

# Privacy Policy

You may be aware of new laws relating to General Data Protection Regulation (GDPR) that took effect on 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 I comply with this law. I explain here how I use any personal information I collect about you. For the purpose of the GDPR, I am also the data controller.

## Why do I collect information about you?

I have a legitimate interest in using your personal and sensitive data to plan and provide psychological treatment and process payments for such a service.

## What information I collect about you?

I collect information about you that may include personal and sensitive information and forms part of your 'health record'. This information includes:

- PERSONAL DATA: first name or given name, family name or surname, address, telephone number(s), date of birth, gender (or preferred gender identity)
- SENSITIVE PERSONAL DATA: signed terms and conditions, treatment record that includes my session notes, any handouts, letters, reports and outcome measures (where applicable), your relationships and children (where applicable), your occupation (if applicable), email addresses and Skype ID (for online therapy), medical conditions (if relevant), prescribed medication, psychological history and current difficulties, sexuality, financial information that could include bank account details, details of your appointments and fees, letters from any other health professionals involved in your care. If you are referred by or claim costs from your health insurance provider, then I will also collect and process personal data provided by that organisation. This may include basic contact information, referral information and health insurance policy number and authorisation for psychological treatment.

### Information submitted via the web

If you contact me via the website by using the contact form, the information that I obtain from you is the information you voluntarily provide, as well as your internet protocol (IP) address. At the top of any contact form on the website, it clearly states that data submitted via the web contact form will be processed by 3rd parties and suggests that if you wish to discuss personal or sensitive information then you may prefer to call on (0044) 020 3637 0796.

## How do I store the information about you?

I take your privacy very seriously. I am committed to taking reasonable steps to protect the personal and sensitive information that you provide to me. Once I receive your data, I make best efforts to ensure its security. All personal information provided is stored in compliance with EU General Data Protection Regulations (GDPR) rules.

Email applications use private (SSL) settings, which encrypt email traffic so that it cannot be read at any point between my computing devices and mail server. I will never use open or unsecure Wi-Fi networks to send any personal data. Any sensitive information will be shared with you via a secure sharing platform (egress). Personal information is minimised in email communication. Electronic personal and sensitive data is stored on a secure and encrypted drive which is also password protected. Malware and antivirus protection is installed on all devices that access the encrypted drive. Mobile devices are protected with a passcode or thumbprint scanner, mobile security and antivirus software. Any paper health record is stored in a locked cupboard and scanned onto an encrypted drive shortly after your discharge. The paper record will be disposed of in accordance with the GDPR rules.

## How long do I keep your information for?

Treatment records will be retained for a period of 8 years. This decision has been made by consulting the guidelines and requirements for record keeping by The British Psychological Society (BPS; 2000), The Health and Care Professions Council (HCPC; 2017) and NHS Code of Practice for Records Management (Records Management Code of Practice for Health and Social Care 2016)

For any referral where I receive no response from you following my initial contact, this record will be kept for a period of two years.

## Who do I share your personal information with?

I hold information about you and any treatment you receive in confidence and take any necessary steps to keep it private. By contacting me by email and/or using the address below you can also get more details on:

- agreements I have with other organisations for sharing information and their privacy policy;
- how I check that the information I hold is accurate and up-to-date

I will not share information with third parties, including for marketing purposes. The following are circumstances where I share your personal information;

- Once you wish to make an appointment, I provide the respective location where you will be seen with the following data:
  - For appointments at 152 Harley Street, I provide them with your full name, the date and time of your appointment(s) and the fee to be charged to you directly.

