

Rose Practice Privacy Notice for Therapy Clients

This privacy policy describes how Rose Practice and Dr M R Rose makes use of the information you give us – why I keep your information, where I keep it, how it is kept safe and your rights.

If you provide, or are asked to provide, information when contacting us it will only be used in accordance with the ways described in this privacy statement. This statement is updated from time to time. This privacy policy was updated on 02.01.20.

Contact details:

Dr M Ruth Rose is the main point of contact: email Ruth@Rosepractice.com or phone on 07308 026320.

Introduction:

- I keep information about you in order to provide you with all of the psychological and therapy services Rose Practice offers, and to process payments.
- I cannot work with you unless you allow me to keep records.
- I follow the law, and the codes of practice set down by the HCPC and the BPS
- I have systems in place to protect your data.
- You are entitled to request a copy of your data free-of-charge, and to have inaccurate information corrected.
- If you have questions, concerns or feedback then please let me know so that I can address them.
- More details on these points and other areas are included in the rest of this document

What type of information we hold

We collect and process the following personal data from therapy clients: basic contact information of name, address, email, contact number, GP contact details and any other health care professional involved in your care where relevant. We also hold sensitive personal data: Signed Therapy Client Agreement, therapy records (therapist notes, letters, reports and/or outcome measures).

Information about you will be collected from you and held in the form of written notes, emails, questionnaires, and letters, in addition to invoices and receipts. This information could be collected at any point during your contact with us and/or during your receipt of services from us.

Your information will be collected, managed and stored solely for the purposes of us providing you with psychological services.

The lawful basis for processing personal data – why do we need to process information about you?

In providing you with our services, Dr M. R. Rose of Rose Practice will need to handle your personal information. Personal data and information is details about you from which you can be identified, such as your name and contact details. Depending on what services you receive from us, we may process additional sensitive data such as notes about our meetings, information about your health, social history. This information is essential to inform, facilitate and provide assessment and therapeutic services which are appropriate to your individual needs.

Under the requirements of the Health Care Professions Council (HCPC) and British Psychological Society (BPS), Dr Rose of Rose Practice is obliged, according to the legitimate interests of provision of our services, to keep documentation of your personal data to allow us to provide assessment and therapy services to you. My professional registration requires me to keep information about my clients and the work that I do. I am registered with the Information Commissioners Office in order to do this. I cannot offer you services unless you allow me to keep data about you and our work together

What information will you hold?

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Depending on your chosen method of payment, bank account details and/or insurance details may also be collected. Personal data pertaining my legitimate interests in running my business, such as invoices and receipts, accounts and tax returns, will also be processed.

How do we use the information that we collect?

At Rose Practice we take your privacy seriously. We use the information we collect:

- To provide our services to you
- To communicate with you so that we can inform you about your appointments with us, we use your name, your contact details such as your telephone number, email address or postal address;

- To deliver the correct service to you, we use your name, your contact details
- For billing, invoicing, receipts, processing payments we use your name and may use your email address;
- To process payment for such services, we use your name and your details which will include your email address if you use PayPal
- To help prevent serious harm (see confidentiality section, below)

Some of our clients may feel vulnerable at times in their lives or be at risk of harming themselves or be at risk of harm to / from others. In these circumstances, we need to be able to communicate effectively with other services such as GP surgeries or emergency care services, to keep clients safe. This would involve sharing of personal information on a need to know basis.

Confidentiality and who we might share personal information with:

The confidentiality of your personal information is very important to Rose Practice. All our services are confidential, and we will not share your information unless we judge that there is a serious risk of harm to yourself or others, or with your written consent, or when we are legally obliged to do so. Confidential information is restricted only to those who have a reasonable need to access it. You may give us written informed consent to update your GP and other health care professionals involved in your care and this will be done using a written consent form. You can withdraw consent by indicating that you do not consent to this on the consent form and date from which this takes effect.

