



Ruth Goodman – Art Therapist

Data Protection and Privacy Policy

Updated September 2026

Data protection law gives individuals the right to be informed about how their personal data is collected, used, stored and shared. This privacy notice explains how I handle personal data in my art therapy practice. For work that I organise and deliver independently, I am the data controller and decide why and how personal data is processed. When another organisation commissions my services, my role and that organisation's role will depend on the arrangements for the work; the relevant contract and privacy information will explain those responsibilities.

This policy explains how I comply with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other applicable data protection requirements. I process personal data lawfully, fairly and transparently; collect it for specified purposes; limit it to what is adequate, relevant and necessary; keep it accurate and up to date; retain it for no longer than necessary; protect it with appropriate security; and maintain evidence of compliance with these principles. Any transfer of personal data outside the UK will take place only where permitted by UK data protection law. Where a restricted transfer is made, I will ensure that it is covered by UK adequacy regulations, appropriate safeguards or another applicable legal exception.

Therapy assessments, interventions and professional consultations depend on clear, open communication and trusting professional relationships. In our early discussions, I explain who I am, what art therapy involves, how sessions are structured and what information I need. This supports informed choices about working with me and enables me to provide a professional, safe and ethical service. I am responsible for data protection compliance, responding to information requests and explaining how personal information is collected and used. When another organisation commissions an intervention, I follow the applicable contractual and data protection arrangements as well as my own professional obligations. I do not sell personal data. I share information only where there is an appropriate lawful basis, including where you have consented,

where sharing is necessary to provide the service, or where disclosure is required or permitted by law, safeguarding duties or professional obligations.

Why do I need the information I hold?

Lawful basis and sensitive information: I identify and document a lawful basis under Article 6 of the UK GDPR for each purpose for which I use personal data. Therapy records are likely to include health information and may include other special category data. Where I process this information, I also identify and document an appropriate condition under Article 9 of the UK GDPR and any relevant condition under the Data Protection Act 2018. I only collect and use information that is necessary for the stated purpose.

I need to request and store your details in order to administer and deliver the service you have requested, and to comply with any legal or professional body responsibilities related to delivering that service.

Personal details:

- For art therapy assessments and interventions for a child or young person, you (or the professional referring) will be asked to complete a client referral form, which will include the child's full name, date of birth, address, name(s), phone number(s) and email address(es) of parent(s)/carer(s), names/ages of significant family members (e.g. siblings), emergency contact details for online work and invites you/referrer to describe the reason for seeking support. It is good practice for me to inform the child's GP about our work. As such you will be given a consent form, which asks for the name and address of the child's GP and the child's NHS number. You will be provided with copies of an introductory and any further letters sent. It can sometimes be helpful to copy letters to other professionals involved with your child, and therefore the consent form also provides space for you to document the name of your child's school and link-person, and details of any other professionals. We will discuss whether you and your child want me to share letters or information with these professionals and I will only do so if you give your consent. You/the referrer (if they are organising and funding the work) will also be given a contract which outlines the terms and conditions of the work. There is space for you/the referrer to initial/sign agreement to the various aspects of the work, and doing so will enable the work to begin. You/the referrer will be given a copy of the signed contract for your/their records, and I will also hold one on file.

Phone number and texts:

The contact phone number(s) you/referrer provide me with will be stored on my work mobile phone, using initials or a single name only. The phone is password protected.

Emails:

I keep and use your email address only in connection with art therapy and related professional work. You are responsible for deciding what detailed or private information to send by email. When corresponding by email, I do not use the client's full name. If I need to send lengthy or sensitive information, I endeavour to use a

password-protected document and provide the password separately by email or text; I encourage you to do likewise. Invoices sent by email are usually password protected. Relevant emails are retained in accordance with the retention schedule set out in the Summary section, and my email account is password protected.

Written letters, invoices and forms:

To undertake the work fully, safely and professionally, as well as to receive payment, I need to send you and relevant others (such as GPs, paying organisations) letters, invoices and/or other relevant documents. I may also need to receive these from others. I will use the minimal information needed for these to be functional and meaningful. I will store these for my records. I will write and send detailed reports or letters to you and/or outside agencies/persons if you have requested and given your express consent for this, via the encrypted email system described above, or Royal Mail post.

Bank details:

If you or the referrer pays by BACS, the chosen reference name or number will appear on my bank records, which I must retain for seven years for HMRC purposes. If I need to print paper statements containing identifying information, I will endeavour to obscure that information where possible.

Clinical notes:

As a professional, I must comply with data protection law and the requirements of my insurer (www.howdengroup.co.uk), my professional body (www.baat.org.uk), my registration body (www.HCPC.org.uk) and, where relevant, organisations connected with you, such as education, social care or health services. These organisations may have different requirements or recommendations for retaining and storing therapy records and related information. I write clinical notes to support my work and identify them using initials only.

Artwork:

All artwork made during an intervention remains the property of the client. My preferred therapeutic approach is that it remains in the therapy space, until the end of therapy/supervision. I endeavour to store it securely in boxes and folders, and out of view of other clients. When therapy/supervision ends it can be taken away or left behind to be disposed of securely.

Case studies:

From time to time I may prepare reports, case studies or presentations that could include photographs of artwork. I will discuss any proposed use with you and obtain specific consent before taking or using photographs for purposes beyond the delivery of therapy. Wherever possible, material will be anonymised. Consent for research, publication, teaching or presentation will be sought separately and can be refused without affecting or prejudicing therapy in any way.

Summary:

I keep only the information that is necessary before, during and after therapy, taking account of legal, tax, insurance, safeguarding and professional requirements. Paper records are stored in a locked cabinet and disposed of using a cross-cut shredder. Electronic records are protected by passwords and, where possible, encryption. I review retention periods and securely delete or destroy records when they are no longer required. My current retention schedule for clinical records is three years after the end of therapy for adults and three years after a child or young person reaches the age of 18, unless a longer period is required for a specific legal, safeguarding, insurance or professional reason. Financial records are retained separately for the period required by HMRC.

Personal data breaches: I keep a record of personal data breaches and assess the possible risk to the people affected. Where a breach is likely to result in a risk to individuals' rights and freedoms, I will notify the Information Commissioner's Office without undue delay and, where feasible, within 72 hours of becoming aware of it. Where a breach is likely to result in a high risk, I will also inform affected individuals without undue delay.

As a professional and ethical practitioner, I work with you in a way that protects your personal data and confidentiality. I share information only where there is an appropriate lawful basis, including in the circumstances listed below.

- 1) Where you give consent for information to be shared
- 2) Where I am compelled by a court of law
- 3) Where the information you give me indicates a safeguarding concern, serious crime, or a serious risk of harm to you or another person.

If I need to share information in these circumstances, I will aim to discuss this with you first whenever it is appropriate and safe to do so.

Your data protection rights: Depending on the circumstances, you may have the right to ask for access to your personal data, correction of inaccurate or incomplete data, erasure of data, restriction of processing, objection to processing, or transfer of data in a portable format. Where processing relies on consent, you may withdraw that consent at any time without affecting processing that was lawful before withdrawal. Some rights are subject to legal and professional exemptions. To exercise a right, please contact me using the details below. You also have the right to complain to the Information Commissioner's Office if you are concerned about how your personal data has been handled.

Contact

If you would like to discuss anything in this privacy notice, please contact Ruth Goodman at rgtherapy6@gmail.com



