

## Privacy Notice for Therapy Clients (March 2022)

You may be aware of new laws relating to General Data Protection Regulation (GDPR) that came into 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 Cornwall Clinical Psychology will comply with these laws.

### Data Control – What is processed and why

Dr Pippa Moran is the data controller for all information within Cornwall Clinical Psychology. Dr Pippa Moran will collect and process the following personal data from therapy clients:

- Personal data: basic contact information: name, address, email, school, contact number and GP contact details.
- Sensitive personal data: Signed therapy contract, therapy records (therapist notes, letters, reports and/or outcome measures).

### The lawful basis for processing personal data

Cornwall Clinical Psychology has a legitimate interest in using the personal data and sensitive personal data collected to provide health treatment. It is necessary to provide psychological therapy to clients. Your information will never be sold to others.

### What will be done with your personal information

Your privacy is taken seriously. Your personal information is only used to provide the services you have requested. If you do not provide the personal information requested, then Cornwall Clinical Psychology may be unable to provide a therapy service to you.

### How long we store personal information

Your personal information will only be stored for as long as it is required. Basic contact information held on a therapist's mobile phone will be 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

Dr Pippa Moran and associates use the information collected to:

- Provide services to you
- Process payment for such services

You have the right to request that your personal contact information is deleted at any time.

### Sharing personal information

Information is held about each client and the therapy they receive in confidence. This means that your personal information is not normally shared with anyone else. However, there are exceptions to this when there may be need for liaison with other parties:

- 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 will NOT be done with your personal information**

Your personal information will not be shared with third-parties for marketing purposes.

### **How the security of personal information is ensured**

- 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.
- No open or unsecure Wi-Fi will be used to send any personal data.
- Personal information is stored on a GDPR compliant secure cloud-based storage facility. This is password protected. No information will be stored on any office computer or mobile phone.
- Malware and antivirus protection is installed on all computing devices used to access the cloud storage and secure email.
- Mobile devices are protected with a passcode/thumbprint scanner, mobile security and antivirus software.

### **Your right to access the personal information held about you**

- You have a right to access the information held about you.
- This will usually be shared with you within 30 days of receiving a request.
- There may be an admin fee for supplying the information to you.
- You may be requested to provide evidence of your identity before information is released.
- 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 Dr Pippa Moran or her associates have not complied with data protection laws, you have a right to lodge a complaint with the Information Commissioner's Office.

Cornwall Clinical 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 Pippa Moran  
Chartered Clinical Psychologist  
Director at Cornwall Clinical Psychology  
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[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.