

# The Child Behaviour Network (TCBN) Privacy Policy

This Privacy Policy is designed to ensure that the rights to privacy of individuals are protected.

In this policy “The Child Behaviour Network”, “we”, “us” or “our” all refer to The Child Behaviour Network and all staff members.

The registered company address for The Child Behaviour Network is Little Beckings, Green End Road, Radnage, HP14 4BY. We are a registered partnership in England.

[www.tcbn.co.uk](http://www.tcbn.co.uk) and [www.thechildbehaviournetwork.co.uk](http://www.thechildbehaviournetwork.co.uk) are website, owned and operated by us

The Child Behaviour Network complies with all the requirements of the UK GDPR, not just those specifically relating to children.

When relying on consent, we make sure that the child understands what they are consenting to, and we do not exploit any imbalance of power in the relationship between us.

When relying on ‘necessary for the performance of a contract’, we consider the child’s competence to understand what they are agreeing to, and to enter into a contract.

When relying upon ‘legitimate interests’, we take responsibility for identifying the risks and consequences of the processing, and put age appropriate safeguards in place.

This Privacy Policy describes how The Child Behaviour Network manages your information when you use our services and / or our Site, if you contact us or when we contact you.

The Child Behaviour Network is the data controller in relation to personal data that you disclose to us. If another party has access to your data we will tell you if they are acting as a data controller or a data processor, who they are, what they are doing with your data and why we need to provide them with the information.

Personal data broadly means any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

If you have any questions regarding this Privacy Policy, you can contact Nicola Rayner [Nicola.Rayner@TheChildBehaviourNetwork.co.uk](mailto:Nicola.Rayner@TheChildBehaviourNetwork.co.uk)

## The Child Behaviour Network Privacy Policy

If you are not satisfied with the answers from Nicola Rayner, you can contact the Information Commissioner's Office (ICO) via <https://ico.org.uk>, Email: [casework@ico.org.uk](mailto:casework@ico.org.uk), Telephone: 0303 1231113.

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## 1. Confidentiality

All staff at The Child Behaviour Network ensure professionalism, integrity and confidentiality when working with families. Your consultant will not disclose information to anyone outside of The Child Behaviour Network unless they have the express permission of the child and parents.

The exceptions to the above rule would be:

- Risk of harm: If we perceived that the child, or someone else, was at risk of harm. If we needed to breach confidentiality for any reason (and this is very rare) we would always seek to discuss this with you first unless in an emergency situation e.g. we felt the child to be in immediate danger
- To comply with applicable laws; respond to governmental enquiries (or enquiries from a legal, governmental or quasi-governmental or local authority agency); comply with a valid legal process or procedure; or protect our rights or property.

## 2. Informed consent and sharing information from therapeutic sessions

All children and young people, whatever their age or status, have a right to express their views freely and be involved in any decision-making that affects their lives. Any direction or guidance provided by parents or other caregivers must be 'in accordance with the child's evolving capabilities' and support the 'exercise by the child of his or her rights'. The onus is then on the adults to provide appropriate support to enable the child or young person to express their views and contribute to decision-making.

When working directly with children and young people, we will obtain informal informed consent and reassure children and young people that they have the right to withdraw at any time should they wish to. The Child Behaviour Network respects children and young people's right to request that information is not shared with parents/carers.

The exceptions to the above rules would be:

- Risk of harm: If we perceived that the child, or someone else, was at risk of harm. If we needed to breach confidentiality for any reason (and this is very rare) we would always seek to discuss this with you first unless in an emergency situation e.g. we felt the child to be in immediate danger
- To comply with applicable laws; respond to governmental enquiries (or enquiries from a legal, governmental or quasi-governmental or local authority agency); comply with a valid legal process or procedure; or protect our rights or property.

### 3. Why do The Child Behaviour Network need to collect your personal data?

We need to collect information about you so that we can:

- Know who you are so that we can communicate with you in a personal way. The legal basis for this is a legitimate interest.
- Deliver goods and services to you. The legal basis for this is the contract with you.
- Process your payment for the goods and services. The legal basis for this is the contract with you.
- Verify your identity so that we can be sure we are dealing with the right person. The legal basis for this is a legitimate interest.
- Optimise your experience on our website. The legal basis for this is a legitimate interest.
- Provide you with useful and relevant Sites. The legal basis for this is a legitimate interest.
- Provide you with useful and relevant marketing material. The legal basis for this is consent (we will request specific consent).

### 4. What personal information do we collect and why do we collect it?

#### *4.1 When you access our websites*

On our website The Child Behaviour Network uses cookies to gather information about visitors in order to monitor the quantity of website traffic. The Child Behaviour Network does not identify you or any other individuals from this information.

