

# PRIVACY POLICY

This privacy notice tells you what to expect when we collect your personal information.

The FDAC National Unit (FDAC NU) uses personal and confidential information for a number of purposes. This Privacy Notice provides a summary of how we use your information. To ensure that we process your personal data fairly and lawfully we are required to inform you:

- Why we need your data
- How it will be used and
- Who it will be shared with

The law determines how we can use personal information. The Key laws are: The General Data Protection Regulation (GDPR), the Human Rights Acts 1998 (HRA), relevant health service legislation, and the common law duty of confidentiality.

As the FDAC NU is an organisation led by the Tavistock and Portman NHS Foundation Trust, the Trust is our “Data Controller” for the purpose of the GDPR. The Trust direct or commission the processing of patient, students, staff and visitors data to help deliver healthcare, or assist the management of healthcare services, students services, staff services and any other responsibility in the delivery of our corporate services.

View the Tavistock and Portman NHS Foundation Trust [Privacy Notice](#) providing details of how the Trust uses information.

## Why we need your data

Data on FDAC families will improve our understanding of the impact of FDAC. We are continuing to build FDAC’s unique evidence base for further analysis and evaluation.

## How it will be used

The FDAC NU provides ongoing support to FDAC sites around the country including reviewing and quality assuring data collection for a specific FDAC Access database. FDAC services share anonymised data from their FDAC Access databases with the FDAC NU to contribute to future national research and evaluation of FDAC. All data shared with the FDAC NU will be anonymised.

## Who it will be shared with

The FDAC NU is committed to disseminating evaluation findings and future research studies that will be of public interest or are of statistical value with the wider public. Data used by the FDAC NU in the production of the aforementioned will be anonymised data so that you cannot be identified.

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Our legal basis for processing FDAC case data is “Public Task” (to perform a task in the public interest or for our official functions): we collect anonymised data of the families (service users) involved with FDAC around the country in order to monitor the delivery of the service, evaluate outcomes and complete future research studies that will be of public interest or are of statistical value.

# Families

Each FDAC collects and holds the data of the service users who have entered the service in order to monitor and develop it. All service users will be advised on how their anonymised data can legally be processed (by FDACs and the FDAC NU) as a result of receiving a service. Consent from all service users will be sought on entering the service for any use of anonymised data that falls outside a legal basis.

The retention period of our anonymised records from the end of FDAC involvement, or when the service user was last seen by the FDAC service, is 20 years. The records will then be reviewed, and if they are no longer needed they will be destroyed.

## Exceptional circumstances

Except in exceptional circumstances personal data will never be disclosed to third parties. Exceptional circumstances could include:

- protecting the vital interests of the data subject (i.e. release of medical data where failure to release the data would result in harm to, or the death of, the data subject)
- preventing serious harm to a third party that would occur if the data were not disclosed
- safeguarding national security
- prevention or detection of crime
- apprehension or prosecution of offenders
- assessment or collection of any tax or duty or of any imposition of a similar nature
- discharge of regulatory functions, including securing the health, safety and welfare of persons at work

## Your Information

This part of the Privacy Notice outlines what personal information we hold, why we use it and how we protect it. Some information explains how FDAC services hold your data and use it. Contact your local FDAC service for full information on their Privacy Notices.

### Local FDAC services

Contact details of FDAC services [here](#)

## What types of personal data do we handle?

As the FDAC NU we receive and process anonymised data of the families involved with FDAC around the country in order to review and develop the delivery of FDAC services and evaluate FDACs impact for children and families experiencing care proceedings in FDAC. The types of anonymised personal information we use includes:

- personal details such as dates of birth and gender
- family details for example children details
- education, training, employment and housing details
- lifestyle and social circumstances

We also process sensitive classes of information that may include:

- racial and ethnic origin
- offences (including alleged offences), criminal proceedings, outcomes and sentences

In terms of health and misuse information, information may include:

