



Privacy Policy

Safeguarding the privacy of the personal information you provide is central to the integrity of our relationship with you. This policy outlines what information we may store and why; how it may be used and who you can contact if you have any questions or concerns.

This privacy policy is regularly reviewed and may be updated at any time to reflect changes in how we use your information. Our website will always link to the latest version of our privacy policy and, where appropriate, we will notify you directly of any significant changes to how we use your information.

Who we are

Families Empowered provide a range of therapeutic services and interventions to support families and children, including adoptive families, special guardians, foster carers, social care professionals and schools, underpinned by the principles of Dyadic Developmental Psychotherapy (DDP) and PACE. Most of our services are commissioned by local authorities or adoption agencies.

We collect personal data to enable us both to provide and improve our therapeutic services and to comply with relevant legal and regulatory obligations.

Families Empowered Limited is a registered company in England and Wales (07489409). Our registered address is Unit 1C, The Gattinetts, Hadleigh Road, East Bergholt, Essex, CO7 6QT

What personal information do we collect?

Personal information is any information that can be used to identify you. It may include your name, email address, postal address, telephone or mobile number, date of birth, relevant referral information to inform the service provided and financial details. The information provided will largely depend on how and why you are engaging with us.

We collect most of this information directly from you or a permitted referring authority by person, by phone, mail, or online. We also collect information when you use one of our services (such as therapy, therapeutic group programmes, training etc), or when you give us information as part of visiting our website.

Personal information may be collected from the following sources:

Registration, referral or clinical assessment forms

The purpose of these forms is to collect basic information on the family which will inform the therapeutic intervention. In addition to the names, contact details and dates of birth of each family member, details such as the local authority name, and the family's therapy history is also collected.

If we are undertaking any therapeutic support we also use a range of clinical evaluation measures to assist us in identifying your needs and to assess whether at the end of our intervention, your needs have been met.

If you share any sensitive information with us, the information you provide will be kept by Families Empowered and will be treated with the strictest of confidence. It will be stored securely and not be shared with a third party without your consent unless we have a statutory obligation to do so, or there are concerns for your safety which Families Empowered has a duty to report to the relevant authority in order for appropriate action to be taken.

Marketing

For marketing purposes we will keep the following personal data where the subscriber has opted in to receive updates from us:

- first name,
- last name,
- email address,
- optional description (e.g. Adoptive parent, professional),
- source (where you heard about us) and
- mailing preferences.

This data will be collected via sign up on our website, in person using a subscriber form or via a link to a sign-up form on a third party email service provider.

Training courses

For training/events purposes, personal details will be collected that are required for the administration of booked training courses and other events such as conferences or therapeutic development days. (i.e. name, job title, organisation, email, telephone number, dietary preference, special requirements, fee paid, date/course attended.)

Why we use your personal information

Families Empowered will only collect and use your personal information where we have a legal basis to do so and will always respect your rights. We may process your personal data for a number of reasons, such as:

- You have given us your explicit consent to use the information for a specified purpose, for example to receive an e-newsletter or to inform you about future training & information events
- You have expressed interest in the organisation by a positive action, for example by completing a contact form, or by enquiring about an event
- We have a legal obligation to use your information
- We also reserve the right to apply our legitimate interest wherever we believe it is appropriate but we promise that we will always obtain your consent and respect your rights and freedoms when doing so. Some examples of when we would rely on our legitimate interest include:
 - To pursue our organisational aims and objectives
 - To ensure we meet our regulatory requirements as an adoption support agency
 - To manage our ongoing relationship with anyone we work with
 - To manage our financial transactions and prevent fraud.

How we use your personal information

The ways that we may use your personal information are as follows:

- to provide you with the services or information you have requested;
- to process any orders that you have submitted e.g. bookings of training courses;
- to provide you with information about our work or our activities, that you have asked to receive;
- for administration purposes e.g. we may contact you about an event you have expressed an interest in or registered for;
- for internal record keeping, such as the management of feedback or complaints or to maintain a list of delegates who have paid for and attended our training courses;
- to analyse and improve the services we offer;
- to use data analytics to improve our website, products/services, marketing, customer relationships and experiences;
- where it is required or authorised by law, or in compliance with our policies and procedures.

Who has access to your information?

We will not sell or provide your information to any third parties for marketing purposes.

As part of providing you with the right service, we may need to share some of your information with other organisations for specific reasons. Here is how third party arrangements like this might affect you:

- Families using our therapeutic services – in discussion with you we will share information with your referring local authority in relation to the assessment and therapy that we have provided. Additionally, with your consent, we may share reports with your child's school or other therapeutic services if you believe this could be helpful.