#### *4.2 When you make an enquiry through The Child Behaviour Network*

If you contact The Child Behaviour Network through our website we will ask your permission to store the following information to ensure that the site works correctly:

- Your name
- Your email address
- Your telephone number

#### *4.3 When you purchase services from The Child Behaviour Network*

Should you choose to engage us to provide Services, we need to collect information through our pre-assessment forms so that we can provide the best possible service to you:

- You and your child's names, contact details and your child's date of birth
- Details of the issue that led you to contact us
- Information on your child's developmental history and relevant family history
- GP and school contact details. We will not contact your GP or child's school without explicit permission

*4.4 When you sign up for updates on The Child Behaviour Network, register interest in future services, or engage services*

We will ask you for:

- Your name
- Your email address

We will not send you any marketing communications without your express consent.

## 5. How does The Child Behaviour Network use the information that we collect?

The Child Behaviour Network uses the data we collect from you in the following ways:

- Operate and improve our sites, services and products;
- Send you advertising or promotional materials (if you have consented to this)
- Provide and deliver products or other services you request, process transactions, and send you related information;
- Respond to your comments, questions, and requests and provide you with requested customer support;
- To create your invoice.

## 6. Where do we keep the information?

The Child Behaviour Network keeps information in the stores described below.

*6.1 On The Child Behaviour Network devices:*

We store documents that contain personal data on a secure cloud based system.

*6.2 On a note keeping system:*

The Child Behaviour Network may take notes when we meet with you on paper. All our clinical notes and personal data are uploaded onto secure cloud storage system, Microsoft OneDrive. Any notes that have been made on paper are shredded following the end of your

engagement with The Child Behaviour Network services. While you are working with The Child Behaviour Network these are kept in a secure location.

## 7. How long do we keep the information?

If you decide that you do not wish to proceed with The Child Behaviour Network's services, your information will be kept for a maximum of one year before being safely destroyed. This is to ensure we provide the best possible service should things change, and you contact us again.

## 8. Who does The Child Behaviour Network send the information to?

We will only send information necessary to achieve business purposes. As previously stated, cloud storage providers will have information shared with them in compliance with UK GDPR and the Data Protection Act 2018. Information is shared to the degree necessary for accounting and tax purposes. The exceptions to the above rule would be:

- Risk of harm: If we perceived that the child, or someone else, was at risk of harm. If we needed to breach confidentiality for any reason (and this is very rare) we would always discuss this with you first unless in an emergency situation e.g. we felt the child to be in immediate danger.
- To comply with applicable laws; respond to governmental enquiries (or enquiries from a legal, governmental or quasi-governmental or local authority agency); comply with a valid legal process or procedure; or protect our rights or property.

## 9. How can I see all the information you have about me?

You can make a subject access request to us. This does not need to be in writing and may be made in person or by phone. We may require further additional verification that you are who you say you are to process this request. We may withhold personal information to the extent permitted by law. In practice, this means that we may not provide information if we consider that providing the information will violate your vital interests.

## 10. What if my information is incorrect or I wish to be removed from your system?

Please contact us. We may require additional verification that you are who you say you are to process this request. If you want to have your data removed, The Child Behaviour Network will have to determine whether we need to keep the data, for example to comply with professional bodies or HMRC. If we decide that we should delete the data, we will do so without undue delay.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

## 11. Will we send emails and text messages to you?

As part of providing a service to you we may communicate via email, keeping the information in the body of the text to a minimum. Any reports with personally identifying or sensitive information that we send to you will be password protected.

We will not send you any marketing communications without your express consent.

## 12. How do I opt out of receiving emails and/or text messages?

If you do not wish to receive information through these means, please let us know.

## 13. What happens in the event of a data breach?

We will notify the Information Commissioner's Office as necessary and also data subjects where the risk to them is high. Breaches which carry any risk to data subjects must be reported to the ICO within 72 hours, together with a summary of the nature of the breach, the steps taken to reduce the risk to data subjects, and measures to prevent the breach from happening again. All personal data breaches, however minor, and whether reportable or not are recorded.

## 14. Changes to this Privacy Policy

14.1 We may change this Privacy Policy from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.



14.2 Any changes will be immediately posted on our site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of either Site following the alterations, or if we have made you aware of the changes via email or text.

## 15. Summary of your rights

Under UK GDPR and the Data Protection Act 2018, you have the following rights, which we will always work to uphold:

- a. The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the contact details given at the start of this Privacy Policy.
- b. The right to access the personal data we hold about you. Clause 8 will tell you how to do this.
- c. The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Clause 9 will tell you how to do this
- d. The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Clause 9 will tell you how to do this.
- e. The right to restrict (i.e. prevent) the processing of your personal data.
- f. The right to object to us using your personal data for a particular purpose or purposes.
- g. The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h. The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent, it is in our legitimate interest or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business. You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. Please email us if you wish to make a request.
- i. Rights relating to automated decision-making and profiling – we do not use your personal data in this way.

## 16. How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at [Nicola.Rayner@tcbn.co.uk](mailto:Nicola.Rayner@tcbn.co.uk)

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office

## The Child Behaviour Network Privacy Policy

Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113  
ICO website: <https://www.ico.org.uk>

### 17. Policy review

This Privacy Policy was last updated in January 2025.

This policy will be reviewed on an annual basis and must be read alongside other The Child Behaviour Network policies.

Version: 2