



Anna Freud

Privacy Notice for SAFE Evolve

Who we are

Anna Freud ('we', 'our', 'us') is a registered mental health charity. The SAFE Evolve service is an early intervention service working with mild to moderate mental health needs. We work with children, young people and families as well as professionals. AF is the data Controller for this data processing.

This notice informs you how we may use the personal data we collect about the people we work with such as children and young people, adults and professionals ('you'). If you have any questions about the content of this notice you can contact us at:

- Irene Brown-Martin, Anna Freud, 4-8 Rodney Street, London N1 9JH.
- irene.brown-martin@annafreud.org or brownmartini@ealing.gov.uk
- Contact phone number: 020 8825 7500

Our Data Protection Officer is Rachel Hart, DPO@annafreud.org 020 7794 2313

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

We are collecting your personal data to enable us to provide our multi-disciplinary therapeutic service to you. The information you provide will be used to provide you with support including, individual therapy, group therapy, workshops and consultations.

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

Art 9(2)(j) Archiving, research and statistics (with a basis in law) [research purposes] and Sched 1 Part 1 (4) DPA (2018) Research

2. How we get information

We use information collected directly from you via your referral form and from you in your discussions with us when you engage.

We receive some information from other organisations, as set out below

Data source	Categories of data	Uses
CAMHS	Children and young people referral data which includes both personal data (such as name and date of birth) and special category data (such as health information)	To allow us to process your referral and offer you a service
GPs	Children and young people referral data which includes both personal data (such as name and date of birth) and special category data (such as health information)	To allow us to process your referral and offer you a service
Early Help	Children and young people referral data which includes both personal data (such as name and date of birth) and special category data (such as health information)	To allow us to process your referral and offer you a service
Multi Agent Support Team (MAST)	Children and young people referral data which includes both personal data (such as name and date of birth) and special category data (such as health information)	To allow us to process your referral and offer you a service
Ealing Children's Integrated Response Service (ECIRS)	Children and young people referral data which includes both personal data (such as name and date of birth) and special category data (such as health information)	To allow us to process your referral and offer you a service

3. Who we share your data with

Your data is stored within a secure system called Mosaic which is managed by Ealing Local Authority. These records are password protected and held in a secure server. The only people authorised to access your file are those who are working with your child/you within the Ealing CYP Team however, if we do need to share your details outside of this team we will inform you. For example, this may occur if your case is passed to another team such as CAMHS. Only staff with adequate clearance will be authorised to see your details.

We do not share your data with other 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 believe there is a significant risk to you or a third party. Where we do share, we satisfy ourselves that we have a lawful basis on which to share the information and document our decision making.

4. How long we retain your data

Your data is held for a prescribed period depending on what is has been collected for. After which we review it before secure disposal. Records are currently held inline with Ealing Local Authority retention policy

Data Type	Retention	Reason
Children and Young People Data	For 6 years since the last interaction or until the child turns 25, whichever is longer	Inline with Limitation Act 1980 guidance on storage of child data.
Care Experienced Children and Young People	Either: until the 75th anniversary of the child's birth, or if the child dies before age 18, for 15 years from the date of death.	Care Planning, Placement and Case Review (England) Regulations 2010, s. 50.
Parents and Carers of children and young people	For 6 years since the last interaction or until the child turns 25, whichever is longer	Inline with Limitation Act 1980 guidance on storage of child data.

5. 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 [yhttps://ico.org.uk/your-data-matters/your-right-to-get-your-data-deleted/](https://ico.org.uk/your-data-matters/your-right-to-get-your-data-deleted/) you have the right to ask us to erase your personal information in certain circumstances, such as where it is no longer required. <https://ico.org.uk/your-data-matters/your-right-to-get-your-data-deleted/>
- **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.

6. 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>

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