- substance misuse details
- physical or mental health details
- pregnancy history and contraception

## How will we use information about you?

Your information is used to review, develop and report on service practice and FDACs impact via outcomes. It may be used to:

- Check and report on how effective FDAC services have been
- Demonstrate that FDAC delivers significantly better outcomes for children and families
- Demonstrate that FDAC is a better experience of justice for families and professionals
- Demonstrate that FDAC is a better use of public money
- Review the services to ensure the FDAC model continues to give parents the best possible chance to solve their problems while testing whether they can meet their children's needs in a timescale compatible with those needs

We keep your anonymised information on a computer on password-protected files.

## Sharing your information

There are a number of reasons why FDAC services share information. This can be due to:

- Obligations to comply with current legislation
- Duty to comply with a Court Order
- You have consented to disclosure

The FDAC services may use the information held about you to detect and prevent crime or fraud. Services may also share this information with other bodies that inspect and manage public funds.

## Security of your information

We take our duty to protect your personal information and confidentiality seriously. We are committed to taking all reasonable measures to ensure the confidentiality and security of anonymised data for which we are responsible, whether computerised or on paper.

The Trust has appointed a Senior Information Risk Owner (SIRO) who is accountable for the management of all information assets and any associated risks and incidents, and a 'Caldicott Guardian' who is responsible for the management of patient information and patient confidentiality. Deputy SIROs have also been appointed in an Information and Security Governance Manager and DPO who is responsible for staff, patients and corporate data.

All staff are required to undertake data security and protection training and are provided with an information governance awareness at induction to understand their responsibilities and agree to adhere to. The staff are aware of their information governance responsibilities and follow best practice guidelines ensuring the necessary safeguards and appropriate use of person-identifiable and confidential information.

All local FDAC services have appointed personnel in line with GDPR requirements.

## Retaining information

We will only retain information for as long as necessary. Records are maintained in line with the Trust retention schedule which determines the length of time records should be kept. Contact local FDAC services for information about local retention periods.

## How can you get access to your personal information?

The GDPR gives you the right to see the information that the FDAC service holds about you and why. Requests must be made in writing and you will need to provide the below to your local FDAC service (the FDAC NU only has access to anonymised version of this data):

- adequate information [for example full name, address, date of birth, etc.] so that your identity can be verified and your information located.
- an indication of what information you are requesting to enable FDAC services to locate this in an efficient manner.

A request for information that an FDAC service holds about you has to be made with the appropriate data controller, this will be the FDAC service if they are the relevant data controller.

Under GDPR services have to provide such information free of charge, however, where a fee is applicable under the terms of the GDPR and subsequent legislation, the service will inform you in writing. In due course our disbursement scheme (which outlines these fees) will be available.

FDAC services aim to comply with requests for access to personal data as quickly as possible. FDAC services will ensure that they deal with requests within 30 days of receipt unless there is a reason for delay that is justifiable under the Data Protection Legislation (GDPR).

FDAC services want to make sure that your personal information is accurate and up to date. If you think any information is inaccurate or incorrect then please contact your local FDAC service to let them know.

### Local FDAC services

Contact details of FDAC services [here](#)

## Website

### Privacy

The FDAC NU is committed to the privacy of individuals using this website. This privacy statement discloses the privacy practices for <http://fdac.org.uk/> and its subdomains.

Some features of this website, for example our contact forms (FDAC services login area), collect personal information submitted by users. Any information submitted will be kept in the strictest confidence and will never be passed on to a third party, unless there is a legal obligation on us to do so.