- For appointments at the Private Patient Unit of the Royal Free Hospital, I provide them with your full name, address, date of birth, contact telephone number (if available) and the date and time of your appointment(s).
- If you are referred by your health insurance provider or otherwise claiming through health insurance policy to fund your appointments, then I will share appointment schedules with that organisation for the purposes of billing.
- In cases where treatment has been instructed by a solicitor, relevant clinical information from your treatment record will be shared with legal services as required and with your written consent.
- If I become aware of your intent to cause harm to another person or organisation (e.g. terrorism), the law may require that I inform an authority without seeking your permission. In such a situation, the law may require that I share your personal information without your knowledge.
- When the information concerns risk of harm to you, or risk of harm to another adult or a child, I may be required to disclose personal information. I will discuss such a proposed disclosure with you unless I believe that to do so could increase the level of risk to you or to someone else. In most other circumstances, I will not disclose personal data without consent. If your health is in jeopardy (with your agreement where required), I may share your contact information with an emergency healthcare service (e.g. Mental Health Crisis Team).
- Your information will be shared with outside organisations or professionals if they are directly involved in your care and have referred you to me (e.g. surgeon, oncologist etc). I may also share information with others who may be involved such as your GP or your private health insurance. I will discuss with you who I would like to talk or write to about your care and what details I would share with them. In many circumstances, you will also see any letters I wish to send to others involved in your care before doing so. This provides you with an opportunity to provide comments.
- In order to practice, I receive regular supervision from a clinical psychologist and may discuss your case anonymously with this professional.
- When I investigate a complaint, I may need to share personal information with other relevant bodies.

## How you can access your information and correct it, if necessary

I try to be as open as I can be, in terms of giving people access to their personal information. Individuals can find out what (if any) personal information I hold by making a 'Subject Access Request' or 'Right of Access'

'Request' under the Data Protection Act and the General Data Protection Regulation. I will then supply you with:

- A description of all data I hold about you
- Inform you how it was obtained (if not supplied by you)
- Inform you why (for what purpose) I am holding it
- What categories of personal data are concerned
- Inform you who it could be disclosed to
- Inform you of the retention periods of the data
- Inform you around any automated decision making
- let you have a copy of the information in an intelligible electronic form unless otherwise requested.

To make a request for any personal information I may hold you need to put the request in writing. I will usually share this with you within 30 working days on receiving a request. I may ask for further evidence from you to check your identity. A copy of personal information will be sent to you in a PDF format. I want to make sure that your personal information is accurate and up to date. You may ask me to correct or remove information you think is inaccurate. Please address these changes to me directly.

## Your rights

You have rights around your personal data and how I handle it. You can contact me as the Data Controller/ Data Protection Officer

- If you believe the information I process on you is incorrect and you want it corrected,
- To request to see information,
- To request the data to be transferred,
- To object to my processing of your personal information or to request to have it deleted.

Unfortunately, your health and treatment record cannot be deleted until the statutory period has expired.

## Complaints or queries

I try to meet the highest standards when collecting and using personal information. For this reason, I take any complaints I receive about this very seriously. I encourage people to bring it to my attention if they think that my collection or use of information is unfair, misleading or inappropriate. I would also welcome any suggestions for improving my procedures. If you do have a complaint, contact me in my position as the Data Protection Officer so I can investigate the matter on your behalf.

If you are not satisfied with my response or believe I am not processing your personal data in accordance with the law, you have the right to raise your complaint with the Information Commissioner's Office (ICO)

Contact information ICO:

Website: <https://ico.org.uk/concerns/>

Email: [caserwork@ico.org.uk](mailto:caserwork@ico.org.uk)

Telephone: +44 (0) 303 123 1113

# Changes to this privacy notice

I keep my privacy policy under regular review and any updates will be available on request or on my web page. This privacy notice was last updated on 25<sup>th</sup> May 2018.

## Who I am and how to contact me

The company Chief Information Security Officer/Data Protection Officer is Dr Esther Hansen and can be contacted by:

**Email:** info@estherhansen.co.uk

**Post:** Dr Esther Hansen  
Information Security Officer/Data Protection Officer  
152 Harley Street  
London W1G 7LH

## References

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

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

NHS Code of Practice for Records Management (Records Management Code of Practice for Health and Social Care 2016) - <https://digital.nhs.uk/data-and-information/looking-after-information/data-security-and-information-governance/codes-of-practice-for-handling-information-in-health-and-care/records-management-code-of-practice-for-health-and-social-care-2016>