**The Mind Bridge Therapy Ltd.**

**Therapy Privacy Policy**

The work I carry out as a hypnotherapist involves processing personal data in compliance with the UK-GDPR (2021) and the Data Protection Act (2018). I am registered with the ICO (Information Commissioner’s Office).

This document ensures that you know why I need this information; that I only ask for the information I need; that only those appropriate have access to it; that it is stored securely; that you are informed if the information will be shared with a third party and that I keep your information only as long as I need it.

1. **Personal Data**

**The Mind Bridge Therapy Ltd.** is collecting and holding personal information for the following purposes:

* *Personal contact details (name, address, email and telephone number) –* in order to notify you, if the need arises, of cancellations or rescheduling of appointments, or for any other reason pertaining to your therapy with me or a safeguarding concern.
* *Your Doctor’s name and contact details* – I may ask your permission to write or speak to your GP, in the interests of your safety and/or wellbeing. If I were to become concerned for your safety I may decide to contact your GP or emergency services.
* *Health Questionnaire (current and previous medical history, medication)* – it is helpful and important that I understand any health concerns or underlying issues, whether physical or mental. This allows me to help work with you in a way that best suits your needs.
* *Communications (written, email, text and voicemail) exchanges between us.*
* *Emergency contact name and telephone number –* to be used if you are taken ill during a session and are unable to notify a friend or relative.
* *Handwritten or digital records of our sessions –* in order to facilitate therapy
* *Notes from supervision sessions -* as a professional requirement.
* *Invoices*
* ***\*Special category data*** *(see below) –* in the course of exchanges between us

In accordance with the UK-GDPR (2021) and the Data Protection Act (2018) the legal basis for obtaining, processing and storing the above data is ‘Consent’ and ‘Legitimate purpose’.

**\*Special category data**

The UK-GDPR defines special category data as:

* *personal data revealing racial or ethnic origin;*
* *personal data revealing political opinions;*
* *personal data revealing religious or philosophical beliefs;*
* *personal data revealing trade union membership;*
* *genetic data;*
* *biometric data (where used for identification purposes);*
* *data concerning health;*
* *data concerning a person’s sex life; and*
* *data concerning a person’s sexual orientation.*

In the course of coming to our therapy sessions to discuss various aspects of your personal life, you are likely to disclose information which is classed as ‘special category data’.

Specific laws designed to protect special category data, require me to state that I have a lawful base for processing such data, (as set out in Article 6 of the UK GDPR). The lawful base for processing special category data is **contract**, such that in order to provide therapy to you, we agree in (this) contract that you have agreed for me to be privy to special category data, in the undertaking of our therapy sessions and contact between sessions where necessary.

I am also required to have a reason for processing such data, (as set out in Article 9 of the UK GDPR). The lawful base for processing special category data is **(a) Explicit Consent**, such that in order to provide therapy to you, we agree in (this) contract that you have agreed for me to be privy to special category data, in the undertaking of our therapy sessions and contact between sessions where necessary.

1. **Sharing Data and Confidentiality**

**Confidentiality**

Hypnotherapy is highly confidential and is carried out within strict professional boundaries. Confidentiality will be strictly upheld in line with The UK Council for Psychotherapy (UKCP) code of ethics, the NSTT code of ethics, and the UK legal requirements.

There are circumstances when I may be legally required to break confidentiality. It's important that you know that confidentiality does not apply where it would mean that I, as your therapist, might break the law by withholding information, such as if:

* I become aware of information which I either know or believe might help prevent another person carrying out an act of terrorism, or might help in bringing a terrorist to justice in the UK, or about specified activities related to money and property used to assist terrorist activities.
* I am informed by someone girl under the age of 18 that they have undergone an act of female genital mutilation.
* The police request information about the driver of a vehicle at the time of an offence it must be disclosed by me as failure to do so would constitute a criminal offence on my part.
* I become aware of drug trafficking or money laundering that may be required to be reported under the Drug Trafficking Act 1994, Proceeds of Crime Act 2002 or the Money Laundering Regulations 2007, if this happens, I may seek legal advice as to any statutory duty.
* I must disclose information that I am ordered to by a court or by a statutory request for access to personal data made under the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.
* The Drug Trafficking Act (1986) requires me to disclose to the police information of any individual making money through drug trafficking.

