



## Privacy Policy

### Introduction

Your privacy is very important to me and you can be confident that your personal information will be kept safe and secure and will only be used for the purpose it was given to me. I adhere to current data protection legislation, including the General Data Protection Regulation (EU/2016/679) (the GDPR), the Data Protection Act 2018 and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

This privacy notice tells you what I will do with your personal information from initial point of contact through to after your therapy has ended, including:

- Why I am able to process your information and for what purpose
- Whether you have to provide it to me
- How long I store it for
- Whether there are other recipients of your personal information
- Your data protection rights.

I am happy to chat through any questions you might have about my data protection policy and you can contact me using the e-mail address and / or telephone number supplied below or via the contact form on my website at:

[www.wisdomwithintherapy.co.uk](http://www.wisdomwithintherapy.co.uk)

### Terms, registration with ICO and contact information

'Data controller' is the term used to describe the person / organisation that collects and stores and has responsibility for people's personal data. In this instance, the data controller is myself, Louise Nash.

I am registered with the Information Commissioner's Office, registration number: ZB897025.

My phone number is: 07707214119

My email address is: [info@wisdomwithintherapy.co.uk](mailto:info@wisdomwithintherapy.co.uk).

### My lawful basis for holding and using your personal information

The GDPR states that I must have a lawful basis for processing your personal data. There are different lawful bases depending on the stage at which I am processing your data. I have explained these below:

If you have had therapy with me and it has now ended, I will use legitimate interest as my lawful basis for holding and using your personal information.

If you are currently having therapy or if you are in contact with me to consider therapy, I will process your personal data where it is necessary for the performance of our contract.

The GDPR also makes sure that I look after any sensitive personal information that you may disclose to me appropriately. This type of information is called 'special category personal information'. The lawful basis for me processing any special categories of personal information is that it is for the provision of the wellbeing service/s you have requested or are engaged in with myself i.e. psychotherapy, counselling, coaching, reiki and / or hypnotherapy.

### How I use your information

I will ask for your explicit consent to obtain and store your data on any forms you are asked to complete. If you do not wish to provide any data requested on intake or assessment forms, then we can discuss your reasons for this and which information may be essential for performance of the contract.

Initial contact:

When you contact me with an enquiry about my therapy services via the contact form on my website, I will collect information to help me satisfy your enquiry. This will include your name, e-mail address, telephone number and the message you choose to add providing further information about your request for therapy.

Alternatively, your GP or other health professional may send me your details when

making a referral, or a trusted individual may give me your details when making an enquiry on your behalf.

If you decide not to proceed with therapy, I will ensure that all of your personal data is deleted within 14 days. If you would like me to delete this information sooner, just let me know.

If we decide that you would like a consultation call to discuss how the therapy service/s I offer might benefit you following an initial enquiry via phone, e-mail or the contact form on my website, then depending on the service you request, I may ask you to complete my client intake form. For counselling, this form requests that you provide your first name, surname, preferred name and pronouns (optional), address, e-mail address, telephone number; details about your trusted emergency contact (where applicable) including their name, their relationship to you, telephone number and e-mail address; the name of your GP and their contact details; details about the concern/s you are seeking therapy for now and any history related to the this; how the concern/s you are bringing to therapy is / are impacting on your daily life (i.e. ability to carry out daily tasks, sleep, diet, relationships etc); are you having or ever had thoughts about suicide or self-harm and if so, further information about this; have you ever had the therapy service you have requested previously, and if so, when and for how long; whether you have someone supportive that you feel you can confide in at this time / your support network; was it your decision to seek therapy or were you referred by someone else; and, what are your expectations for therapy. I will ask that you give your consent for me to use the information on the Client Intake Form for the purpose of assessing whether therapy is a suitable and safe intervention for you, to liaise with you about your therapy sessions, to conduct therapy appropriately and effectively, and, in the event of a serious emergency, to ensure your safety and / or the safety of others. If you have any queries or concerns about completing this form or any of the questions, then please do not hesitate to contact me.

