓ We may ask to **share your data with other agencies** where we need to do so. We will always have a lawful reason to do so, and may ask for your consent where required)
- ✓ We may need to **disclose your information if required to do so by law**. We will always try to discuss this with you before doing do and explain why we are doing it.
- ✓ We may also need to **disclose your information if there are concerns about your safety or wellbeing**. Your safety is really important to us and we may need to share or disclose information if we believe there is a real risk to you, or if you pose a risk to others or yourself.
- ✓ We may choose to **delete posts on social media** which contain information of a sensitive nature.



- ✗ We will never **sell or share your personal information** with organisations so that they can contact you for any marketing activities.
- ✗ We will never **sell any information about the website you visit**.
- ✗ We will never **share your information with people who don't need access to it**.

5. Who sees your personal information?

The personal information we collect about you will be used by our staff at PSS so that they can ensure that we can continue to provide your support. This information will be known to the Spinning World team who help support you, and to staff in central services who need access to your information - such as the Quality and Compliance Team who send out the annual surveys and do audits of files and information on a regular basis. We may also possibly share your information with legal and regulatory authorities if required to by law.

6. How we keep your information safe

We take the security of your personal information extremely seriously and anything we do with your data will be in line with the Data Protection Act 1998, the General Data Protection Regulation and any new relevant domestic legislation.

Your personal information may be stored by PSS either in paper form or electronically. We have implemented appropriate physical, technical and organisational measures to protect the personal information we have under our control, both on and off-line, from improper access, use, alteration, destruction and loss.

We only keep your information for as long as is reasonable and necessary, in line with our retention schedules which are based on best practice guidance. This is usually for a set period of time and will depend on the type of information and the individual requirements of the service. We will then ensure that the information is securely destroyed.



Here are some of the ways we protect your personal information:

- Secure folders on our system
- Password protection
- Firewalls on our servers
- Locked cabinets and drawers
- Restricted access to systems
- Policies, Procedures and Training

7. Your rights over your information

Your personal information is yours, and you have a range of other rights over it. This includes accessing it, updating it, amending it or asking for it to be erased. Please refer to the “My Information, My Rights” leaflet for further information, or contact us at the details on the back of this leaflet.

8. Changes to this Privacy Notice

This Privacy Notice is reviewed regularly to ensure that it reflects how we use your information. Where appropriate, changes will be notified to you by email or post. We may update this on the internet when there are minor changes, but will let you know of any major changes.

9. Data Controller and Data Processor

PSS is commissioned by Ashton, Leigh and Wigan CCG and Liverpool CAMHS to deliver the Spinning World services. They as the commissioners are the Data Controller. PSS do the collecting, updating and storing of personal information and we are the Data Processor. Where schools commission us individually, we are also the Data Controller. This just means there are slight differences in responsibility, but all organisations involved are fully committed to keeping your personal information safe.



10. Right of Complaint

If you have a concern about the way we are handling your information, then we would like to discuss this with you in the first instance and see if we can put things right. You can contact us using the details on the back of this leaflet.

However, if you wish, you are entitled to complain to the supervisory body which is the Information Commissioner's Office. The contact details are below:

Phone: 0303 123 1113

Online: ico.org.uk/concerns/handling/





Who we are

PSS as the Data Controller / Processor are committed to protecting your personal information and to reassure you that you have control over the information we store about you, how we use it and what types of information you would like to receive from us.

We are always happy to respond to concerns and objections, or provide any additional information or explanations where needed.

Please contact our Data Protection Lead by:

Writing to **PSS, Head of Quality and Compliance,**
18-24 Seel Street, Liverpool, L1 4BE

Calling us on **0151 702 5524**

Emailing **data@pss.org.uk**

Online: **psspeople.com/who-we-are/tell-us**

psspeople.com

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