



## Great Bear Psychology Services



Dr Paul Bibby, BSc, D Clin Psychol  
Chartered Clinical Psychologist, HCPC Registered Practitioner Psychologist  
www.greatbearpsychology.co.uk  
Email: hello.gbps@gmail.com  
Tel: 07923 442757

### **Privacy Notice**

On 25 May 2018, the law changed with regard to how organisations have to protect your 'data' (personal details and records); this is called the *General Data Protection Regulation* or GDPR. The following summary highlights how GDPR is being implemented, by explaining why confidential information is held and how this is protected. Please also see <https://ico.org.uk>

I provide psychological services, including psychological assessments and therapy. You have provided me with personal and sensitive information. ***It is assumed that by engaging with this service you are consenting to records being kept.***

### **What personal data is processed?**

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

- **Personal data:** Basic contact information including name, address, email, contact number, health insurance details (where applicable) and GP contact details.
- **Sensitive personal data:** Signed therapy contract agreement, mental health therapy records (therapist notes, letters, reports, drawings, outcome measures) and potentially video or audio recordings if agreed to by yourself.
- If you are referred by your health insurance provider, solicitor, rehabilitation company or other health-related agency, then I will also collect and process personal data provided by that organisation. This includes basic contact information, referral information, and health insurance policy number and authorisation for psychological treatment if appropriate.
- These activities require me to act as a 'Data Controller', and by law I am required to be registered with the Information Commissioners Office (ICO). This register is an online public register of Data Controllers and is available for anyone to check. The register can be found at <https://ico.org.uk>

### **The lawful basis for processing personal data**

- I have a legitimate interest in using the personal data and sensitive personal data collected to provide health treatment. This data is necessary to provide psychological assessment and therapy to clients.

- I may also ask for information on how you found the service for the purpose of marketing research. No information you provide is passed on without your consent. I will never sell your information to others.

### **What is done with your personal information?**

- I will use the information collected to provide psychological assessment and therapy services to you. Your personal information may also be required to process payment for such services.
- I take your privacy extremely seriously and will only use your personal information to provide the services you have requested. I am committed to protecting and respecting your privacy.
- If you do not provide the personal information requested I may be unable to provide a service to you.

### **How long personal information will be stored?**

- I will only store your personal information for as long as it is required. Basic contact information held on a therapist's mobile phone is deleted within 6 months of the end of therapy.
- The sensitive personal data defined above is subject to special legislation:
  - Adult records can be retained for up to 8 years after the last contact with the service if appropriate to do so;
  - Children's records are kept until age 26;
  - [www.gov.uk/government/publications/records-management-code-of-practice-for-health-and-social-care](http://www.gov.uk/government/publications/records-management-code-of-practice-for-health-and-social-care)
  - After this time, this data is carefully and securely disposed of at the end of each calendar year.
- Some records may be held indefinitely if there were any issues of concern that could lead to police investigation in the future.

### **Who personal information may be shared with**

Keeping records is an essential component of healthcare, which helps in understanding how best to help and forms the basis of any reports needed. Personal information is only collected and retained to enable me to provide my services. Information about clients and the therapy they receive is held in confidence. This means that your personal information will not normally be shared with anyone else. However, there are exceptions to this when there may be need for liaison with other parties:

- If you are referred by your health insurance provider, or otherwise claiming through a health insurance policy to fund therapy, appointment schedules or treatment updates will be shared with that organisation as appropriate.
- In cases where treatment has been instructed by a solicitor/rehabilitation company, relevant clinical information from therapy records will be shared with legal services

as required and with your written consent. Appointment schedules or treatment updates will be shared with that organisation as appropriate.

- Where an assessment or treatment is commissioned by a local authority, legal firm or insurance company for court purposes, personal information will be shared in the form of a report.

In exceptional circumstances, I may need to share personal information with relevant authorities:

- When the information concerns risk of harm to you the client, or risk of harm to another adult or a child. In such circumstances, a proposed disclosure will be discussed with you unless I believe that to do so could increase the level of risk to you or to someone else;
- 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 there is 'need-to-know' information for another health provider, such as your GP.

Your personal information will never be used for marketing purposes or to send you marketing materials.

### **How security of personal information is ensured**

- Personal information is minimised in phone and email communication. Sensitive personal data will be sent to clients using e-mail services which are GDPR compliant (which means that the content of emails is encrypted from user to user). Any sensitive data attached in an email attachment will be password protected. Email applications use private (SSL) settings, which encrypts email traffic so that it cannot be read at any point between computing devices and mail servers. I will never use open or un-secure Wi-Fi networks to send any personal data.
- Personal information is also stored on a dedicated, secure, external hard drive. This is password protected and is securely locked away when not in use. Malware and antivirus protection is installed on all computing devices. Mobile devices are protected with a passcode/face recognition technology, mobile security and antivirus software.
- Confidential digital information may also be stored in a secure cloud service offering high levels of security which is GDPR compliant.

### **Your right to access the personal information which is held about you**

- You have a right to access the information that is held about you by making a 'Subject Access Request' (SAR).
- This will usually be shared with you within 30 days of receiving a request.
- There may be an admin fee for supplying the information to you.
- Further evidence from you may be requested 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 get your personal information corrected if you believe it is inaccurate.
- You can complain to a regulator. If you think that I have not complied with data protection laws, you have a right to lodge a complaint with the Information Commissioner’s Office.
- In the event of death or incapacity of the therapist, arrangements have been made for records to be held by a named professional colleague who will continue with the above obligations.
- I reserve the right to refuse a request to delete a client’s personal information where this relates to therapy records. Therapy records are retained for a period of 8 years in accordance with the guidelines and requirements for record keeping by The British Psychological Society (BPS; 2000)<sup>[1]</sup> and The Health and Care Professions Council (HCPC; 2017)<sup>[2]</sup>.

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

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

**I agree to the terms and conditions detailed in this contract:**

CLIENT:

Name (please print) ..... Signed..... Date.....

THERAPIST:

Dr Paul Bibby Signed..... Date.....