

# Data Protection Policy

## Scope of the Policy

This policy applies to the work of **the Practitioner** (hereafter referred to as “*the Practitioner*”). It outlines the requirements for collecting, storing, and managing personal information for professional purposes in accordance with data protection principles.

The policy is reviewed regularly to ensure compliance and should be read in conjunction with the Practitioner’s **Privacy Policy**.

## Purpose of This Policy

This Data Protection Policy ensures that the Practitioner:

- Complies with data protection law and follows good practice
- Protects the rights and privacy of clients
- Is transparent about how client data is collected, stored, and processed
- Protects both clients and the Practitioner from the risks of a data breach

## Data Protection Principles

The Practitioner adheres to the eight data protection principles under the General Data Protection Regulation:

1. **Lawfulness, fairness and transparency** — Personal data must be processed lawfully, fairly, and in a transparent manner.
2. **Purpose limitation** — Data may only be collected for specified, explicit, and legitimate purposes and not processed further in incompatible ways.
3. **Data minimization** — Data collected must be adequate, relevant, and limited to what is necessary.
4. **Accuracy** — Personal data must be accurate and kept up to date.
5. **Storage limitation** — Personal data shall not be kept longer than necessary.
6. **Integrity and confidentiality** — Data must be processed securely, protecting against unauthorized or unlawful processing, accidental loss, or damage.
7. **Accountability** — The Practitioner must be able to demonstrate compliance with data protection obligations.
8. **International transfers** — Personal data cannot be transferred outside the country without adequate protection measures.

## **Lawful, Fair, and Transparent Data Processing**

The Practitioner collects personal information from clients and potential clients for the purpose of providing consultations, assessments, and related professional services.

Clients are informed why their data is being collected, how it will be used, and how long it will be retained.

Consent will be obtained where required, and clients will be informed that they can withdraw their consent at any time.

**Please note:**

Calls or online sessions **may be recorded** for training, quality assurance, or service improvement purposes. Where recordings occur, clients will be informed in advance, and recordings will be stored securely in accordance with this policy.

## **Specified, Explicit, and Legitimate Purposes**

Personal information is used solely for professional purposes, including:

- Communicating with clients to arrange, confirm, or reschedule appointments
- Conducting consultations, assessments, or treatment sessions
- Maintaining client records for ongoing professional support
- Improving the quality of services through reflective practice and training

Client information will not be shared or used in ways that are incompatible with these purposes.

Clients retain the following rights under data protection law:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure (“right to be forgotten”)
- The right to restrict processing
- The right to data portability
- The right to object

## **Adequate, Relevant, and Limited Data Collection**

The Practitioner will only collect information necessary for professional purposes, which may include:

- Full name
- Date of birth

- Contact details (address, phone, email)
- Medical history or relevant background information
- Session notes or assessments

Additional information will only be collected with explicit consent and for clearly defined purposes.

In exceptional circumstances—such as concerns for safety or legal requirements—data may be shared with relevant authorities without prior consent, in accordance with statutory obligations.

## **Accuracy and Data Maintenance**

The Practitioner is responsible for ensuring that personal data remains accurate and up to date.

Clients are encouraged to inform the Practitioner of any changes to their personal details.

## **Accountability and Governance**

The Practitioner is responsible for ensuring compliance with data protection requirements and maintaining appropriate documentation as evidence.

When sharing data with third parties (such as other healthcare providers or administrative services), explicit consent will be sought unless a legal or safety exception applies.

## **Secure Processing**

The Practitioner ensures that all data is securely held and processed by:

- Using strong passwords and secure cloud-based storage
- Restricting access to data to authorized persons only
- Protecting devices with encryption, passwords, and up-to-date security software
- Regularly reviewing data security measures

## **Subject Access Requests**

Clients have the right to access the information held about them.

Requests must be made in writing to the Practitioner.

Upon receipt, the Practitioner will acknowledge the request and provide a full response within **14 days**, unless exceptional circumstances prevent this.

## **Data Breach Notification**

In the event of a data breach, the Practitioner will act promptly to minimize harm and notify affected clients as appropriate.

Serious breaches will be reported to the relevant authorities in accordance with legal requirements.

All breaches will be investigated, recorded, and reviewed to prevent recurrence.

## **Review**

This policy is reviewed regularly to ensure ongoing compliance with current legislation and best practice.