

# General Data Protection Policy

We take your privacy and the processing and secure storage of your data very seriously. This policy applies to our use of any, and all data collected by us or provided by you in relation to your use of the website and all other technologies we use now or in the future (e.g., email, telephone, video conference software, and so on). This policy should be read alongside our Terms and Conditions, which can be found at [www.papps.org.uk](http://www.papps.org.uk).

**Please read this policy carefully.**

## Definitions and interpretation

We use the following terms and meanings within this policy:

|   |   |
|---|---|
| <b>Data</b>   | Collectively all information that you submit to Palmer and Palmer Psychology Ltd via the website and by any and all other means. This definition incorporates, where applicable, the definitions provided in the Data Protection Laws.  |
| <b>Cookies</b>                                      | A small text file placed on your computer by this website when you visit certain parts of the website and/or when you use certain features of the website. Details of the cookies used by this website are set out in the clause below ( <b>Cookies</b> ).  |
| <b>Data Protection Laws</b>                         | Any applicable law relating to the processing of personal data, including but not limited to the GDPR, and any national implementing and supplementary laws, regulations, and secondary legislation.  |
| <b>GDPR</b>   | The UK General Data Protection Regulation.  |
| <b>Palmer and Palmer Psychology Ltd. / we or us</b> | Palmer and Palmer Psychology Ltd, a company incorporated in England and Wales with registered number 14602051 whose registered office is at 7 The Close, Norwich, NR1 4DJ.  |
| <b>UK and EU Cookie Law</b>                         | The Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011 & the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2018.  |
| <b>User or you</b>                                  | Any third party that accesses the website and is not either (i) employed by Palmer and Palmer Psychology Ltd and acting in the course of their employment, or (ii) engaged as a consultant or otherwise providing services to Palmer and Palmer Psychology Ltd and accessing the website in connection with the provision of such services. |
| <b>Website</b>                                      | The website that you are currently using, <a href="http://www.papps.org.uk">www.papps.org.uk</a> , and any sub-domains of this site unless expressly excluded by their own terms and conditions.  |

In this policy, unless the context requires a different interpretation:

- a. The singular includes the plural and vice versa.

- b. References to sub-clauses, clauses, schedules, or appendices are to sub-clauses, clauses, schedules, or appendices of this policy.
- c. A reference to a person includes firms, companies, government entities, trusts, and partnerships.
- d. "Including" is understood to mean "including without limitation".
- e. Reference to any statutory provision includes any modification or amendment of it.
- f. The headings and sub-headings do not form part of this privacy policy.

## Scope of this policy

- 1. Palmer and Palmer Psychology Ltd (“we”, “us”, “our”) is committed to protecting and respecting personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Given the sensitive nature of the services, we provide—including education, child psychology, and therapy—we apply particularly high standards of confidentiality, security, and ethical responsibility.
- 2. This policy applies to all personal data processed by Palmer and Palmer Psychology Ltd in the course of delivering services to children, families, and organisations, including schools, solicitors, local authorities, and the NHS. It applies to all staff, contractors, and any third parties acting on our behalf.

## The nature of our services

- 3. We provide psychological, therapeutic, and educational services, including assessment, consultation, intervention, and reporting. This includes therapy delivered to children, young people, and adults. Our work often involves processing highly sensitive personal data, including special category data.

## Categories of personal data collected

- 4. We may collect and process the following types of personal data:
  - a. Personal identifiers (name, address, email address, phone number, date of birth).
  - b. Employment and professional information.
  - c. Payment and financial data.
  - d. Clinical, therapeutic, and professional opinions and reports.
  - e. Confidential records, including:

- i. Medical and mental health information.
    - ii. Educational records.
    - iii. Social care information.
    - iv. Special educational needs data.
  - f. Audio, video, and written records from assessments, therapy sessions, or consultations.
5. This list is not exhaustive and reflects the varied nature of our services.

## How we collect data

6. We collect personal data through multiple channels, including:
  - a. Online referral forms via our website.
  - b. Direct enquiries and communications (email, phone, video conferencing).
  - c. Third-party referrals (e.g., schools, solicitors, local authorities, NHS, or other organisations).
  - d. In-person assessments, therapy sessions, and written notes.
  - e. Remote services, including therapy and consultations conducted via telephone or video conferencing, which may involve recorded or transcribed content where appropriate.
  - f. Website cookies and analytics tools.
7. Personal data may be provided by clients, their representatives, commissioning organisations, or may include information relating to third parties (such as teachers, professionals, or organisations) where this is necessary for the delivery of our services. The processing of such third-party information is undertaken on the basis of our legitimate interests, specifically to enable us to effectively assess, support, and provide services in relation to a child, family, or client, and is limited to what is necessary and proportionate for those purposes.

## Lawful basis for processing

8. We process personal data under the following lawful bases:
  - a. Contractual necessity – to provide agreed services, including therapy.
  - b. Legal obligation – to comply with applicable laws and professional requirements.

