

Sarah Kane  
www.sarahkanecounselling.co.uk  
0797 222 9560



## Privacy Policy and Data Retention Statement-Effective from 25<sup>th</sup> May 2018

I aim to be fully compliant with current GDPR legislation and to let you know how I use and protect the data you've given me. GDPR replaces the previous Data Protection Act. I wish to be transparent with regard to the processes I have in place. Identifiable information, if shared, will only be used in accordance with this privacy statement. I follow guidance from my governing bodies UKCP and my insurers Towergate.

As a private practitioner I'm considered the data processor and controller in my practice. As the data controller, I process some of your personal data. During the assessment process information such as next of kin, family members and medication are gathered and held. This is anonymised, coded and securely stored. No one but me can access this information.

Data Processing means obtaining, recording or holding information. The definition is very wide, and most of what I do involves a degree of processing. I process the personal data I have collected as controller. I maintain records of personal data and processing activities and hold responsibility should there be a breach.

### Your Consent

This is a primary concern and is separate to other terms and conditions. As my client, you can withdraw consent at any time. I hope to offer you choice and control. As a therapist who occasionally uses creative interventions, I want to ensure you know that any drawings or art done in session is yours. I will store this material safely and dispose of it in a timely manner. I will never use any of your data/artworks for writing, publishing, research or training purposes.

I have weekly ongoing supervision to support and ensure my practice is safe. When I share client material or images this is always done confidentially, protecting your identity. Nobody but me has access to any of your data. I will keep this process under review and refresh it if anything changes.

### Note keeping

I do not keep process notes. When I decide to do so I shred and dispose of this confidential material asap, often after supervision. I keep an Assessment Sheet (taken with you in the second session) and minimal content notes which I hold for seven years. After this time frame, they're disposed of securely. You have a right to see the information I hold about you should you wish to. You have a right to change any information which you consider to be incorrect. You can also ask me to delete all/any of the information that I hold at any point. There are however some details I need to keep due to legal and professional obligations. This would include your first name and the number of hours and dates we have worked together.

### Data Storage.

I promise to keep all sensitive data safely. This involves my anonymising, using passwords or initials only and encrypted documents. I keep all sensitive data in a locked filing cabinet. I dispose of data by deleting from my phone or laptop or shredding papernotes.

While we work together I will store your firstname and phone number on my smartphone and your email address on my phone and laptop. I only contact you in response to you or concerning appointments. When

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we discontinue working I will delete your number and email. I do not engage with clients through any social media.

**In the event of a complaint.**

Please contact me directly. And if we cannot resolve this you could then contact the Information Commissioner Office ( ICO) <https://ico.org.uk/concerns/handling/> or Guidance for GDPR Compliance.

**Clinical will**

In the event of a sudden cessation of practice eg through an accident or death, I have appointed a professional executor who manage things on my behalf. This is arranged for your welfare as my client and every step is taken to ensure GDPR standards are met.

**Agreement:**

Having read, understood and discussed the above, both parties are satisfied with regard to consent and the data and privacy policies. We agree on why I have collected and kept specific data and what I do with it. You may withdraw consent at any time without detriment. I will regularly review consent with you to check that the relationship, the processing and the purposes have not changed.

Name of Client / Supervisee : .....  
(delete as appropriate)

Signed by Client / Supervisee : .....  
(delete as appropriate)

Signed by you : .....

Dated : .....