

## Privacy Notice

### Clinical Psychology Services North West Ltd.

#### 1. Introduction

Clinical psychology Services North West is a company offering clinical psychology services (including Psychological Assessment, Psychological Therapy, Medicolegal reports and Training). This privacy policy explains how we use any personal information we collect about you, as a past, present, future employee or associate, a service user (client or patient) or when you use our website.

This privacy notice provides information about the personal information we process about you as a data controller, in compliance with the General Data Protection Regulation (GDPR).

Our ICO registration number is ZA503669

Please contact us at [enquiries@cpsnw.co.uk](mailto:enquiries@cpsnw.co.uk) with any questions or requests about the personal information we process.

#### 2. What are your rights

We are committed to protecting your rights to privacy. They include:

- Right to be informed about what we do with your personal data
- Right to have a copy of all the personal information we process about you
- Right to rectification of any inaccurate data we process, and to add to the information we hold about you if it is incomplete
- Right to be forgotten and your personal data destroyed
- Right to restrict the processing of your personal data
- Right to object to the processing we carry out based on our legitimate interest

#### 3. Why do we collect information about you?

We may collect information about you because you are a patient or client of ours. You may be an associate or employee. You might be a claimant or defendant within a litigation process.

We process the data because it is in our legitimate interests as a clinical psychologist or expert witness to do so. We need to see and analyse documents containing this information in order to provide our expert advice, to carry out an assessment or to deliver psychological intervention.

Another lawful reason for us processing your data may be Legal Obligation. If we are processing “special category data” about you, this is our second lawful reason to do so. This is likely to apply if you are being assessed as part of a litigation claim.

As a client or patient of Clinical Psychology Services North West our lawful reason for processing “special category data” is that it is necessary for the purposes of the provision of health or social care or treatment. If you are an employee or associate of Clinical Psychology Services North West we will have a contract with you, which will be our lawful reason to process your data.

#### **4. What information do we collect about you?**

We collect information about you that may include personal or sensitive information, such as:

- First name or given name
- Family name or surname
- Address
- Telephone numbers
- Date of birth
- Gender (or preferred identity).
- Age.
- Date of Birth.
- Relationships & children
- Occupation.
- Address.
- Telephone/SMS number
- Email address

To make sure that you are assessed and/or treated safely and appropriately, we record your personal information, such as your name, address, as well as all contacts you have with the Company such as appointments and the results of assessments and letters relating to your care/report. Your data is kept confidential within the Company at all times and is only shared with staff when they need it to carry out their job.

We also process personal data pursuant to our legitimate interests in running our business such as:

- Invoices and receipts
- Accounts and tax returns

### **Patients/Clients (Therapy or private assessment)**

When you are a patient or client of Clinical Psychology Service North West we record all your treatment and details of your appointment so that your clinician can plan your treatment correctly. In addition to the personal information above, we may also collect additional information, including:

- Medical conditions (if relevant)
- Prescribed medication.
- Psychological history and current difficulties.
- Significant life events
- Relationships/ sexuality
- Offences (including alleged offences)
- Financial information, including bank account details (if you are a private patient/client of Clinical Psychology Services North West)

We may collect some of this information from your insurance company or other referrer if you have one, and some of this information will be collected directly from you.

### **People attending for medico-legal psychological assessment (Court reports)**

In the case of a court report we retain the information as required by the courts or your solicitor. In addition to the personal information above, we may also collect additional information, including:

- Medical conditions (if relevant)
- Prescribed medication.
- Psychological history and current difficulties.
- Sexuality
- Offences (including alleged offences)

We may be given some of this information from your solicitor or the party instructing us for the purposes of litigation, and some of this information will be collected directly from you.

In many cases, an individual has consented to the transfer of their personal data to us. Where an individual has consented, he or she may easily withdraw it by notifying those providing the information to us.

### **Job applicants, current and former employees and associates**

When individuals apply to work at Clinical Psychology Services North West we will only use the information you supply to us to process your application and to monitor recruitment statistics. Data that we collect about you, in addition to the above, may include:

- Pay and bank details, pay slips
- Curricula vitae, contracts of employment, references, accreditations and appraisals

**Clinical Psychology Services North West Ltd**

Company Registration No: 11500727.

Registered Office: Cromwell House, 68 West Gate, Mansfield, Nottinghamshire, NG18 1RR, United Kingdom

- Health information (in reliance on the occupational health exemption contained in the Data Protection Act 2018)

Where we want to disclose information to a third party, for example where we want to take up a reference or obtain a 'disclosure' from the Disclosure and Barring Service we will not do so without informing you beforehand unless the disclosure is required by law.

#### **Web access collection of information**

We collect information about you when you register with us or place any order for services. We also collect information when you voluntarily complete contact forms. Clinical Psychology Services North West always tries to minimise the amount of personal information that we require in order to provide a specific service or feature.

#### **5. How do we store information about you?**

We take your privacy very seriously.

Where possible we process all data electronically. If we are given hard copy material such as records to review in preparing a court report, it is returned to the person that has given or it will be shredded (having been scanned and saved electronically if appropriate). While in our possession hard copies are kept in a locked filing cabinet. Shredding takes place on site, or with a third party shredding company.

We are committed to taking reasonable steps to protect any individual identifying information that you provide to us. Once we receive your data, we make best efforts to ensure its security on our systems.

