



## Privacy Notice

### Clinical Health Psychology Associates

#### 1. Introduction

Clinical Health Psychology Associates is a group of psychology professionals offering psychological services (including Psychological Assessment and Psychological Therapy). This privacy policy explains how we use any personal information we collect about you, as a past, present, future associate, a service user (client or patient) or when you use our website.

This privacy notice provides information about the personal information we process about you as a data controller, in compliance with the General Data Protection Regulation (GDPR).

Each associate is individually registered with the ICO.

Please contact us with any questions or requests about the personal information we process.

#### 2. What are your rights

We are committed to protecting your rights to privacy. They include:

- Right to be informed about what we do with your personal data
- Right to have a copy of all the personal information we process about you
- Right to rectification of any inaccurate data we process, and to add to the information we hold about you if it is incomplete
- Right to be forgotten and your personal data destroyed
- Right to restrict the processing of your personal data
- Right to object to the processing we carry out based on our legitimate interest

#### 3. Why do we collect information about you?

We may collect information about you because you are a patient or client of ours. You may be an associate.

We process the data because it is in our legitimate interests as a psychologist/ psychological therapist to do so.

Another lawful reason for us processing your data may be Legal Obligation. If we are processing “special category data” about you, this is our second lawful reason to do so.

As a client or patient under our care, our lawful reason for processing “special category data” is that it is



necessary for the purposes of the provision of health or social care or treatment.

#### **4. What information do we collect about you?**

We collect information about you that may include personal or sensitive information, such as:

- First name or given name
- Family name or surname
- Address
- Telephone numbers
- Date of birth
- Gender (or preferred identity).
- Age.
- Date of Birth.
- Relationships & children
- Occupation.
- Address.
- Telephone/SMS number
- Email address

To make sure that you are assessed and/or treated safely and appropriately, we record your personal information, such as your name, address, as well as all contacts you have with us, such as appointments and the results of assessments and letters relating to your care/report. Your data is kept confidential within our practice at all times and is only shared with colleagues/staff when they need it to carry out their job.

We also process personal data pursuant to our legitimate interests in running our practices, such as:

- Invoices and receipts
- Accounts and tax returns

#### **Patients/Clients (Therapy or private assessment)**

When you are a patient or client of our's we record all your treatment and details of your appointment so that your clinician can plan your treatment correctly. In addition to the personal information above, we may also collect additional information, including:

- Medical conditions (if relevant)
- Prescribed medication.
- Psychological history and current difficulties.
- Significant life events



- Relationships/ sexuality
- Offences (including alleged offences)
- Financial information, including bank account details (if you are a private patient/client)

We may collect some of this information from your insurance company or other referrer if you have one.

#### **Web access collection of information**

We collect information about you when you register with us or place any order for services. We also collect information when you voluntarily complete contact forms. We always try to minimise the amount of personal information that we require to provide a specific service or feature.

#### **5. How do we store information about you?**

We take your privacy very seriously.

Where possible we process all data electronically. If we are given hard copy material such as letters of referral or clinical information, hard copies are kept in a locked filing cabinet. Shredding, when necessary, takes place on site or with a third-party shredding company.

We are committed to taking reasonable steps to protect any individual identifying information that you provide to us. Once we receive your data, we make best efforts to ensure its security on our systems.

All who attend for therapy will be informed of the way in which information is recorded and stored at the beginning of the work and will have the chance to ask questions. Storage may vary depending on location (for example if you attend appointments at a hospital, records may be paper records held securely in the medical records department at the hospital).

All personal information provided is stored in compliance with EU General Data Protection Regulations (GDPR) rules.

#### **6. How long do we hold information about you?**

We do not keep your data for longer than is necessary.

Administrative data is retained for up to eight years as necessary, in the unlikely event there are queries from HMRC and the VAT commissioner. Where it is not necessary to retain the data for eight years, it is destroyed as soon as possible.

#### **Patients/Clients (Therapy or private assessment)**

Personal data in psychological therapy cases is retained, where necessary, for eight years in compliance with our professional indemnity obligations.

#### **7. Who do we share your data with?**



Your information is kept confidential within our practice and is only shared with staff when they need it to carry out their job. All staff are required to work to strict professional and contractual codes of confidentiality and where possible we will anonymise information so that individual patients cannot be identified.

If you attend for psychological therapy, we may inform your GP, or other clinicians involved in your care, that you are being seen and let them know once the work is completed. This will be discussed with you in the sessions with the psychological therapist.

If we become aware of an intent to cause harm to yourself, another person/organisation (e.g., terrorism), or become aware of someone else who is at risk of harm, the law and good practice in terms of safeguarding may require that we inform an authority without seeking your permission. In such a situation, the law/ good safeguarding practice may require that we share your personal information without your knowledge.

By contacting us you can also get more details on:

- agreements we have with other organisations for sharing information;
- circumstances where we can pass on personal data without consent for example, to prevent and detect crime and to produce anonymised statistics;
- our instructions to staff on how to collect, use and delete personal data; and
- how we check that the information we hold is accurate and up to date

Special category data and personnel files held electronically are encrypted with restricted access.

#### **Patients/Clients (Therapy or private assessment)**

In most circumstances, we will not disclose personal data without consent.

Your information may be shared with outside organisations if they are directly involved in your care/case, for instance, your insurer if they are funding your treatment, your GP, or others involved in your care. We will discuss with you who we would discuss your care with, and what details we would share with them.

If we become aware of a client/ patient's intent to cause harm to them self, another person/organisation (e.g. terrorism), or become aware of someone else who is at risk of harm, the law and good practice in terms of safeguarding may require that we inform an authority without seeking their permission. We will usually discuss this with the person first and do it with their agreement. However, the limits to confidentiality include cases of risk of harm to self or others which means in such circumstances we do not need to have consent to share information to act in the best interests to protect the person who may be at risk of harm.

If we do need to share your information, we will always try and ask for your permission for this. We may not be able to ask your permission under special circumstances where we are legally required to do so.

#### **8. How you can access your information and correct it, if necessary?**

We try to be as open as we can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'subject access request' or 'Right of Access' under the Data Protection Act and the General Data Protection Regulation. We will then supply to you:

- A description of all data we hold about you



- Inform you how it was obtained (if not supplied by you)
- Inform you why, what purposes, we are holding it
- Inform you what categories of personal data are held
- Inform you who it could be disclosed to
- Inform you of the retention periods of the data
- Inform you around any automated decision-making including profiling
- Let you have a copy of the information in an intelligible electronic form unless otherwise requested.

To make a request to us for any personal information we may hold you need to put the request in writing. We want to make sure that your personal information is accurate and up to date.

### **9. Complaints and queries**

Clinical Health Psychology Associates try to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures. If you do have a complaint, contact us and we will investigate the matter on your behalf.

If you are not satisfied with the response from us or believe we are not processing your personal data in accordance with the law you have the right to raise your complaint with the Information Commissioner's Office (ICO)

Contact information ICO:

Website: <https://ico.org.uk/concerns/>

Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

Telephone: +44 (0) 303 123 1113

### **10. How to Contact Us**

We each have our own registrations with the ICO and you can contact us using the details on our website [www.chpsych.co.uk](http://www.chpsych.co.uk)