



BRIDGE THE GAP

01332 600827

INFO@JWBRIDGETHEGAP.COM

Privacy Policy

This privacy policy applies between you, the user of this organisation, and Bridge the Gap CIC, the owner and provider of this organisation.

Bridge the Gap CIC takes the privacy of your information very seriously. This privacy policy applies to our use of any, and all, data collected by us or provided by you, in relation to your use of our services.

Please read this privacy policy carefully.

Definitions and interpretation

1. In this privacy policy, the following definitions are used:

Data - collectively all information that you submit or is collated by Bridge the Gap CIC via your private sessions with one of our practitioners. This definition incorporates, where applicable, the definitions provided in the Data Protection Laws;

Data Protection Laws - any applicable law relating to the processing of personal Data, including but not limited to the Directive 96/46/EC (Data Protection Directive) or the GDPR, and any national implementing laws, regulations and secondary legislation, for as long as the GDPR is effective in the U.K

GDPR - the General Data Protection Regulation (EU) 2016/679;

Bridge the Gap Child Mental Health, we or us – Bridge the Gap CIC, a company incorporated in England and Wales with registered business address of 45 Friar Gate, Derby DE1 1DA

UK Law - the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011;

User or you - any third party that accesses our services and is not either (i) employed by Bridge the Gap CIC and acting in the course of their employment or (ii) engaged as a consultant or otherwise providing services to Bridge the Gap CIC.

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

1. the singular includes the plural and vice versa;

2. references to sub-clauses, clauses, schedules or appendices are to sub-clauses, clauses, schedules or appendices of this privacy policy;

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3. a reference to a person includes our private service users;
4. “including” is understood to mean “including without limitation”;
5. reference to any statutory provision includes any modification or amendment of it;
6. the headings and sub-headings do not form part of this privacy policy.

Scope of this privacy policy

1. This privacy policy applies only to the actions of Bridge the Gap CIC and its private service users.
2. For purposes of the applicable Data Protection Laws, Bridge the Gap CIC is the “data controller”. This means that Bridge the Gap CIC determines the purposes for which, and the manner in which, your Data is stored.

Data collection

We may collect the following Data, which includes personal Data, from you:

1. name;
2. date of birth;
3. home address;
4. G.P name and address;
5. name of referrer and relationship to child;
6. contact Information such as email addresses and telephone numbers;
7. details of activities in sessions, planning for next steps, and impact measurements. Any issues concerned will be raised in accordance with our safeguarding policy.
8. information will be stored until the child is 25 years old, in line with government guidelines;
9. in each case this will be done, in accordance with this privacy policy.

How we collect Data

We collect Data in the following ways:

1. data is given to us by you; and
2. data is taken by our practitioners.

Data that is given to us by you



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Bridge the Gap CIC will collect your Data in a number of ways, for example:

1. when you have an assessment call, we will take data from you to ensure we are able to comply with our safeguarding policy and maintain our professional responsibility;
2. when you use our services; in each case, in accordance with this privacy policy.

Working with a child

1. we require permission from one parent with parental responsibility to start working with a minor.
2. session details are confidential unless a practitioner views there to be a risk.
3. we hold reviews and encourage the parent child bond within them to help work towards the same goal.
4. our sessions are non-clinical, and relationship focused, using emotional literacy strategies and CBT and ACT informed practice to help children gain a better relationship with their feelings and themselves.
5. our practitioners are not counsellors but professionals working in and/or trained to work within the field of mental health. All mental health practitioners have protected professional titles. We also have team members working with children in an emotional literacy based proactive and supportive role, these practitioners are qualified to support children and young people and hold a minimum of a level 3 qualification in the children and young person's workforce, or as part of the health and social care pathway. These practitioners are also able to deliver small group programmes created by the Bridge the Gap team.
6. all practitioners and team members receive regular clinical supervision.
7. our senior team receive supervision from an educational psychologist.
8. more information on what informs this section of our privacy policy can be found on the governments website, we have linked two documents below;

[Understanding and dealing with issues relating to parental responsibility - GOV.UK \(www.gov.uk\)](http://www.gov.uk)
[Information sharing advice for safeguarding practitioners - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

9. If we feel there is any element of risk to a child, or a case for a referral into secondary services, all steps will be taken to ensure that all those with parental responsibility are included in this conversation.

Data that is collected automatically.

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To the extent that you access our social media channels, we will collect your Data automatically, for example:

1. our Facebook and Instagram pages automatically gives us your name when you engage with content or send us a message, you send messages via this platform on this understanding, we do not take any responsibility for Facebook and Instagram privacy breaches.

Our use of Data

Any Data collected is required to provide you with the best possible service and to ensure we are meeting our professional responsibility. Specifically, Data may be used by us for the following reasons:

1. internal record keeping;
2. in multi-disciplinary team meetings to ensure that we are maintaining professional responsibility to our service users, and our team.

Who we share Data with

We may share your Data with the following groups of people for the following reasons:

1. our employees, agents and/or professional advisors – in order to provide professional services;
2. relevant authorities – if necessary, to ensure that we are adhering to our safeguarding policy; in each case, in accordance with this privacy policy.

Keeping Data secure

1. We will use technical and organisational measures to safeguard your Data, for example:
2. we use the practice management system Cliniko where all of your data is kept securely. You can read more about our practice management system below:

[Cliniko Security](#)

3. any other data is stored (such as emails for invoices through our accounting software (XERO) on secure servers.
4. technical and organisational measures include measures to deal with any suspected data breach. If you suspect any misuse or loss or unauthorised access to your Data, please let us know immediately by contacting us via this e-mail address:

info@jwbridgethegap.com.

Data retention

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1. Unless a longer retention period is required or permitted by law, we will only hold your Data on our systems for the period necessary to fulfil the purposes outlined in this privacy policy or until you request that the Data be deleted.

Your rights

You have the following rights in relation to your Data:

Please see our freedom of Information policy. This can be found linked on our website.

3. 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 in line with Records Management Code of Practice for Health and Social Care 2016.

The full policy can be found here: [Information Governance Alliance \(IGA\) - NHS Digital](#)

4. 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.

Changes of business ownership and control

1. Bridge the Gap CIC, from time to time, may expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of Bridge the Gap CIC. 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.

General

2. You may not transfer any of your rights under this privacy policy to any other person. We may transfer our rights under this privacy policy where we reasonably believe your rights will not be affected.

3. If any court or competent authority finds that any provision of this privacy 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.

4. 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.



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5. 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.

Changes to this privacy policy

Bridge the Gap CIC reserves the right to change this privacy policy as we may deem necessary from time to time or as may be required by law. Service users will be notified of changes made.

You may contact Bridge the Gap Child Mental Health by email at info@jwbridgethegap.com.