

## **Privacy Notice for Privacy Notice for The Senior Mental Health Lead training**

### **1. Who we are**

The Anna Freud Centre (AFC) ('we', 'our', 'us'), also known as the Anna Freud National Centre for Children and Families, is a registered mental health charity. The Senior Mental Health Lead training team has been assured by the Department for Education (DfE) to deliver Senior Mental Health Lead training. The training is delivered via either online and face to face sessions. AFC is the data controller for this data processing.

This notice informs you how we may use the personal data we collect about participants that access the training ('you'). If you have any questions about the content of this notice you can contact us at:

- [smhl.training@annafreud.org](mailto:smhl.training@annafreud.org), Anna Freud National Centre for Children and Families, 4-8 Rodney Street, London N1 9JH.
- Contact phone number: 020 7794 2313

Our Data Protection Officer is Rachel Hart, [DPO@annafreud.org](mailto:DPO@annafreud.org) 020 7794 2313

We are collecting your personal data so that we know who will be attending the sessions for Senior Mental Health Lead training. The information you provide will be used to plan and prepare for your meetings and ensure you have the correct information to attend. We will also use it to monitor the number of people who have attended the meetings and their feedback on the course. Some of this information will be reported to the DfE.

Our lawful basis for processing this data is:

**Art 6 1 (b) Contract:** the processing is necessary for a contract we have with you, or to enable us to take specific steps before entering into a contract with you.

We also request special category data to monitor equality and diversity. Providing this data is optional, and we only process this data with your consent (**Article 9(2a) of the GDPR**).

### **2. How we get information and the lawful bases**

Contact details will be collected via a link on the Anna Freud Website. Delegates select the course they wish to attend and click the associated link. The link is connected to either a Zoho Form or a MS Form. Participants then complete the form with their contact details and information such as accessibility requirements. The information captured on Zoho or MS Forms is then stored in the Zoho database.

| <b>Training, conference and events registrants</b>  |  |   |  |   |
|---|--|---|--|---|
| <b>What information will we collect about you?</b>  | <b>How will we collect information about you?</b>                                | <b>Why are we processing information about you?</b>   | <b>How long will we keep this information for?</b>   | <b>What is our lawful basis for processing information about you?</b> |
| Name and attendance information (date and name of training)   | Provided by you on the online booking form and from attendance recorded at event | In order to confirm attendance at a training event for certification and we use the data (anonymised) to report on training activity and plan future event activity at the Centre.  | Indefinitely to keep a permanent record of training attendance   | Contract  |
| email address, job title, school/college/organisation, phone number, address, invoicing information, accessibility needs, | Provided by you on the online booking form                                       | <p>Providing information about your booked training</p> <p>Requesting payment for training</p> <p>Preparing for training sessions</p> <p>Keeping a record of who has attended</p> <p>Reporting attendance information and contact details to CPD to provide</p> | This information will be kept on our secure CRM until 12 months after the close of the DfE Senior Mental Health Lead programme or for six years. | Contract  |

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|---|---|---|--|----------|
|   |   | course certificates   |  |          |
|   |   | Reporting data the Department for Education on the training   |  |          |
| Your consent to receive marketing emails (optional) | Provided by you through the online booking form | To confirm you want to receive emails about trainings and events  | We will keep this information until you withdraw consent to be contacted Your consent to receive marketing communications                        | Consent  |
| Accessibility requirements (optional)               | Provided by you through the online booking form | In order to help us accommodate for any special requirements such as dietary or access related, you may have. | This information will be kept on our secure CRM until 12 months after the close of the DfE Senior Mental Health Lead programme or for six years. | Contract |
| Ethnicity   | This is collected via an anonymous MS form      | To understand our audience and inform our Equality, Diversity and Inclusion strategy.                         | We will keep this information separate to your personal record. It will be used in aggregate form and will be held indefinitely.                 | Consent  |
| Sexual Orientation                                  | This is collected via an anonymous MS form      | To understand our audience and inform our Equality, Diversity and Inclusion strategy.                         | We will keep this information separate to your personal record. It will be used in aggregate form and will be held indefinitely.                 | Consent  |

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|   |  |   |  |  |
| Disability                              | This is collected via an anonymous MS form       | To understand our audience and inform our Equality, Diversity and Inclusion strategy. | We will keep this information separate to your personal record. It will be used in aggregate form and will be held indefinitely. | Consent  |
| <b>Organisations we share data with</b> |  |   |  |  |
| <b>Organisation</b>                     | <b>What information about you will we share?</b> | <b>How will we collect information about you?</b>                                     | <b>Why are we sharing this information about you?</b>  | <b>What is our lawful basis for processing this information about you?</b> |
| CPD                                     | Attendance data, name and email                  | You will provide this when completing the booking form.                               | So CPD can provide you with an certificate for the course, as it is accredited by them.  | Contract   |
| Zoom                                    | Name, email and attendance data                  | You provide this when registering to attend the online sessions.                      | To report on attendance and sign off completion of the course.   | Contract   |

|                      |   |   |  |          |
|----------------------|---|---|--|----------|
| Zoho                 | Name, email address, job title, school/ college/ organisation, phone number, address, invoicing information, accessibility needs, attendance information                          | You will provide this when completing the booking form.   | Zoho is used to process the bookings and share the information about the courses, times, dates, trainers etc.  | Contract |
| Disciple             | Name and email  | You will provide this when completing the booking form. We will take it from attendance data and use it to invite you to the Disciple platform. | So that you can join the online platform and network with your course colleagues and previous attendees for support.   | Contract |
| Jamboard             | None  | N/A   | To make notes on the course activities   | Contract |
| Commissioning groups | Name, email address, job title, school/ college/ organisation, phone number, address, invoicing information, accessibility needs, dietary requirements and attendance information | You will provide this when completing the booking form.   | Where you are attending a training organised by a commissioning group, we will share the booking information with them to support running of the event e.g. to organise a venue and provide catering and to report on the attendance and | Contract |

|  |  |  |                       |  |
|--|--|--|-----------------------|--|
|  |  |  | success of the event. |  |
|--|--|--|-----------------------|--|

