
Data Privacy Policy for Therapy Clients (October 2019)

Summary

In order to provide you with a service I will need to keep information about you. This document explains why I keep this information, how it is stored, how I keep it safe and what your rights are.

I adhere to the latest General Data Protection Regulation (GDPR) laws and the codes of practice set down by the Health and Care Professions Council (HCPC) and the British Psychological Society (BPS).

I am registered with the Information Commissioners Office (ICO) as a data controller.

What Information I process

I collect and keep personal data (basic contact information, such as name, address, email, contact number and GP contact details). I also keep sensitive data (e.g. notes from our therapy meetings, outcome measures and any letters or reports). If you complete a web-based enquiry form, we will also collect any information you provide to us this way.

If you are referred by your health insurance provider then I will also keep personal data provided by that organisation. This may include (but not limited to) referral information, health insurance policy number and authorisation for psychological treatment.

Why I keep this information

I am required by my professional bodies (BPS, HCPC) to keep information about my clients and our work together. I am not able to work with you unless you allow me to do so.

The lawful basis for processing information

I have a legitimate interest for processing this information in order to provide you with health treatment. Please see the Information Commissioners Office (ICO) if you would like more information about this www.ico.org.uk

What I do with the information I have

I use the information that you have given me in order to provide you with a therapy service, as well as for processing payments and in some cases to help prevent serious harm.

Who I might share personal information with

I keep the information you give me confidential. This means I do not normally share this information with anyone else. There are exceptional circumstances which mean I may need to share personal information with relevant authorities;

When the need for disclosure is in the public interest, to prevent a miscarriage of justice or where there is a legal duty such as a Court Order

Where there is risk of harm to yourself, or to another adult or child. If this need arises, I will try to discuss this with you first, unless doing so leads to an increased risk of harm.

If you are referred by a health insurance provider / using health insurance policy, that provider may wish to be provided with treatment updates. As a Clinical Psychologist I am required to have clinical supervision. Any content from therapy sessions which is discussed with my supervisor is kept anonymous.

How Long I keep Data

I will keep client data throughout the time I work with my clients. Personal information such as phone number will be deleted within six months of therapy. Sensitive personal data will be stored for a period of seven years after the end of therapy in accordance with professional guidelines, after which it will be deleted. For children (under 18) sensitive personal data will be until the child is 25 (seven years after the child reaches the age of 18).

How I store data

Data may be stored in a variety of ways; online cloud, laptop, paperfile, mobile phone, email system.

I use a cloud service that is GDPR compliant and an end to end encryption technology provider which copies any paper notes and stores them in the cloud. My mobile device is encrypted and can only be opened by a password or fingerprint each time it is used. Any paper notes are stored in a locked cabinet and I may bring them to the clinic specifically for our meetings, and then return them afterwards. My email system is GDPR compliant and secured with a password. Any personal information sent via email will be password protected. My laptop is password protected and malware and antivirus protection is installed on this as well as on my mobile device.

Your data protection rights

You have the right to request a copy of the information that I keep about you and to receive this within a month of request

There will be no fee payable for this information.

You have the right to have your personal information corrected if you believe it to be inaccurate.

You can complain to a regulator if you think I have not complied with data protection laws, you can make this to ICO, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.