



# Thinking Through ...Therapy

Client Privacy Notice



## About us

We are Associate Development Solutions Ltd. (registered company number 7486948), a growing independent company specialising in children's and young people's mental health, providing bespoke solutions for service transformation, leadership and professional development, and research and evaluation.

Our address is:

*Associate Development Solutions Ltd.*

*Spaces - Pennine Five, Block 2,*

*1 Tenter Street,*

*Sheffield,*

*S1 4BY*

## What this notice is about

Please read this notice carefully. You may wish to read it with someone else, like a friend, parent or guardian. If you don't understand anything or have any questions, please get in touch with us at [data@thinkingthrough.com](mailto:data@thinkingthrough.com).

### If you are a parent or guardian

If you are the parent or guardian of a child or young person receiving our services, please be aware that this notice is written from their point of view. References to terms such as "you" and "your" therefore relate to them.

This notice tells you about the information we need to collect about you. If you are a child or young person using our services, we may need to collect information about your parent or guardian too. The information we collect is called *personal data* and the reasons for collecting it are explained below.

- **If you are enquiring about our service:**

When you visit our website and use our contact form, we collect some information about you and your needs to help us to understand whether our service is right for you.

- **If you're receiving therapy from ThinkingThrough**

If you are a ThinkingThrough Therapy client, we collect your data to provide you with our therapy service.

- **If you're receiving therapy from another professional**

If you receive therapy from another professional, like a Wellbeing Practitioner for Children and Young People (WPCYP/CWP) or an Education Mental Health Practitioner (EMHP), we collect your data because we are supervising your therapist's work. This involves meeting with your therapist to discuss your therapy.

The remainder of this notice tells you more about the data we collect and how we use it and share it, as well as important things like your legal rights.

## Where we get your data from

### **If you are enquiring about our service...**

...your data comes from the contact form on our website.

### **If you're receiving therapy from ThinkingThrough...**

...we collect data from you and – if you are a child or young person using our services – your parent or guardian. Other data, such as data about your health, may come from other sources, like your GP (doctor), or a service involved in your care.

### **If you're receiving therapy from another professional...**

... they share your data with us as part of our supervision work with them.

## How we use your data

To offer you the best possible service and support, we collect the following personal data and use it for the reasons described:

Contact details	
<b>What we collect</b>	Contact information such as names and addresses, email addresses, phone numbers, emergency contacts, etc.
<b>Why we collect it</b>	<p><b>If you are enquiring about our service:</b></p> <ul style="list-style-type: none"><li>• To enable us to respond to you.</li><li>• To market our services to you if we have your permission.</li></ul> <p><b>If you're receiving therapy from ThinkingThrough:</b></p> <ul style="list-style-type: none"><li>• To communicate with you / your parent or guardian to arrange appointments, provide you with care, or get in touch in case of emergency.</li><li>• To market our services to you / your parent or guardian if we have your permission.</li></ul>

## Health data

### What we collect

#### If you are enquiring about our service:

- Personal details like your age or gender;
- Details of your medical history, including mental and physical health;
- Other information you may choose to provide via our contact form.

#### If you're receiving therapy from ThinkingThrough or another professional:

Data relating to your health, including:

- personal details like your age or gender;
- details of your mental and physical health;
- any treatment or medication you have received, or are still receiving;
- any medication you have taken, or are still taking;
- any relevant major events in your life;
- information about you that may have come from other health and social care professionals, family, friends, relatives, etc.;
- information you provide during therapy, or when contacting your therapist between sessions;
- video or audio recordings of your therapy sessions.

### Why we collect it

#### If you are enquiring about our service:

- To understand your needs so that we can respond to you.
- To understand whether our service is right for you.

#### If you're receiving therapy from ThinkingThrough:

- To understand your needs so that you receive the best and most appropriate care and treatment.
- To protect you and other people, if we feel that there is a threat to your or their health and wellbeing.
- To help us to measure how well our therapy service is doing, so that we can keep improving it.
- To provide supervision, which is where your therapist meets with another expert, called a supervisor, to discuss and think about their work.

#### If you're receiving therapy from another professional:

- To provide supervision, which is where your therapist meets with another expert, called a supervisor, to discuss and think about their work.
- To protect you and other people, if we feel that there is a threat to your or their health and wellbeing.
- To help us to measure how well our supervision service is doing, so that we can keep improving it.

