

Updated October 2020.

**Dr Rachel M Allan recognises that it is essential for professional therapy services to be confidential, trustworthy, secure and discreet. Client privacy and confidentiality is protected with the utmost care and sensitivity. Dr Rachel M Allan is committed to protecting the privacy of clients accessing her services from the point of initial enquiry to the end of therapy, and beyond. Prospective clients who may have specific considerations or requirements around privacy are welcome to contact Dr Rachel M Allan to discuss these in confidence.**

When working with a Psychologist, it is essential that clients can have total confidence that any information shared is handled securely, safely and in compliance with legislation. Dr Rachel M Allan is committed to protecting information through safe and responsible data handling.

Information gathered by Dr Rachel M Allan is handled in accordance with laws concerning the protection of personal data (UK Data Protection Bill 2018 and General Data Protection Regulation 2018). Dr Rachel M Allan is the data controller, and is registered with the Information Commissioners Office.

This policy covers the procedures followed by Dr Rachel M Allan to protect the information of therapy and supervision clients and any other clients contracting with Dr Rachel M Allan for professional psychological services. For the purposes of this policy, the term “client” covers each and all of these client groups.

### **1. What information is collected?**

In order to make an enquiry about services, the client’s name, e-mail address, contact telephone number, and a brief summary of the client’s query are required. This is to enable a response to initial enquiries. Dr Rachel M Allan recommends that prospective clients provide only minimal information about their mental health and personal circumstances when making an initial website or e-mail enquiry. The purpose of the initial enquiry is to set up a phone consultation, where there will be an opportunity to describe difficulties or service requirements in more detail.

Further information is collected and stored at the assessment appointment. This includes a full name, residential address, date of birth, phone number, e-mail address, emergency contact details, GP information and details of any other professional involved in the client’s mental health care. Insurer details are collected if applicable.

Written notes are taken during therapy and supervision sessions. These are transferred to an encrypted digital drive at the end of the clinic, and paper notes are shredded. Professional Psychology clinical practice requires clinical note taking. Clinical notes contain sensitive information relevant to therapy.

Additional therapy or supervision documents, such as psychological outcome measures or formulation information, completed between the client and Dr Rachel M Allan are handled in the same way.

Clients are given the opportunity to complete a feedback form at the end of therapy, supervision and training. These are anonymised and stored securely. Clients are not obliged to complete a feedback sheet.

Dr Rachel M Allan strongly advises that clients do not include sensitive information in e-mails, text messages or any other method of written communication.

## **2. Why is this information collected?**

Information is collected by Dr Rachel M Allan in order to provide professional services.

Contact details are kept so that clients can be contacted about appointment scheduling or other arrangements pertaining to organising service delivery. Dr Rachel M Allan will use the client's e-mail address as the primary mode of contact for matters relating to appointments. E-mail is vulnerable to viruses and human error. For this reason, Dr Rachel M Allan advises clients to be thoughtful about what is included in e-mails to Dr Rachel M Allan and to consider which e-mail is chosen to use to make contact.

E-mail is used to provide clients with an online invitation to join sessions via Zoom. E-mail may be used to share password-protected documents pertaining to therapy, pending mutual agreement. For self-funding clients, e-mail is used to provide a record of payment for services, which is sent via an encrypted link.

Dr Rachel M Allan may contact clients by text message to advise of a last minute change to an appointment. Dr Rachel M Allan requests that text message is used for the sole purpose of appointment scheduling. Dr Rachel M Allan strongly advises that clients do not use text message for the communication of sensitive information.

Dr Rachel M Allan may use a client's mobile phone number to reach the client via Whatsapp when using this back-up method of video call for online sessions. This will be done by mutual agreement between the client and Dr Rachel M Allan.

GP details are required to allow Dr Rachel M Allan to share information with a client's GP should Dr Rachel M Allan assess that this is required to safeguard physical and/or emotional health.

Emergency contact details are stored should an emergency situation related to a client's health and wellbeing arise during an appointment, and notification is deemed essential to the client's wellbeing and safety.

If applicable, details of the client's insurance policy are collected in order to allow Dr Rachel M Allan to verify the client's insurance cover and process payment from the insurance provider.

