**Susan Holden's Therapist GDPR Compliance and Privacy Statement**

Susan Holden is committed to complying with the terms of the General Data Protection Regulation (GDPR) regarding the responsible and secure use of your data and protection of your privacy.  
Susan has a legitimate interest in processing personal data in order to provide therapy and supervision services. The purpose of this statement is to let you know what personal information Susan collects and holds; why this data is collected; how long it is kept and what your rights are regarding this personal data. Susan is registered with the Information Commissioners Office (ICO).  
  
When you make a contract with Susan, for therapy or supervision, you will be asked to consent to the processing of your data under the terms of this policy.  
  
**What information does Susan collect?**  
For supervisees Susan only collects addresses, email addresses, and telephone numbers. For therapy clients she collects personal data such as name, address, date of birth, gender, telephone numbers and sometimes email address. Susan may also collect any data you give her regarding personal and family background, alongside potentially sensitive data relating to medical and mental health conditions.  
  
**What does Susan use your information for?** She uses your information in the following ways:

• To provide supervisees with supervision or clients with therapy.

• To notify you about changes to your appointments and the services she provides.

• To fulfil any administrative, legal, ethical and contractual obligations.  
  
**What information does Susan share?**  
She will **not** share any information about you with other organisations or people, except in the following situations:

• Consent – She may share information with relevant medical professionals or others whom you have requested or agreed she needs to contact.

• Serious harm – She may share your information with the relevant authorities if she has reason to believe that this may prevent serious harm being caused to you or another person.

• Compliance with law – She may share information when the law requires this - i.e. safeguarding, terrorism, drug trafficking, serious crime or if subpoenaed by the courts.

• Clinical Will – She has a Clinical Will which means in the event of sudden death or a serious accident or illness, a named colleague will be able to access the contact details so they can notify clients.

• Supervision – It is an ethical requirement for anyone offering therapy services to

have regular supervision. Any supervisor used is an accredited member of the relevant accrediting body and works within their ethical framework.

**How does Susan keep your information safe?** All information you provide to Susan is stored as securely as possible. She will take all reasonable precautions to prevent the loss, misuse or alteration of information given.

• All paper forms and correspondence are kept in a locked filing cabinet. All electronic files are kept on password-protected devices with virus protection software.

• All client or supervisee information is destroyed 3 years after cessation of the supervision or therapeutic contract.

• If process notes are made they are kept separate from any identifiable personal information.

• For live chat, wherever possible, Susan uses phone or ZOOM.

• Whilst she will endeavour to keep these systems and communications protected against viruses and other harmful effects, Susan cannot bear responsibility for all communications being virus free.

• Any known data breaches will be reported to the ICO within 72 hours.

• Any requests for personal data will be supplied within one month.

• If clients choose to contact Susan by text or mobile phone, numbers are not stored on her phone together with identifiable information.  
  
**Your rights**  
Under the GDPR, you have the right to:

• Access your personal data - Rectify, erase or restrict your data - Object to the processing of your data - Request transfer of data (data portability).

• You may withdraw your consent for Susan to hold and process your data at any time. However, if you do this while actively receiving therapy, the services would have to end. You can withdraw your consent by requesting this in a letter or on an email.

• If you have any concerns about the way Susan handles your data please contact her on 01748 825732 or 07941386702. If you feel this has not been resolved effectively you have the right to contact the Information Commissioners Office (www.ico.org.uk)  
  
**Changes to this policy**  
This document is a work in progress and may be modified from time to time.

19/3/2019