## How we keep your personal data safe

We know how important it is to look after your personal data, so here are some of the things we do to protect it:

- We only use the personal data we really need;
- We train our staff how to use and share your data safely;
- We use security measures like strong passwords and encryption<sup>1</sup>;
- We make sure we store and send data using secure technologies;
- We make sure that only people with permission can access your data;
- We only work with companies who promise to look after your data too.

## How we share your personal data

Sharing your data means letting people or organisations who aren't part of our company use your data too. We only do this when we need to and we take great care of your data when we do.

### Sharing with our temporary staff


To provide our services, we may need to share your personal data with people who work for us temporarily. These are people we trust to work for us when we don't have enough people on our team, or we need people with particular skills. If we use temporary therapists and supervisors, we call them our *associates*.

The tables below explain what we share, who we share it with and why.

Contact details	
Who we share with	Why we share
Associates	<p><b>If you are enquiring about our service:</b> We share with our associates so they can respond to your enquiry.</p> <p><b>If you're receiving therapy from ThinkingThrough:</b> We share with our associates so they can communicate with you / your parent or guardian to arrange appointments; provide you with care; get in touch in case of emergency; and keep you and others safe if we feel there is a threat to your or their health or wellbeing.</p>

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<sup>1</sup> Encryption means we turn your data into a code that can only be read by the people we trust.



<b>Administrative staff</b>	<p><b>If you are enquiring about our service:</b> We share with our administrative staff so they can respond to your enquiry.</p> <p><b>If you're receiving therapy from ThinkingThrough:</b> We share with our administrative staff so they can do things like organising your therapy, taking messages and keeping an appointment diary.</p>
<b>Technical staff</b>	Technical staff aren't involved in your care but they may need to access your data if there is a problem with our software and systems.

Health data	
Who we share with	Why we share
<b>Associates</b>	<p><b>If you are enquiring about our service:</b> We share with our associates so they can better understand your needs and decide whether our service is appropriate for you.</p> <p><b>If you're receiving therapy from ThinkingThrough:</b> We share with our associate therapists so they can offer you the best and most appropriate care and treatment. We also share with our associate supervisors so they and your therapist can discuss your therapy and needs.</p> <p><b>If you're receiving therapy from another professional:</b> We share with our associate supervisors so they and your therapist can discuss your therapy and needs.</p>
<b>Technical staff</b>	Technical staff aren't involved in your care but they may need to access your data if there is a problem with our software and systems.

## Sharing with other organisations

Sometimes, other organisations help us to run our service. These organisations may be in the UK or in another country, including countries outside the European Union (EU). Whenever we do this, we only use organisations that promise to look after your data according to UK law.

The table below tells you about the organisations we work with today, what we share with them and why. In future, we may use different organisations for the same purpose; for instance, if they offer

better value or features. If this happens, we will not change the type of data we share, or how it is used, without telling you first.

Contact details and health data	
Who we share with	Why we share
Microsoft 365	We use Microsoft 365 tools for things like email and data storage and to deliver therapy and supervision via video calls. This involves storing your data on Microsoft's systems. You can read more about how Microsoft uses your data by reading their <a href="#">privacy statement</a> .
Dropbox	<p>Dropbox is a service for storing data safely and securely on the Internet. We use it to store our company data, including personal data. It allows our team to work together, wherever they are.</p> <p>Occasionally, Dropbox staff need to access personal data too. They provide a <a href="#">help page</a><sup>2</sup> that explains when and why this might happen.</p>
Pragmatic Tracker	Pragmatic Tracker is a secure tool that we use to keep track of your progress if you are receiving therapy. We use it to store our records, including personal data such as contact details, health records and notes written by your therapist or other care provider.
Zoom	Zoom is a tool for making video calls. Our therapists use it to deliver therapy and to record sessions for supervision. Our supervisors use it as part of their work with therapists from other organisations.
Adobe	We use Adobe tools for things like writing reports and looking at data. This may involve storing some of your data on Adobe's systems.
123-Reg	We use 123-Reg for email, which means any personal data we send or receive may be stored on their systems. We also have a policy of encrypting all sensitive personal data before sending it anywhere.