- c. Legitimate interests – for the effective delivery and improvement of our services, including the processing of relevant third-party information as described above.
- d. Consent – where required, particularly for recordings or optional processing.
- e. Special category data is processed under Article 9 UK GDPR, including where necessary for the provision of health or social care and subject to appropriate safeguards

## Use of personal data

- 9. We use personal data to:
  - a. Deliver psychological, therapeutic, and educational services.
  - b. Conduct assessments, therapy sessions, and produce reports.
  - c. Communicate with clients and commissioning organisations.
  - d. Maintain accurate clinical and administrative records.
  - e. Process payments and financial transactions.
  - f. Meet legal, regulatory, and professional obligations.
- 10. We may use your data for the above purposes if we deem it necessary to do so for our legitimate interests. If you are not satisfied with this, you have the right to object in certain circumstances (see the section headed "your rights" below).
- 11. When you register with us and set up an account to receive our services, the legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter such a contract. We will also have legitimate interest to process the data of third parties in the context of their relationship to you and/or the person you represent.

## Payment processing

- 12. We use third-party providers to securely process financial transactions, including Stripe, Monzo, and Xero. These providers process payment data in accordance with their own data protection policies and applicable regulations.

## Using Artificial Intelligence (AI)

- 13. We use AI technologies in a limited and controlled manner to support our work. This includes:

- a. Research and evidence gathering (e.g., academic databases).
  - b. Document preparation (e.g., speech-to-text and grammar tools).
  - c. Statistical analysis and data processing.
  - d. Live transcription during remote sessions.
  - e. Administrative support tasks such as data organisation.
14. All AI-generated outputs are subject to human review and verification. AI is not used to form the basis of clinical or professional opinions in our work.

## Collecting data automatically

15. To the extent that you interact with us, we will collect your Data automatically, for example:
- a. We automatically collect some information about your visit to our website. This information helps us to make improvements to website content and navigation, and includes your IP address, the date, times, and frequency with which you access the website and the way you use and interact with its content.
  - b. We will collect your data automatically via cookies, in line with the cookie settings on your browser. Information about cookies is provided later in this document.

## Data sharing and disclosure

16. We may share personal data with:
- a. Commissioning organisations or individuals (e.g., schools, local authorities, NHS bodies, parents/carers).
  - b. Professional partners involved in a case.
  - c. Internal directions, employees, contractors, and professional advisors in order to deliver a safe and effective service.
  - d. Payment processors.
  - e. Legal or regulatory authorities where required.
17. We ensure that any third parties handling data on our behalf implement appropriate data protection safeguards.

## Sharing data

18. We may share your data with the following groups of people for the following reasons:

## Data retention

19. We retain personal data as follows:
  - a. Children's records: retained until six years after the child's 18th birthday, regardless of when services were provided.
  - b. Adult records: retained for six years from the final date of contact.
20. These retention periods include all associated records, including therapy notes and references to third parties.
21. If you make an enquiry with us, including a referral you do not proceed with after seven days, we will keep your information on file for **no longer than 28 days**.
22. If you **agree to marketing**, your information will be **kept for that purpose until you tell us otherwise**. We may contact you periodically, to make sure you wish to remain on this list and that your details are correct.
23. Even if we delete your data with all means available to us, it may persist on backup or archival media for legal, tax or regulatory purposes.

## Data security

24. We implement robust technical and organisational security measures, including:
  - a. Secure encrypted storage using Tresorit.
  - b. Secure data deletion using iShredder Military.
  - c. Cybersecurity protection and firewall services via Bitdefender.
  - d. End-to-end encryption on AI platforms, MS Teams Professional and Heidi AI.
  - e. Controlled access to personal data on a strict need-to-know basis.
25. We are registered with the Information Commissioner's Office (ICO), the UK government department that oversees and regulates information processing in the UK.
26. Detailed information about staying safe and protecting your online data can be obtained from the UK Government backed [Get Safe Online](#).

## International data transfer

27. All data processing is conducted within the United Kingdom. Where any tools used involve transfers outside the UK, we ensure appropriate safeguards are in place in accordance with UK GDPR.

## Data subject rights ('Your Rights')

28. You have the following rights in relation to your data:
- a. **Right to access** - the right to request (i) copies of the information we hold about you at any time, or (ii) that we modify, update, or delete such information. If we provide you with access to the information we hold about you, we will not charge you for this, unless your request is "manifestly unfounded or excessive." Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will tell you the reasons why.
  - b. **Right to correct** - the right to have your data rectified if it is inaccurate or incomplete. This relates to objectively factual errors, not necessarily disputed professional opinion or interpretation. Where data is incomplete rather than inaccurate, a supplementary statement may be added rather than wholesale amendment.
  - c. **Right to erase** - the right to request that we delete or remove your data from our systems.
  - d. **Right to restrict our use of your data** - the right to "block" us from using your data or limit the way in which we can use it.
  - e. **Right to data portability** - the right to request that we move, copy, or transfer your data.
  - f. **Right to object** - the right to object to our use of your data including where we use it for our legitimate interests.
29. To make enquiries, exercise any of your rights set out above, or withdraw your consent to the processing of your data (where consent is our legal basis for processing your data), please contact us via this e-mail address at [npalmer@papps.org.uk](mailto:npalmer@papps.org.uk).
30. If you are not satisfied with the way a complaint you make in relation to your data is handled by us, you may be able to refer your complaint to the relevant data protection authority. For the UK, this is the Information Commissioner's Office (ICO). The ICO's contact details can be found on their website at <https://ico.org.uk/>. We are registered with the ICO with reference number: **ZB511845**.

