

**Privacy Policy: Alison Lane, Clinical Psychologist,
Last updated 13th January 2025**

I promise to keep any data you share with me during our sessions together safe and secure. I promise not to share it with anyone unless I have a professional or legal obligation. If we contract to work together you give me permission to collect information concerning your mental health along with other data which is necessary to deliver my services.

Introduction.

I am responsible for protecting your privacy and any personal information you may share with me when we work together. For this purpose, under UK data protection law which includes the UK GDPR, I would be a “data controller” which means I am responsible for taking measures to ensure your data is safe and for policies on such things as how long data is kept and who if anyone, I might share it with.

This notice explains the kinds of personal data I may collect about you and that are necessary for us to work effectively together. It also explains how I store and handle the data and how I keep it safe.

First of all, it’s important to understand a few terms. “Personal data” is information that identifies you, it will also be information about your problems and progress in therapy and will include any notes I make about our meetings.

“Processing” your data includes various activities using your data. These may include collecting, recording, organising, using, disclosing, storing and deleting it.

A “Condition for processing data” is essentially my justification for processing the information. I will for example ask you for your Consent for me to process your data to deliver psychological therapies to you.

The law requires me to:

- process your data in a lawful, fair and transparent way – I promise to always be clear about what data I am processing and why.
- only collect your data for explicit and legitimate purposes – I can only collect your data that is with reference to your therapy.
- only collect data that is relevant and limited to the purpose(s) I have told you about – I won’t record any data that isn’t directly relevant to your condition.
- ensure that your data is accurate and up to date – I am required to ensure data is up to date, I may check with you from time to time to make sure of this.
- ensure that your data is only kept as long as necessary for the purpose(s) I have told you about – I have strict policies on how long I will keep your information after which it will be securely destroyed.
- ensure that appropriate security measures are used to protect your data – I am very careful about my security arrangements and constantly update my systems and procedures.

The following sections should answer any questions you have but if not, please let me know.

It is likely that I will need to update this Privacy Notice from time to time, and you are welcome to come back and check this at any time or contact me by any of the means shown below.

Conditions for processing your data.

The law on data protection sets out a number of different conditions or justifications if you like for which an organisation or individual may collect and process your personal data. When collecting your personal data, I will always make all of this very clear to you. Most commonly, I will process your data on the following lawful grounds:

1. Your Explicit Consent
2. Where there is a Contractual Obligation

3. Where I have a concern about your well being

I discuss your personal information in supervision with my supervisor who is another psychologist for the purposes of ensuring that my practice is safe and effective, and as mandated by my professional bodies. I do not reveal your name when I share your information in supervision. My supervisor does not share your personal information with anyone else. If applicable I will from time to time write to your referrer with a summary of your treatment and progress and will always obtain your consent and show you the content of such letters before sending them.

If you have not engaged with me for more than seven years, you may be flagged as an inactive individual and I will delete your file. If you would like me to keep our information for future reference, then please make this clear.

4. We may have some contractual obligations.

When we begin working together, I will ask you to agree to my therapy agreement. This is normal practice and lays out what we expect of one another. For example, I promise to give you the support you asked for, in return you promise to promptly pay your fees. By entering into these terms, we enter into a contract together.

5. Vital use of data

I may also use your data, typically in an emergency, where this is necessary to protect your life, or someone else's life. In a small number of cases where other lawful bases do not apply, I will process your data on this basis and in your best interest.

I do not discuss your personal information with third parties, except for the purposes of supervision. However, if my professional opinion was that there was an immediate and serious risk that you might harm yourself or someone else then I may have to share your personal information with a third party such as your GP or the emergency services without first obtaining your consent. This might be because it is not practically possible to obtain your consent or because attempting to do so might lead to a delay in accessing help and therefore endanger your life or that of another.

In situations where I did have to share your personal information with third parties to protect you or another, I will only share your personal information in so far as it is relevant and necessary to protect you or someone else. I will inform you what personal information I shared and to whom.

6. Legal Obligation.

It is possible that your personal information may be requested by the Police, a Court of Law, Coroners Office or Professional Body in which circumstances I would have no option but to comply with the law.

7. Legitimate interest

In certain circumstances, I may require your data to pursue my legitimate interest in a way which might reasonably be expected as a Clinical Psychologist. When I process data in this way, I will make sure there isn't a chance of any impact upon your rights, freedom or interests. I will never use my Legitimate Interest to process your sensitive data such as your case notes relating to your mental health.

Special category data.

I collect information about your current and previous psychological and physical health, and where relevant sexual health, and your current and previous social and family circumstances during your appointments. I will also collect information about you when you voluntarily complete questionnaires. This sensitive personal information is defined as "Special Category Data" and I collect it because I am providing psychological assessment or treatment to you. "Special categories" of particularly sensitive personal data require higher levels

of protection. I need to have clear justification for collecting, storing and using this type of personal data. I aim to collect and process only the special category data relevant to your mental health.

How I might collect your data:

I collect your data in different ways that may include, but are not limited to:

- When you write to me about any subject by any means.
- When you enquire about my services but do not engage.
- When you attend an appointment.
- When you complete questionnaires.
- When you access or engage with my website.

I collect personal data in order to deliver my services. The data collected is most likely in electronic format but can also be in paper form

For your security, I use all appropriate organisational and technical security controls to safeguard your data.

I am committed to your data protection rights.

You have important rights detailed in the UK GDPR and the Data Protection Act 2018, here's a brief explanation of them.

Right to Object

You have the right to object to my processing or use of your personal information. But remember in some cases I am bound by law to process your data. If you have given consent for me to collect and process your personal data, you have the right to change your mind at any time and to withdraw that consent. However, please remember that if you withdraw your consent, because of the nature of my services, I may not be able to continue supporting you.

Right to a copy of your information and a chance to correct inaccuracies. You have the right to request a copy of any information about you that I may hold at any time to check whether it is accurate. To ask for that information, please contact me in the normal way. To protect the confidentiality of your information and the interests I will ask you to verify your identity before proceeding with any request for information. If you have authorised a third party to submit a request on your behalf, I will ask them to prove they have your permission to request such information.

Right to be Forgotten

You have the right to ask me to forget you from my records. I will uphold this right unless there is a legal obligation such as a contractual agreement or it is in my legitimate interest to keep your data.

Right to be informed

You have a right to be informed, to know what I am doing with your data and why. I promise to publish privacy notices wherever they may be required to clearly explain our reasons.

Right to Restriction

You have the right to ask me to stop processing your data for a number of different reasons. For example, it might be because you think the data I hold about you is incorrect. Or maybe you think I am doing something wrong. Please contact me for further details.

Your right of portability.

If I hold information about you and you want me to 'port' it or send it to another organisation that does similar work to me or provides a similar service, you can ask me to do this. This service will be free of charge and I will endeavour to provide this service without undue delay.

Data retention and how long I may keep information

Whenever I collect or process your personal data, I will only keep it for as long as is necessary for the purpose for which it was collected. I keep your personal information and the record of our work together for seven years. I then erase your records.

How to complain about our processing of your data

If you feel that your data has been handled incorrectly, or you are unhappy with the way I have dealt with your query regarding the way I use your personal data, you have the right to complain to the Information Commissioner's Office (ICO) which regulates the use of information in the UK.

You can call them on [0303 123 1113](tel:03031231113) or go online to www.ico.org.uk/concerns

If you are based outside the UK, you have the right to complain to the relevant data protection supervisory authority in your country.

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