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<sup>2</sup> <https://help.dropbox.com/accounts-billing/security/file-access>

<b>Zoho</b>	We use Zoho tools, such as Zoho Survey, to measure how well our service is doing.
<b>Other agencies</b>	<p>To provide you with the best possible care, we may share personal data with other agencies where we feel this is appropriate. We will only do this if one or more of the following is true:</p> <ul style="list-style-type: none"> <li>• you ask us to;</li> <li>• we ask you and you give us permission;</li> <li>• we have special permission because the public good is thought to be more important than data privacy;</li> <li>• there is a concern that you are putting yourself, or another person, at risk of harm.</li> </ul>

## Our data retention policy

When we collect your data, we only keep it for as long as we need to. The maximum length of time depends on the type of data, as shown in this table:

Type of data	The maximum length of time we keep it for
<b>Contact data</b>	7 years after your last contact with us
<b>Health data</b>	<p><b>Adults:</b> 8 years after your last contact with us</p> <p><b>Children and young people:</b> <i>If you are under 17 when you leave our service:</i> Until your 25th birthday</p> <p><i>If you are 17 or older when you leave our service:</i> Until your 26th birthday</p> <p><i>In the event of your death:</i> 8 years after your death</p>

Once we no longer need your data, we will securely delete it unless we have good reason, such as a legal requirement to keep it.



## Your personal data and the law

The law says we must have a good reason to use your data. This is called our *lawful basis* and there are six to choose from. For our ThinkingThrough service, we use more than one lawful basis because we use your data in different ways. The tables below tell you which lawful basis we use in each case, along with other information that you may find useful:

Activity	Our lawful basis	What else we need to tell you
Communicating with you if you contact us via our website	<i>Legitimate interests</i>	<p>We use this basis because:</p> <ul style="list-style-type: none"><li>• We want to be able to respond to your enquiry;</li><li>• We can't respond unless we have your contact details;</li><li>• We believe the risk to you is low (because we will take care of your data), while the benefit is high (because we can respond to your enquiry).</li></ul> <p><u>GDPR conditions that apply</u></p> <ul style="list-style-type: none"><li>• <i>Article 9(2)(h)</i></li></ul> <p><i>See also: Article 9(3)</i></p> <p><u>DPA (2018) conditions that apply</u></p> <ul style="list-style-type: none"><li>• <i>Schedule 1 / Part 1(2): Health or social care purposes</i></li></ul> <p><i>See also: Section 11(1)</i></p>
Communicating with you if you're receiving therapy from ThinkingThrough	<b>For referred clients<sup>3</sup>:</b> <i>Legitimate interests</i>	<p>We use this basis because:</p> <ul style="list-style-type: none"><li>• We want to communicate with you so that we can offer you a high standard of care;</li><li>• We can't communicate with you unless we have your contact details;</li><li>• We believe the risk to you is low (because we will take care of your data), while the benefit is high (because we can provide you with the treatment you want or need).</li></ul>

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<sup>3</sup> Referred clients are children or young people who are introduced to the ThinkingThrough Therapy service by another care provider, such as your GP or a hospital that is treating you.

	<b>For private clients<sup>4</sup>:</b> <i>Contract</i>	-
<b>Telling you / your parent or guardian about our services (marketing)</b>	<i>Consent</i>	-
<b>Providing you with therapy</b>	<b>For referred clients:</b> <i>Legitimate interests</i>	<p>We use this basis because:</p> <ul style="list-style-type: none"> <li>• We want to offer you appropriate care;</li> <li>• We can't do that unless we have access to your health data and your / your parent or guardian's contact data;</li> <li>• Although your health data is very sensitive, we will take care to keep it secure and private. We also believe that the benefits of appropriate care are greater than the risks of accessing your health data.</li> </ul> <p><u>GDPR conditions that apply</u></p> <ul style="list-style-type: none"> <li>• <i>Article 9(2)(h)</i></li> </ul> <p><i>See also: Article 9(3)</i></p> <p><u>DPA (2018) conditions that apply</u></p> <ul style="list-style-type: none"> <li>• <i>Schedule 1 / Part 1(2): Health or social care purposes</i></li> </ul> <p><i>See also: Section 11(1)</i></p>
	<b>For private clients:</b> <i>Contract</i>	<p><u>GDPR conditions that apply</u></p> <ul style="list-style-type: none"> <li>• <i>Article 9(2)(h)</i></li> </ul> <p><i>See also: Article 9(3)</i></p> <p><u>DPA (2018) conditions that apply</u></p> <ul style="list-style-type: none"> <li>• <i>Schedule 1 / Part 1(2): Health or social care purposes</i></li> </ul> <p><i>See also: Section 11(1)</i></p>

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<sup>4</sup> Private clients are people who come to our service directly – or are brought by a parent, guardian, friend or family member – and who pay for the service themselves.

