



Privacy Notice for Clinical Professionals in Schools (CLIPS)

1. Who we are

Anna Freud ('we', 'our', 'us'). The CLIPS is a school based therapeutic service and Anna Freud is the data Controller for this data processing.

This notice informs you how we may use the personal data we collect about children and young people and parents and carers ('you'). If you have any questions about the content of this notice you can contact us at:

- Cyra Neave (cyra.neave@annafreud.org) Anna Freud, 4-8 Rodney Street, London N1 9JH.
- 07776 760 876

Our Data Protection Officer is Rachel Hart, DPO@annafreud.org

2. Purpose of the processing and the lawful basis for the processing

We are collecting your personal data to enable us to provide a therapeutic service to you/your child. The information you provide will be used to document our therapeutic work together, track progress and evaluate the service.

Our lawful bases for processing this data are:

Art 6 1 (f) Legitimate interests: the processing is necessary for our legitimate interests.]

We process Special Category data relying upon

Art 9(2)(h) Health or social care (with a basis in law) [used for delivery of clinical interventions and services, NOT service evaluation] and Sched 1 Part 1 (2) DPA (2018) Health or Social Care Purposes

3. How we get information

We use information collected directly from you via the referral form that is completed by the school and sent to us with your consent.

4. Who we share your data with

We do not use third parties to process the data and we do not share it with third parties for other purposes, including direct marketing.

Generally, we will ask your permission before we share your data, but in some circumstances, we are legally obliged to share information, for example under a court order or if we need to safeguard you or another person. Where we do share, we satisfy ourselves that we have a lawful basis on which to share the information and document our decision making.

5. How long we retain your data

Your child's data is held until their 25th birthday. The exceptions to this will be records relating to children who are subject to child protection arrangements, which will be retained for 75 years; and records for children in care (looked after) which will be retained for 101 years. This is in line with national guidelines and we will periodically review these to ensure they are still appropriate. Case files are securely disposed of at the end of their retention period.

Adult and carer data will be retained for a period

6. Your data rights

Under data protection law, you have rights we want to make you aware of. The rights available to you depend on our reason for processing your information and may only apply in certain circumstances. You can check the [Information Commissioners website](#) for more detail or contact the DPO.

- **Your right to be informed** - this notice informs you what data we collect and how we use it.
- **Your right of access** - You have the right to ask us for a copy of your personal information.
- **Your right to rectification** - You have the right to ask us to correct information which you think is inaccurate or incomplete.
- **Your right to erasure** - This is known as the 'right to be forgotten' and you have the right to ask us to erase your personal information in certain circumstances, such as where it is no longer required.
- **Your right to restriction of processing** - You have the right to ask us to limit the processing of your information in certain circumstances.
- **Your right to object to processing** - You have the right to request we stop processing some or all of your data.
- **Your right to data portability** - This only applies to information you have given us and where we rely upon your consent to process the data.
- **Rights around automated decision making and profiling**

You are not required to pay a charge for exercising your rights. We generally have one month within which to respond to your request.

Please contact us at DPO@annafreud.org if you wish to make a request with regard to any of your rights.

7. Making a complaint

If you feel we may not be handling your data appropriately or if you have any queries or concerns about this you can contact us, dpo@annafreud.org

You can also, at any time, make a complaint about our processing of your data to the Information Commissioner, <https://ico.org.uk/global/contact-us>

Last updated April 2024