If I feel it would be beneficial to your therapy, at the client intake / assessment and during your therapy, I may also ask you to complete a PHQ9 and / or GAD7 questionnaire before our first session and / or before any ongoing subsequent sessions. These forms are used to measure your level of low mood / depression and / or anxiety, if this is relevant to you.

If you disclose that you are currently having suicidal thoughts or feeling as though you want to end your own life on your intake form or throughout therapy, you will be asked to complete, or we will complete together a further form to assess this. This form requests the following information: Do you have any intent or plan to act on the suicidal thoughts / feelings you are having; If you have a plan, when are you planning on ending your life and what is your plan; Do you have the means to carry out your plan i.e. how are you going to do it and what will you use / have you ever

tried to end your life previously – if yes, tell me about that; tell me about the thoughts you have that make you feel like you want to end your own life; when do you have them; how long do they last; on a scale of 1-10 how strong are your intentions to act on your thoughts, what prevents or stops you from acting on these thoughts; what triggers these thoughts / what is happening in your life at the moment to trigger these thoughts; how would you like therapy to support you; what existing support do you have around you – is there someone you can reach out to when you are feeling low; external support services (GP, local crisis and home treatment teams, Samaritans). This form is used to assess risk, consider support and client expectations, determine the suitability of therapy as an intervention at this time and to consider external support where appropriate.

For hypnotherapy, the client intake form includes some of the relevant questions within the counselling intake form, along with a question to assess any contraindications or diagnoses that may need to be considered in relation to the suitability and safety of hypnotherapy.

While you are accessing therapy:

Rest assured that everything you discuss with me is confidential.

That confidentiality will only be broken if you 1) disclose any information that may indicate you are a threat to or plan to cause harm to yourself or others; 2) that you are involved in any safeguarding concern and / or illegal activities that could be considered a serious crime, for example, but not limited to: money laundering, activities relating to terrorism, murder, manslaughter, drug trafficking or sexual trafficking, child abuse or the abuse of a dependant adult; or 3) that I am legally required to do so on account of a court order. If I need to break confidentiality, I will always try to speak to you about this first, unless there are safeguarding issues or concerns for my own welfare that prevent this.

If there is an indication that you are unable to keep yourself safe and may be at immediate risk of taking your own life, the information required to protect you may be shared with emergency services and / or relevant healthcare practitioners and / or your preferred emergency contact and in this instance, your data will be shared and processed under vital interests. Where it is safe and / or possible to do so, I will discuss this with you and let you know of my intention to share relevant information and with who.

I will keep a record of your personal details and may keep brief written notes of any therapy sessions to help the therapy services run smoothly. These details are kept securely in the TheraSee secure online portal and are not shared with any third party. For security reasons, I do not retain text messages or e-mail correspondence

for more than 14 days. If there is relevant information that relates to your therapy sessions contained in a text message or e-mail correspondence and therefore, there is a necessity to keep it longer, I will add this as an upload or note on the TheraSee secure online portal.

I share information about the content of my therapy sessions with my Clinical Supervisor. Regular supervision is a requirement of my registration as a therapist with the British Association of Counselling and Psychotherapy (BACP) in order to ensure that I am working safely and in accordance with best practice. However, all case information is anonymised so you will not be identified as part of this process. More information about the BACP can be found at: <https://www.bacp.co.uk/>.

After therapy has ended:

Once therapy has ended your records will be kept for 5 years from the end of our contact with each other and will then be securely destroyed. The reason for keeping data for 5 years is that my insurance company Holistic Insurance Services requires that data be kept for this period in the event that any insurance claim is needed. In the event that a claim is needed, specific client information may be shared on a need-to-know basis with this insurance provider. If you want me to delete your information sooner than this, please tell me.

