

Updated Privacy Notice for Therapy Clients

You may be aware of new laws relating to General Data Protection Regulation (GDPR) that are in effect from 25 May 2018. The purpose of GDPR is to provide a set of standardised data protection laws across all EU member countries. This document sets out how Well-Ahead and its associated service, A Pain in the Mind, comply with these laws.

Data Control:

Dr Sue Peacock is the data controller for Well-Ahead and its associated service, A Pain in the Mind.

What personal data we process:

Well-Ahead and A Pain in the Mind collects and processes the following personal data from therapy clients:

- Personal data: basic contact information: name, address, email, contact number, video conference ID (if online therapy), and GP contact details.
- Sensitive personal data: Signed Client-Psychologist Agreement, therapy records (therapist notes, letters, reports and/or outcome measures).
- If you complete a web-based enquiry form, we will also collect any information you provide to us as well as your internet protocol (IP) address. This is automatically supplied by the website software used to offer the form. All web services used by Well-Ahead and A Pain in the Mind are verified by themselves as GDPR compliant.

If you are referred by your health insurance provider, then we will also collect and process personal data provided by that organisation. This includes basic contact information, referral information, and health insurance policy number and authorisation for psychological treatment.

The lawful basis for processing personal data:

Well-Ahead & A Pain in the Mind has a legitimate interest in using the personal data and sensitive personal data we collect to provide health treatment. It is necessary for us to provide psychological therapy to clients.

We may also ask for information on how you found our service for the purpose of our own marketing research. No information you provide is passed on without your consent. We will never sell your information to others.

What we do with your personal information:

At Well-Ahead & A Pain in the Mind we take your privacy seriously. We will only use your personal information to provide the services you have requested from us.

If you do not provide the personal information requested, then we may be unable to provide a therapy service to you.

How long we store personal information:

We will only store your personal information for as long as it is required. Basic contact information held on a therapist's mobile phone is deleted within 6 months of the end of therapy.

The sensitive personal data defined above is stored for a period of 7 years after the end of therapy. After this time, this data is deleted at the end of each calendar year.

How your personal information is used:

We use the information we collect to:

- Provide our services to you.
- Process payment for such services.
- Send you information and information about our services that might be of interest to you. You have the right to opt-out at any time, and request that your personal contact information is deleted to prevent future proactive contact from ourselves.

Who we might share personal information with:

We hold information about each of our clients and the therapy they receive in confidence. This means that we will not normally share your personal information with anyone else. However, there are exceptions to this when there may be need for liaison with other parties:

- If you are referred by your health insurance provider, or otherwise claiming through a health insurance policy to fund therapy, then we will share appointment schedules with that organisation for the purposes of billing. We may also share information with that organisation to provide treatment updates.
- In cases where treatment has been instructed by a solicitor, relevant clinical information from therapy records will be shared with legal services as required and with your written consent.

In exceptional circumstances, we might need to share personal information with relevant authorities:

- When there is need-to-know information for another health provider, such as your GP.
- When disclosure is in the public interest, to prevent a miscarriage of justice or where there is a legal duty, for example a Court Order.
- When the information concerns risk of harm to the client, or risk of harm to another adult or a child. We will discuss such a proposed disclosure with you unless we believe that to do so could increase the level of risk to you or to someone else.

In the event of my incapacity to continue practising as a Health Psychologist or my death, your psychological records will be incinerated by my nominated clinical executor.

What we will NOT do with your personal information:

We will not share your personal information with third-parties for marketing purposes.

How we ensure the security of personal information:

- Paper records containing your personal information will be stored in a locked filing cabinet within a locked office.
- Electronic records are held on a password protected computer. Malware and antivirus protection is installed on all computing devices.
- Email correspondence will be from a secure account and encrypted ensuring compliance with the general data protection regulations.
- We will never use open or unsecure Wi-Fi networks to send any personal data.
- Letters sent to professionals such as GP's, by surface mail, will be clearly marked Confidential

Your right to access the personal information we hold about you:

- You have a right to access the information we hold about you.
- We will usually share this with you within 30 days of receiving a request.
- There may be an admin fee for supplying the information to you.
- We may request further evidence from you to check your identity.
- A copy of your personal information will usually be sent to you in a permanent form (that is, a printed copy).
- You have a right to get your personal information corrected if it is inaccurate.
- You can complain to a regulator. If you think that we haven't complied with data protection laws, you have a right to lodge a complaint with the Information Commissioner's Office.

Well-Ahead & A Pain in the Mind reserves the right to refuse a request to delete a client's personal information where this is therapy records. Therapy records are retained for a period of 7 years in accordance with the guidelines and requirements for record keeping by The British Psychological Society (BPS; 2000) [1]and The Health and Care Professions Council (HCPC; 2017) [2].

Dr Sue Peacock

Consultant Health Psychologist

Chartered with The British Psychological Society

Registered Practitioner Psychologist with HCPC

Revised May 2018

[1] The British Psychological Society (2000). Clinical Psychology and Case Notes: Guidance on Good Practice. Leicester: Division of Clinical Psychology, BPS.

[2] Health and Care Professions Council (2017). Confidentiality – guidance for registrants. London: HCPC.