

HART PSYCHOLOGY Privacy Notice

This is the privacy notice of HART PSYCHOLOGY, which is under the direction of Dr Helen Childs, Chartered Psychologist. In this document, "we", "our", or "us" refer to Hart Psychology.

Data control: Dr Helen Childs is the data controller for Hart Psychology.

Hart psychology practices at Odiham Health Centre, Deer Park View, Odiham, RG29 1JY. The company is separate to the health practice and is independent from the NHS services provided there.

Introduction

1. This is a notice to inform you of our policy about all information that we record about you. It sets out the conditions under which we may process any information that we collect from you, or that you provide to us. It covers information that could identify you ("personal information") and information that could not. In the context of the law and this notice, "process" means collect, store, transfer, use or otherwise act on information.

2. We regret that if there are one or more points below with which you are not happy, your only recourse is to leave the website immediately.

3. We take seriously the protection of your privacy and confidentiality. We understand that all our clients and visitors to our website are entitled to know that their personal data will not be used for any purpose unintended by them, and will not accidentally fall into the hands of a third party.

4. We undertake to preserve the confidentiality of all information you provide to us, and hope that you reciprocate.

5. Our policy complies with UK law accordingly implemented, including that required by the EU General Data Protection Regulation (GDPR).

6. The law requires us to tell you about your rights and our obligations to you in regards to the processing and control of your personal data. We do this now, by requesting that you read the information provided at www.knowyourprivacyrights.org

7. Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website.

What personal data Hart Psychology processes:

We collect and process the following personal data from therapy clients:

- Personal data: basic contact information, name, address, email, contact number, and GP contact details.

- Sensitive personal data: Signed Therapy Client 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 required in order to respond to your enquiry. All web services used by Hart Psychology are verified by themselves as GDPR compliant.
- If you are referred by a health insurance provider, then Hart Psychology will also collect and process personal data provided by that organisation.

The lawful basis for processing data:

Hart Psychology has a legitimate interest in using personal and sensitive data we collect in order to provide psychological treatment to you. 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 Hart Psychology 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 information requested then we may be unable to provide a therapy service to you.

How long we store personal data:

We will only store your personal information for as long as it is required. Basic contact information held on the psychologist's phone will be deleted within 6 months from the end of therapy. The sensitive data outlined 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 services to you.
- Process payment for such services.
- Send you information about our services which might be of interest to you. You have the right to opt out at any time, and request that your personal data is deleted to prevent future proactive contact from us.

Who might we share personal information with:

Hart Psychology holds information about each client 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 a need for liaison with other parties:

- If you are referred by your health insurance provider, or claiming through a health insurance policy, we need to share appointment schedules with that organisation for the purpose of billing. We may also share information with that organisation to provide treatment updates.
- Should treatment have been instructed by a solicitor, relevant clinical information from therapy records will be shared with legal services as required and with your written consent.
- If you are a patient at Odiham Health Centre, your information held by Hart Psychology will not be shared with your NHS record. The exceptions to this are 1) where you have explicitly given consent for your GP to be provided with updates regarding therapy (in which case details are kept to a minimum requirement and you will be provided with a copy of any details shared) or 2) if Dr Helen Childs believes you present a significant/immediate risk of harm to yourself or others which necessitates breach of confidence under her duty of care to you (see below)

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

- When there is need-to-know information for another health provider, such as your GP – this will normally be discussed with you first unless there is a pressing risk concern.
- 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 child. We will discuss the need to disclose this with you first unless we believe that to do so could increase the level of risk to you/others, or if the risk is imminent.

What we will NOT do with your personal information:

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

How we ensure the security of your personal information:

Personal information is minimised in phone and email communication. Sensitive personal data will be sent to clients in an email attachment that is password protected. Email applications use private (SSL) settings, which encrypts email computing devices and our mail server.

Personal information is also stored on a computer and on a secure server. These are password protected. Malware and antivirus protection is installed on all computing and mobile devices.

Information relating to your method of payment

Payment for services is accepted via bank transfer and payment details for psychology services will be provided prior to the first appointment. Other payment information is never taken by us or transferred to us either through our website or otherwise.

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 request your personal information is corrected if it is inaccurate.

If you believe that Hart Psychology is not compliant with data protection laws, you have a right to lodge a complaint with the Information Commissioner's Office (ICO).

Hart Psychology reserves the right to refuse a request to delete a client's personal information if this pertains to their therapy records. Such 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) and the Health and Care Professions Council (HCPC, 2017).

Dr Helen Childs

Chartered and Clinical Psychologist and Director of Hart Psychology

October 2019

References:

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

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