



PRIVACY NOTICE

This privacy notice sets out how I (Dr. Jenny Turner) process personal data within my company: Mind Body Soul Psychology. I take your privacy very seriously, and I am committed to protecting your personal information at all times, and to taking all actions necessary to ensure that your personal data is processed lawfully, fairly & in a transparent manner. This privacy notice is provided in line with GDPR legislation, and the Data Protection Act 2018.

Data control:

I (Dr. Jenny Turner) am registered with the Information Commissioner's Office (ICO) as a "data controller" for Mind Body Soul Psychology.

When I begin to collect personal data:

As soon as you make contact with me (e.g. via my website, email) I begin processing your personal data - For example, if you use my 'Contact Me' form on my website, or email me, then I immediately begin to process some personal data related to you (i.e. In this example, I begin to process your email address/phone number, etc., and any clinically relevant communication you provide).

It is possible that another professional/person may contact me about you, on your behalf - Where this occurs, I will assume that this third party has sought your consent for this processing & sharing of your data. I will then contact you myself (as soon as is possible, within one month of receiving the enquiry, and if I have been provided contact details for you) to confirm receipt of your information, and to let you know how I process your data once I receive it.

Why I collect personal information:

As a clinical psychologist, I need to collect personal information in order to provide safe, professional and effective psychology services. I will only use your personal information to

provide the services you have requested from us, and/or to respond to queries you make about my services, and I only collect data in line with widely-held public expectations of how a psychologist would need to process data in the line of their work.

Lawful basis for processing personal data:

In line with the GDPR, I have a legitimate interest in processing the personal data that I collect, to provide health treatment. This will include personally-identifying data (name, contacts details, etc.), and will also include more sensitive* information about you, or your family/child(ren) when relevant (e.g. race, ethnic origin, political opinions, religious beliefs, genetic information, sex life or sexual orientation, etc.). **In the GDPR, this sensitive information is referred to as 'special category data'.*

It is necessary for me to collect & process the data that I do, in order to provide safe, ethical & effective psychological services, within the clearly defined therapeutic relationship with you, my client. I am also governed by the Health & Care Professions Council's (HCPC's) 'Standard of Conduct, Performance and Ethics', which also advocates for the privacy and confidentiality of all psychological services offered & I work in line with ethical & professional guidance also provided by the British Psychological Society (BPS).

What information I collect:

Information I will collect from you, at the point of you making an enquiry to me about my services are: Name, Email address, Mobile phone number, Confirmation that you are registered with a UK-based GP (although please note that no details of which GP are gathered at this time); and lastly any free-form information you wish to provide (about why you are making an enquiry). Please note: Regardless of whether or not you ever make an appointment with me, after this enquiry, I will keep a record of this data provided by you, for seven years, as per professional guidelines ^{[1][2]}.

Information I will collect from you, once you agree to make an appointment with me for my psychology services, will include: Your name, contact details, address, date of birth, GP contact details, and next of kin contact information. If you are a parent, then I may gather some/all of this information relating to your child(ren) too, if/when that is relevant to the psychological assessment/intervention I am offering.

Once you agree to work with me, I also routinely ask for information on how you found my service, for the purpose of my own marketing audits. No information you provide is passed on without your consent. I will never sell your information to others.

I do not routinely collect any specific special category data, at any set time-points - Any special category data you provide will be collected as/when relevant, in the course of any enquiries you make about my services and/or throughout the psychological assessments/interventions I offer. You can always decline to provide the information I request. Depending on the information you choose not to share with me, I may not be able offer you psychological services. This will be discussed with you, on a case-by-case basis, if/when relevant.

Other services/online platforms that I use, when you work/interact with me:

1. Wix, website host.
2. Zoom, for online appointments.
3. Protonmail, for all email correspondence.
4. WriteUpp, for clinical record keeping.
5. Barclays, for BACS payments for services.
6. Social Media platforms, such as Facebook, Instagram, X (previously Twitter), and LinkedIn - please note these are never used for any therapy services I offer; People (both clients/non-clients are free to follow me & interact with me on these apps, but I do not further process any data provided on those apps).

A privacy policy for each of these external services/platforms is freely available online, and/or please ask to see my more detailed Privacy Policy, for Mind Body Soul Psychology, for more information and links to the above-mentioned external privacy policies.

How do I use the information you provide:

- To provide safe, effective psychology services to you.
- To process payment for such services.
- To maintain a confidential & accurate clinical record of the psychology services* I offer
(*Including any enquiries that do not lead to appointments).

How do I protect the information I collect:

All information I collect is kept confidential and private, with a few (mostly very rare) exceptions, summarised below. I keep information private and confidential by prioritising data storage in secure cloud-based electronic records; Any minimal hand-written paper notes/ records that are stored by me in the course of our work are kept private in a locked cupboard on my private business premises (i.e. I do not share my business office with anyone else).