In exceptional circumstances, we 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. We will discuss such a proposed disclosure with you unless we believe that to do so could increase the level of risk to you or to someone else.

What Rose Practice will NOT do with your personal information

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

Where do we keep the information?

I keep your data and information:

On a laptop computer: Rose Practice uses a personal laptop that is password protected and encrypted. All documents will be password protected. Where cloud services are used, these meet GDPR requirements and all data is securely encrypted when stored there.

In a mobile phone: Your contact details (name, mobile, email) may be stored on my Rose Practice work mobile phone. This is encrypted and protected with a passcode/thumbprint scanner.

In our email system which is secured with a strong password. I will not use open or unsecure Wi-Fi networks to send personal and/or sensitive data electronically. The Rose Practice

website uses cookies so that I can see the number of visitors and which pages are popular. Cookies are anonymous and contain no personal data. You can turn cookies off in your website browser if you wish to. Access to the analytics from my website is secured with a strong password.

As a paper copy: I take hand written notes when I meet you. These notes may be used to create a report on the services that I provide to you, or to an approved third party (i.e. your insurer where relevant). Mostly, however, the written notes serve simply as an aide memoire for the therapist to ensure continuity of treatment over time. I keep a paper copy of your notes and any invoices in a locked cabinet. I may send copies of invoices to an accountant to enable them to process our accounts each year.

How long will you store my information for?

We will hold information about you for as long as you receive services from us and for seven (7) years following the date of our last contact with you.

Paper-based information will be electronically scanned and stored shortly after the point your case file is closed to the service (usually defined as your last appointment).

Once scanned, paper-based information will be shredded and disposed of in a confidential manner. Electronically held files will be securely and deleted after seven years (or if a minor, when they reach the age of majority plus seven years).

You also have the right to ask for your information we hold on you to be erased prior to this time. However, if you want to have your data removed, we do have to determine if we need to keep the data. For example, if your request falls within the timeframe that our governing practice body has a requirement that we hold data for (around seven years). In this instance, we may not be able to erase your data before that time has passed or any court action is ended.

How can I access the information you hold?

Under data protection law, you have rights including your right of access. You can ask to access the information we hold by writing to Dr M Ruth Rose at Ruth@Rosepractice.com. Your right to data portability: You can also ask for your information to be transferred to another provider of psychological services. We will respond to your request within 30 days. Verification of the identity of anyone making such a request will be required before information can be shared.

What if I believe the information you hold about me is incorrect?

Whilst you are receiving services from Dr Rose and Rose Practice we will aim to keep the information we hold about you up-to-date. We would encourage you to tell us as soon as possible if your personal data changes so that we can update our records.

Your right to rectification: You can also let us know if you believe the information we hold about you is inaccurate, needs amending or updating, by contacting Dr Rose at Ruth@Rosepractice.com

How can I have my information removed?

If you want to have your data removed we have to determine if we need to keep the data, for

example in case HMRC wish to inspect our records or if in doing so we would breach our professional organisations data retention requirements (see above). If we decide that we should delete the data, we will do so without undue delay.

Protecting your Information

We are committed to keeping the information we hold about you secure. To protect your personal data, we follow the guidelines and recommendations in line with our professional bodies (The British Psychological Society and The Health Care Professionals Council) and regulatory bodies such as the Information Commissioners Office. More detailed information can be found in our Data Protection Policy, which complies with the requirements detailed in the Data Protection Act (1998) and the General Data Protection Regulations (2018). This document is available on request.

Your data protection rights:

Who can I contact if I have concerns about my data management?

Should you have any concerns about the management of your data by Rose Practice please contact us in the first instance. If we are unable to resolve your concerns, you have a right to complain to the Information Commissioner's Office if you are unhappy with how we have used your data: visit ico.org.uk/concerns, phone 0303 123 1113, The ICO's address is Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Policy prepared by:

Dr M Ruth Rose, Clinical Psychologist

Policy operational on:

JANUARY 2nd 2020