



## Privacy Policy

This privacy policy sets out how any personal data we collect from you, or that you provide to us, will be stored and processed confidentially.

*Mindsight Psychology Services Ltd* provides psychological assessment, therapy and consultation services. We also trade as *Mindsight Autism Services* providing autism and ADHD assessments and diagnoses for children and adults. This privacy policy covers our work for both services.

### Data control

- Dr Victoria Perry is the data controller for Mindsight Psychology Services Ltd (also trading as Mindsight Autism Services). Associate therapists taking on referrals with Mindsight Psychology Services Ltd will be additional data controllers (registered individually with the ICO) for the clients they work with directly and may have access to more data than Dr Perry due to the confidential nature of their therapy work with a specific client. In such cases, associates will be the primary data controller for those clients.
- Mindsight Psychology Services Ltd may also use an administrative assistant for tasks such as invoicing and organising or rearranging appointments. Assistants will be data processors (also registered with the ICO) and will only have access to information essential for carrying out administrative tasks such as Name and Contact details. They will not have access to any sensitive personal information such as clinical or therapy notes.

- In joint assessment work carried out under the trading name Mindsight Autism Services, Dr Perry, Shelley Natt and associates will share sensitive information in a data secure way through our online cloud-based file storage system in order to reach an assessment outcome.
- This privacy policy sets out how any personal data we collect from you, or that you provide to us, will be stored and processed confidentially.

### **How we gather your personal information**

- Information that you provide by emailing us via our websites and via various therapy directories and platforms or by phone to request further information about our services.
- Emails to [admin@mindsightpsychology.co.uk](mailto:admin@mindsightpsychology.co.uk), [autism@mindsightpsychology.co.uk](mailto:autism@mindsightpsychology.co.uk) or phone calls and text messages or Whatsapp messages to 07599264651
- Contact information and NOK details gathered during the assessment sessions or in our online information gathering forms (Using Google Drive or One-Drive secure cloud storage systems) prior to an assessment session.
- Brief session notes.
- For online therapy sessions we use the platform Google Meet which is securely encrypted.
- Information gathering forms and questionnaires shared securely online or via post forming part of an in-depth neurodevelopmental assessment.

### **What personal information we gather:**

We process the personal data of individuals who are therapy or assessment clients or have made enquiries about these services. This might include:

- Names, contact details and dates of birth;
- IP address (if collected via the website contact box)
- Health information (including GP and NOK details);
- Information about race, ethnic origin and sex;
- Information about criminal offences.

## **Other personal data**

We also process personal data pursuant to our legitimate interests in running our business such as:

- Invoices and receipts
- Accounts and tax returns
- Information to help with our marketing (such as how you heard about our service)

## **Where we store your personal data**

- Client contact details, session notes and information gathered for neurodevelopmental assessments are stored securely in our online cloud storage system. This has a secure 2 step verification system for access, requiring a code sent to our mobile phones.
- Notes about therapy sessions will not be read by anyone else apart from the clinician working with you.
- Any written notes taken in the session will be transferred to the electronic notes and then shredded after each session.
- If the paper notes, drawings etc from the session would be useful for subsequent sessions, these will be kept in a secure locked filing cabinet until they are no longer needed, then shredded.
- We take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

## **How your information is used**

- We use your contact details to allow us to provide you with information about the service that you request from us, to allow you to tell us about changes in your availability and to notify you about changes to our availability and any other relevant administrative changes.
- We use the brief session notes to carry out our obligation arising from the therapy agreement entered into between you and us (separate to this policy).

- Brief case notes documenting contact and information gathered with anyone involved in the neurodevelopmental assessment process are used to reach a clinical conclusion regarding an autism/ADHD diagnosis.
- As part of our commitment to providing a professional service, we attend supervision regularly. This is bound by a confidentiality contract (separate from this policy) and to protect your identity we only use your initials to refer to you.

### **How long we keep your information/notes for**

- After therapy has finished, your phone number and any text messages will be deleted from our smart phones.
- Emails relating to initial enquiries that do not progress to an assessment session are deleted every 6 months unless enquiries are still ongoing.
- Emails pertaining to enquiries that are still ongoing after 6 months are deleted as soon as possible when the enquiries are resolved.
- If a potential client would like to be on our waiting list, their email will be retained within our business g-mail account (which will include their contact details), so that we are able to contact them when we have availability. If after this they do not want to proceed with their therapy or assessment enquiry, their email will be deleted.
- We will retain your pre-therapy questionnaires and brief sessions notes for as long as we are working together. After therapy has finished, we will retain these documents for a further seven years in case you decide to return to therapy with us, and which is also a requirement of our indemnity insurance, after which the documents will be destroyed.
- We will retain information gathering forms, questionnaire measures, assessment reports pertaining to neurodevelopmental assessments for:
  - 7 years if the person is over 18 at the time of the assessment
  - Until the person is 26 years old if they were under 18 at the time of the assessment
- Videos relating to neurodevelopmental assessments are stored on the secure One Drive system until the assessment report is completed and are then deleted.

## **Your rights**

- You are entitled to view, amend, or delete the personal information that we hold. All requests have a month to be carried out.
- If you request to have your records deleted, we will seek advice from the HCPC, British Psychological Society and our professional indemnity insurers before agreeing to the request.

## **In the event of a data breach**

- We have a legal obligation to report a data breach to you and the Information Commissioners Office (ICO) within 72 hours.

## **Disclosure of your personal information:**

We take your privacy seriously. Your data will only be provided to associates and administrative assistants on a strictly need to know and on the basis of minimum information required to successfully deliver our services. We do not share personal data with anyone external to the organisation, without your consent, other than with:

- Health insurance providers for the purposes of billing and to provide treatment updates where necessary for billing.
- Psychologists and other clinical professionals working with Mindsight Psychology Services Ltd on an associate basis (your consent will be asked before doing this).
- Those who have instructed us to provide psychological treatment, such as a solicitor. In these cases, relevant clinical information from therapy records will be shared with legal services as required and with your written consent.
- Relevant authorities when the information concerns risk of harm to the client, or risk of harm to another adult or a child. We will discuss such a proposed disclosure with you unless we believe that to do so could increase the level of risk to you or to someone else.

- Outsourced service providers such as accountancy services, pursuant to GDPR compliant written contracts.
- HMRC and VAT Commissioner as they require.
- With others pursuant to a court order.
- In the event of Dr Perry's death your personal contact information will be disclosed to her nominated clinical supervisor so that they can notify you. They will also destroy all contact information and notes on her computer.

### **Changes to the GDPR agreement**

- We will notify you of changes we may make to this privacy policy in the future, if you are still open to our service.

### **Consent to the GDPR agreement**

***Your use and undertaking of the services of Mindsight Psychology Services Ltd constitutes your approval and acceptance of this agreement, and that you are consenting to our use and storage of the personal information you have disclosed to us as detailed above. You have the right to withdraw your consent at any time.***