Information, including any sensitive information provided by the client, deemed relevant to clinical work is stored in order to support the delivery of safe and effective psychological therapy. As a Health and Care Professions Council (HCPC) registered Psychologist, Dr Rachel M Allan is required to keep records of clinical practice.

Feedback is collected to improve and refine existing services. Anonymised client feedback may be used for marketing and promotional purposes. Permission is sought from the client prior to feedback being shared in this way. Permission for the anonymous sharing of client feedback can be withdrawn by the client at any point. Client feedback will not be shared without their permission. Clients are under no obligation to provide feedback.

### **3. Data storage**

All client information is held in password-protected documents, stored in secure cloud storage (Tresorit) and accessible only through password protected devices to which only Dr Rachel M Allan has access. Any client information held in hard copy (e.g. signed contract or completed feedback sheet) is held in a locked file box. Any written notes made during sessions are either handed to the client for their use, or shredded following the therapy session.

Client mobile numbers may be stored in a device which is the property of Dr Rachel M Allan. This device is passcode protected. Client numbers will be saved under initials only, and will be deleted at the end of therapy.

In the event of information relating to a client being provided by a third party (e.g. if referred by another professional) only information pertinent to assessment and therapy will be kept. This information will be password protected and stored on an encrypted system. Clients are made aware that this information is held, and that they have the right to access it.

Details about the handling and storage of personal information are included in the Terms and Conditions for services. During the first session, clients are informed about how their personal information is handled. Clients are directed to this document for full and detailed information about privacy.

Clients are advised that they may request to access their personal information at any time. Clients requesting to access the information held about them will be provided access within one month of the request being made in writing. There is no charge for information access.

GDPR legislation states that individuals have the right to be 'forgotten' i.e. for their information to be erased should they request that. However, Dr Rachel M Allan is a Practitioner Psychologist and registrant of the HCPC, and information gathered for the purposes of psychological assessment and treatment form part of a client's health record. HCPC guidelines require practitioners to store health records for 7 years.

Records are held for seven years from the completion of therapy or supervision. Records are destroyed at the end of the calendar year once seven years have expired.

In the event of a data breach, the ICO will be notified. Clients will be notified within 72 hours in the event of a data breach where their information has been compromised.

Dr Rachel M Allan receives clinical supervision where clinical work is discussed. All client information is anonymised and supervision is protected by a confidentiality agreement.

Dr Rachel M Allan may speak in general terms about professional activities and experience when delivering training and in other professional contexts. Any information provided in these contexts is general, and does not relate to one specific client case or clinical event. Specific, detailed or identifying client information is never shared in any public context.

#### **4. Information Sharing**

The information provided by clients to Dr Rachel M Allan is confidential, however there are limits to confidentiality. This is in keeping with HCPC Professional Practice Guidelines.

Some client personal information may be shared in exceptional circumstances:

- When the information concerns risk of harm to the client, risk of harm to Dr Rachel M Allan, another adult, or a child.
- When information is pertinent to treatment being delivered by another health provider, such as the client's GP.
- In the event of a court order to share information.

If the client wishes to use an insurance policy to cover the cost of sessions, Dr Rachel M Allan will contact the insurance provider to verify the policy and will notify the insurance provider of work completed, referencing policy details provided by the client. Dates of therapy sessions and a record of attendance will be provided to the insurer in order to request payment for services. Similarly, if therapy costs are covered by a third party individual or organisation, dates of sessions may need to be provided by Dr Rachel M Allan for invoicing purposes.

Client requests for written reports or other evidence of therapy will be considered on a case-by-case basis. In the event of such documentation being provided, it will be sent by e-mail in a password protected document, in hard copy format handed to the client in person, or posted using Recorded Delivery. The mode of delivery will be mutually agreed between the client and Dr Rachel M Allan.

#### **5. Online Data**

The website for Dr Rachel M Allan uses a cookie to analyse web traffic. A Facebook pixel is used for this purpose, linking the website for Dr Rachel M Allan to the Facebook and Instagram accounts for Dr Rachel M Allan. Full details of website analytics used by Dr Rachel M Allan are available in a separate Cookie Policy.