



## **Privacy Policy for Child, Adolescent and Adult Psychotherapy Services**

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On May 25 2018, a new European Union (EU) data protection law, the General Data Protection Regulation (GDPR), took effect. GDPR gives individuals in the EU more control over how their data is used and places obligations on businesses that process information.

My privacy policy and legal basis for processing personal data takes into account the requirements of the GDPR and the UK Data Protection Act 2018.

The ICO (Information Commissioner's Officer) is 'The UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals' (source: ICO website.) I am a data controller registered with the ICO as I use personal data for the purposes of providing assessment and therapy work.

### Relevant and accurate personal data collected is used for the following purposes:

- To keep in contact with families and adult clients via email, telephone or letters regarding therapy enquiries, arrangement of sessions, private practice updates, invoicing, therapy treatment, arrangement of encrypted video and/or audio therapy sessions (when online and audio sessions take place), etc.
- Sometimes with older children and adolescents some text and/or email exchanges with the therapist and encrypted video or email therapy sessions might be contracted if appropriate (e.g. during therapy breaks if the young client would benefit from having the choice to contact the therapist; when online or phone/audio or email sessions are agreed.)
- Sometimes with younger children some text and/or email exchanges with the therapist might be contracted with parental consent (e.g. during therapy breaks if the young client would benefit from some contact with the therapist, etc.) This type of communication is done via parents' emails and mobile phones.
- To make informed contact with professionals, individuals or agencies who support your child and/or family if you have given consent
- Clients might request supportive letters so data will be used to prepare these letters

- To prepare commissioned Child & Adolescent clinical letters/reports if parents/carers consent
- To carry out signposting to other professionals if consent has been given
- In the event of the therapist's unexpected death or serious illness, all clients and families will be contacted by a designated UKCP psychotherapist who will be responsible for discussing concerns regarding therapeutic welfare and making appropriate recommendations and signposting.

### Confidentiality Limits during Assessment and Therapy Sessions

Reasons for breaking confidentiality and for sharing personal data, outlined in my therapy services contract, are:

- 1 - Safeguarding (children, public interest)    2 - Imminent danger to self or others  
3 - Acts of terrorism/Radicalisation            4 - Money laundering

Except for these mentioned four reasons, I will not share your personal data with third parties (e.g. NHS, CAMHS, school, support services, etc.) without obtaining your consent first.

### Confidential Case Notes

I keep brief anonymous session notes for professional, legal and insurance purposes. These notes are stored securely and are kept separate from securely stored personal data.

Regarding Child and Adolescent Therapy work anonymous case notes will be securely disposed of seven years after young clients' 18<sup>th</sup> birthday.

Regarding Adult Therapy work case notes will be securely disposed of seven years after therapy has been completed.

Personal data collected in therapy (e.g. referral form containing name and address, phone number and email, etc.) will be disposed of securely shortly after therapy is completed.

### Artwork and Other Items

Clients' art work and any other items produced in sessions (e.g. lists, drawings, etc.) are securely kept to ensure confidentiality from start to end of therapy in order to contain the therapeutic process.

### Contact between Sessions

Please contact me via text message if you're running late for a session or if you need to cancel a session that day. For all other communications please send me an email to inform me of your updates.

Therapeutic information is only discussed in sessions or via end-to-end encrypted emails if agreed previously.

### Cyber Security

- *Secure Email Communications*

To protect the confidentiality of young and adult clients and families, during the therapy intervention, I will often send encrypted emails from a secure Protonmail email address whenever

emails might include sensitive information. To securely reply to encrypted emails you won't need to sign up with the Protonmail service.

- *Email Therapy Sessions*

To ensure absolute confidentiality this modality of online therapy is carried out between two Protonmail email accounts (the client's and therapist's) or via email exchanges of password-protected Word documents.

- *Online Video Conference Platforms*

Zoom is a GDPR-compliant platform with full end-to-end encryption and any user activity regarding video, audio and chat content is fully protected. Zoom is one of the secure platforms recommended by BACP, ICO, Privacy4 and EMDR UK and Ireland.

As the host of the Zoom session, I use the 'Waiting Room' feature. This action enhances security levels as it allows me to approve who comes into the scheduled session.

Also, 'locking' a meeting (once the client has logged on to a session) and adding an 'access password' to join sessions are other ways to enhance security levels with Zoom.

For security reasons please do not share Zoom URL access links or meeting IDs with third parties.

*Note:* Alternative encrypted video and audio platforms such as Doxy.me can be agreed should clients and families desire to use alternatives to Zoom.

#### What to do if the connection or the audio breaks during an Online Video Session

- We will try to reconnect onto Zoom (or any alternative platforms agreed on) in the following 5 minutes from the disconnection.
- If the above actions don't work, then the adult client/adolescent client/family will go on to calling me on my work mobile to resume the session.

#### Social Media Policy

To preserve the integrity and confidentiality of the therapeutic alliance and adhere to the UKCP Online Working Guidance relationships with all clients will be kept in the context of therapy so social media requests and contact (e.g. WhatsApp, LinkedIn...) will be politely declined.

#### Consent

Clients and families consenting to this privacy policy give permission to process their personal data specifically for the purposes mentioned in this document. Consent needs to be explicitly given with regards to processing personal data. Whenever I ask for sensitive personal data, I will always tell you how and why the information will be used.

Clients and families do not have to do anything to give consent, unless they want to withdraw the consent given at the time the therapy referral was made. To withdraw consent clients and families can contact me via email to state their wishes.