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PRIVACY NOTICE: DATA PROTECTION

Why do we need to process information about you?

In providing you with our services, Happiness in Mind Ltd will need to handle your personal information. Personal information is details about you from which you can be identified, such as your name and contact details. Depending on what services you receive from us, we may process additional sensitive data such as information about your health. This information is essential to inform, facilitate and provide assessment and therapeutic services which are appropriate to your individual needs.

Under the requirements of the Health Care Professions Council (HCPC) and British Psychological Society (BPS), Happiness in Mind Ltd are obliged, according to the legitimate interests of provision of our services, to keep documentation of your personal data to allow us to provide assessment and therapy services to you.

What information will you hold?

Information about you will be held in the form of written notes, emails, questionnaires, and letters, in addition to our practice management software system and invoices.

This information could be collected at any point during your contact with us and/or during your receipt of services from us.

Your information will be collected, managed and stored solely for the purposes of us providing you with psychological services or training.

How do we use the information that we collect?

We use the information we collect:

- To communicate with you so that we can inform you about your appointments with us, we use your name, your contact details such as your telephone number, email address or postal address;
- To deliver the correct service to you, we use your name, your contact details and the details about your purchases;
- To create your invoice using our accounting package, we use your name and may use your email address;
- To process your payment, we use your name and your payment card details;
- To register any product you purchase from us, so that it is covered under guarantee, we use your name, telephone number, email and postal address;
- To optimise our website so that users can find the information they need.

Where do we keep the information?

We keep your information in the stores described below. Please note that we do not store your payment card details in any of our systems; these are passed straight through to our payment provider.

On our company computers

We use personal computers that are located on our business premises. The computers are password protected and the hard drives are encrypted. Passwords are changed regularly and are not shared beyond those who need access to a given computer.

Where cloud services are used, these meet GDPR requirements and all data is securely encrypted when stored there.

Your client record

We use Cliniko Practice Management Software which is a computer program that stores the information on a computer in our office. We also record some aspects of our interaction with you in Microsoft Excel Spreadsheets on a computer in our office.

In our practice management / accounts package

We use Cliniko Practice Management Software and MS Excel to manage your account. The company that provides Cliniko software has stated that they are compliant with GDPR. We occasionally need to transfer our accounts Excel Spreadsheet to our (UK-based) accountant. This is done using encrypted transfer and our accountant has stated that her company's processes are GDPR compliant.

As a paper copy

We take hand written notes when we meet you. These notes may be used to create a report on the services that we provide to you, to you or to an approved third party (i/e/your insurer). Mostly, however, our written notes serve simply as an aide memoire for your therapist to ensure continuity of treatment over time.

We keep a paper copy of your notes and any invoices in locked filing cabinets in our offices. We send paper copies of invoices to our accountant to enable her to process our accounts each year.

How long will you store my information for?

We will hold information about you for as long as you receive services from us and for 6 years following the date of our last contact with you. If our identified client is a minor, we will hold information about the services that we have provided to them for six years past the age of majority.

Paper-based information will be stored in a locked filing cabinet or stored electronically scanned and stored shortly after the point your case file is closed to the service (usually defined as your last appointment).

Once scanned, paper-based information will be shredded and disposed of in confidential waste. Paper-based files and electronically held files will be stored securely and deleted after six years (or if a minor, when they reach the age of majority plus six years).

You also have the right to ask for your information we hold on you to be erased prior to this time by contacting our Data Protection Officer, Dr Aoiffe Kilcommons, Director via email to Aoiffe@happinessinmind.co.uk

However, if you want to have your data removed, we do have to determine if we need to keep the data. For example, if there is an on-going legal matter related to your case or if your request falls within the timeframe that our governing practice body has a requirement that we hold data for (around 6 years). In this instance, we may not be able to erase your data before that time has passed or any court action is ended.

How can I access the information you hold?

You can ask to access the information we hold by writing to our Data Protection Officer, Dr Aoiffe Kilcommons via email to Aoiffe@happinessinmind.co.uk to make a Subject Access Request (SAR). You can also ask for your information to be transferred to another provider of psychological services. We will respond to your request within 30 days.

Verification of the identity of anyone making such a request will be required before information can be shared.

What if I believe the information you hold about me is incorrect?

Whilst you are receiving services from Happiness in Mind Ltd, we will aim to keep the information we hold about you up-to-date. We would encourage you to tell us as soon as possible if your personal data changes so that we can update our records.

You can also let us know if you believe the information we hold about you is inaccurate, needs amending or updating, by contacting our Data Protection Officer, Dr Aoiffe Kilcommons. We will aim to update your information within 72 hours.

How can I have my information removed?

If you want to have your data removed we have to determine if we need to keep the data, for example in case HMRC wish to inspect our records or if in doing so we would breach our professional organisations data retention requirements (see above). If we decide that we should delete the data, we will do so without undue delay.

Protecting your Information

Happiness in Mind Ltd is committed to keeping the information we hold about you secure. To protect your personal data, we follow the guidelines and recommendations in line with our professional bodies (The British Psychological Society and The Health Care Professionals Council) and regulatory bodies such as the Information Commissioners Office. More detailed information can be found in our Data Protection Policy, which complies with the requirements detailed in the Data Protection Act (1998) and the General Data Protection Regulations (2018). This document is available on request.

We have physical, electronic, and operational procedures in place to protect your data. In the unlikely event of our security processes being compromised leading to a significant breach of your information, we will endeavour to inform you within 72 hours.

Confidentiality:

The confidentiality of your personal information is very important to Happiness in Mind Ltd. All our services are confidential, and we will not share your information unless we judge that there is a serious

risk of harm to yourself or others, or with your written consent, or when we are legally obliged to do so. Confidential information is restricted only to those who have a reasonable need to access it.

Who can I contact if I have concerns about my data management?

Should you have any concerns about the management of your data by Happiness in Mind Ltd, please contact our Data Protection Officer, Dr Kilcommons, in the first instance. If we are unable to resolve your concerns, you have a right to complain to the Information Commissioner's Office: <https://ico.org.uk/for-the-public/raisingconcerns/>

Policy prepared by: Dr Aoiffe Kilcommons, Clinical Psychologist

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