



Delta Therapy Ltd
Counselling & Psychotherapy
www.deltatherapy.co.uk
info@deltatherapy.co.uk

Privacy Policy (version 2.4) last updated 21/02/22

Introduction

Your privacy is very important to me and you can be confident that your personal information will be kept safe and secure and will only be used for the purpose it was given to me. I adhere to current data protection legislation, including the General Data Protection Regulation (EU/2016/679) (the GDPR), the Data Protection Act 2018 and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

This privacy notice tells you what I will do with your personal information from initial point of contact through to after your therapy has ended, 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 info@deltatherapy.co.uk

'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 Delta Therapy Ltd.

Delta Therapy is registered with the Information Commissioner's Office [registration number ZA889027].

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.

Delta Therapy Ltd is a limited company registered in Scotland
Registered Number: SC688985
Registered office: 101 Rose Street South Lane, Edinburgh, Scotland, EH2 3JG
Director: Dr Shirley Moore BEng(Hons), MSc, MBChB, DipHE, MBACP

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 counselling) and necessary for a contract with a health professional (in this case, a contract between me and you).

How I use your information

Counselling Clients

Initial contact.

When you contact me with an enquiry about my counselling services, I will collect information to help me satisfy your enquiry. This will include your name, your contact details and an outline of the reasons you are seeking counselling. Alternatively, another health professional or support agency 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.

After our initial contact, I will ask you to fill out a client engagement form with details of your medical history and any therapy you may have had in the past.

If you decide not to commence counselling, including following an initial introductory session, I will ensure all your personal data is deleted within 6 months. If you would like me to delete this information sooner, just let me know.

Waiting List

Depending on my workload, I may need to operate a waiting list for counselling sessions. If you consent to be placed on my waiting list, I will hold the information obtained from you during your initial contact while you remain on the waiting list. I will confirm with you on a 6-monthly basis if you wish to remain on the waiting list. If you do not confirm you wish to remain on the waiting list, I will ensure all your personal data is deleted within 6 months.

While you are accessing counselling.

Rest assured that everything you discuss with me is confidential. That confidentiality will only be broken if there are ethical or legal obligations to disclose. Where possible, I will always try to speak to you about this first.

I will keep a record of your personal details to help the counselling services run smoothly. These details are kept securely and are not shared with any third party. The only exception to this would be if I were taken seriously ill, so that you could be contacted via email by a counselling colleague, to make you aware of the situation. In this case my next of kin would have access to your name and email address only to

pass on to my colleague These contact details are stored in a filing cabinet in a locked office room. I also keep paperwork related to financial transactions and a record of sessions attended.

I am currently trialing a Clinical Will software programme which stores client contact details securely online to be accessed only in the case that I became incapacitated. Their privacy policy can be found on their website <https://clinicalwill.app/>

I keep written notes of each session. I use a password-protected personal computer to record these notes and back up to a secure, purpose-built, online electronic records system or an encrypted, password-protected cloud-based file storage system (ProtonDrive). Any handwritten notes I make during our sessions will be entered into your electronic record shortly after our session and the paper shredded.

For security reasons I do not retain text or answerphone messages for more than a month. If there is relevant information contained in a message, I will add it to your secure electronic record. I use a secure, encrypted email provider, ProtonMail.

For private counselling clients who pay directly via bank transfer, please be aware that financial records may be shared with Delta Therapy's accountant and HMRC. They will also be bound by strict confidentiality policies, however as I may not be able to redact your name from bank statements, etc. I recommend not using your full name as a payee reference if you are concerned about this. Please use your initials or some other reference from which I can identify you. For example, you could use your initials plus the date of the session for which you are paying. E.g. SM250521.

After counselling has ended.

Once counselling has ended your records, including email correspondence will be kept for 10 years from the end of our contact with each other and are then securely deleted/destroyed. They are kept for insurance and tax purposes and may also be useful if you have a break and then choose to return to therapy at a later date.