## Sharing your personal data with others

The application information is gathered directly by us and processed in-house. Where you successfully complete the training, we will share the information with CPD who accredit the training. Where we provide training on behalf of a commissioner, we will share your details with them, so we can plan effectively and they can retain a record of attendees. The data we process is not shared with other organisations.

The data we process is provided to us directly by you when you complete the registration form. We share information about who has registered for the programme with our internal trainers and admin team. If online sessions are used, we share your data (name and email address) with Zoom, the platform used to deliver the meetings and tailored support sessions. We have an agreement with Zoom covering their management of your data on our behalf. [Zoom privacy notice](#).

We also share your data (name, email address, organisation, school address, accessibility requirements and job title) with Zoho, our Customer Relationship Management (CRM) provider. We have an agreement with Zoho covering their management of your data on our behalf.

[Zoho privacy notice](#)

Online forms may be protected by Google reCAPTCHA v2. This ensures the form is completed by a real person and not automated software, to protect systems against abuse. Data captured by Google will include information such as IP address, length of page visit, mouse movements. Google reCAPTCHA is covered by Google's [privacy policy and terms](#).

We also share your data (name, email address) with Disciple, our online platform for SMHLs. You will be invited to join this network as part of the SMHL offer but it is not compulsory. You do not have to create an account.

[Disciple privacy notice](#)

During the course of the training, you will be invited to use Jamboard, to make notes on discussions. This does not require a log in and is not compulsory.

[Jamboard Privacy Policy](#).

You will also be asked to join our Schools in Mind network which will provide ongoing opportunities and support for Senior Mental Health Leads.

After the training, we will share your contact and attendance information with CPD, who will provide you with an accredited attendance certificate.

[CPD privacy policy](#).

We will ask your permission if we want to share your data for any other purposes than those set out above. In some circumstances, we are legally obliged to share information and where we do, we satisfy ourselves that we have a lawful basis on which to share the information and we document our decision making.

Generally, we will ask your permission before we share your data, but in some circumstances, we are legally obliged to share information, for example under a court order. Where we do share, we satisfy ourselves that we have a lawful basis on which to share the information and document our decision making.

### **3. How long we retain your data**

#### Training applicant:

If you have successfully, or unsuccessfully, attempted to register for one of our trainings or events, the information you have entered will be kept on file for 2 years in case any query should arise from your booking. After 2 years from the training/event date, all registration information will be deleted.

#### Training attendee:

If you have attended a training or event with us, your name will be held on record indefinitely so that we can confirm your accreditation and reissue your certificate(s) to you upon request. All other data submitted to us will be held on file until Dec 2026 when the SMHL grant funding from DfE is closed, unless you have opted into our training mailings. If you have opted into training mailings, your name, email address, town, country, sector and profession will be held on your record until you withdraw consent to be contacted by us. Financial information will be kept for six years.

#### Enquirer:

Your name, contact details, and the nature of your enquiry will be kept on file until the enquiry is closed.

#### Newsletter recipient:

Your personal data will be kept on file until you withdraw consent to be contacted with our newsletter. Should you withdraw consent to be contacted, only your name and training or events that you have attended will be kept on file for certification purposes; any other information we hold on you will be deleted. If you have never attended one of our trainings or events, all of your personal data will be deleted from our file.

### **4. Your data rights**

Under data protection law, you have rights we want to make you aware of. The rights available to you depend on our reason for processing your information and may only apply in certain circumstances. You can check the [Information Commissioners website](#) for more detail or contact the DPO.

- **Your right to be informed** – this notice informs you what data we collect and how we use it.
- **Your right of access** – You have the right to ask us for a copy of your personal information.
- **Your right to rectification** - You have the right to ask us to correct information which you think is inaccurate or incomplete.
- **Your right to erasure** - This is known as the 'right to be forgotten' and [yhttps://ico.org.uk/your-data-matters/your-right-to-get-your-data-deleted/](https://ico.org.uk/your-data-matters/your-right-to-get-your-data-deleted/)ou have the right to ask us to erase your personal information in certain circumstances, such as where it is no longer required. <https://ico.org.uk/your-data-matters/your-right-to-get-your-data-deleted/>
- **Your right to restriction of processing** - You have the right to ask us to limit the processing of your information in certain circumstances.
- **Your right to object to processing** - You have the right to request we stop processing some or all of your data.
- **Your right to data portability** - This only applies to information you have given us and where we rely upon your consent to process the data.
- **Rights around automated decision making and profiling**

You are not required to pay a charge for exercising your rights. We generally have one month within which to respond to your request.

Please contact us at [DPO@annafreud.org](mailto:DPO@annafreud.org) if you wish to make a request with regard to any of your rights.

## 5. Making a complaint

If you feel we may not be handling your data appropriately or if you have any queries or concerns about this you can contact us, [dpo@annafreud.org](mailto:dpo@annafreud.org)

You can also, at any time, make a complaint about our processing of your data to the Information Commissioner, <https://ico.org.uk/global/contact-us>