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Data Privacy Policy

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GDPR SME



Introduction

As part of complying with GDPR I take the management of your personal data very seriously. This document describes what data I need to capture from you, where and how I store it and how long I keep it for.

If you have any questions, please get in touch

Data Privacy Policy

I aim to be as clear as possible about how and why I use information about you so that you can be confident that your privacy is protected.

This policy describes the information that I collect when you use my services, if you contact me or when I contact you. This information includes personal information 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].

I use the information I collect in accordance with all laws concerning the protection of personal data, including the Data Protection Act 1998 and the GDPR 2016. As per these laws, I am the data controller; if another party has access to your data I will tell you if they are acting as a data controller or a data processor, who they are, what they are doing with your data and why I need to provide them with the information.

If your questions are not fully answered by this policy, please contact me. If you are not satisfied with the answers, you can contact the Information Commissioner's Office (ICO) <https://ico.org.uk>.

1. The legal basis for collecting your data

I need to collect information about you so that I can:

- Know who you are so that I can communicate with you in a personal way. The legal basis for this is a legitimate interest as an expert witness or clinical psychologist to do so.
- The second lawful reason for us processing your data may be Legal Obligation. If we are processing "special category data" about you, this is our second lawful reason to do so. This is likely to apply if you are being assessed as part of a litigation claim. As a client or patient of Associates in Clinical Psychology LTD our lawful reason for processing special category data is that it is necessary for the purposes of the provision of health and social care or treatment.
- Deliver psychological services to you. The legal basis for this is the contract with you.
- Process your payment for the goods and services. The legal basis for this is the contract with you.
- Verify your identity so that I can be sure I am dealing with the right person. The legal basis for this is a legitimate interest.

2. The personal data I collect

For us to provide you with goods and services, I need to collect the following information:

- Basic information about you such as your name, date of birth and occupation.
- Your contact information including a postal address, telephone number(s) and electronic contact such as email address.
- Relevant events in your life history such as previous therapeutic help, medication, any drug or alcohol usage and your psychological history.

I collect this information directly from you or from the letter provided by the agency that I have received your referral from.

I may also collect information about you from third parties; for example, if I need to gather information from another health professional (such as your Doctor) to provide a complete health assessment.

3. What I use your personal data for

I use the data I collect from you in the following ways:

- To communicate with you so that I can inform you about your appointments with us I use your name, your contact details such as your telephone number, email address or postal address.
- To verify your identity, for example with your health professional, I use your name and date of birth.
- To deliver the psychological service to you.
- In the case of a court report we process and retain the information as required by the courts or your solicitor. We process the date of claimants, defendants as part of a legal or litigation claim and also the personal data of witness and others with links to the issues in the case.

4. Where I keep your personal data

I keep your information in the stores described below. Please note that I do not store your payment card details in any of my systems.

4.1. On my company computers

I use a personal computer that is located on my business premises. The computer is password protected. The computer stores your assessment report and the client record that stores your name, the agency that referred you, the work I've been asked to do, the location of the consultation (city) and the fee I've charged. The company laptop is password protected and encrypted. All reports are password protected in addition to the computer being password protected.

I use iCloud to make a backup copy of your client record data.

4.2. In my filing cabinet

I use a paper-based notes as part of the assessment process and to capture the results of any questionnaires that you fill in.

The paper records are kept in a locked and secure filing cabinet. They are then securely shredded after being uploaded to the company computer.

4.3. In my email system

I use Gmail for email. The email system stores the email that I receive from the agency that refers you and details of your appointments.

My secretary also uses Gmail.

4.4. In my accounting system

I use Xero to produce my invoices. Xero stores the invoices on server in the US. The invoice contains your name and contact details, and the amount that I have charged.

5. How long I keep the personal data

I keep your data for the following periods after you have ceased to be a patient. I do not hold data for longer than is necessary.

Information Representation	Period	Rationale
Assessment Report	7 years	
Patient Questionnaire	12 months	The questionnaire is used to create the Assessment Report, after the report is created there is no need to keep the Questionnaire
Client Record	7 years	
Invoice	7 years	This follows the guidance provided by HMRC
Assessment Notes	12 months	The Assessment Notes are used to create the Assessment Report, after the report is created there is no need to keep the Notes
Patient Communication	12 months	The records of communication are needed whilst you are an active patient. Once your treatment is concluded there is no need to keep the records

6. Where I send the personal data

I send your basic details and your contact details to my secretary so that they can arrange your appointment with me.

I may also send your information to your health care provider if I determine that it is in your vital interests.

Any other information, I only send to anyone I am required by law to inform.

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

You can make a subject access request (SAR) by contacting me. I may require additional

verification that you are who you say you are to process this request.

I may withhold such personal information to the extent permitted by law. In practice, this means that I may not provide information if I consider that providing the information will violate your vital interests

8. What if my information is incorrect?

Please contact me. I may require additional verification that you are who you say you are to process this request and to verify that the corrected information is indeed correct.

If you wish to have your information corrected, you must provide me with the correct data and after I have corrected the data in my systems I will send you a copy of the updated information in the same format at the subject access request in section 7.

9. How can I have my information removed?

If you want to have your data removed I need to determine if I need to keep the data, for example in case HMRC wish to inspect my records or if it is necessary to comply with the special category of data condition. If I decide that I should delete the data, I will do so without undue delay.

10. Will I send emails and text messages to you?

As part of providing my service to I need to send details of your appointments to you. To protect your information, I prefer to use an end-to-end encrypted messaging service. If you are not able to use such a service I may use SMS (text messages).

I will send emails and text messages to you about marketing and additional services that I provide only if I have your consent to do so.

11. How do I opt out of receiving emails and/or text messages from us?

If you are receiving text messages from us about marketing and additional services, you may unsubscribe at any time by following the instructions included within the text message. Similarly, if you are receiving emails from us, you may unsubscribe at any time by following the instructions included within the email.

When you unsubscribe (i.e. opt out) from either text message and/or email communications, I will suppress your details on my systems to ensure I have a record of your decision to not be contacted in that particular manner. I will not use the email address or mobile phone number for such messages again unless you opt back in.

When unsubscribing from either email or text communications, you should always follow the specific instructions given in the particular email or text that you wish to discontinue receiving.