



Privacy Policy

Introduction

At City Solace Psychotherapy maintaining your privacy and keeping your personal information safe is of crucial important. I follow and adhere to the General Data Protection Regulation (EU/2016/679) the Data Protection Act 2018 and the Privacy and Electronic Communications Regulations 2003.

In this notice it will tell you how I use and store your data from subscribing to the monthly newsletter, direct contact, during therapy and after we end. Including:

- Why I am able to process your information and what purpose I am processing it for
- Whether you have to provide it to me
- How long I store it for
- Whether there are other recipients of your personal information
- Whether I intend to transfer it to another country,
- Whether I do automated decision-making or profiling, and
- Your data protection rights.

I am happy to chat through any questions you might have about my data protection policy and you can contact me via email.

‘Data controller’ is the term used to describe the person/ organisation that collects and stores and has responsibility for people’s personal data. In this instance, the data controller is me.

I am registered with the Information Commissioner’s Office registration number ZB670769. My phone number is: 07471 788227 My email address is: jodun@citysolacepsychotherapy.com

My lawful basis for holding and using your personal information

The GDPR states that I must have a lawful basis for processing your personal data. There are different lawful bases depending on the stage at which I am processing your data. I have explained these below.

If you have had therapy with me and it has now ended, I will use legitimate interest as my lawful basis for holding and using your personal information.

If you are currently having therapy or if you are in contact with me to consider therapy, I will process your personal data where it is necessary for the performance of our contract.

The GDPR also makes sure that I look after any sensitive personal information that you may disclose to me appropriately. This type of information is called 'special category personal information'. The lawful basis for me processing any special categories of personal information is that it is for provision of health treatment (in this case therapy) and necessary for a contract with a health professional (in this case, a contract between me and you).

How I use your information

Initial contact. When you contact me with an enquiry about my therapy services I will collect information to help me satisfy your enquiry. This will include your full name, email and phone number and a basic explanation of why you are seeking therapy. Alternatively, your GP, child's school or other health professional may send me your details when making a referral or a parent or trusted individual may give me your details when making an enquiry on your behalf.

Initial conversation: During our initial conversation I may store some further information in regards to other professionals involved, any diagnosis or medications and whether you have accessed therapy previously. This is to help assess my professional suitability for your needs before a consultation. Prior to your consultation I do send out an "Initial Information" form this is to identify suitability of the therapy and also identify and assess risk.

All personal information and data at this point is stored on an encrypted memory stick. If you decide not to proceed past an initial enquiry, conversation or consultation I will ensure all your personal data I have is deleted within **72 hours**. If you would like me to delete this information sooner, just let me know.

While you are accessing therapy. Rest assured that everything you discuss with me is confidential. That confidentiality will only be broken if I feel you are at risk of harm to yourself or others (see contract for full information). I will always try to speak to you about this first, unless there are safeguarding issues that prevent this.

I will keep a record of your personal details to help the therapy services run smoothly. These and all notes I make are kept securely on an encrypted memory stick and stored in a locked container. This memory stick is not shared with any third party. I do not keep hand written notes of session. I do keep a second memory stick with just your Basic contact details for Emergencies (see Living Will section below)

For security reasons I do not retain text messages for more than **1 week**. If there is relevant information contained in a text message I will transcript this to an electronic note and store it on the same encrypted memory stick. Likewise, any email correspondence will be deleted after **1 week** if it is not important. If necessary I will cut and paste these to my electronic notes stored on the same encrypted memory stick.

Art Work

Any art making will be stored in a confidential manner for the duration of the therapy. It will be stored in a locked cabinet within my therapy room. Your art work is stored in an individual folder with only your initial as identification.

After therapy has ended.

Once therapy has ended your records will be kept for **seven years** from the end of our contact with each other and are then securely destroyed. If you want me to delete your information sooner than this, please tell me.

At the end clients can take artwork made, any chosen to be left with be kept for **1 week**. If a client disengages, artwork is kept for **three months**. It is then disposed of in a confidential manner via shredding.

Third party recipients of personal data

I sometimes share personal data with third parties, for example, where I have contracted with a supplier to carry out specific tasks. I take great care to ensure that I have a contract with the third party that states what they are allowed to do with the data I share with them. I ensure that they do not use your information in any way other than the task for which they have been contracted.

Supervisor: I receive regular supervision in line with the regulations of HCPC. This is confidential and your anonymity is upheld, however I do discuss all therapeutic work.

HMRC and accountant: Your initials are noted under payments on my tax returns.

Tide bank: I use Tide bank to create my invoices therefore your name, email address and phone number are stored within their invoicing system.

Your rights

I try to be as open as I can be in terms of giving people access to their personal information. You have a right to ask me to delete your personal information, to limit how I use your personal information, or to stop processing your personal information. You also have a right to ask for a copy of any information that I hold about you and to object to the use of your personal data in some circumstances. You can read more about your rights at ico.org.uk/your-data-matters.

If I do hold information about you I will:

- give you a description of it and where it came from;
- tell you why I am holding it, tell you how long I will store your data and how I made this decision;
- tell you who it could be disclosed to;
- let you have a copy of the information in an intelligible form.

You can also ask me at any time to correct any mistakes there may be in the personal information I hold about you.

To make a request for any personal information I may hold about you, please put the request in writing addressing it to [**jodun@citysolacepsychotherapy.com**](mailto:jodun@citysolacepsychotherapy.com).

If you have any complaint about how I handle your personal data please do not hesitate to get in touch with me by writing or emailing to the contact details given above. I would welcome any suggestions for improving my data protection procedures.

If you want to make a formal complaint about the way I have processed your personal information you can contact the ICO which is the statutory body that oversees data protection law in the UK. For more information go to ico.org.uk/make-a-complaint.

Data security

I take the security of the data I hold about you very seriously and as such I take every effort to make sure it is kept secure. I store all forms, personal information and data on encrypted memory sticks that are unlabelled and stored in an unmarked locked container in a private property. No one has access to the password or key.

Living Will

As I work privately I do make it clear to all clients who work with me that if there is an emergency I have a living will in place. My elected LPA will give an encrypted memory stick to my supervisor **Jenny Downie**. This memory stick only contains your basic information: name, email, phone number and appointment time. She then has to

contact my solicitor who holds the password for this memory stick. This is so she can alert you of any changes in my circumstances and your therapy.

Additional information for website owners and employers

When someone visits my website, I use a third party service, Wix analytics and Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. I do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way that does not identify anyone. I do not make, and do not allow Wix Analytics or Google Analytics to make, any attempt to find out the identities of those visiting my website. I use legitimate interests as my lawful basis for holding and using your personal information in this way when you visit my website.

I use Wix Analytics or Google Analytics so that I can continually improve my service to you, You can read Wix Privacy Policy <https://www.wix.com/about/privacy> and Google Analytics Policy <https://policies.google.com/technologies/partner-sites>

I use Wix as the content management system for our website - find out about their data protection here <https://support.wix.com/en/article/general-data-protection-regulation-gdpr>

Like most websites we use cookies to help the site work more efficiently - find out about our use of cookies <https://support.wix.com/en/article/cookies-and-your-wix-site>

No user-specific data is collected by me or any third party. If you fill in a form on my website, that data will be temporarily stored on the web host before being sent to me.

Subscribing to mailing list:

If an individual decides to subscribe to my mailing list their email is stored within Wix content management system. See above for their data protection. I do not make any other copy of this mailing list and do not use data for any other purposes other than for those specified.