

Fair Processing Notice – Privacy notice

What type of personal information / data does Mantle Psychology collect and process?

Mantle Psychology currently collects and processes personal information. This is data or information about a person that could be used to identify them.

This includes information such as a person's name, address, email, telephone number, date of birth, gender, finance details such as bank card details, family contact information, GP details and details regarding other external agencies involved in the support of a person.

Mantle Psychology also collects data or information that is called 'Special Category Data'. Special category data is information of a sensitive nature, or which has a particularly high risk of being used to negatively target or discriminate against Mantle Psychology clients. The special category data Mantle Psychology collects is information that relates to a person's health (physical or mental health past, current or future). In addition, during therapy or assessment a person's data concerning their sex life or sexual orientation, racial or ethnic origin, political opinion or religious or philosophical beliefs may be disclosed. This is also classed as special category data.

Mantle Psychology is committed to protecting a person's confidentiality and processing data with integrity and within the law. To assist Mantle Psychology in fulfilling its responsibilities it is essential that people report immediately any changes to their personal information to ensure correspondence from Mantle Psychology reaches them correctly.

Most frequently, personal information is collected directly from clients or their legal representative (eg. parent, carer) for assessment, payment, or treatment purposes. Personal information may also be collected by Mantle Psychology indirectly through external agencies, such as the NHS. This enables Mantle Psychology to assess and treat clients safely and appropriately.

Personal information is collected via our website referral forms, telephone calls and texts, emails and in person. Personal information may also be gathered in artwork and written work the client produces during the assessment or treatment process. Personal information is also collected from Associate Practitioners who deliver online information gathering appointments or private therapy.

Mantle Psychology collects personal information to enable the assessment and treatment process as follows:

- To make clinical decisions
- To provide health care or treatment
- To verify the identity of clients
- To make sure that the therapy or assessment offered/ provided is appropriate
- To process and verify any financial transactions as part of providing services
- To comply with the law to the extent that it requires Mantle Psychology to keep a record

- of any clinical care provided and any financial transactions associated with our work.
- To safeguard children and vulnerable adults
- To address compliments, complaints, and concerns
- Mantle Psychology's website does not collect personally identifiable information without a person's knowledge. Please see the Cookie section below.

What is the legal basis Mantle Psychology that can process personal information / data?

Processing data means the activities each Mantle Psychology employee or associate practitioner does in the course of their work with personal information/ data. Such as:

- Collecting data
- Recording data
- Organising data
- Structuring data
- Storing data
- Adapting or altering data
- Retrieving data
- Consulting data
- Using data
- Disclosing data by transmission
- Disseminating data or otherwise making available
- Aligning or combining data
- Restricting data
- Erasing or destroying data

Under the General Data Protection Regulations (GDPR) and associated Data Protection laws Mantle Psychology relies on the following lawful basis for processing personal data because it is necessary to carry out our work:

Contractual necessity

Where a client or their legal representative has signed a contract and Mantle Psychology therefore needs to fulfil its promise of services outlined in the contract.

Legal obligation

Where Mantle Psychology is subject to legal obligations, for example processing finance data.

Vital interests

Where Mantle Psychology must process personal data in order to protect the vital interests of the client or another living person. For example, to save a person's life.

Public interests

To enable Mantle Psychology to process personal data that is in the public interest, for example safeguarding disclosures.

Legitimate interests

Where processing personal data is necessary to pursue a legitimate interest of the Data Controller. In these circumstances the rights and freedoms of the person must be considered and decisions as to why consent was not sought recorded. This is usually used in marketing processes.

Consent has been provided

Mantle Psychology will inform the person what data it requires, why and their rights with regards to the personal data Mantle Psychology will process on their behalf. This privacy notice contains all of the details required to enable a data subject to make an informed decision and understand their rights.

Mantle Psychology has a Consent and Mental Capacity Policy which staff members use to ensure consent from clients is obtained legally based on their age (children and adults), and that their capacity or competence is assessed and where needed their legal representative has full involvement.

Mantle Psychology can seek verbal or written consent to gather personal information when a referral is initially received but the privacy notice shall be sent immediately to the person explaining fully the process and their rights. The person has the right to withdraw their consent at any time.

Where Mantle Psychology decides that personal information will be used for a different reason than initially explained, Mantle Psychology will seek further consent from the person. Mantle Psychology reserves the right to process personal information without the consent of a person if it is a member of the team's belief it is required to safeguard the person or others from abuse.

Where a person provides consent for Mantle Psychology to contact them regarding the latest promotions or services Mantle Psychology will use email to communicate with the person.

Withdrawal of consent

Consent can be withdrawn by contacting Mantle Psychology using the details in the introduction section of this Privacy Notice.

Who do Mantle Psychology share personal information / data with?

Mantle Psychology will seek consent from the client or their legal representative to enable them to share information with all the relevant internal team members and external agencies to enable the safe delivery of assessment and/ or therapy for them. This may include sharing personal information with an agency following discharge from Mantle Psychology services to ensure a client's care and needs are handed over safely.

