



Nurturing Progress

Privacy Policy

1. What does this policy cover?

Nurturing Progress Ltd. is committed to protecting and respecting your privacy. This Privacy policy explains how Nurturing Progress Ltd. uses your personal data. This includes: what information will be gathered, how it is collected, how it is stored, and how it is processed. It also explains your rights under the law relating to your personal data.

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’. This includes contact information that is used to communicate with individuals and organisations, as well as client confidential data collected or generated by Nurturing Progress Ltd. Should we ask you to provide certain information by which you can be identified, then you can be assured that it will only be used in accordance with this privacy policy.

We may change this policy from time to time by updating this policy. You can contact us for an updated policy at any time.

2. General information

Nurturing Progress Ltd. (company number: 14642197) is the controller and is responsible for your personal data (collectively referred to as Nurturing Progress Ltd, “we”, “us” or “our” in this privacy policy).

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights (explained below), please contact the DPO using the details set out below.

Contact details of DPO

- Name of DPO: Rachel Lander
- Email address: rachel@nurturingprogress.co.uk
- Telephone Number: 07721 406507

Any questions, comments and requests regarding this privacy policy are welcomed and should be addressed to rachel@nurturingprogress.co.uk

If you believe Nurturing Progress Ltd. has not complied with your data protection rights, you can contact us directly at rachel@nurturingprogress.co.uk and we will investigate your complaint. You also have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

4. Why we need to collect and store your personal information?

Nurturing Progress Ltd. provides services to support children, young people, parents / carers and school staff (referred to as “you” or “service users” in this privacy policy). Nurturing Progress Ltd. therefore has a legitimate interest to collect personal information about a child, young person, parent or carer or school staff. Initial information is gathered so that we can contact you and so that we can decide if we can support you / your child / young person. If you give consent to our involvement, we need to collect further personal information for the purpose of forming a professional opinion in relation to your specific needs as agreed. In so doing, we only collect information that is relevant to the purpose of undertaking that work and the associated reporting and advising.

5. What information do we collect?

We collect a variety of data about service users for the purposes of supporting children, young people, parents and educational settings. The specific data collected will vary according to service user's individual requirements but may include:

- Name, address, telephone number, email address, date of birth
- School/setting information
- Special category characteristics e.g. ethnicity, language, physical or mental health conditions, criminal convictions.
- Other services/agencies involved
- The name and contact details of individuals with parental responsibility of specified children/young people
- Details of individual needs, family history, safety and wellbeing
- School details including attainment and progress data, attendance, exclusion information, child support plans, Education and Health Care Plans and other assessment data
- Answers to questionnaires and assessments
- Images, video and audio recordings, digital and paper records that support our work with you
- Financial information for example bank account and payment details.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during our involvement with you. If you fail to give us accurate personal information then we may not be able to carry out the work agreed. In this case we may have to cancel our services with you, but we will notify you if this is the case at the time.

6. How do we collect personal information?

We may collect personal information in some or all of the following ways:

- Website contact form
- Telephone/email
- Consent for involvement form
- Questionnaires and other assessments
- Discussion with you / child / young person
- Discussion with schools staff and other professionals
- Reading of professional reports
- Observation
- Direct work

7. How and where is your personal data stored?

We will take all reasonable steps to protect your personal information and make sure that it remains safe and secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect. For example,

- Paper containing personal data is stored in a locked file. It is then scanned and stored securely in an electronic folder as required and the paper is shredded when no longer needed.
- Electronic information is stored securely on a password protected locked device (e.g. laptop or memory stick). If transported, the device will remain either in a locked environment or in the personal possession of the Psychologist.
- Information is stored on secure email and cloud systems.
- Electronic information is backed up and stored securely on an external hard drive.
- Any records that need to be shared electronically will be shared by password protection.

8. How long will we keep your data for?

Nurturing Progress Ltd. will not keep personal data for any longer than is necessary in light of the reason(s) for which it was first collected.

