**Updated Privacy Notice for Therapy Clients (May 2018)**

You may be aware of new laws relating to General Data Protection Regulation (GDPR) that are in effect from 25 May 2018. The purpose of GDPR is to provide a set of standardised data protection laws across all EU member countries. This document sets out how GMD Psychology complies with these laws.

**Data Control**

Dr Gerwyn Mahoney-Davies is the data controller for GMD Psychology.

**What personal data GMD Psychology processes**

GMD Psychology collects and processes 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, GMD Psychology will also collect any information you provide to us as well as your internet protocol (IP) address. This is automatically supplied by the website software used to offer the form. All web services used by GMD Psychology are verified by themselves as GDPR compliant.

If you are referred by your health insurance provider, then GMD Psychology 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.

**The lawful basis for processing personal data**

GMD Psychology has a legitimate interest in using the personal data and sensitive personal data collected to provide health treatment. This data is necessary for GMD Psychology to provide psychological therapy to clients.

GMD Psychology 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. GMD Psychology will never sell your information to others.

**What GMD Psychology does with your personal information**

GMD Psychology takes your privacy seriously. GMD Psychology will only use your personal information to provide the services you have requested.

If you do not provide the personal information requested, then GMD Psychology may be unable to provide a therapy service to you.

**How long GMD Psychology stores personal information**

GMD Psychology 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 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**

GMD Psychology will use the information collected to:

* Provide psychological therapy services to you.
* Process payment for such services.
* Engage in correspondence relevant to your enquiry or therapy services.

**Who GMD Psychology might share personal information with**

GMD Psychology holds information about clients and the therapy they receive in confidence. This means that GMD Psychology will not normally share your personal information 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, then GMD Psychology will share appointment schedules with that organisation for the purposes of billing. GMD Psychology may also share information with that organisation to provide treatment updates.
* In cases where treatment has been instructed by a solicitor, relevant clinical information from therapy records will be shared with legal services as required and with your written consent.

In exceptional circumstances, GMD 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.
* 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 a child. GMD Psychology will discuss such a proposed disclosure with you unless it is reasonable to believe that to do so could increase the level of risk to you or to someone else.

**What GMD Psychology will NOT do with your personal information**

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

**How GMD Psychology ensures the security of 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 traffic so that it cannot be read at any point between our computing devices and our mail server. GMD Psychology will never use open or unsecure Wi-Fi networks to send any personal data.

Personal information is also stored on a computer. These files are password protected. Malware and antivirus protection is installed on all computing devices. Mobile devices are protected with a passcode/thumbprint scanner, mobile security and antivirus software.

**Your right to access the personal information GMD Psychology holds about you**

* You have a right to access the information GMD Psychology holds about you.
* GMD Psychology will usually share this with you within 30 days of receiving a request.
* GMD Psychology 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 get your personal information corrected if it is inaccurate.
* You can complain to a regulator. If you think that I haven't complied with data protection laws, you have a right to lodge a complaint with the Information Commissioner’s Office.

GMD Psychology reserves the right to refuse a request to delete a client’s personal information where this is therapy records. Therapy 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)[1]and The Health and Care Professions Council (HCPC; 2017)[2].

Dr Gerwyn Mahoney-Davies

Clinical Psychologist

March 2019

[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.