My emails and records are encrypted and I am the only person who has access. If I were to become incapacitated, the information contained within them would not be accessible to anyone else.

Non-Counselling-Related enquiries

If I am contacted for networking, training or other professional purposes I will use legitimate interest as my lawful basis for holding and using your personal information and will retain it while we have an ongoing professional relationship.

Third party recipients of personal data

I sometimes share personal data with third parties, for example, where an organisation has approached me or contracted with me for counselling services on your behalf.

Where I provide counselling services on behalf of a third-party organisation, I will provide the organisation with the number of sessions we have had together and a very brief note of the focus of our sessions e.g.

“bereavement”, “relationship difficulties”, “anxiety”, as required by the organisation for funding and evaluation purposes. Any information which is then used by the organisation for these purposes will be anonymised. I may occasionally share anonymised quotes and feedback from clients about their experience of our counselling sessions in order to support funding applications. No sensitive or identifiable information will be shared.

As part of my professional practice requirements, I am required to undergo supervision. Any supervisor I engage will be appropriately qualified and bound by an ethical code of conduct with regards to confidentiality and GDPR. Any client issues discussed with my supervisor will be anonymised.

If I feel that you need emergency assistance at any point, I may need to share some of your personal information with your GP or another healthcare professional or emergency service. If you have given me the name of an emergency contact who is a family member or friend, I will only contact them in an emergency, as agreed by you and will limit my disclosure of any information to what is absolutely necessary in the immediate situation.

If you raise a concern with a third party relating to my practice, I may be required to share some of these records with them and with other involved parties, such as my insurer or professional body.

I will not share your information with any third parties for the purposes of direct marketing.

In the unlikely and unfortunate event that I am unable to contact clients myself, due to serious ill health or death, I have a clinical will. In this situation my next of kin will contact my trustees (who will be qualified counsellors abiding to an ethical code) and my supervisor to inform them of the situation and they will take on responsibility for communicating with you. They will have access to your contact information only.

Emergency contact details

I keep emergency contact details, if they have been provided by a client, for the sole purpose of contacting individuals in an emergency situation. My legal basis for processing these is legitimate interests.

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 use a secure email host, a secure online records system, and a password protected cloud-based filing system. All these are accessed via a password protected personal computer with antivirus software. My mobile ‘phone is protected by a PIN.

I use ProtonMail, Proton Drive and Proton Calendar to manage my caseload. The ProtonMail suite is secure and encrypted which means that ProtonMail has no technical means to access the content of emails, files or calendar events. The ProtonMail privacy policy can be found at <https://protonmail.com/privacy-policy>.

Transfer of data to another country

ProtonMail servers are located in Switzerland and Germany.

Automated decision-making or profiling

I do not use automated decision-making or profiling

Visitors to my website

When someone visits my website, I use a third-party service, 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 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 Google Analytics so that I can continually improve my service to you, you can read Google Analytics' terms of service and privacy information here.

<https://marketingplatform.google.com/about/analytics/terms/us/>.

I use WordPress as the content management system for my website - find out about WordPress and data protection here <https://en-gb.wordpress.org/about/privacy/>.

Like most websites we use cookies to help the site work more efficiently you will be asked to consent to the use of cookies when visiting my website.

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.

My website may, from time to time, contain links to and from external websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that I do not accept any responsibility or liability for these policies and the content of the website.

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:

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- 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 info@deltatherapy.co.uk

If you have a complaint about how I handle your personal data please do not hesitate to get in touch with me by emailing info@deltatherapy.co.uk. 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, please go to ico.org.uk.

Updates to this privacy notice

This privacy notice may be updated periodically and without prior notice to you to reflect changes in Delta Therapy's information practices or relevant laws. The latest version will be available at www.deltatherapy.co.uk or by emailing info@deltatherapy.co.uk. I will indicate at the top of the privacy notice when it was last updated.