- When you complete evaluation measures after therapeutic assessment or intervention; we collect information regarding clinical changes.
- We access consultation and supervision with external specialist clinical consultants regarding our therapeutic work. We may share some of your personal information during consultations to ensure that our practice is of the highest quality.
- Nurturing Attachment Groups – we share attendance details of people who have attended these groups with the commissioning local authorities and summary reports of outcomes.
- Training programme attendees – we will share a list who attended the training with the training commissioners or funding parties.
- We may send an online anonymised satisfaction questionnaire with regards to a number of our services in order that we can ensure the quality of our provision.

The only other time a third party would have access to your information is where we are obliged by law to provide certain information, for example legal or safeguarding situations.

How long will we keep your personal information?

We always have your best interests at heart and your personal information will not be retained by Families Empowered for longer than necessary in relation to the purposes for which it was originally collected, or for which it was further processed, subject to UK legal and regulatory obligations, including Adoption Regulations, tax purposes etc.

Where we have provided a therapeutic service, records will be kept securely for 7 years, Children's records will be kept for 7 years following the child's 18th birthday and any safeguarding records also will be kept until the child reaches the age of 25

When holding your information is no longer necessary it will be securely and confidentially disposed of, or fully anonymised, so that no information can be attributed to you.

We review our data retention periods for personal information on a regular basis.

Security precautions to safeguard your data

We maintain the highest standards of data privacy and security to protect your personal details and other information about you because we want you to feel completely confident about engaging with us. We will not rent or sell your personal information to other organisations for use by them in any way. We regularly review our processes and procedures to protect your information from unauthorised access and use, accidental loss and/or destruction.

Web browser cookies

Our website may use standard 'cookies' used by Google Analytics. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to monitor visitor behaviour.

Standard cookies used by Google Analytics will include a random unique number or string of letters and numbers to identify your browser, the time and dates that you interacted with the site recently and the marketing materials or referring pages that led you to the site. The data collected by Google Analytics is used to analyse how frequently the same people revisit the website, how the website is found and which pages are most frequently viewed. This information is combined with data from other users to create an overall picture of website use, and is never identified individually or personally and is not linked to any other information we store about you.

You can prevent the setting of cookies by adjusting the settings on your browser (see your browser Help for how to do this). Be aware that disabling cookies will affect the functionality of this and many other websites that you visit. Disabling cookies will usually result in also disabling certain functionality and features of this site.

When you click on links on our website, they may direct you away from our site. We are not responsible for the privacy practices of other sites and encourage you to read their privacy statements.

Your rights

Under the General Data Protection Regulation, parents, carers and children have the right to request access to information about them that we hold. To make a request for your personal information contact deborah@familieempowered.co.uk or write to:

Registered Manager
Families Empowered
Unit 1C
The Gattinetts
Hadleigh Road
East Bergholt
Essex
CO7 6QT

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>

The data that we keep about you is your data and we ensure that we keep it confidential and that it is used appropriately. You have the following rights when it comes to your data:

- You have the right to request a copy of all of the data we keep about you. Generally, we will not charge for this service;
- You have the right to ask us to correct any data we have which you believe to be inaccurate. You can also request that we restrict all processing of your data while we consider your rectification request;
- You have the right to request that we erase any of your personal data which is no longer necessary for the purpose we originally collected it for. You may also request that we

restrict processing if we no longer require your personal data for the purpose we originally collected it for, but you do not wish for it to be erased.

- You can ask for your data to be erased if we have asked for your consent to process your data. You can withdraw consent at any time – please contact us to do so.
- If we are processing your data as part of our legitimate interests as an organisation or in order to complete a task in the public interest, you have the right to object to that processing. We will restrict all processing of this data while we look into your objection.

You may need to provide adequate information for our staff to be able to identify you, for example, a passport or driver's licence. This is to make sure that data is not shared with the wrong person inappropriately. We will always respond to your request as soon as possible and at the latest within one month.

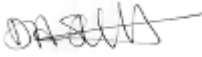
Contact

If you would like to discuss anything in this Privacy Policy, please contact Deborah Sharratt, Data Protection Lead, deborah@familiesempowered.co.uk or Wendy Edgell, Registered Manager, wendy@familiesempowered.co.uk

Monitoring, Review and Revision

This policy statement came into force on 11th August 2020.

Families Empowered are committed to reviewing our policy and good practice annually.

Signed 

Version	Review Date	Reviewer	Reason for Revision
2	31/5/2021	WE	Review and update of policy & procedure
3	13/6/22	WE	Change of registered address
3	13/7/22	Tara Davey	Annual Review - No change
4	18/8/23	WE	Update to retention timescales
5	19/12/23	WE	Update to Marketing consent