<p><b>Providing your therapist with supervision</b></p>	<p><i>Contract</i></p>	<p><u>GDPR conditions that apply</u></p> <ul style="list-style-type: none"> <li>• <i>Article 9(2)(h)</i></li> </ul> <p><i>See also: Article 9(3)</i></p> <p><u>DPA (2018) conditions that apply</u></p> <ul style="list-style-type: none"> <li>• <i>Schedule 1 / Part 1(2): Health or social care purposes</i></li> </ul> <p><i>See also: Section 11(1)</i></p>
<p><b>Evaluating our service</b></p>	<p><i>Legitimate interests</i></p>	<p>We use this basis because:</p> <ul style="list-style-type: none"> <li>• We want to keep improving our service so that it's better for you and our future clients;</li> <li>• We can't do that effectively without using your data to measure how well our service has worked for you;</li> <li>• Although some of your data may be very sensitive, we will take care to keep it secure and private. We also believe that the benefits of improving our service for you and others are greater than the risks of accessing your health data.</li> </ul> <p><u>GDPR conditions that apply</u></p> <ul style="list-style-type: none"> <li>• <i>Article 9(2)(j)</i></li> </ul> <p><i>See also: Article 89(1)</i></p> <p><u>DPA (2018) conditions that apply</u></p> <ul style="list-style-type: none"> <li>• <i>Schedule 1 / Part 1(4): Statistical purposes</i></li> </ul> <p><i>See also: Section 19</i></p>

<p><b>Handling an urgent matter relating to your care, or the care of others (safeguarding)</b></p>	<p><i>Legal obligation</i></p>	<p>We use this basis because:</p> <p>We need to keep you and others safe if we feel there is a threat to your or their health or wellbeing.</p> <p><u>GDPR conditions that apply</u></p> <ul style="list-style-type: none"> <li>• <i>Article 9(2)(g)</i></li> </ul> <p><u>DPA (2018) conditions that apply</u></p> <ul style="list-style-type: none"> <li>• <i>Schedule 1 / Part 2(18): Safeguarding of children and of individuals at risk</i></li> </ul> <p><i>See also: Schedule 1 / Part 4</i></p>
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If you have any questions or concerns about the use of your data, please let us know at the above address, or by email at [data@thinkingthrough.com](mailto:data@thinkingthrough.com).

## Your rights

The law gives you some important rights that help protect you and your personal data:

- The right to be informed *...to know who we are and how we use your data*
- The right of access *...to find out what data we have about you*
- The right to rectification *...to ask us to correct mistakes in your data*
- The right to erasure *...to ask us to delete your data*
- The right to restrict processing *...to ask us to limit how we use your data*
- The right to data portability *...to ask us to send your data to you or another provider*
- The right to object *...to complain challenge our use of your data*

In some cases, one or more of these rights may not apply – for instance, if we feel it might cause serious harm to you or others.

Similarly, even if you are the parent or guardian of a child receiving our services, you may not be entitled to certain rights, depending on the child's age, wishes and the data involved.

However, we promise to always consider your rights and respond to you promptly, fairly and within the law.

If you would like to contact us about any of your rights, you can either write to us at the above address or email [data@thinkingthrough.com](mailto:data@thinkingthrough.com). You can find out more about your rights on the [Information Commissioner's Office \(ICO\) website](#).

## How to make a complaint

If you are unhappy about the way we're using your personal data, you can contact us at the above address, or by email at [data@thinkingthrough.com](mailto:data@thinkingthrough.com).

If you are not satisfied with our response or believe we are processing your personal data in a way that is not lawful, you may complain to the Information Commissioner's Office (ICO).



# Company Contact Details

**Directors:** Dr Fiona Warner-Gale and Jane Sedgewick

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