

DATA AND PRIVACY POLICY

I do everything I can to maintain your privacy. What you tell me is confidential within a few limits. I maintain some essential records. I will not share my records unless there is a clear obligation.

CONFIDENTIALITY

I may reduce or break your confidentiality in the following circumstances:

- If essential to protect you or others from serious harm, or to prevent a serious crime e.g., terrorism, drug trafficking or money laundering.
- If I am compelled by a legitimate state or legal authority to disclose information.
- If you authorise disclosure i.e., you ask me, in writing, to release some of my commitments to your confidentiality
- If non-payment of fees leads to legal action against you
- To discuss my work with a professional supervisor. My supervisors are bound by similar commitments to confidentiality. During supervision, I typically refer to you only by first name.
- If I am incapacitated by injury or death, a colleague may contact you under the provisions of my 'Therapy Will'.

DATA THAT I STORE

Data that I store includes your name and contact details; emails and mobile texts and messages that we exchange; records of your attendance and payments; and any professional notes that I might use to reflect upon your sessions and improve my practice.

DATA THAT I DO NOT COLLECT

During your 50-minute sessions I do not make notes and do not use recording devices. My voicemail is switched off. Please, do not leave messages for me with anyone. I do not ask for your street address or GP details.

LEGAL BASIS

The legal basis for my storage and use of your data is a) the legitimate interests of my insurers and professional bodies b) to protect your vital interests c) for scientific or scholarly research d) by contract with you.

I send this contract and policy to you before work begins, maintain a copy on my website and issue updates if needed. If you meet with me, this contract is in operation. You have asked me to provide a service to you and my ability to fulfil our contract depends on my access to the data I describe.

PURPOSE

- I use your contact details, email address and phone number to communicate between sessions and so that others can contact you if something happens to me (the 'therapy will').
- I maintain payment records to know what you have paid or owe.
- I summarise anonymised attendance records to supervisory, academic, professional and insurance bodies to meet policy, qualification, and accreditation criteria regarding my client hours.
- I may make therapy notes to reflect on my work and your sessions including via supervision. I will not share therapy notes with anyone except with your permission or where mandated by law.
- Where I use aspects of your sessions for academic, professional or research purposes, I will anonymise these aspects and operate within an appropriate ethical framework.
- Where data is shared with another party, I will take steps to anonymise, where appropriate.

STORAGE

Your data is kept electronically with appropriate security measures, including two-factor authentication.

RETENTION POLICY

I keep data up to seven years after your sessions end. Retention periods are subject to insurance and regulatory requirements.

YOUR RIGHTS

You have the right to request a copy of the data I hold on you and update it if necessary. I will respond to requests for data access within one calendar month. I will consider any request for deletion or minimisation of data in consultation with my insurers and professional bodies. Before releasing any data to you, I may ask to confirm your identity. I may also eliminate or redact data relating to myself or third parties to protect their privacy.

COMPLAINTS

I pay an annual fee to the Information Commissioner's Office (ICO). Beyond my accountability to the UKCP mentioned elsewhere, you can complain to the ICO if you think there is a problem with the way I handle your data. If I become aware of a data breach, I will notify anyone affected and, if the breach meets their conditions for notification in terms of risk and likely impact, inform the ICO.