

# Ormiston Families' Supporting Smiles' Privacy Policy

This privacy policy sets out how Ormiston Families' Supporting Smiles uses and protects any data that you provide us when you use this website and/or access our services. This should be read in conjunction with our organisational privacy notice available here [link].

Ormiston Families' Supporting Smiles service is a member of Norfolk & Waveney's Children and Young People's Alliance, which provides integrated mental health services to children and young people aged 0-25.

We are committed to ensuring that your privacy is protected. Should we ask you to provide certain data by which you can be identified when using this website and/or accessing our services, then you can be assured that it will only be used in accordance with this privacy statement.

## What information do we collect?

We collect information about you when you, a carer or relative, or other professional enquire about our services, engage with our services, send or receive an email or text or otherwise provide us with your personal information. We also receive information about you via a referral form.

We collect information from you, a carer or relative, or other professionals in order to be able to provide you with direct health and/or social care.

The table below sets out what personal data we process, our purpose for doing so, our lawful justification and how long we keep it for:

<b>What personal data we process:</b>	<b>Our purpose for doing so:</b>	<b>Our lawful justification:</b>	<b>How long we keep it for:</b>
Personal Information will include: <ul style="list-style-type: none"> <li>Your name,</li> <li>Your address and post code,</li> <li>Your telephone number,</li> <li>Your date of birth,</li> <li>Your email address,</li> <li>Your NHS number,</li> <li>Your GP surgery,</li> <li>Your school (if appropriate),</li> <li>Your preferred contact &amp; family details,</li> <li>Your opinions &amp; decisions about your contact with our service.</li> </ul>	We process your personal information so that we are able to: <ul style="list-style-type: none"> <li>Confirm your identity,</li> <li>Contact you by post, email and telephone to remind you about your appointments, send you relevant correspondence, and assess the outcomes of the services or treatment you have received,</li> <li>Ensure that Ormiston Families Supporting Smiles services meets our contractual and legal obligations to provide health care,</li> <li>Ensure that up-to-date and relevant information is available to all staff associated with your referral and treatment,</li> <li>Manage and investigate complaints made by you about your treatment,</li> </ul>	We process your personal information under UK GDPR Article 6 (1) (e) which states that "processing is necessary for the performance of a task carried out in the public interest...".	Your information will be kept in accordance with our Records Management policy: <ul style="list-style-type: none"> <li>Service users' files created on or after the 1<sup>st</sup> April 2021 should be kept for 6 years from the date of last contact with the service.</li> </ul> The exemptions from the 6-year limit are: <ul style="list-style-type: none"> <li>Service users' files created before the 1<sup>st</sup> of April 2021.</li> </ul>

	<ul style="list-style-type: none"> <li>• Provide information to other NHS organisations as required by law or other directions,</li> <li>• Provide statistical analysis of the use of services so that we can plan future services,</li> <li>• Support the funding of your care with commissioning organisations.</li> </ul>		<ul style="list-style-type: none"> <li>• Service users' records created before the 1<sup>st</sup> of April 2021 are kept for 9 years for the date of last date with the service.</li> </ul>
<p>Sensitive or special categories of data will include:</p> <ul style="list-style-type: none"> <li>• Your racial or ethnic origin,</li> <li>• Your religious or other beliefs (if appropriate),</li> <li>• Your preferred language (if appropriate),</li> <li>• Your gender &amp; sexual orientation,</li> <li>• Your specific health data,</li> <li>• Records of your contacts with our services,</li> <li>• Diagnosis and/or the problems that you are experiencing with your health,</li> <li>• Personal appearance &amp; behaviour (relevant to your clinical presentation),</li> <li>• Results of test results or other investigations or assessments,</li> <li>• Any previous information about care &amp; treatment that you have received,</li> <li>• Relevant information from other health and/or social care organisations,</li> <li>• Domestic &amp; social circumstances directly relevant to your care &amp; treatment,</li> </ul>	<p>We process your sensitive or special category data so that we are able to:</p> <ul style="list-style-type: none"> <li>• Assess your health and/or social care needs</li> <li>• Deliver appropriate health and/or social care to you,</li> <li>• Ensure that Ormiston Families Supporting Smiles services meets our contractual and legal obligations to provide health care,</li> <li>• Ensure that the treatment that you receive is safe and effective,</li> <li>• Ensure that up-to-date and relevant information is available to all staff associated with your referral and treatment,</li> <li>• Help to train and educate healthcare professionals as well as support research and development,</li> <li>• Manage and investigate complaints made by you about your treatment,</li> <li>• Prevent harm or injury to you or another person,</li> <li>• Provide information to other NHS organisations as required by law or other directions,</li> <li>• Provide statistical analysis of the use of services so that we can plan future services,</li> <li>• Respond to legal or other claims about your treatment,</li> <li>• Review your care and treatment in the event of an untoward incident,</li> <li>• Review treatment to ensure that it is of the highest standard, and</li> <li>• Support the funding of your care with commissioning organisations.</li> </ul>	<p>We process your sensitive or special category data under UK GDPR Article 9 (2) (h) which states that "processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or member State Law".</p>	<ul style="list-style-type: none"> <li>• Records containing formal child protection information (e.g. a Child Protection Plan) are kept for 25 years from a service user's date of birth.</li> <li>• Records about children who have been 'looked after' by the local authority or adopted are kept until the child or young person is 75 years old, or for 15 years after their death if they die before they are 18.</li> </ul>

<ul style="list-style-type: none"> <li>Professional opinions on your current health status and future health care needs,</li> <li>Information about risks that may affect you or where you may pose a risk to others.</li> </ul>			
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We maintain a Retention Schedule, detailing how long we keep all items of information at Ormiston Families beyond those listed above. This is available to view on request.

