

# **IPS PRIVACY POLICY**

## **Who We Are**

The Independent Psychology Service (IPS) comprises the professional practice of Michele Roitt (Clinical Psychologist and Psychoanalyst) and the network of associated independent therapeutic practitioners. The IPS office is at 7 Lansdowne Road, London N10 2AX, and all IPS Assessors and Therapists work from their own consulting rooms. The Service involves the delivery of psychological assessment; referral to a suitable therapist; and on-going therapy. We work in accordance with the codes of practice of the professional bodies to which IPS assessors and Therapists are accredited (e.g. HCPC, BPC, UKCP, ACP, BACP).

## **Data Protection**

The laws governing data protection in the UK establish the rights of patients and the obligations of mental health professionals in the matters of recording, processing, communicating, maintaining and erasing personal data. These laws are set out in the General Data Protection Regulations (GDPR) with the aim of protecting the rights of individuals. The UK Regulator is the Information Commissioners Office (ICO).

In order to meet the expectations of the GDPR, this privacy policy, published on the IPS website ([www.independentpsychologyservice.co.uk](http://www.independentpsychologyservice.co.uk)), will be supplemented by additional privacy notices delivered by IPS assessors and therapists during the course of registration, assessment, onward referral and ongoing psychological therapy.

We take our responsibility to protect the confidentiality and privacy of patients very seriously. Psychological assessment and treatment require the patient to share details of highly personal life events, relationships, feelings, behaviours and health records. It is this detailed, and very private, information that enables mental health professionals to explore the nature of the emotional distress and recommend appropriate therapies and therapists. This private information, alongside identity information, when recorded in a systematic manner, is considered as either Personal Data or Sensitive Personal Data as defined by the GDPR. To comply with these regulations, such personal data is only used for the lawful and specific purpose for which it is held.

## **The Legal Basis for IPS Holding and Communicating Data**

- The assessor or therapist records, processes and further communicates personal data for the purposes of agreeing a contract for professional psychological assessment and treatment services, and the delivery of those services according to professional codes of practice.

## **The Responsibilities of Therapists**

- Each IPS assessor and therapist is responsible for: complying with GDPR; registering with the Information Commissioners Office (ICO); and being accountable for their own data protection practices, which must include a commitment to appropriate levels of physical and electronic security.

- IPS assessors and therapists communicate internally using the IPS reference number, not the patient's name. If patients are discussed in professional supervision, this is done in an anonymised manner.
- GDPR emphasises the importance of not holding personal data longer than is necessary for the purpose for which it is held. Therapists have a professional and tax responsibility to hold information for seven years. In the experience of the IPS, patients sometimes return for further help long after therapy has ended, and their interests may not be best served by deleting baseline assessment information. For this reason, the contact and assessment information held by the IPS is deleted around ten years after assessment, unless there is a specific reason, not to do so.

### **The Rights of Patients**

- Patients have rights to retain control over their personal data. Control means the right to request access to personal information held, and to request correction, modification or erasure of information held or communicated.
- Any issues that are spoken about during assessment or therapy remain confidential. Any written or verbal contact with others, such as the therapist to whom a referral is made; a GP; a psychiatrist; or medical insurers that may cover treatment costs, would only be made with the patient's explicit agreement.
- The right to confidentiality may be waived on the rare occasion that the assessor or therapist had serious concerns about the safety of the patient or others, when our professional, ethical and legal responsibility to share this information may take precedence over data protection rights.
- If patients have any concerns in the matter of privacy, these should be directed in the first instance to the relevant therapist or initial assessor. If a solution cannot be satisfactorily agreed, the patient may contact the relevant professional regulator, or the Information Commissioners Office (ICO).

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