In rare circumstances, including where I have good grounds for believing that you may cause serious harm to others, if you tell me of others who are at risk of imminent harm or I have concern for your immediate wellbeing, I may feel ethically obliged to inform relevant safeguarding services, or other critical persons in order to ensure your/their safety. I will usually discuss this with you where possible.

I may break our normal confidentiality if I become aware (or have good reason to suspect) that you have knowledge of:

* A past, present or future incident/situation that may be dangerous or harmful to you, another adult or a child and that is not known to the relevant authorities.
* Future or past criminal activity that has not been resolved in law. This means any criminal activity, of which the relevant authorities are either unaware or a case they know about which they consider not to be closed (provided you do not present information in therapy which would reasonably re-open the case). This does not include parking or traffic offences unless there is intent, by you or anyone else, to cause danger to yourself or others, or that it is deemed to be a serious offence.

In such circumstances, I will work with you to see if we can work together to make appropriate disclosures. For our purposes a serious offence is:

‘Murder, manslaughter, rape, treason, kidnapping, child abuse or other cases where individuals have suffered serious harm or there is serious harm to the security of the state or to public order and crimes that involve substantial financial gain and loss.'

**Supervision**: As part of my code(s) of practice I am required to engage in regular on-going supervision. This is to ensure an ethical and professional service to clients. Therefore, my supervisor is the one person with whom I regularly discuss the content of therapeutic sessions. My supervisor is held to strict confidentiality, and is required to comply with the UK-GDPR (2021) and the Data Protection Act (2018). In the unlikely event of my sudden incapacity, illness or death, my client files will be transferred to my supervisor, who will be given access on an as-needed basis, in order to inform and offer ongoing care to clients on my behalf.

**Doctor/GP**: I may talk or write to your GP with your prior consent, but I will not give any personal details beyond what we are working on.

If I were to become concerned for your immediate wellbeing, I may feel ethically obliged to contact your GP or emergency services. I will usually discuss this with you where possible.

**Research**: If I wish to share aspects of our work together in other contexts, such as research, I will only do so with your explicit consent.

1. **Storage of Data**

I use the Google suite for business, and have opted into a Data Processing Agreement with Google, which means a greater degree of privacy in line with GDPR regulations. For more details please visit <https://cloud.google.com/privacy/gdpr>.

Our online therapy sessions are conducted via Zoom which is an encrypted service. You will be provided a personalised link and password for our sessions. <https://explore.zoom.us/en/gdpr/>.

​Alternatively, we may also use Google Meet for our sessions in the event of technical difficulties. All Google Meet meetings are encrypted by default and password protected.

All handwritten and printed information pertaining to therapy (session notes) are stored in a locked filing cabinet and identifiable by a client code. These will then be ultimately stored digitally in a password-protected folder on Google Drive, and the paper versions shredded.

I may voice record our sessions, particularly in the early stages of our sessions. This is order to assist notetaking, so that I can remain focussed and present during our sessions. Copies of the sessions will be deleted after my session notes have been written up, usually within 4 weeks of the session. Similarly, I will occasionally use notetaking software such as Otter.AI in order to assist with session summaries and notetaking. These will then be ultimately stored digitally in a password-protected folder on Google Drive.

Contact details, the signed contract, and signed Therapy Privacy Policy are kept digitally in a password-protected folder on Google Drive. I also keep your phone number and email address in paper form in a locked filing cabinet. These are kept separate from your session notes.

Supervision Notes, consisting of Client Codes and a brief summary statement of each session are also kept in a separate file, in a locked filing cabinet, as well as digitally in a password-protected folder on Dropbox.

Any emails sent between us are held in my therapy Gmail account, which is password protected and is only accessible by me. Any texts sent between us are held in my personal phone, which is password protected and is only accessible by me. However, please be aware that text applications, are not recommended due to confidentiality and privacy issues, and so please refrain from putting sensitive clinical or therapeutic details into texts.

Any other digital notes are stored securely in a password-protected folder, as is information that is sent to me by e-mail, which may be kept in your therapy session notes file.

Telephone calls and voicemails are received to The Mind Bridge Therapy Ltd. via a digital phone system called Vonage. Personal data held by Vonage (such as text, call recording, message bodies, conversation transcriptions, voicemail recordings, voicemail transcription, video files, images and sound) is stored on and processed on Vonage’s computers situated in the United Kingdom, the EEA, the United States, and in other jurisdictions.  For more details please see <https://www.vonage.com/legal/data/dpa/>. Whilst Vonage commit to upholding the necessary standards of data protection in line with the GDPR, I would advise that you do not disclose personal or sensitive clinical matters via the voicemail or phone system, and that we discuss these in our sessions. If you prefer that we do not communicate via the phone system we can agree to talk via email or in sessions.