### Who will we share personal data with?

Where information is used for the reasons listed above, we may need to share the information about you with other organisations. This will include:

<b>Who we share your information with:</b>	<b>The purpose for sharing it:</b>	<b>Our justification for sharing:</b>
<p>Your personal and sensitive or special categories of data is shared within the Supporting Smiles service providing you with direct health care as well as other partner health professionals providing you with care and treatment.</p> <p>Within the Supporting Smiles service this will include authorised counsellors, therapists, administrators and their managers.</p> <p>Partner agencies include the Cambridgeshire Children’s Services, Mancroft Advice Project (MAP), MIND, the Norfolk County Council’s Emotional Wellbeing Service, YMCA, and the Norfolk and Suffolk Foundation Trust (NSFT).</p>	<p>We share your information to:</p> <ul style="list-style-type: none"> <li>Assess your health and/or social care needs,</li> <li>Deliver appropriate health and/or social care to you,</li> <li>Ensure that Ormiston Families Supporting Smiles services meets our contractual and legal obligations to provide health care,</li> <li>Ensure that up-to-date and relevant information is available to all staff associated with your referral and treatment.</li> </ul>	<p>Without sharing this information we would be unable to provide you with direct health and/or social care or ensure our service meets contractual and legal obligations.</p>
<p>Your personal and sensitive or special categories of data is shared with your referrer (when there is one other than you or your family) and your GP unless you tell us otherwise.</p>	<p>We share your information with your referrer and your GP to ensure that up-to-date and relevant information is available to all professionals associated with your referral and treatment.</p>	<p>If we do not share your information, we cannot ensure that your referrer and GP have up-to-date and relevant information on the outcome of your referral and treatment.</p>
<p>Your personal and sensitive or special categories of data is a shared with the Mental Health Services Data Set (MHSDS). The Mental Health Services Dataset (MHSDS) is a national-level dataset which records information on</p>	<p>We share your information to inform:</p> <ul style="list-style-type: none"> <li>commissioning services,</li> <li>clinical audit,</li> <li>research,</li> <li>service planning,</li> <li>inspection and regulation,</li> </ul>	<p>It is mandatory for all providers of NHS-funded specialist mental health services to submit data about these services to the Mental Health Services Data Set (MHSDS). This applies to both</p>

<p>children, young people and adults who are in contact with services for mental health and wellbeing, Learning Disability, autism or other neurodevelopmental conditions.</p>	<ul style="list-style-type: none"> <li>• monitoring government policies and legislation,</li> <li>• local and national performance management and benchmarking,</li> <li>• national reporting and analysis.</li> </ul>	<p>NHS and independent providers like ourselves.</p>
<p>Your personal and sensitive or special categories of data is shared with the Norfolk and Waveney Clinical Commissioning Group (CCG).</p>	<p>We share your information to inform:</p> <ul style="list-style-type: none"> <li>• Ensure that Ormiston Families Supporting Smiles services meets our contractual and legal obligations to provide health care,</li> <li>• Provide information to other NHS organisations as required by law or other directions,</li> <li>• Provide statistical analysis of the use of services so that we can plan future services,</li> <li>• Support the funding of your care with commissioning organisations.</li> </ul>	<p>It is a contractual obligation for all providers of NHS-funded specialist mental health services to submit data about these services to the Clinical Commissioning Group (CCG).</p>
<p>Your personal and sensitive or special categories of data may be shared with the Local Authority.</p>	<p>We may share information about you or information that you have shared with us to protect or safeguard you or another individual.</p>	<p>We have a legal responsibility under the Children’s Act 1989 and the 2004 Act to share such information that is required by the appropriate local authority who are conducting investigations in regard to the safeguarding of a child or children.</p> <p>We also have a duty to cooperate and to share relevant information in regard to an adult ‘at risk’ under the Care Act 2014. This Act gives the Local Authority in each area a duty to put procedures in place to safeguard adults ‘at risk’ who have care and support needs.</p>
<p>Your personal and sensitive or special categories of data is shared with Dizons, the provider of our online case management system.</p>	<p>Our case management system is provided by a partner organisation, Dizons. We share your information to provide you with direct health and/or social care and support the funding of your care with commissioning organisations.</p>	<p>Without sharing this information we would be unable to provide you with direct health and/or social care and support the funding of your care with commissioning organisations.</p>
<p>If provided, your mobile phone number is shared with TextAnywhere, the provider of our SMS service.</p>	<p>Our SMS (Short Message Service) text message service is provided by ap partner organisation, TextAnywhere. We share your information to remind you about</p>	<p>Without sharing this information we would be unable to remind you about your appointments or send</p>

	your appointments and send you relevant, correspondence.	you relevant, correspondence via our SMS service.
Your postcode is shared with Loqate, the provider of our postcode verification service.	Our case management system uses postcode verification software provided by a partner organisation, Loqate. We share your information to verify we have an accurate address for any relevant correspondence we may send you.	Without sharing this information we would be unable to verify if we have an accurate address for any relevant correspondence we may send you.

### International Transfers

In limited and necessary circumstances, your personal information may be transferred outside of the European Economic Area (EEA). Where such transfers occur, we will assure that adequate protection exists either through appropriate contractual arrangements or as required by law.

### Data Subject Rights

You have a number of rights which may be available in relation to your data. For more information on these rights and how to action them please visit our main privacy notice [here](#).

You can also find more information on the [ICO website](#).

### Contacting Us

Please contact us if you have any questions or complaints in relation with this notice or the information we hold about you:

by email: [privacyofficer@ormistonfamilies.org.uk](mailto:privacyofficer@ormistonfamilies.org.uk)

by phone: 01473 724517

by post: Ormiston Families, Unit 17 The Quadrangle Centre, The Drift, Nacton Road, IP3 9QR