### Third party recipients of personal data

Where I have contracted with a supplier to carry out specific tasks, I sometimes share personal data with third parties. In such cases I have carefully selected which partners I work with. I take great care to ensure that where appropriate and it is possible to do so, I have a contract with the third party that states what they are allowed to do with the data I share with them. I ensure that they do not use your information in any way other than the task for which they have been contracted. Any messages, documents and notes are only saved and stored for the period of time as set out in my data retention processes outlined in this document.

Third party suppliers that I use include IONOS who securely host any e-mail correspondence for the [info@wisdomwithintherapy.co.uk](mailto:info@wisdomwithintherapy.co.uk) e-mail address and my website. TheraSee is the secure and encrypted online portal which I use to store client notes, take payments and conduct online client sessions. You can see a copy of TheraSee's Privacy Policy here at: <https://www.therasee.com/legal/privacy>. Apple and Microsoft may temporarily store any telephone messages and / or e-mails / client letters on their cloud services when these are created or received. These are anonymised and / or deleted within 14 days in keeping with my data

retention process unless they are required for the performance of the contract or under legitimate or vital interest in which case they will be uploaded to the secure Therasee portal and deleted after 5 years.

The regulators that I use are HMRC who may request information to evidence invoicing for tax purposes and the ICO for the purpose of ensuring I am working in keeping with GDPR in order to maintain client confidentiality and meet data protection legislation.

## Your rights

I believe it is important to be open and transparent about giving people access to their personal information. You have a right to ask me to delete your personal information, to limit how I use your personal information, or to stop processing your personal information at any time. You also have a right to ask for a copy of any information that I hold about you and to object to the use of your personal data in some circumstances. You can read more about your rights at: [www.ico.org.uk/your-data-matters](http://www.ico.org.uk/your-data-matters) .

If I do hold information about you, I will:

- give you a description of it and where it came from;
- tell you why I am holding it, tell you how long I will store your data and how I made this decision;
- tell you who it could be disclosed to;
- let you have a copy of the information in an intelligible form.

You can also ask me at any time to correct any mistakes there may be in the personal information I hold about you. To make a request for any personal information I may hold about you, please put the request in writing to: [info@wisdomwithinthepathy.co.uk](mailto:info@wisdomwithinthepathy.co.uk) .

## Data security

I take the security of the data I hold about you very seriously and as such I take every effort to make sure it is kept secure. My IT devices (laptop and smartphone) are protected using FaceID and / or password. I use antivirus software on my laptop and ensure both my laptop and iPhone are updated regularly to minimise the risk and likelihood of any data breaches.

I use a secure online portal (TheraSee) to store client data and conduct online video sessions. This portal is registered with the ICO and meets with GDPR legislation. I only store client data for the relevant period of time as set out in my data retention policy provided in this document. Any paper notes taken are anonymised, uploaded to the secure online portal and any hard copies shredded before disposal. My e-mail address is password protected and I have additional security to ensure that my website is less likely to be hacked.

I use IONOS as the content management system for my website. If you fill in a form on my website, that data will be temporarily stored on the web host before being sent to me. When someone visits my website, I use third party services IONOS and Google Analytics to collect standard internet log information and details of visitor behaviour patterns. I do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way that does not identify anyone. I do not make, and do not allow IONOS to make any attempt to find out the identities of those visiting my website.

I use legitimate interests as my lawful basis for holding and using your personal information in this way when you visit my website. I use IONOS and Google Analytics so that I can continually improve my service to you. You can read IONOS' privacy policy here: <https://www.ionos.co.uk/terms-gtc/privacy-policy/> and Google's privacy policy here: <https://policies.google.com/technologies/partner-sites> .

If you have any complaint about how I handle your personal data please do not hesitate to get in touch with me by writing or emailing to the contact details given above. I would welcome any suggestions for improving my data protection procedures. If you want to make a formal complaint about the way I have processed your personal information you can contact the ICO which is the statutory body that oversees data protection law in the UK. For more information go to [www.ico.org.uk/make-a-complaint](http://www.ico.org.uk/make-a-complaint) .