

## Privacy Policy

### Who are we?

Adélie Psychology Ltd is a limited company providing a range of Clinical Psychology services for children and families including assessment, therapy, consultation, training, and clinical supervision. Dr Catherine Lawrence is the Director of Adélie Psychology Ltd.

In order to respond and process any enquiries from you, we require you to agree to the conditions set out in this privacy policy.

This privacy policy describes how we (Dr Lawrence and all Associate professionals) use any personal information we collect about you as a service user (client/patient or supervisee) when you use our website (<https://adeliopsychology.co.uk>) and services. Any personal information we hold about you is stored and processed in line with the Data Protection Act (1998) and the General Data Protection Regulation (GDPR, Regulation (EU) 2016/679) adopted on 27<sup>th</sup> April 2016 and applicable from 25<sup>th</sup> May 2018.

We take your privacy and confidentiality very seriously. Dr Catherine Lawrence is registered as the Data Protection Officer for Adélie Psychology Ltd with the Information Commissioner's Office (ICO). If you have any questions about this privacy policy please email: [info@adeliopsychology.co.uk](mailto:info@adeliopsychology.co.uk).

Adélie Psychology Ltd's ICO Registration Number is: ZB180455

### Why do we collect data?

We will collect data about you if you are a client, service user or supervisee. This includes data about the child who is the focus of the work, parents/carers, siblings and other family members if appropriate and relevant to our work. The nature of our work with you and the information we collect, store, process and share must have a lawful basis. We process data because it is in the legitimate interest as Registered Psychologist's to do so. We need to see and analyse documents containing this information in order to provide professional psychological opinion/consultation, carry out an assessment or provide interventions. As a client our lawful reason for processing special category data is that it is necessary for the purpose of the provision of health or social care or treatment. Another lawful reason for us processing your data is it is our

legal obligation. If we are processing special category data about you, this is our second lawful reason to do so. You can find out more about the lawful basis for personal data collection on the ICO website: <http://www.ico.org.uk>.

### How do we collect data?

We will use a number of methods to collect data about you to enable us to provide the services you have enquired about or requested from Adélie Psychology Ltd, including:

- Website: we will collect personal data and technical data from you when you use our website, including use of the contact us form.
- Telephone: We may telephone you and other people connected to your care to gather information as part of our assessment, intervention, consultation, training and supervision services.
- Text/Email/WhatsApp: We may use email to communicate with you and other third-parties connected to your care. We may use email, text messages or WhatsApp messages for the purposes of communication with you, for example, sending appointment reminders, checking if you're attending your online appointment.
- Face-to-face/online: When we meet face-to-face or online and we have contact with other parties connected with your care we take written notes to inform our work.
- Written Communications: We may use other forms of written communication, including letters and email to communicate with you and others connected with your care. We may also ask you to complete forms as part of your assessment, intervention, consultation, training and supervision services.
- Third-party sources: With your consent we may collect personal data about you from third-parties connected with your care, for example, other health and social care providers. We may also use search analytics providers to provide us with personal data about individual's accessing our website.

### What data do we gather?

We collect information about you to enable us to work with you safely and effectively in providing the clinical psychology services we offer and also to ensure efficient appointment and payment processes. We will gather personal data about you to enable us to fulfil these service needs, such as:

- Identity data: Personal details including your name, address, date of birth and gender.

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- Contact data: Including your postal address, billing address, email address, contact telephone number(s).
- Other data: Including General Practitioner (G.P.) details, health, education and social care agencies (including voluntary and statutory services), details of private health insurance providers (where relevant).
- Financial data: Including payment/transaction information.
- Technical data: As required for accessing and providing information through our website.

The nature of our work with you means that we will also need to gather, store and potentially share sensitive personal data in therapy records (for example, notes, letters, reports, outcome measures/psychometric assessments) about your psychological and physical wellbeing, mental health, relationships, life events, diagnoses, medical conditions, prescribed medications and other forms of treatment and forensic/criminal history. We gather this information as is relevant for the purposes of our agreed work with you and to offer you the services you have sought from us.