All electronic devices and programs that I use are password/passcode/Touch ID or Face ID protected, and I use encryption, and/or password protection, to protect your sensitive data if/ when it is sent electronically.

When do I share the information I collect:

All personal information I collect in the course of offering psychological therapy services is kept confidential and private, so **I will not normally share your personal information with anyone else**. I will *never* share any information you provide with any third-parties for marketing purposes.

There are some necessary exceptions to total confidentiality, which are summarised here:

1. I am professionally required to engage in clinical supervision of my work - This means that I may discuss my clients with my clinical supervisor, to ensure that my clients get a professional, safe and effective service from me. Usually this is done with just first names and ages being processed, rather than any identifying data such as your surname or date of birth, etc being revealed.
2. I will also share information with another party if you request that I do that (e.g. if you wish me to write to your GP/another professional regarding an update of our work).
3. I also have a legal obligation to share any information I have pertaining to any potential risk of harm, where doing so has the potential to reduce/stop harm from occurring - Potential agencies that I may contact in this instance are: GP, child's school, police, social services, etc. I will discuss such a proposed disclosure with you, unless I believe that to do so could increase the level of risk to you or to someone else.
4. When there is need-to-know information for another health provider, such as your GP.
5. When disclosure is in the public interest, to prevent a miscarriage of justice or where there is a legal duty, for example a Court Order.

6. in the event that I experience a serious accident/medical event, which would mean that I am suddenly unable to communicate with my clients myself: My clinical supervisor holds a password-protected document with a list of my current clients': Names; Contacts details; and a very short summary of the themes we are discussing in therapy - This list will only be accessed by my supervisor, to contact my clients, in the above-mentioned unlikely context, and not before.
7. In the event that I experience a serious accident/medical event, which leads to me suddenly ceasing my work (temporarily or permanently), and if I am unable to attend to administrative tasks associated with ceasing work: A separate third party holds a password protected list of administrative tasks associated with Mind Body Soul Psychology, and will open this document only in the above-mentioned context; This third party will attend to the listed administrative tasks on my behalf (meaning they will have access to client's personal data, at that time only). This third party: Will be respectful of the privacy of all personal data they encounter while completing these tasks; Will not further process any accessed personal data themselves; Will maintain the confidentiality of all data they access, as they attend to these administrative tasks as quickly as possible.

How long do I keep the data?

Once a client makes any enquiry about my services, then any data related to that client is kept for the duration of our time working together, and an additional seven years after the work has ceased ^{[1][2]}.

What are your rights?

The GDPR clearly states that you have the following rights regarding any personal data of yours, which is processed by someone else:

1. The right to be informed.
2. The right of access - We will usually share the requested information with you within 30 days of receiving a request; Some information may be redacted in your best interests & to protect the integrity of the therapy process. There may also be an admin fee for supplying the information to you. I may request further evidence from you to check your identity.
3. The right to have your personal information rectified, if it is inaccurate.

4. The right to erasure, in certain circumstances. Please note: Mind Body Soul Psychology reserves the right to refuse a request to delete a client's personal information where this is therapy records. Therapy records are retained for a period of seven years in accordance with the guidelines and requirements for record keeping by The British Psychological Society (BPS; 2000) ^[1] and The Health and Care Professions Council (HCPC; 2017) ^[2].
5. The right to restrict processing, in certain circumstances
6. The right to data portability, in certain circumstances.
7. The right to object, in certain circumstances.
8. Rights in relation to automated decision making and profiling (neither of which are relevant to the data I collect).

Please see <https://ico.org.uk> for more information about these rights and/or ask to see a copy of my more detailed Privacy Policy for more information about how I uphold these rights, and under what circumstances these rights may not be upheld.

If you have any concerns, or questions, or complaints about how I manage personal information:

Please contact me (Dr. Jenny Turner, data controller) in the first instance, using the contact details provided below. If you are not satisfied with my response, and/or if you would prefer not to raise it with me, you can complain to a regulator: If you think that I haven't complied with data protection laws, you always have a right to lodge a complaint with the Information Commissioner's Office - please see <https://ico.org.uk> for more information.

For more information:

I have also prepared a more detailed Privacy Policy, which anyone can request from me at any time - Please contact me if you would like to see this document, via my email address: hello@mindbodysoulpsychology.co.uk

References:

[1] The British Psychological Society (2000). Clinical Psychology and Case Notes: Guidance on Good Practice. Leicester: Division of Clinical Psychology, BPS.

[2] Health and Care Professions Council (2017). Confidentiality – guidance for registrants. London: HCPC.

Dr. Jenny Turner, Clinical Psychologist & Owner of Mind Body Soul Psychology