



## **U-Evolve Privacy Notice**

### **Therapeutic Coaching Services with Young People**

## Who collects and uses information about me for my therapeutic coaching sessions?

U-Evolve is a 'Data Controller'. This means that we are responsible for making sure that we process your personal data securely and in accordance with Data Protection law. We collect, store and sometimes share information about you. This notice tells you about how and why we do this, as well as your rights under data protection law. If you need some help or you want a bit more information about how we use your personal data and why, please speak to your therapeutic coach. Every so often, we may need to update this notice to make sure it is accurate and fully reflects our services and the information we need to process to run those services. We'll let you know if we do. The most up to date version of this notice will always be available on our website.

## What is personal data/information?

This notice relates to all the data which we process about you which can either directly or indirectly identify you. This covers data which can obviously identify you such as your name, as well as data which cannot so obviously identify you but, coupled with other information (such as other information in your file) could be used to identify you. This notice explains when, how and why we process such personal data about you to provide you with therapeutic coaching. Where possible, we anonymise data to protect your privacy as much as possible.

## The Data Protection Principles

U-Evolve are required to follow the Data Protection Principles by law. We do so to the best of our ability and wish to use best practice and protect and respect your personal data as much as possible. The Data protection principles are:

### Processing is lawful, fair and transparent

We follow data protection laws and try to let you know exactly how we want to process your data before we do, both using this notice and through discussions with you during your therapeutic coaching sessions.

### Purpose limitation

We only process your data for specific reasons. We make sure that those reasons are always in your best interests and related to providing you the best possible therapeutic coaching sessions. We do not process your personal data for reasons other than stated in the tables below, we never sell your data or use it any other way.

### Data minimisation

We collect and record as little personal data about you as we can, and only what we need to safely and effectively provide you with therapeutic coaching. We won't collect or record anything that isn't needed.

### Accuracy

We do our best to ensure that all the personal data we process is accurate. We make sure that we investigate and alter inaccurate data about you as soon as we become aware of it.

### Storage limitation

We don't keep your personal data forever. We will keep a record of your personal data for 5 years from the day you leave our service.

### Security

We take all necessary steps to ensure that we keep your data as secure as possible, from policies and procedures relating to how our staff handle your data to ensuring that our IT systems are robust and secure.

### Accountability

We can demonstrate our compliance through our practice. Where possible, we use best practice in relation to data protection. Our staff receive data protection training to ensure they handle your data with the care and respect that you deserve.

## Do U-Evolve share my information with anyone?

As we offer confidential therapeutic coaching sessions, we do not routinely share information regarding you or your sessions with others. However, there are sometimes circumstances when we do need share your personal data which we need to make you aware of:

### Making onward referrals:

We may think that you would benefit from the services of one our partners, for example, to offer services in a specialised area. We may talk to you about their services to see if you'd like us to help you access these. If you would like to access our partners services, we will always check with you first and seek your consent before making a referral for you on your behalf and sharing your personal information to make this referral.

### Safeguarding

Where we have a concern for your safety, we are required by law to take action to keep you safe from harm. This may, in certain circumstances, mean discussing our concerns with agencies such as the Police or Social Work. We may also inform your school if we have a safeguarding concern so that they can keep you safe when you are within their care. We will usually tell you when we have concerns and if we are going to talk to these agencies about your case. We only do this to keep you safe, we do not do this to try to get you into trouble. We will only tell these agencies what they need to know so that they can make sure that you are safe – we will not disclose anything to them that we do not absolutely have to.

### When required to by law or other legal purposes

Sometimes we will be required by law to disclose certain information about you, for example:

- Where we are required to by a court or otherwise need to satisfy any legal claims brought against us
- To our professional advisors or legal representatives

We will only share the information that we absolutely have to and will keep any information that we must share about you to a minimum. We will also anonymise your information where possible.

Seeking clinical advice about your case

Our Therapeutic Coaches are required to undertake ongoing clinical supervision with a 3<sup>rd</sup> party clinical advisor, under the BACP Ethical Framework. During these sessions, they may discuss elements of your case where they need further clinical guidance to make sure you receive the best possible support. We try to keep discussions anonymous, but this is not always possible. The content of our discussion is always kept confidential by our clinical supervisors, who are bound by professional standards and confidentiality agreements. We carry out supervisions to make sure we are the best we can possibly be and to make sure we are doing a good job.

## What are my rights in relation to my personal data?

<b>Data Rights you have</b>	<b>Explanation of your rights</b>
The right to be informed	This Privacy Notice tries to give you lots of information about how we process data, but you can always contact us or speak to your therapeutic coach to find out more or to ask any questions.
The right to access your data	You have a right to see and have a copy of your personal data that we store. If you'd like to do this, speak to your therapeutic coach or email <a href="mailto:hello@u-evolve.org.uk">hello@u-evolve.org.uk</a>
The right of rectification	If you think that any of the data we process about you is not right or is out of date, you can ask us to update this. Sometimes we will have to check if the information is in fact inaccurate before we make a change to our records.
The right to be forgotten	In limited circumstances, you have the right to ask that we delete any information we store about you.
The right to restrict the processing of your personal data	Where an investigation regarding your data is underway, you have the right to request we pause our processing of your personal data. This means we do not add to, or delete any of your personal data for a time.
The right to object	In limited circumstances, you have a right to object to the way we process your data.
The right to data portability	In certain circumstances, you can request that we send your data to another Data Controller (e.g. another charity)
Automated decision making	U-Evolve do not carry out automated decision making or profiling activities

Not all of these rights apply in all circumstances. However, if you wish to use one of your rights, speak to your therapeutic coach or email [hello@u-evolve.org](mailto:hello@u-evolve.org) and we will discuss your request with you to see how we can help. We will either carry out your request or, if we refuse, explain why we cannot or will not be carrying out your request. In such an event, you have a right to complain to the ICO as outlined below.