To make sure that you are assessed/treated/supervised safely and appropriately, we record your personal information as well as details about all contacts you have with us, such as clinical appointments, supervision sessions, assessment information, letters/reports relating to your care so that we can plan and review your treatment correctly.

We also process data in relation to the legitimate interests of the business including:

- Invoices, receipts, accounts and tax returns. Our accountant has access to our accounting software which may include client's names, addresses and emails, and any Purchase Orders or PMI Authorisation codes used for invoicing. Our accountant is not local so is unlikely to know you and is also bound by GDPR and ICO for data protection.

### How do we use the data we collect from you?

We will only collect data from you that is necessary and relevant to offering you the services that you have sought from us, for example; psychological assessment, psychological therapy, training, consultation and supervision. Collecting this data helps us to:

- Find out if we are the right service to help you.
- Contact you to set up assessment, therapy, training, consultation or supervision.
- Conduct a thorough psychological assessment

- Devise and implement a therapeutic intervention/treatment plan.
- Review and plan your psychological care and other services provided to you through clinical supervision.
- Contact you to provide you with the opportunity to complete a satisfaction survey.
- Invoice you for services provided.
- Communicate with relevant third-parties to support your treatment and manage risks (where necessary and agreed with you).

If your work is interrupted due to your therapist having unexpected long-term unavailability, either Dr Lawrence or another Clinical Psychologist, will have access to your contact information and be in touch with you to discuss options.

### How long do we keep your data for?

We do not keep information for any longer than necessary.

Administrative data is retained for up to 6 years in line with HMRC guidance. Where it is not necessary to retain the data for 6 years, it is destroyed as soon as possible.

Personal data is retained for the duration of your work with us.

If you are over the age of 18 years old when we end our work together, we will continue to store your data using the methods outlined in this policy for 7 years from the date of our last contact with you in line with BPS Practice Guidelines (August 2017).

For clients who are 17 years old at the last contact with Adélie Psychology, data is retained until your 26th birthday. For clients under the age of 17 years old at the last contact with Adélie Psychology, your data is retained until your 25th birthday in line with the BPS Practice Guidelines (August 2017) and the The Records Management Code of Practice for Health and Social Care 2020.

We have the right to retain your data for these periods so that we can respond effectively to any questions or complaints that may later be raised by you and/or your representatives. After these retention periods we will erase (delete) the information I held about you securely.

### Security

We will always store and process the information we collect about you securely. Specifically, this includes:

- All electronic information is stored on encrypted devices which are backed up on a secure, GDPR-compliant electronic system. Client-side encryption protects your

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data from unauthorized access before it even leaves our NAS to be backed up on the cloud.

- Any paper records will be kept secure in a locked filing cabinet with restricted access.
- The email platform we use (Protonmail) is secure and encrypted.

None of your personal information is stored on the Adélie Psychology Ltd website (adeliopsychology.co.uk).

In the unlikely event of a data protection breach, I will notify the ICO so that the appropriate procedures can be followed.

### Children

Our services are not directed to individuals aged under 16. If you are aged under 16, please get your parent or guardian's permission before providing us with any personal information. We do not process data from those under 16 without explicit permission from a parent or guardian.

### Cookies

The Adélie Psychology Ltd website uses necessary cookies to enable core functionality such as security, network management, and accessibility. You may disable these by changing your browser settings, but this may affect how the website functions.

Cookies by themselves cannot be used to discover the identity of the user. A cookie is a small piece of information which is sent to your browser and stored on your computer's hard drive to perform functions and enhance your experience when using a website.

We DO NOT use cookies for advertising purposes.

We may also use your IP address to help diagnose problems with our server and to administer the website. An IP address is an assigned number that identifies your computer on a network. Your IP address may also be used to gather broad demographic information.