Mantle Psychology reserves the right to process personal information without the consent of a person if it is a member of the team's belief it is required to safeguard the person or others from abuse.

Mantle Psychology runs services under contract from other organisations such as the NHS. Data may be shared with these organisations during contract audits and or data returns to enable them to ensure Mantle Psychology is providing safe and quality services.

Mantle Psychology must comply with legal requirements with regards to reporting certain incidents and taking part in regulatory inspections. Personal information will be shared during these times.

Mantle Psychology will share financial data with your bank to enable payments for services. In the event that Mantle Psychology transfers its services to a new operator, personal

information will be shared to enable the delivery of services without interruption.

Mantle Psychology contracts with self-employed professionals to deliver some of its private psychological services. In these circumstances the client will be made aware that they have been introduced to an associate Practitioner, who will, as a private practitioner, deliver their treatment. In these circumstances personal data will be shared with the Associate to enable them to fulfil the requirements of the contract. The Franchisee and Mantle Psychology both therefore hold personal information and are responsible for the data they each process.

Mantle Psychology may be required to share personal information with our insurers/ professional advisors in so far as it is reasonably necessary to seek insurance cover, manage risk, obtain professional advice and manage legal disputes or insurance claims.

Social media platforms

Mantle Psychology does operate social media platforms for psychoeducational purposes, they are closely monitored, and we do not share anything pertaining to clients and ensure we do not upload any confidential personal information via these forums.

How does Mantle Psychology store personal information?

Mantle Psychology uses a highly encrypted electronic Client Management System which stores all personal client information. Any data collected on paper is either scanned into the electronic records system or typed into the system. All paper copies are then securely shredded.

Associate Practitioners must sign an NDA, privacy policy and contract, and they must use Mantle Psychology's Client Management System to store any client information. Any data downloaded must be destroyed after use.

Mantle Psychology uses a secure IT platform to ensure documents are kept within a secure shared drive. The shared drive is securely maintained with access/ permissions restricted, so staff members and associate practitioners can only see what they are authorized to see.

How does Mantle Psychology keep personal information safe?

Mantle Psychology has policies which describe to employees and associate practitioners the processes they must follow to ensure personal information is processed safely and protected.

Mantle Psychology has an assigned Data Protection Officer who is responsible for ensuring all personal information is used legally, ethically and appropriately, and that confidentiality is maintained.

The cloud-based client management system protects all personal information from improper access, use, alteration, destruction or loss. It complies with all data protection laws and guidance to ensure information is protected.

All employees and Associate Practitioners are required to complete training annually to maintain their knowledge of information security.

Mantle Psychology has a transparent and open culture and a process for employees and

Associate Practitioners to report data breaches. The governance team and Board ensure all breaches are reported appropriately and investigated. Any lessons learned are communicated and action taken to minimise the likelihood a breach will occur again.

Where a data breach occurs Mantle Psychology uses the Information Commissioner's Officer (ICO) screening tool to determine if the breach has led to a person's rights and freedoms being impacted. If there is a high risk to a person's rights and freedoms, Mantle Psychology will tell them and the ICO about the breach and actions taken.

How long will Mantle Psychology keep personal information for?

Mantle Psychology only retains personal information for as long as is reasonable and necessary for the purposes required.

Mantle Psychology must retain personal data for compliance with legal obligations it is subject to or to protect the vital interests of clients or others. The NHS Records Retention Schedule sets out the appropriate timescales data must be kept for, dependent on its type.

Mantle Psychology has a Document Control Policy which outlines this process. If you would like a copy of this policy, please ask Mantle Psychology for this.

Once personal information has been retained for the required timeframe Mantle Psychology will take steps to permanently delete the data from its systems securely.

What are people's data protection rights?

Under data protection law, Mantle Psychology must ensure that the people (data subjects) whose data they process have their rights explained and upheld. Data Subjects have the right to:

- Right of Access: The right to request a copy of the personal information Mantle Psychology holds about you.
- Right to Rectification: The right to ask Mantle Psychology to change or rectify any personal information held about you that you think is inaccurate.
- Right to Erasure: The right to ask Mantle Psychology to delete/ erase your personal information in certain circumstances.
- Right to Restriction of Processing: The right to ask for restriction of processing in certain circumstances.
- Right to Object to Data Processing: The right to object to the processing of personal data in certain circumstances.
- Right to Data Portability: The right to ask that Mantle Psychology transfer personal information to another organisation, or to the data subject in certain circumstances.
- Rights relating to automated decision making and profiling: The right to know if personal data is being profiled and used in automated decision making. This is where an organisation uses personal data automatically to profile a person and make decisions that may impact on them, for example credit decisions or recruitment tests. Mantle Psychology does not use personal data in this way.

People are not required to pay a charge for exercising their rights. If a request is made Mantle Psychology will respond within one month.

People's rights will be considered when a request is received, and their rights will differ depending on the lawful basis for which Mantle Psychology is processing their personal information. Mantle Psychology will always explain where it can or cannot agree to a request

based on the legal parameters Mantle Psychology must operate within.