## How to make a complaint if you are unhappy with how we process your data

If you have any concerns about how we use your data, we encourage you to talk to your therapeutic coach about this. If they can't help and you wish to make a complaint, you can contact our Data Protection Officer on [hello@u-evolve.org](mailto:hello@u-evolve.org). You also have a right to complain to the Data Protection Regulator (The ICO) about how we process your data. You can do this by visiting [www.ico.org.uk/make-a-complaint](http://www.ico.org.uk/make-a-complaint), or calling 0303 123 1113.

## Therapeutic Coaching Services: A breakdown of the personal data we process

Processing activity	The kind of data we process	How we collect this data	Why we process this data	Who we may share some of this data with	The legal bit
<b>Requests and referrals to use our Services</b>	<ul style="list-style-type: none"> <li>Your personal details and contact details</li> <li>Contact details of your parent/carer</li> <li>Reasons why you may wish to use our services</li> <li>next of kin information</li> <li>Health and medication</li> </ul>	We collect data from the person/organisation/school who thinks you may benefit from our services. We then collect information directly from you when you decide you want to use our services.	We collect this data to assess how we can help you and for the administration of the services we provide.	We do not share data processed to administer our referral process	<p>UKGDPR Article 6(1)(b), Processing is necessary for the performance of a contract.</p> <p>UKGDPR Article 6(1)(f), Legitimate Interests</p> <p><u>Special Category Health data:</u></p> <p>DPA 2018, Schedule 1 s.17, counselling</p>

<p><b>Understanding your needs</b></p>	<p>Getting to know you including:</p> <ul style="list-style-type: none"> <li>• Your expectations,</li> <li>• family background</li> <li>• social situation</li> <li>• living conditions</li> </ul>	<p>We collect this data directly from you during our first therapeutic coaching sessions with you, to make sure we can offer you the support that's right for you.</p>	<p>We collect this data to get to know you and understand what support you need in order to inform your ongoing therapeutic coaching sessions.</p>	<p>We may discuss your case with our clinical supervisors to make sure we provide you the best support possible. We are required to conduct clinical supervision as a result of the BACP Ethical Framework.</p>	<p>Article 6(1)(b): Processing is necessary for the performance of a contract.</p> <p>Article 6 (1)(f): Legitimate Interests</p> <p><u>Special Category Health data:</u></p> <p>DPA 2018, Schedule 1 s.17, counselling</p>
<p><b>Notes from our therapeutic coaching sessions</b></p>	<p>Notes from our sessions including things like:</p> <ul style="list-style-type: none"> <li>• Things you said</li> <li>• Our observations</li> <li>• About school, home life, how you're feeling</li> </ul>	<p>We collect this data directly from you during our first therapeutic coaching sessions with you, to make sure we can offer you the support that's right for you.</p>	<p>We process this data in order to provide you with therapeutic coaching sessions</p>	<p>We may discuss your case with our clinical supervisors to make sure we provide you the best support possible. We are required to conduct clinical supervision as a result of the BACP Ethical Framework.</p>	<p>Article 6(1)(b): Processing is necessary for the performance of a contract.</p> <p>Article 6 (1)(f): Legitimate Interests</p> <p><u>Special Category Health data:</u></p> <p>DPA 2018, Schedule 1 s.17, counselling</p>

<b>Wellbeing and Improvement</b>	Our observations as well as questionnaires about how you are feeling and your feedback. This is kept anonymous	We collect this data directly from you as well as through our observations	We collect this data for the demonstrate progress of our young people, for our staff development and for our funders.	We share anonymous data with our funders and in our impact reports to demonstrate our work.	Article 6 (1)(f): Legitimate Interests
<b>Keeping you Safe</b>	Details of safeguarding incidents and concerns we may have about your safety, wellbeing and potential abuse	Where we suspect you may be at risk of harm or child abuse, we record our concerns and observations. We may also process data provided by 3 <sup>rd</sup> parties such as schools and social work.	We collect this data to make sure you are safe and free from abuse and do what we can to prevent you from being harmed.	We may share data with: <ul style="list-style-type: none"> <li>• Social work/Police Scotland: if we believe you are at risk of harm or abuse</li> <li>• Your school: if we raise concerns for you during a session at your school</li> </ul>	UKGDPR Article 6(1)(b), Processing is necessary for the performance of a contract.  UKGDPR Article 6(1)(f), Legitimate Interests  <u>Special Category Health data:</u>  DPA 2018, schedule 1, s.18 Safeguarding of children at risk
<b>Referring you on for other services</b>	Personal details, contact details and why you are wishing a referral for their services. Referral contents vary between different service providers.	We will discuss the possibility of a referral with you. If you decide you'd like a referral to another service, we will make sure you are aware of the contents of the referral before we send this.	We process this data for the purpose making referrals to services who may specialise in a certain area. We may suggest services that you may benefit from and will only make referrals that you wish us to.	We share this data with our partners to allow you to access their services. We will always seek your explicit consent in writing, we may also have to request your parent/carer/guardians consent depending on the circumstances but will only do this having spoken to you first.	UKGDPR Article 6(1)(b), Processing is necessary for the performance of a contract.  UKGDPR Article 6(1)(f), Legitimate Interests  <u>Special Category Health data:</u>  DPA 2018, Schedule 1 s.17, counselling  UKGDPR Article 9 (a): Explicit consent