All who attend for therapy will be informed the way in which information is recorded and stored at the beginning of the work and will have the chance to ask questions. Storage may vary depending on location (for example if you attend appointments at Spire Murrayfield Hospital, records are paper records and are held securely in the medical records department at the hospital).

All personal information provided is stored in compliance with EU General Data Protection Regulations (GDPR) rules.

#### **6. How long do we hold information about you?**

We do not keep your data for longer than is necessary.

Administrative data is retained for up to eight years as necessary, in the unlikely event there are queries from HMRC and the VAT commissioner. Where it is not necessary to retain the data for eight years, it is destroyed as soon as possible.

#### **Patients/Clients (Therapy or private assessment)**

Personal data in psychological therapy cases is retained, where necessary, for eight years in compliance with our professional indemnity obligations.

### **People attending for medico-legal psychological assessment (Court reports)**

Personal data in legal cases is retained, where necessary, for eight years in compliance with our professional indemnity obligations. Where this is not necessary, it is destroyed on the conclusion of the case, when we are informed of the conclusion of the case.

### **Job applicants, current and former Clinical Psychology North West employees and associates**

Personal information about unsuccessful job candidates will be held for 12 months after the recruitment exercise has been completed, it will then be destroyed or deleted. Once a person has taken up employment with us, we will compile a file relating to their employment/ associate role. The information contained in this will be kept secure and will only be used for purposes directly relevant to that person's employment/ associate work.

Personal data relating to employees who have left our employment/ left our associate arrangement is retained for up to eight years as necessary.

## **7. Who do we share your data with?**

Your information is kept confidential within the Company and is only shared with staff when they need it to carry out their job. All staff are required to work to strict professional and contractual codes of confidentiality and where possible we will anonymise information so that individual patients cannot be identified.

It is good practice, if you attend for psychological therapy, that we inform your GP that you are being seen and let them know once the work is completed. This will be discussed with you in the sessions with the psychologist.

If we become aware of an intent to cause harm to yourself, another person/organisation (e.g. terrorism), or become aware of someone else who is at risk of harm, the law and good practice in terms of safeguarding may require that we inform an authority without seeking your permission. In such a situation, the law/ good safeguarding practice may require that we share your personal information without your knowledge.

By contacting the us, by email and/or using the address below you can also get more details on:

- agreements we have with other organisations for sharing information;
- circumstances where we can pass on personal data without consent for example, to prevent and detect crime and to produce anonymised statistics;
- our instructions to staff on how to collect, use and delete personal data; and
- how we check that the information we hold is accurate and up to date

Special category data and personnel files held electronically are encrypted with restricted access.

### **Patients/Clients (Therapy or private assessment)**

In most circumstances, we will not disclose personal data without consent.

Your information may be shared with outside organisations if they are directly involved in your care/case, for instance, your insurer if they are funding your treatment, your GP, or others involved in your care. We will discuss with you who we would discuss your care with, and what details we would share with them.

If we become aware of a client/ patient's intent to cause harm to them self, another person/organisation (e.g. terrorism), or become aware of someone else who is at risk of harm, the law and good practice in terms of safeguarding may require that we inform an authority without seeking their permission. We will usually discuss this with the person first and do it with their agreement. However, the limits to confidentiality include cases of risk of harm to self or others which means in such circumstances we do not need to have consent to share information to act in the best interests to protect the person who may be at risk of harm.

If we do need to share your information, we will always try and ask for your permission for this. We may not be able to ask your permission under special circumstances where we are legally required to do so.

#### **People attending for medico-legal psychological assessment (Court reports)**

We share personal data internally strictly on a need to know basis.

We do not share personal data with anyone external to the organisation, other than with:

- Those who have instructed us as an expert witness
- Outsourced service providers such as typists pursuant to GDPR compliant written contracts
- With others pursuant to a court order

#### **8. How you can access your information and correct it, if necessary?**

Clinical Psychology Services North West tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'subject access request' or 'Right of Access' under the Data Protection Act and the General Data Protection Regulation. We will then supply to you:

- A description of all data we hold about you
- Inform you how it was obtained (if not supplied by you)
- Inform you why, what purposes, we are holding it
- What categories of personal data are concerned
- Inform you who it could be disclosed to
- Inform you of the retention periods of the data
- Inform you around any automated decision making including profiling
- Let you have a copy of the information in an intelligible electronic form unless otherwise requested.

To make a request to us for any personal information we may hold you need to put the request in writing. We want to make sure that your personal information is accurate and up to date.

#### **People attending for medico-legal psychological assessment (Court reports)**

If your concern is related to a case with a solicitor that we are working for, please refer the queries through them. We may not be able to comply with a request to correct information we hold about you where it pertains to a litigation claim – this would need to be discussed with your solicitor.

## **9. Complaints and queries**

Clinical Psychology Services North West tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures. If you do have a complaint, contact our Data Protection Officer who will investigate the matter on your behalf. If you are not satisfied with the response from us or believe we are not processing your personal data in accordance with the law you have the right to raise your complaint with the Information Commissioner's Office (ICO)

Contact information ICO:

Website: <https://ico.org.uk/concerns/>

Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

Telephone: +44 (0) 303 123 1113

## **10. How to Contact Us**

Clinical Psychology Services North West is the company that you are supplying your personal information to. The Director of the Company (Dr Helen Beesley) can be contacted by:

Email: [enquiries@cpsnw.co.uk](mailto:enquiries@cpsnw.co.uk)

Post:

Suite 111a

Cotton Exchange

Bixteth Street

Liverpool

L3 9LQ