

**Dr Rima Lamba CPsychol**

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**Privacy Notice and Consent Form**

You may be aware of new laws relating to General Data Protection Regulation (GDPR) that are in effect from 25 May 2018. The purpose of GDPR is to provide a set of standardised data protection laws across all EU member countries. This document sets out how Blue River Psychology complies with these laws. This information may be updated at any time.

**Data Control**

Dr Rima Lamba is the Data Controller for Blue River Psychology. Dr Lamba also works with a self-employed Administrator/Secretary, who acts as a Data Processor. A Data Processor is someone who processes the data on behalf of the Data Controller.

If any Associate Psychologist/Psychotherapist/Counsellors working with Blue River Psychology, take on referrals with Blue River Psychology, these Associates will be additional Data Controllers for the clients they work with directly and may have access to more data than Dr Lamba due to the confidential nature of their therapy work with a specific client. In such cases, Associates will be the primary Data Controller for those clients.

**What personal data we process**

Blue River Psychology collects and processes the following personal data from therapy clients:

* Personal data: basic contact information: name, address, email, contact number, date of birth, video conference ID (if online therapy), and GP contact details.
* Sensitive personal data: Signed Therapy Terms and Conditions Agreement, information on any medical and/or mental health diagnosis (current and/or historical), therapy records (therapist notes, letters, reports and/or outcome measures).
* If you complete a web-based enquiry form, we will also collect any information you provide to us.

If you are referred by your health insurance provider, then we will also collect, and process personal data provided by that organisation. This includes basic contact information, referral information, and health insurance policy number and authorisation for psychological treatment.

**The lawful basis for processing personal data**

Blue River Psychology has a legitimate interest in using the personal data and sensitive personal data we collect to provide psychology related care and treatment. This is necessary, so we can provide psychological therapy to clients.

We may also ask for information on how you found our service for the purpose of our own marketing research. No information you provide is passed on without your consent. We will never sell your information to others.

**What we do with your personal information**

At Blue River Psychology we take your privacy seriously. We will use your personal information to provide the services you have requested from us.

You are under no obligation to provide information to us, but we may not be able to provide services you are requesting, and we may therefore choose not to provide services you are seeking.

​We may use your information in our accounting system to bill for services, take payments, file tax returns, and track your financial obligations to us. Once our financial relationship is concluded we will continue to hold that information until no longer required by HMRC or any other party with a legitimate interest.

**How long we store personal information**

We will only store your personal information for as long as it is required. Basic contact information held on a therapist’s mobile phone is deleted within 6 months of the end of therapy.

The sensitive personal data defined above is stored for a period of 7 years after the end of therapy. After this time, this data is deleted at the end of each calendar year. We save your billing information and other information gathered about you for as long as needed for accounting purposes and/or other obligations deriving from law.

**How your personal information is used**

We use the information we collect to:

* Provide our services to you.
* Process billing and payment for such services.

**Who we might share personal information with?**

We (Dr Lamba and the Administrator she works with) hold information about each of our clients and the therapy they receive in confidence. This means that we will not normally share your personal information with anyone else. However, there are exceptions to this, and these exceptions include the following:

* If you are referred by your health insurance provider, or otherwise claiming through a health insurance policy to fund therapy, then we will share information with that organisation for the purposes of billing. We may also share information with that organisation to provide treatment updates.
* We will write to your GP to let them know you are accessing a psychological therapy service with us.
* In cases where treatment has been instructed by a solicitor, relevant clinical information from therapy records will be shared with legal services as required and with your written consent.
* If we are working alongside another health professional who is also providing you care, and information needs to be shared for your healthcare.
* Your billing information may be shared with an accounting professional (for HMRC taxation purposes only) who is duty bound to protect and maintain confidentiality of client information they may come across.
* When there is need-to-know information for another health provider, such as your GP.
* 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.
* When the information concerns risk of harm to the client, or risk of harm to another adult or a child. We will discuss such a proposed disclosure with you unless we believe that to do so could increase the level of risk to you or to someone else.
* When we discuss and you agree to a referral to another colleague(s).
* Under any circumstances required by law.

**What we will NOT do with your personal information**

We will not share your personal information with third parties for marketing purposes.

**Where is data stored**

* In online cloud storage systems
* On a password protected laptop (which no other person/professional has use of)
* In a paper file
* In mobile phones
* In email systems
* The Blue River Psychology website uses cookies so that we can see how many people have visited and which pages are most popular. Google may send additional cookies if you use the google map links on the site. Cookies are anonymous and contain no personal data. You can turn cookies off in your website browser if you wish to.

**How data is kept safe**

* Laptops are password protected and has an installed firewall, malware and anti-virus protection to prevent others gaining access to my computer.
* Paper notes are stored in a locked cabinet. I bring them to the clinic for our meetings and return them to the cabinet after the meeting.
* Mobile phone is encrypted and must be opened with a password or fingerprint each time it is used.
* Email systems are secured with a password.
* Access to the analytics on the website are secured with a strong password.
* All passwords are stored in a password manager on the phone.
* Personal information is minimised in phone and email communication. Sensitive personal data will be sent to clients in an email attachment that is password protected. Email applications use private (SSL) settings, which encrypts email traffic so that it cannot be read at any point between our computing devices and our mail server. Blue River Psychology will never use open or unsecure Wi-Fi networks to send any personal data.

**Your right to access the personal information we hold about you**

* You have a right to access the information we hold about you.
* We will usually share this with you within 30 days of receiving a request.
* There may be an admin fee for supplying the information to you.
* We may request further evidence from you to check your identity.
* A copy of your personal information will usually be sent to you in a permanent form (that is, a printed copy).
* You have a right to get your personal information corrected if it is inaccurate.
* You can complain to a regulator. If you think that we haven't complied with data protection laws, you have a right to lodge a complaint with the Information Commissioner’s Office. We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

Blue River 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 7 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]. We save your billing information and other information gathered about you for as long as needed for accounting purposes and/or other obligations deriving from law.

Blue River Psychology reserves the right to alter and/or update this document at any point, in accordance with changes in policies, regulations and/or laws, and this may be done without providing any notice.

**Informed Consent**

**I understand that my email address will be used by Blue River Psychology, Dr Lamba and her secretary to correspond with me and send and receive service-related information.**

**I consent to Blue River Psychology gathering, using and securely storing my personal information as a necessary requirement of the service I am receiving from Blue River Psychology**

**I understand that Blue River Psychology will hold and process the information I have provided in accordance with the policies and procedures contained within this document.**

**I would like to receive information about and from Blue River Psychology in the future.**

**Date:**

**Client Name:**

**Client Signature:**

If you should have any questions, please don't hesitate to contact me.

With best wishes,

***Dr Rima Lamba CPsychol***

***HCPC Registered Counselling Psychologist***

***Clinical Director and Founder of Blue River Psychology.***