Emails sent via my website [www.themindbridge.co.uk](http://www.themindbridge.co.uk) are processed via Wix.com. Whilst Wix.com commit to upholding the necessary standards of data protection in line with the GDPR, I would advise that you do not disclose personal or sensitive clinical matters via the website, and that we only discuss these in our sessions. For full details on how Wix processes data via the website, I have a page on my website which covers this in full at <https://www.themindbridge.co.uk/privacy-policy>.

I utilise an online calendar system (Calendly.com) in order to facilitate client bookings and payments. The calendar invite will only include your first name and email address. Any information you include in the ‘comments’ box will appear in the meeting description. Please be aware that other parties who have access to your calendar may be able to see this. I would advise that you do not disclose personal or sensitive clinical matters via the website, and that we only discuss these in our sessions. For more details please see <https://calendly.com/dpa>. If you prefer not to use Calendly to book sessions with me, then we can schedule sessions via email or during our therapy sessions. You will need to pay for your sessions using another means, such as through a bank transfer.

Payments made via Calendly bookings are fulfilled by PayPal. If you choose the PayPal payment gateway to complete your purchase, then PayPal stores your credit card data. PayPal commits to upholding the necessary standards of data protection in line with the GDPR. For full information on how PayPal collects and stores your data, please see <https://www.paypal.com/uk/webapps/mpp/ua/privacy-full>.

In order to assist with signing client documents virtually I utilise Adobe Sign, which is a highly reputable digital signing software. According to Adobe “Adobe Sign fully supports the General Data Protection Regulation (GDPR) for all users.” For full information on how Adobe Sign collects and stores your data, please see <https://helpx.adobe.com/in/sign/using/gdpr-compliance.html>. If you would not like to use Adobe Sign to sign documents, you can alternatively print off and sign copies of documents manually.

Please be aware that your bank statements will show that payments have been made to The Mind Bridge Therapy Ltd. In many cases, this is automatically shortened to The Mind Bridge Th. If you are concerned about discretion and would like to amend this so that payments will show up as a different reference/payee, you will need to discuss and arrange this with your bank.

**Disposal of Data**

In accordance with professional recommendations, I will dispose of (shred or delete) therapy notes and client contact details 7 years after therapy has ended, unless there is a legitimate requirement not to do so (such as Court proceedings).

Voicemails will be deleted after 30 days, or manually deleted sooner.

My professional executor will destroy any data that s/he has when you and I finish our work.

1. **You have rights with regards to the data held:**
* The right of access. I will provide you with all data I hold on you as soon as I can following a request (and definitely within 30 days, unless this is impossible due to holidays or illness).
* The right to rectification. If any data I hold is incorrect, just let me know and I will correct it as soon as I can following a request (and definitely within 30 days, unless this is impossible due to holidays or illness).
* The right to erasure. If you wish me to erase your data just let me know and I will delete any computer records and shred any paper records as soon as I can following a request (and definitely within 30 days, unless this is impossible due to holidays or illness). NB: data may be retained for scientific research, historical research or statistical purposes where erasure is likely to render impossible or seriously impair the achievement of that processing but this would never include case notes or data such as address/email/phone.
* The right to restrict processing. This would usually be a stop-gap measure before correction of any errors or before erasure
* The right to data portability. This might apply if you want your notes sent to another therapist for example, but it is likely that the easiest solution would come under the right to access, i.e. I would send the data to you.
* The right to object to:
	+ processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling). I do not engage in these.
	+ direct marketing: such as promotional emails
	+ processing for purposes of scientific/historical research and statistics
	+ automated decision making and profiling. I do not engage in automated decision making or profiling

## **Please sign and date below if you consent to the points above. A digital signature (or your handwritten name and signature) is acceptable.**

**I have read, understood and consent for The Mind Bridge Therapy Ltd. to use my data as set out above in this privacy policy.**

**Print Name: Signature:**

**Date:** / /

If you would like to discuss data handling or have any questions or concerns, please contact me at hello@themindbridge.co.uk

If you have concerns about how I have handled your data, you can obtain further information from, or make a complaint to, the Information Commissioners Office (ICO) <https://ico.org.uk>

If you wish to withdraw your consent, please contact me at hello@themindbridge.co.uk