



Client Privacy Policy

Bromley Y holds personal information about children and young people it provides services to. This information is shared with other organisations and protected under data protection law. We keep information about you so that we can:

- arrange the right service for you
- plan and improve our services
- look into any concerns you may have about our services
- keep in touch with you.

What information do we hold about you?

The information we hold about you will depend on the service we provide you, this will include:

- Personal details such as name, address, date of birth, school/college attended.
- Demographics such as ethnicity, gender and disability status.
- Names of your family members.
- Reasons for your referral to us and background details such as previous involvement with our and other services.
- Information about any medical condition you may have.
- Information about you from other organisations, including reports from doctors and other health-care professionals, which we need to help us assess how best to provide services for you.
- Questionnaire data on measures such as scores on stress, anxiety/depression scales and feedback are collected on referral and through treatment.

How do we keep your information safe?

We keep information about you in a paper file and on a computer (electronic file), sometimes both. There are strict controls about who can see your records. Nobody can see your information unless it will help them provide a service you need for your care or treatment. Specific personal information collected by Bromley Y is sensitive – all health data is classified as a ‘special category of personal data’ under data protection law. We may also be required to share your information if needed by law as part of a criminal investigation, or when we need to protect you or other people from harm.

People working for Bromley Y have security checks before they can handle your information. We only pass on information about you to other people if they have a real need for it and we always do it in line with the law. We may sometimes need to share your information with other organisations to arrange the right service for you. We may also sometimes need to share it to look into any concerns you may have about the service you receive. If you choose not to provide certain information, this may limit the ability of Bromley Y to provide an effective service. In some cases, for example if clients do not want information to be stored securely and transferred to other health professionals, due to contractual and safety reasons this will mean that referrals cannot be accepted or that the individual cannot be provided with the service. Date of birth, address, school/college and GP are required to assess whether an individual is eligible to receive a service within Bromley Y.

Our staff take part in training courses which are accredited. As part of their training, you may be asked to agree to video recordings of your sessions. If you do not wish to be recorded, no recording will take place. You also have the right to withdraw consent for recording at any time and the recording will then be permanently deleted. Bromley Y's legal basis for processing your personal data (and specifically for processing sensitive data) under data protection law is:

- Processing is necessary to meet contractual obligations entered into by the data subject: this relates to Bromley Y being commissioned as an early intervention service for emotional wellbeing and contractual obligations existing for recording and transferring certain client data.
- Processing is necessary to protect the vital interests of the data subject: This relates to the sharing of information with social services if required for the purpose of safeguarding children.

Asking to See Your Information

Normally, you can ask the people who provide a service to let you see the information they keep about you. You can also ask to see your information using your rights under data protection law. This is known as a Subject Access Request. You can make a Subject Access Request yourself, and in certain circumstances you also have the right to:

- Have personal data rectified if it is inaccurate or incomplete.
- Request the removal of personal data where there is no convincing reason for its continued processing.
- Suppress or object to processing of personal data that is causing or is likely to cause distress or damage, unless there are overriding legitimate grounds for processing.
- Prevent processing related to direct marketing.
- Data portability: to move, copy or transfer electronic personal data from one location to another in a safe and secure way.
- Object to decisions being taken by automated means (making a decision solely by without any human involvement) including profiling (automated processing of personal data to evaluate certain things about an individual).
- Claim compensation for damages caused by a breach of Data Protection.

For more details on how you can ask to see your information, please contact the Bromley Y Data Protection Officer.

Storage/Retention of Information

Due to contractual requirements, data will be securely stored electronically within the encrypted client database. Bromley Y staff have access to these database records. Staff are required to undertake training in data protection legislation and have a contracted obligation to follow data security standards and work according to Bromley Y's Data Protection Policy. Paper records for psychological questionnaires will be kept for no longer than seven years for record-keeping, possible data audit or research purposes and will be disposed securely following this time.

Any video recordings taken based on the explicit consent of the client will be stored and transferred securely and are only retained for as long as required for training supervision sessions, after which time the recordings are securely deleted.

Further Uses of Information Bromley Y is required by contract to submit information to the National Health Service for the Mental Health Services Dataset. This shows information about who is in contact with Mental Health Services across the country. The information is sent securely and names are not included. The Government may use general information to make decisions on services across the country but people are not identified within reports. Information is also analysed internally for reports/research but people are also not identifiable within this.

Help us Keep Your Information Accurate

We want the information we keep about you to be correct and up to date. Please tell us if your address or other information we have about you is not right. We will check your information and correct it if we find that it is wrong. If you do not agree with some of the information we hold about you, we will add your comments to your information so that people seeing it know about your views. Concerns If you have any concerns specifically about data protection, you have the right to raise this directly with Bromley Y's Data Protection Officer and you also have the right to lodge a complaint with the Information Commissioner's Office <https://ico.org.uk/concerns/>

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Data Protection Officer: dpo@bromleyy.org



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