### Third-party links

The Adélie Psychology Ltd website contains links to third-party websites and information. Clicking on those links may enable other third-party organisations to gather personal data about you. We do not control these third-party websites and are not responsible for their privacy policies and how they use your personal data once you have chosen to visit their website.

## Data accuracy

It is important that the information, including personal data (for example; name, contact details, other professionals involved) and sensitive personal data we hold about you is accurate. During the course of your work with us, if your personal data changes, please notify us at the earliest opportunity to enable us to update your information to ensure accuracy and that our records are up-to-date. This is necessary for both data protection and safety/safeguarding purposes.

## Sharing and disclosing data

Your information is kept confidential wherever possible. In most circumstances we will not disclose personal data without your consent. If we do need to share your information we will always try and ask your permission for this. We may not be able to ask for permission under special circumstances where we are professionally and/or legally required to do so.

If we believe you or others are at serious risk of harm, either from yourself or others, or if you are at risk of harming others, we will share your information with an appropriate professional (for example, Social Care, G.P., Mental Health Service, Emergency/Crisis Services).

Similarly, if we become aware of an intent to cause harm to an organisation (for example, terrorism), the law may require that we inform an authority without seeking your permission. In such a situation the law may require that we share your personal information without your knowledge.

Your information may be shared with outside organisations if they are directly involved with your care/case (for example, a Local Authority funding your therapy, a G.P. or Paediatrician overseeing the medical care of your child). We would discuss with you who we are sharing your information with and what details we would share with them.

As part of on-going professional practice, we all have regular clinical supervision where we discuss and explore the therapeutic work we are undertaking. This may occur through verbal discussion or the showing of recorded sessions (when consent for this has been obtained from you). In order to protect your privacy, the supervisor, will not know you personally or professionally.

If you are a supervisee, we will collect sensitive data related to your psychological practice. This data may be shared with a third party if we are legally or ethically obliged to do so (for example, if there are concerns of malpractice and we need to report these to a professional body).

When investigating a complaint, we may need to share personal information with other relevant bodies.

## Your rights

We are fully committed to protecting your rights to privacy. Under the Data Protection Act and General Data Protection Regulations (GDPR), you have certain rights in relation to the personal data collected, stored, processed and shared about you, including the rights to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing of your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of these rights, please contact Dr Catherine Lawrence via email on [info@adeliepsychology.co.uk](mailto:info@adeliepsychology.co.uk).

## Accessing your information

All individuals we collect, store, and process personal information about as a client/user of our service are entitled to:

- Ask what information we hold about them and why.
- Ask how to gain access to this information.
- Be informed about how it is kept up-to-date.
- Be informed about how we meet data protection regulations.

If you would like to find out what data is held about you and how it is used you have a right of access and can make a subject access request. Subject access requests can be made verbally or in writing to Dr Catherine Lawrence as the Data Protection Officer. She will aim to respond to your subject access request within one month of receiving it. In certain circumstances she may need extra time to consider your request and it can take up to an extra two months. If this is the case, she will let you know within one month that it needs more time and why. She will always verify the identity of anyone making a subject access request before disclosing any data.

## Complaints or queries

We make every effort to meet the highest standards when collecting and using your personal information. If you have questions or concerns about how your information is handled, please email Dr Catherine Lawrence, Director, at [info@adeliepsychology.co.uk](mailto:info@adeliepsychology.co.uk)

If you are not satisfied with the response from Dr Lawrence or believe that we are not processing your data in accordance with the law you have the right to raise your complaint with the Information Commissioner's Office (ICO):  
Website: <https://ico.org.uk/make-a-complaint>  
Helpline: 0303 123 1113

## Changes to this privacy policy

This privacy policy will be regularly reviewed and updated so please check back to ensure that you are happy with any changes. By using our website and services you are agreeing to be bound by this privacy policy.