### Content

We strive to offer accurate and up to date web content. However, inaccuracies are sometimes unavoidable. Whilst we welcome feedback to correct errors, responsibility for the use of any information found here lies solely with the user. You also assume the risk of computer viruses, worms, Trojan horses and other destructive code by downloading files from this website. To report an error or inaccuracy please contact [info.fdacnu@coram.org.uk](mailto:info.fdacnu@coram.org.uk)

### Links

The Trust and the FDAC NU are not responsible for the content or reliability of linked websites and does not necessarily endorse the views expressed within them. Listing should not be taken as endorsement of any kind. While we endeavour to keep all links up to date we cannot guarantee that

these links will work all of the time and we have no control over the availability of linked pages. To report a broken or dead link please contact [info.fdacnu@coram.org.uk](mailto:info.fdacnu@coram.org.uk)

## Availability

We cannot guarantee uninterrupted access to this website or the sites to which it links. We accept no responsibility for any damages arising from the loss of access to information.

## Copyright

Different copyright restrictions apply to individual documents on this website. Unless otherwise stated, the following copyright statement applies to content found on this site:

The FDAC NU reserves its right to retain its intellectual property. Visitors to this website are welcome to access this copyright material and view for any purpose, or to download onto electronic, magnetic, optical or similar storage media provided that such activities are for personal use or private research. Content downloaded from this website may not be used for income generating activity without prior consent from the FDAC NU team, to seek consent, please contact [info.fdacnu@coram.org.uk](mailto:info.fdacnu@coram.org.uk)

### Cookies

Cookies are small files that are placed on your computer or mobile device by websites that you visit. Our cookies help us:

- Make our website work as you would expect
- Remember your settings during and between visits
- Improve the speed/security of the site
- Allow you to share pages with social networks like Facebook, LinkedIn and Twitter
- Continuously improve our website for you
- Make our marketing more efficient

We do not use cookies to:

- Collect any personally identifiable information
- Collect any sensitive information
- Pass data to advertising networks
- Pass personally identifiable data to third parties

Most web browsers allow some control of cookies. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>.

The cookie we use on this site include:

**Google Analytics** (\_utma, \_utmb, \_utmc, \_utmz): These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited. It is not possible to identify or gather individual's personal information through the collection of these cookies.

Our website has been developed in WordPress and the default time period that this platform tells visitor's computers to store cookies locally is for 30 days. We occasionally use our records of the

pages users have visited on this website to analyse trends, administer the site and track users' movements. Our records do not contain any personal information about users.

## Changing your cookie settings in your browser

To control the way your device manages cookies, go to your browser settings. The links below are designed to help but are not exhaustive:

[Changing cookie settings in Firefox](#)

[Changing cookie settings in Internet Explorer](#)

[Changing cookie settings in Google Chrome](#)

[Changing cookie settings in Safari \(OS X\)](#)

[Changing cookie settings in Safari \(iOS\)](#)

[Changing cookie settings in Android](#)

## Notification of changes

If we alter any of the above, we will post notification of the changes on our homepage.

## Changes to our privacy policy

We keep our Privacy Policy under regular review and we will place any updates on this webpage.

## Data Protection Notification

Tavistock and Portman NHS Foundation Trust is our 'data controller' under the GDPR. The Trust has notified the Information Commissioner that we process personal data and the details are publicly available from:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
SK9 5AF  
<https://ico.org.uk/>

## How to contact us

Please contact us if you have any questions about our privacy policy or information we hold about you:

FDAC National Unit

Tavistock Centre  
120 Belsize Lane  
London  
NW3 5BA

Email: [info.fdacnu@coram.org.uk](mailto:info.fdacnu@coram.org.uk)

## Make a complaint

### FDAC NU

Email: [info.fdacnu@coram.org.uk](mailto:info.fdacnu@coram.org.uk)

### Local FDAC services

Each FDAC service has a complaints procedure please contact your local FDAC service to make a complaint. Contact details of FDAC services [here](#)

## Contact our Information and Security Governance Manager and Data Protection Officer

Contact S.I Ndumbe, the Trust Information & Security Governance Manager and DPO, via [ig@tavi-port.nhs.uk](mailto:ig@tavi-port.nhs.uk)