

GDPR

As a therapist I am acutely aware of the importance of confidentiality and as a registered member of the British Association of Counsellors and Psychotherapists (BACP) I observe their guidelines on confidentiality and explain these guidelines at the beginning of therapy.

At the same time I aim for transparency with my clients - about the way I work and the kind of boundaries that contain and protect our work together.

For these reasons I would like to explain the impact of General Data Protection Regulation (GDPR) which came into effect on May 25th, 2018 and applies to all companies that handle personal data including 'small companies' like therapeutic practices. In brief, GDPR formalises and extends regulations around the collection, storage and protection of data, in response to the increasing reach of technology and prevalence of digitally held data.

Firstly, you have a right to know what information I keep about you. In addition to contact details I may also keep notes about our sessions together. These notes are kept manually on pad and paper and are not kept alongside information that identifies you. For organisational purposes I also keep a record of our sessions manually in an old-fashioned paper diary, using only first names or initials.

My notes are not shared with anyone other than anonymously within clinical supervision or other professional confidential contexts. In rare circumstances, notes can be subpoenaed in a court of law. Because of this, I try to keep my notes to a minimum.

I will keep your notes for the period I am obliged to which is 3 years, after which they will be shredded.

You have the right to request any information I keep about you. As these notes are hand written and only for my own use in order to reflect on the work we are doing, I would advise that we discuss together your reasons for requesting them in therapy. After this conversation, should you request a written copy, I will require time to type them up and you can have them within one calendar month.

I also keep your email and phone number in my digital contacts so I can contact you if necessary. These contacts may be vulnerable to hacking. If you prefer, I can refrain from keeping them digitally and instead record them manually. Please let me know if you would rather I held your contact details this way.

I do not use an encryption programme so emails may also be vulnerable to hacking or mis-sending by human error. If you would prefer not to communicate by email, please let me know. Otherwise, it is best to use email only for logistical purposes (changing session times, etc.) and to avoid the inclusion of personal or sensitive information.

I do not invoice by email unless you request this although I do accept online payments which can also be hacked. If you are concerned about this please let me know and we can arrange an alternative method of payment.

You have the right to have the information I hold about you erased. If you would like me to delete your information, let me know. However, as above, I may need to retain your notes for a required period of time, after which they will be deleted. In general, I will only hold the minimum of information I need about you to carry out my duties, and will regularly audit and clear such data.

If you would like to discuss any aspect of the above, please let me know.