

All Families Mediation (AFM) Privacy Policy

1. Introduction

All Families Mediation (AFM) works within the requirements of the Data Protection Act 1998 and the General Data Protection Regulation 2018 (GDPR).

This privacy notice outlines the reasons we ask for your personal data, how we manage and look after the data you give to us and your rights under GDPR. AFM is committed to ensuring the lawful and careful collection of your personal information, the appropriate use and secure storage of your personal information and that we meet our other commitments under the regulations. Your information will not be used by us nor shared with anyone or any organisation for marketing purposes.

We are committed to keeping your data as safe and secure as possible and to protecting it against unauthorised access. However, as transmission of information electronically can never be completely secure, we cannot guarantee complete security and your information is provided to us electronically (via the internet/by online means) at your own risk. When requesting information from us by electronic means or sending information to us by electronic means, it is important that you ensure you do so via a channel which you trust to be safe.

2. Why we need certain personal data from you

AFM provides family mediation and related services. The reason we need to process some of your personal data is to enable us to provide those services

- as part of a contract with you
- to give you access to the mediation information and assessment (MIAM) process introduced under the Children and Families Act 2014, s10.

3. Information we collect

We may collect the following information in order to provide a service to you/make a contract with you/provide access to MIAM:

- Personal information including your name, email address, mailing address, phone numbers, date of birth, national insurance number.
- Details of your children and/or details of your finances* dependent on the type of services we are being asked to provide to you.
- From time to time and as permitted by applicable law(s), we may collect other Personal Data about you and update any existing Personal Data that we currently hold from other third-party sources.

4. We collect your information from

- Referral Forms on our website (these may be completed and sent to us by you or your representative at your request with a view to AFM providing you with a service)
- Electronic and paper-based communications from other referring agencies including but not limited to Cafcass, Family Law Solicitors, HM Courts Services
- Telephone conversations, emails, face to face written or verbal communications with you, your representative or a third party
- Our appointment/session records

5. How we Use Your Information

- To provide our services under our contract with you
- To respond to your requests and enquiries
- To give you access to a MIAM
- To improve our services, for example, by requesting feedback, your participation in surveys or other initiatives which will help us to gather information to develop and enhance our services

- To comply with applicable law(s), for example, to comply with a court order or to carry out professional ethics/conduct investigations

6. Lawful Processing of data

We collect and process data in line with our legitimate interests, which include processing such Personal Data for the purposes of:

- Providing a service to you at your request under contract, and enhancing the provision of our services
- Providing access to a MIAM
- Administration and service delivery

7. How long will we keep your information?

Files are stored for a maximum of 6 years

8. Sharing and Disclosure to Third Parties

We do not share your personal data with any third parties except in the following circumstances

- Where there is a risk to children, when we have a duty to alert the relevant authorities (usually local authority social workers) as part of our overall responsibility to safeguard children
- Where you are provided with publicly funded (legally aided) family mediation and the Legal Aid Agency seeks to audit your files
- Where you request or authorise the disclosure of your personal details to a third party.
- Where we are requested to do so by any law enforcement agency, regulator, government authority where we believe this is necessary to comply with a legal or regulatory obligation

9. Where the information is provided to service providers who perform functions on our behalf.

- Hosting providers for the secure storage and transmission of your data
- Legal and compliance consultants, such as external auditors
- Technology providers who assist in the development and management of our website

10. Parents and Children

If the person about whom we are holding information is below the age of 16 then we will need to seek consent from the parent or legal guardian to provide a direct service (where consent is required). Once a person reaches age 16, we will seek consent direct from them to provide services.

11. Subject Access/User Rights

Your rights with regard to the data we hold on you are as follows. You have the right to:

- Be informed of our use of your Personal Data
- Access and/or to require the correction or erasure of your Personal Data
- Block and/or object to the processing of your Personal Data
- Not be subject to any decision based solely on automated processing of your Personal Data
- In limited circumstances, to receive Personal Data in a format which may be transmitted to another entity.

If you have a complaint in relation to the processing of your data carried out under this Privacy Policy, you have the right to lodge a complaint with the Information Commissioner's Office.

You may seek to exercise any of these rights by emailing: info@allfamiliesmediation.com

12. Information security

We work to protect your personal information that we hold, its confidentiality, integrity and availability by:

- regularly reviewing our information collection, storage and processing practices, including physical security measures, to guard against unauthorised access to systems
- restricting access to personal information to Staff and Volunteers subject to strict contractual confidentiality obligations including disciplinary action if they fail to meet these obligations

- ensuring we have a Security Information Policy in place which defines the measures we take to protect your personal information. We use a combination of technology and procedures to ensure that our paper and computer systems are protected, monitored and recoverable.
- We only use third party service providers where we are satisfied that they provide adequate security for your personal data.

13. Compliance and cooperation with regulatory authorities

We regularly review our compliance with our Privacy Policy. If we receive formal written complaints, we will contact the person who made the complaint to follow up. We will work with the ICO to resolve any complaints regarding the transfer of personal data that we cannot resolve with our users directly.

14. Changes

Our Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent.