



Dr Susan M Krasner
PhD., BPS Dip Clin Psychol
& Associates

THE PSYCHOLOGY PRACTICE PRIVACY & DATA PROTECTION POLICY: CLIENTS, PATIENTS & SERVICE USERS

The Psychology Practice (TPP) aims to be as clear as possible about how and why we use information about you so that you can be confident that your privacy is protected. This policy describes the information that TPP collects about you and / or your child/ren when you use our services. This information includes personal data as defined in the General Data Protection Regulation (GDPR) 2016 (and the subsequent UK Data Protection Bill that is expected to be enacted in 2018).

The policy tells you how we manage and protect your information when you use our services, when you contact us and when we contact you. We collect this information in accordance with all laws concerning the protection of personal data, including the Data Protection Act 1998 and the GDPR 2016, and in accordance with professional best practice guidelines.

If you have any queries about this policy, please contact the Data Protection Officer, Dr Susan Krasner at skrasner@thepsychologypractice.co.uk or by phone on 01923 729872. If you are not satisfied with the answers from the Data Protection Officer, you can contact the Information Commissioner's Office (ICO): <https://ico.org.uk>

1. Why do we need to collect your personal data?

We need to collect your personal information so that we can:

- Know who you are so that we can communicate with you personally, confidentially and directly. Legally we have a legitimate interest in so doing.
- Communicate about you / your child with referrers and insurance companies accurately and confidentially. Legally we have a legitimate interest in so doing.
- Deliver our service to you. Legally our contract with you forms the basis for this.
- Process invoices and payments for the services you receive from us. Again, our contract with you forms the legal basis for this.

2. What personal data do we collect and when do we collect it?

For us to provide you with a professional psychology service, we need to collect the following information for you / your child:

Batchworth Lock House • 99 Church Street • Rickmansworth WD3 1JJ
E: admin@thepsychologypractice.co.uk T: +44(0)1923 729872 W: www.thepsychologypractice.co.uk

- Name
- Contact details: postal address, phone numbers including a mobile number, and email address
- Name and contact details of your General Practitioner and / or referring Consultant
- Name of school attended by your child/ren
- Matters discussed at your consultations

3. How do we use the information that we collect?

We use the data we collect from you in the following ways:

- To communicate with you about appointments, we use your name and contact details such as telephone number, email address and / or postal address
- To create invoices, we use your and / or your child's name, date of birth and address, and your email and / or postal address.
- To ensure that children / students from the same school are not present in the waiting room at the same times (which may feel uncomfortable or lacking in privacy for children, teenagers and their parents), we include the initials of the school name when we enter your child on our appointments diary.
- To communicate with other health professionals (such as GPs, CAMHS, consultant psychiatrists, consultant paediatricians, etc), we use your / your child's name, address and date of birth and your GP's and / or Consultants' details.
- To communicate with education colleagues (for example school teachers, head teachers, school counsellors), we use your child's name and year group, or form, or date of birth.
- To write reports we use your / your child's name, date of birth, address, and information gathered during your consultations.

4. Where do we keep the information we collect?

We keep the information we collect in the following stores:

- We maintain data in a digital storage facility at TPP. Data is stored in encrypted external storage, maintained and backed up in our premises. Access to the storage is via the computers in the Practice, and these are password protected; or via remote, encrypted access on password protected computers used only by staff and associates of TPP. All passwords are changed regularly. The premises in which the Practice is located is protected by a burglar alarm. We do not use DropBox, Google Drive or any other cloud services to store your data.
- We maintain paper and digital records during the period of your assessment and treatment with us. Records may include handwritten notes taken during your appointments, correspondence from other health professionals (such as GP letters, letters from Consultant Psychiatrists, etc), psychometric test forms, reports and correspondence regarding your assessment and treatment here, and email correspondences. All information, including handwritten notes, is scanned and stored on the encrypted storage described above. During your period of assessment and treatment, the paper records are stored in locked filing cabinets. The Practice building is protected by a burglar alarm. 6 months after your / your child's treatment is ended, all paper records are shredded, and the digital record alone is maintained, as detailed below.
- We maintain a data base of patient contact details as specified in paragraph 1 above. This is stored in an encrypted data base on a password protected computer in our Practice.

- We maintain an invoicing log specifying patient name, date of appointment, invoice number and date payment received. Our accountants have a copy of this information on an annual basis. This data is separate from all other patient related data. It is stored at our Practice on the external encrypted storage as detailed above.

5. How long do we keep information?

Our policy for the retention of patient related records is informed by NHS standards of good practice. These recommended:

Children and young people

All types of records for children and young people should be retained until the patient is 25 (or 26 if they are 17 when treatment ends) or eight years after their death, if sooner.

If a child's illness or death could be relevant to an adult condition or have genetic implications for their family, records may be kept for longer.

and

Mental health records

Records of people who have been treated for a mental disorder should be retained for 20 years after the date of last contact between the patient and any healthcare professional employed by the mental health provider, or eight years after the death of the patient if sooner.

See: <https://www.nhs.uk/chq/Pages/1889.aspx?CategoryID=68>

We keep electronic invoices for 7 years, in compliance with HMRC regulations.

We keep information regarding potential patients / service users for 6 months after the initial enquiry. If after 6 months, the patient has not attended an appointment/s, all their personal data will be deleted completely from our records.

6. To whom do we send your information?

We send any reports and clinical letters and / or updates we write to you and to relevant healthcare, education or other professionals only if you have consented to our so doing. *

All reports and correspondence that are sent electronically are sent as attachments that are encrypted and password protected. The password used will be specific to you / your child and will be established with you by phone. If you forget your password, this will be sent to you separately via text message.

We send your name and invoice details to our accountant as detailed above. Our accountants are UK based.

**Reports / correspondence may be sent to other health / social service professionals without your consent only in the rare circumstances where Safeguarding concerns prevail.*

7. How can I see the information you have about me?

You can make a subject access request by contacting the Data Protection Officer, Dr Susan Krasner. We may require verification of your identity in order to process this request.

If there is an error in our data and you wish to have your information corrected, you must provide us with correct data and after we have corrected the data in our system, we will send you a copy of the updated information. Whilst we will make every effort to provide access to all information we hold, our professional practice is also informed by the Access to Health Records Act 1990. This stipulates the following exceptions to the right to access your health records:

- Access may be refused if healthcare professionals believe that information in the records would be likely to cause serious harm to the patient or to another person
- Details about third parties might be removed from the records
- If you are applying for access on behalf of someone else, you will not be given information which the patient gave to his or her doctor on the understanding that it would remain confidential

8. Will we send emails and text messages to you?

As part of our service, we may send a report/s to you. These will be sent as email attachments and will be encrypted and password protected.

Also, as part of our service, by email, we will send you

- information about appointments
- invoices
- information about changes to fees and charges

All communications containing sensitive (personal) information will be sent as email attachments and will be password protected.

If you forget your password, we will send this to you via text message.

If you would prefer us to communicate with you by Royal Mail, we will be happy to do so.

We will not send you emails or text messages about marketing or additional services that we offer.

For further information or enquiries about this policy, please contact Dr Susan Krasner.

May 2018

*The contents of this correspondence are confidential and unless stated otherwise, are only for the attention of the addressee.
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