Without signing a consent form, we will keep the information you provide us with through the website or initial contact via phone/email on our records for 12 months. During this 12 month period, we may contact you from time to time to

see whether you would like further involvement. You have the right to ask us not to contact you for these purposes. You can exercise this right at any time by contacting us at rachel@nurturingprogress.co.uk

Following a consent form being signed, Nurturing Progress Ltd. will keep personal information about children and young people until the CYP turns 25 years of age. In their 25th year, Nurturing Progress Ltd. will delete all personal data.

If Nurturing Progress Ltd. works with a client who is aged 18 years or over, their records will be kept for 8 years. In the 8th year following the work, Nurturing Progress Ltd. will delete the client's electronic folder, related documentation, and remove them from the client master database.

9. Who else has access to your data?

We treat all of the personal data we collect about you as confidential. We will only use your personal data relevant to your specific request. We will not sell, distribute or lease your personal information to any third parties.

Personal information about you may be shared in consultation with a multidisciplinary team of professionals who are supporting you, your child / young person, for example education staff at a child or young person's current education setting or other professionals working with you / your child young person. This is as deemed necessary in accordance to the specific nature of the work being carried out and for the purpose of forming a professional opinion in relation to the service user's specific needs. Sharing information with other relevant practitioners is part of our good practice and is often an important way of making sure that support can be provided effectively. We will only share information that we feel is necessary and relevant and we will make sure that the professional receiving the information understand why we are sharing it and that they have a duty to keep it confidential. Please discuss with us any information that you do not wish to be shared with other relevant professionals.

After working with you / your child / young person we may produce a report or record of involvement. This will include personal, and confidential, information we have collected. Copies of Nurturing Progress Ltd. written records will be sent by password protected email to you if you have consented for this. If you have not consented you will be sent this by first class post. Where the record is relating to a child or young person and their educational provision has been invoiced for the work, they will also be emailed a copy. The written record may also be shared with other external professionals who are currently involved, with verbal consent from you.

There are a number of circumstances where we may need to pass on information without consent or where we have asked for consent but it has been refused; for example where the health, safety, security or welfare of the client or someone else may otherwise be put at risk; and if there are legal or safeguarding responsibilities.

10. How you can control your personal information

Unless subject to an exemption under GDPR you have a number of rights with respect to your personal data. You may choose to restrict the collection or use of your personal information in the following ways:

- You may request details of the personal information which we hold about you. Please make any such request in writing to Nurturing Progress Ltd. This is known as a 'subject access request'. There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover administrative costs in responding. Nurturing Progress Ltd. will respond to your subject access request within one month of receipt. Normally, we will provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date received.
- Please only complete the website online form with information that you are happy to be stored by us and give us contact details that you are happy for us to use. If you have emailed us any details that you no longer wish us to store, please contact us and request this to be deleted.
- If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible using the contact details on our website. We will promptly correct any information found to be incorrect.
- Service users access to records will be restricted to information about themselves, or children/ young people where they are the parent / legal guardian for children and young people under 16. Young people aged 12 to 16 may have a right to refuse parents / guardians access to their information. If this occurs further advice may need to be sought. Restrictions will apply when disclosure would place the service user or others at risk of serious harm.

- You may request for personal data to be erased. Under article 17 of the GDPR individuals have the right to have personal data erased. This is known as the 'right to be forgotten'. The right is not absolute and only applies in certain circumstances. In the event of such a request Nurturing Progress Ltd. will comply with GDPR guidelines and legal obligations. One exemption to erasure of data is if the data may be needed for demonstrating professional accountability and defending legal claims. If there a planning record with a member of educational staff names a child/ young person this will be kept in the school file as a record of the conversation between the psychologist and school contact.
- You/ a parent / legal guardian may withdraw consent for Nurturing Progress Ltd. involvement at any time. If consent is withdrawn no further personal data will be gathered.

11. Data Breaches

Any data breaches will be reported within 72 hours

Updated 21st August 2024