31. It is important that the data we hold about you is accurate and current. Please keep us informed if your data changes during the period for which we hold it.

## Data breaches

32. In the event of a data breach, we will:
- a. Assess the nature and risk of the breach.]
  - b. Notify the Information Commissioner's Office (ICO) where required within 72 hours.
  - c. Inform affected individuals where there is a high risk to their rights and freedoms.
  - d. Act to limit any perceived or actual harm or freedoms the breach may lead to, pending investigation.

## Third-party websites

33. Our website may, from time to time, provide links to other websites. We have no control over such websites and are not responsible for the content of these websites. This privacy policy does not extend to your use of such websites or any service or interaction you have with the owners, agents, employees, or contractors of those websites or associated organisations. You are advised to read their data protection, privacy, and cookie policies prior to using them.

## Changes of business ownership and control

34. Palmer and Palmer Psychology Ltd may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of Palmer and Palmer Psychology Ltd. Data provided by users will, where it is relevant to any part of our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this privacy policy, be permitted to use the data for the purposes for which it was originally supplied to us.
35. We may also disclose data to a prospective purchaser of our business or any part of it.
36. In the above instances, we will take steps to ensure your privacy is protected as far as practicably possible.

## Cookies

37. Our website may place and access certain cookies on your computer. Palmer and Palmer Psychology Ltd uses cookies to improve your experience of using the Website and to improve our range of services. Palmer and Palmer Psychology Ltd has carefully chosen these cookies and has taken steps to ensure that your privacy is protected and always respected.

### What are cookies?

38. A cookie is a small text file placed on your computer by this website when you visit certain parts of the website and/or when you use certain features of the website.

39. This website may place and access certain cookies on your computer. We use these cookies to improve your experience of using the website and to improve our range of services.

40. Cookies do not usually contain any information that personally identifies you, the website user. However, personal information that we store about you may be linked to the information obtained from and stored in cookies.

41. All cookies used by this website are used in accordance with current UK and EU Cookie Law.

### How do we use cookies?

42. Before the website places cookies on your computer, you will be presented with a message bar requesting your consent to set those cookies. By giving your consent to the placing of cookies, you are enabling Palmer and Palmer Psychology Ltd to provide a better experience and service to you. You may, if you wish, deny consent to the placing these cookies; however certain features of the website may not function fully or as intended.

43. This website may place the following Cookies:

| Type of Cookie                 | Purpose  |
|--------------------------------|--|
| Strictly necessary cookies     | These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services. |
| Analytical/performance cookies | They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by                  |

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|-----------------------|---|
|                       | ensuring that users are finding what they are looking for easily.   |
| Functionality cookies | These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region). By using the Website, you agree to our placement of functionality cookie. |

44. You can choose to enable or disable cookies in your internet browser. By default, most internet browsers accept cookies, but this can be changed. For further details, please see the help menu in your internet browser. You can switch off cookies at any time, however, you may lose any information that enables you to access the website more quickly and efficiently (such as automatic username/password filling).
45. You can choose to delete cookies at any time; however, you may lose any information that enables you to access the website more quickly and efficiently including, but not limited to, personalisation settings.
46. It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.
47. For more information generally on cookies, including how to disable them, please refer to [aboutcookies.org](http://aboutcookies.org). You will also find details on how to delete cookies from your computer.

## General

48. You may not transfer any of your rights under this policy to any other person. We may transfer our rights under this policy where we reasonably believe your rights will not be affected.
49. If any court or competent authority finds that any provision of this policy (or part of any provision) is invalid, illegal, or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy policy will not be affected.
50. Unless otherwise agreed, no delay, act, or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.
51. This agreement will be governed by and interpreted according to the law of England and Wales. All disputes arising under the agreement will be subject to the exclusive jurisdiction of the English and Welsh courts.

## Our agents

52. To operate a safe, effective, and compliant service, we work with several third-party agencies and contractors. These include our accountants, insurers, lawyers, designers, illustrators, marketing, business support, and technical teams, amongst others. In some cases, your personal data will be shared or otherwise accessible to our trusted third parties.

## Changes to this policy

53. Palmer and Palmer Psychology Ltd reserves the right to change this policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the website, and you are deemed to have accepted the terms of the policy on your first use of the website following the alterations or accessing our service(s).

54. You may contact Palmer and Palmer Psychology Ltd by email at [npalmer@papps.org.uk](mailto:npalmer@papps.org.uk).

## Contacting us

55. The website is owned by Palmer and Palmer Psychology Ltd incorporated in England and Wales with registered number 14602051 whose registered office is at 7 The Close, Norwich, Norfolk, NR1 4DJ, England.

56. For any data protection queries or requests, please contact:

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