

PRIVACY POLICY

What is the purpose of this privacy policy?

This policy explains how we use any personal information we collect about you, as a past, present, future employee, contractor or affiliate, a client or claimant or when you use our website.

This privacy policy contains all information that we are obliged to provide data subjects in accordance with articles 13 & 14 of the General Data Protection Regulation (GDPR). It provides information about the personal information we process and our compliance with the GDPR and the Data Protection Act 2018 (DPA).

Who are we and what do we do?

Aberdeenshire Clinical Psychology was established in 2016 by Directors Dr A Keenan, Dr S Kerr, and Dr C Trevethan. We operate as a cooperative of clinicians who hold our own ICO registrations, and we are all data controllers for our individual sole trading businesses.

In 2020 we established Aberdeenshire Clinical Psychology Ltd as a limited company. The company is registered with Companies House under number: SC670568. The data controller for Aberdeenshire Clinical Psychology Ltd is Dr A Keenan.

In 2020 Associate Psychologists started accepting referrals for Aberdeenshire Clinical Psychology Ltd. Associate Psychologists are data controllers for the clients they work with directly and may have access to more data than Dr A Keenan due to the confidential nature of their work with a specific client. In such cases, Associate Psychologists will be the primary data controller for those clients.

What personal data do we process?

The following data is collected from clients:

- Personal data: Client Information Sheet (name, address, email, contact number, emergency contact name and number), video conference ID (if online therapy), and GP contact details.
- Sensitive personal data: Confidentiality Agreement (Signed or confirmed via email), assessment and therapy records (therapist notes, letters, reports and/or outcome measures).
- If you complete a web-based enquiry form, we 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 us are verified by themselves as GDPR compliant.

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

What is the lawful basis for processing personal data?

We have a legitimate interest in using the personal data and sensitive personal data we collect to provide clinical assessment and treatment. It is necessary for us to provide assessment and treatment to clients.

We 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. We will never sell your information to others.

What do we do with your personal information?

We take your privacy seriously. We will only use your personal information to provide the services you have requested from us. If you do not provide the personal information requested, then we may be unable to provide a service to you.

How long do we store personal information?

We will only store your personal information for as long as it is required. The sensitive personal data defined above is stored for a period of 7 years after the end of assessment / therapy. After this time, this data is deleted at the end of each calendar year.

How is your personal information used?

We use the information we collect to:

- Provide our services to you.
- Process payment for such services.

Who might we share personal information with?

We hold information about each of our clients and the assessment / treatment they receive in confidence. This means that we 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 we will share appointment schedules with that organisation for the purposes of billing. We 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, 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. Whenever reasonably possible, 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.

We never share personal information with third parties for marketing purposes.

Why do we ask for emergency contact details?

We only contact your chosen emergency contact if you become unwell during an appointment. We would never contact this individual for any other reason.

How do we ensure the security of personal information?

Personal information is minimised in phone and email communication. Sensitive personal data is sent in an email attachment that is password protected, with the password sent separately. We never use open or unsecure Wi-Fi networks to send any personal data. Our email services have stated that they are fully compliant with GDPR. For online assessment and therapy, we use services that have stated that they are fully compliant with GDPR. Any cloud systems we use are stated to be GDPR compliant. Personal information is always stored with a password. Malware / antivirus protection is installed on all computing devices.

Do I have the right to access the personal information we hold about you?

- You have a right to access the information we hold about you.
- We will usually share this with you within 30 days of receiving a request.

- There may be an admin fee for supplying the information to you.
- We 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 we have not complied with data protection laws, you have a right to lodge a complaint with the Information Commissioner's Office.

We reserve the right to refuse a request to delete a client's personal information where this is assessment and 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].

[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.