

# Dr Amy Gibbard CPsychol AFBPsS

## Psychology and Mindfulness

### Privacy Policy

I, (Dr Amy Gibbard, Psychology and Mindfulness) offer psychological services, specialising in psychological therapy, supervision and training. This privacy policy explains how information about you is collected, stored and processed by me as a data controller, in compliance with the General Data Protection Regulation (GDPR).

#### 1. Why do I collect information about you?

I collect information about you to provide you with psychological assessment and treatment and because it supports the provision of a safe and professional service. It is therefore in my legitimate interests as a Registered Psychologist to collect your personal data. I also collect sensitive 'special category' data (such as details about psychological difficulty). My lawful reason for doing so is that it is necessary for the provision of safe and professional (mental) health treatment (psychological therapy). You do not have to agree to share information with me, however, in many cases I may not be able to offer you a service if you do not.

#### 2. What information do I collect about you?

In order to provide a professional and safe service, I collect information about you that includes personal and sensitive information. This is collected directly from you. It may also be provided to me by referring agencies such as psychiatrists, G.Ps or insurance companies.

##### **Personal data collected:**

- Name; Date of birth; Address; Telephone number; Email address; Name and telephone number of emergency contact; Names and dob of any dependent children; GP

##### **Sensitive data collected:**

- Presenting difficulties and current circumstances
- Relationships and history (including therapy history)
- Gender and sexuality (if relevant to our work)
- Medical conditions relevant to therapy
- Prescribed medication
- Any illicit substance use
- Completed outcome measures
- Signed therapy agreement
- Session summary

#### 3. How will I use the information that I collect?

- To respond to your enquiries
- To communicate with you about appointments
- To offer you high quality psychological assessment and treatment including liaison with others involved in your care, where relevant and with your consent.
- To create invoices.

#### 4. How I will store your personal information

I take your privacy very seriously. I am committed to taking reasonable steps to protect any personal, sensitive and identifiable information that I hold about you. Personal information provided is stored in compliance with EU General Data Protection Regulations (GDPR). Your data may be stored in the following ways:

- Written assessment and session notes. Only initials are written on assessment and session notes or in a diary. Notes are kept separately from your contact details in locked cabinets.
- Electronic information (e.g. a report) is held in highly secure encrypted cloud storage.
- Email correspondence between us is stored in my email account including your email address and anything you disclosed in emails. I regularly delete emails, however, please be aware that email is not a secure mode of communication and you may prefer to communicate personal information to me directly in person or on the telephone. My smartphone and computer are password protected.
- Your telephone number may be stored in my SMS if we have communicated in this way.
- If you choose to pay me by electronic bank transfer then I may hold a record of this transfer through my bank. This data is secured by the bank's data security systems.
- I use cookies on my website to gather information about visitors in order to monitor the quantity of website traffic. I do not identify you or any other individuals from this information.

#### 5. How I may process / share your personal information

- **Reports to referrers or private health insurance companies:** If you were referred to me by a psychiatrist, with your consent, I may write them an assessment and discharge report. Some insurance companies require reports to grant funding / extension of treatment. Reports are sent securely in password protected documents. In the event that a letter needs to be physically posted, it would be sent by Royal Mail recorded delivery.
- **Supervision / consultation:** It is a professional requirement that I have supervision. I therefore discuss my work with two supervisors (registered psychologists equally bound to keep information confidential). I do not disclose your name to them.
- **Therapeutic will:** In the event of my death, should you still be in therapy with me, my Therapeutic Executor (registered psychologist) would access your contact details to advise you of this and to ensure the ongoing security / appropriate deletion of your data.
- **Risk and safeguarding:** In certain circumstances, such as where I believed there was significant risk to you (e.g. suicide), to others (e.g. child protection) or where a crime was reported to me, I may have a legal and professional obligation to share information with third parties without seeking your prior permission.
- **Erasing your information:** On completion of work, any email correspondence between us that has not already been deleted is erased within one month. Electronic and paper documents are kept securely for 7 years after our work ends or for 7 years from the date you turn 18 if you were seen as a child. This is in line with professional and HMRC guidelines and is so that I have reference to our work should you return to therapy or should I be required to provide information in the event of legal action / court instruction. I will then delete electronically held reports and shred written information.

## 6. Your Rights

### You have the following rights...

- To be informed of what information I collect and hold about you and how it is processed
- To ask to see the information I hold about you
- To rectify any inaccurate or incomplete personal information
- To restrict the processing of your personal data
- To object to the processing I carry out based on my legitimate interest
- To request your personal information be erased (*we can discuss whether this right can over-ride the requirement to retain data*).

## 7. How do you Access information I hold about you?

You have the right to access information held about you. You can make a subject access request to me to see information held about you and I will respond to such requests within 30 days as per GDPR guidance. This does not need to be in writing and may be made in person or by phone. I may require further additional verification that you are who you say you are to process this request. I may withhold personal information to the extent permitted by law. In practice, this means that I may not provide information if I consider that providing the information will violate your vital interests.

## 8. What happens if there is a breach of data security?

Should there be any breaches with regard to your personal data this will be reported to the ICO within 72 hours together with a summary of the nature of the breach, the steps taken to reduce the risk to data subjects, and measures to prevent the breach from happening again. The individuals affected will also be informed if this occurs.

All personal data breaches, however minor, and whether reportable or not are recorded.

For further information about GDPR or to raise concerns about how I am processing your data, please contact the ICO on <http://ico.org.uk/concerns> or 0303 123 1113

- **My ICO registration number: ZA257077**
- **Named Data Protection Officer: Dr Amy Gibbard**

Please contact me at [amy@psychologyandmndfulness.com](mailto:amy@psychologyandmndfulness.com) or call 07951 207142 with any questions or concerns about the information that I process.