

Privacy Policy

What information I hold & why

Contact details: Client's name, phone number and email address are necessary to arrange appointments.

Emergency details: GP practice, date of birth and postal address are required to refer clients to the relevant services, if I believe a client is a serious risk to themselves or others.

Sensitive notes: completed questionnaires, formulations and my clinical notes include client's medical history and mental health issues. Notes may include client's gender identity, sexuality, ethnicity or beliefs, if these issues are raised during therapy. Sensitive notes are necessary to keep track of progress and for clinical supervision.

When I need to share information

I do not share information with anyone, with the following exceptions:

Clinical supervision: As part of my professional responsibilities, I have regular clinical supervision to review my work. Any information shared during these sessions remains confidential.

GP: I ask client's consent to write to their GP at the beginning and end of therapy. If a client does not consent, no information is disclosed.

Managing risk: If I am seriously concerned that a client is a risk to themselves or others, I will disclose this information to the appropriate professionals. The legal basis for this is to "protect the vital interests" of my clients. When possible, I discuss this with the client first and encourage them to inform others directly.

Health insurance providers: For clients whose appointments are paid for by a private health insurance provider, I need to disclose contact information and the date of appointments for invoicing. If a client would like to extend the number of sessions, I will request client's consent to disclose limited sensitive information, to support this request. Health insurance providers may also request information to notify them of any serious incidents or to assist them in investigating client's complaints.

Therapeutic will: In the event of my death or incapacity, a GP is my Therapeutic Executor. She will use encrypted email to send my current clients contact details to my clinical supervisor. My supervisor will contact my current clients to inform them and offer support or signposting, as appropriate. The GP will delete all confidential information on my laptop and shred all paper notes, without reading them.

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How I keep information secure

- All paperwork remains locked in a filing cabinet.
- Sensitive notes, which I bring to each appointment, do not include any names or contact details.
- Current client contact details are stored in my Outlook contacts and are indistinguishable from any other contact.
- All electronic documents are encrypted or password protected.
- My smartphone, email account and laptop are password protected.

How long I keep information for

- Within a month of finishing therapy, I delete all clients' details from my smartphone. Paper notes are scanned & all paper is shredded.
- If a client may return for follow up sessions, I will keep the paper notes until January of the following year.
- Electronic documents are saved securely for 6 years after therapy, for "defence of legal claims" in accordance with the statute of limitations.

Legal basis for processing data

I have a "legitimate interest" for keeping data, as it is necessary to provide psychological therapy and protect the safety of my clients.

EU Regulation 2016/679 Article 9(2h) states it is legal to process sensitive data if is necessary for the provision of healthcare and processed by a professional, obliged to secrecy under a national professional body.

I follow the regulations of the Health and Care Professions Council (HPCP), British Psychological Society (BPS) and British Association of Behavioural and Cognitive Psychotherapists (BABCP). I am registered with the Information Commissioners Office (ICO).

Clients have the right to:

- Read all information I hold about them, within 1 month of request
- Correct any information they think is inaccurate or incomplete
- Complain to the Information Commissioners Office (ICO) if they believe I am acting unlawfully: by visiting ico.org.uk/concerns or call 0303 123 1113.