**Privacy Policy**

**1. Introduction**

This privacy policy outlines how Open Mind Psychology Ltd processes, stores, and protects your personal data in compliance with the General Data Protection Regulation (GDPR) and the Privacy and Electronic Communications Regulations (PECR). These regulations enhance the rights of data subjects regarding personal data protection, ensuring the lawful processing of personal information.

I, Dr. Eloise Smith, a Clinical Psychologist regulated by the Health and Care Professions Council (HCPC) and the British Psychological Society (BPS), am committed to upholding the highest standards of privacy and confidentiality.

**2. Why Do I Collect Information About You?**

I collect information about you to provide psychological assessment and treatment, ensuring the safe and professional delivery of psychological services. There are several legal bases for processing your personal data:

* **Communication**: I use your personal information to communicate with you directly. The legal basis for this is legitimate interest.
* **Provision of Psychological Services**: As a Psychologist, I collect your personal and sensitive ‘special category’ data (such as details about psychological difficulties) to provide safe and professional therapy. The legal basis for this is our contract.
* **Processing Payments**: I collect payment information to process fees for services provided. The legal basis for this is our contract.
* **Supervision and Training**: If you are receiving supervision, training, or other professional services, I will process your personal data under our contractual agreement.

**3. What Information Do I Collect About You?**

To provide a safe and professional service, I collect personal and sensitive information, including:

* **Personal Information**: Name, address, telephone numbers, email address, date of birth, gender (or preferred identity), age, relationships, children, and occupation.
* **Sensitive Information**: Referral information, medical history (if relevant), medication, psychological history and current difficulties, developmental history, educational history, family history, relationship history, illicit substance use (if appropriate), financial information (including bank account details), session notes,
* signed therapy terms and conditions, signed GDPR agreement, and completed questionnaires.

Some of this information is collected directly from you, while other data may come from referrers such as your GP, psychiatrist, or health insurance provider. If you do not provide the necessary personal information, I may be unable to offer you therapy services.

Additionally, I process personal data for legitimate business interests, including maintaining invoices, receipts, and financial documents related to accounts, VAT, and tax returns.

**4. How Is Your Information Stored and Kept Secure?**

* Personal information is minimized in phone and email communication.
* Sensitive personal data is sent in password-protected email attachments, using encrypted email applications.
* No personal data is stored on unsecured Wi-Fi networks.
* Personal data is stored on a GDPR-compliant, secure cloud-based storage system, protected by strong passwords.
* Malware and antivirus protection is installed on all devices used to access secure storage and email.
* Mobile devices used for professional purposes are secured with a passcode or biometric authentication.

**5. Confidentiality and Information Sharing**

All information shared during therapy or assessments is strictly confidential. However, confidentiality may be broken in exceptional circumstances, including:

* If there is a risk of harm to you or another person.
* If you disclose information about a crime.

I will always discuss any potential disclosure with you unless doing so could increase the level of risk.

If I am asked to provide reports or records to external agencies (e.g., Social Services, NHS), I will do so only with your written consent and if it is in your best interest. Client records are not intended as legal evidence, and I reserve the right to refuse legal requests for access to protect confidentiality.

**6. Your Rights**

You have rights under GDPR, including:

* **Access**: You can request a copy of the information I hold about you.
* **Correction**: If there are factual errors in your data, you may request corrections.
* **Erasure**: You can request data deletion, though this is subject to legal and ethical considerations.
* **Complaints**: You have the right to lodge a complaint with the Information Commissioner’s Office (ICO).

To make a request, you may be asked to provide identity verification. Information will typically be provided within 30 days.

**7. Contact Information**

For any privacy-related concerns, you may contact:

Dr. Eloise Smith (Clinical Psychologist & Data Protection Representative)

* Email: dreloisesmith@gmail.com
* Phone: 07741456958

Or contact the Information Commissioner’s Office (ICO):

* Address: Wycliffe House, Water Lane, Wilmslow, SK9 5AF
* Phone: +44 (0) 303 123 1113
* Website: <https://ico.org.uk>