

CTC

Empathy • Experience • Expertise

Psychological Services

Over 30 Years Experience

Expert Witness

Assessment

Therapy &

Training

GDPR / PRIVACY

FEBRUARY 2022

COMPANY POLICY

GDPR / Privacy Policy

Introduction

CTC Psychological Services LLP [CTC] aims to be as clear as possible about how and why we use information about you so that you can be confident that your privacy is protected.

This policy describes the information that CTC collects when you use our services. This information includes personal information as defined in the General Data Protection Regulation (GDPR) 2016 and the subsequent UK Data Protection Bill 2018.

The policy explain is how we manage your information when you use our services, if you contact us or when we contact you. It also provides extra details to accompany specific statements about privacy that you may see when you use our website (such as cookies) or with other online presence (such as Facebook or Twitter). In respect of cookies, the policy includes information about the type of cookies that we use and how you may disable those cookies.

CTC uses the information we collect in accordance with all laws concerning the protection of personal data, including the Data Protection Act 1998 and the GDPR 2016. As per these laws, CTC is the data controller; if another party has access to your data we will tell you if they are acting as a data controller or a data processor, who they are, what they are doing with your data and why we need to provide them with the information.

If your questions are not fully answered by this policy, please contact admin@ctcps.co.uk If you are not satisfied with the answers from CTC, you can contact:

The Information Commissioner's Office [ICO]

<https://ico.org.uk>

Organisation name: CTC PSYCHOLOGICAL SERVICES LLP

Registration reference: ZA021953

Why do we need to collect your personal data?

The nature of work at CTC includes psychological assessment, therapy, training and consultancy. The following is a broad description of the way this organisation/data controller processes personal information. To understand how your own personal information is processed you may need to refer to any personal communications you have received, check any privacy notices the organisation has provided or contact the organisation to ask about your personal circumstances.

We need to collect information about you so that we can:

- Know who you are so that we can communicate with you in a personal way. The legal basis for this is a legitimate interest;
- Deliver services to you. The legal basis for this is the contract with you;
- Process your payment for the services. The legal basis for this is the contract with you, or via our contract with a Local Authority;
- Verify your identity so that we can be sure we are dealing with the right person. The legal basis for this is a legitimate interest;
- Contact you in case there is an issue with the service we offer you. The legal basis for this is a legitimate interest;

- Optimise your experience on our website. The legal basis for this is a legitimate interest;
- Send you information about additional services. The legal basis for this is your consent;
- Provide you with a useful and relevant website. The legal basis for this is legitimate interest.

What personal information do we collect and when do we collect it?

For us to provide you with your services, we need to collect the following information:

- Personal details, family details, lifestyle and social circumstances, employment and education details;
- Your contact details including a postal address, telephone number(s) and electronic contact such as email address;
- Your payment card details – if you are self-funding;
- Details about how you access our website such as the IP address, the browser you use, and which pages you access.

We collect this information directly from you. We may also collect information about you from third parties; for example, if we need to gather information from another health professional (such as your Doctor, Solicitor or Local Authority) to provide a complete psychological assessment.

To ensure that you are assessed and/or treated safely, we record your personal information, such as that mentioned above, as well as all contacts you have with the service such as appointments and the results of assessments and letters relating to your care/report.

Your case record is kept confidential within the service at all times and is only shared with staff when they need it to carry out their job.

Patients/Clients (Therapy or Private Assessment)

When you are a client of CTC we record all your treatment and details of your appointments so that your clinician can plan your treatment correctly. In addition to the personal information above, we may also collect information regarding:

- Medical conditions (if relevant);
- Prescribed medication;
- Psychological history and current difficulties;
- Sexuality;
- Offences (including alleged offences);
- Financial information, including bank account details (if you are a private client of CTC).

Clients undertaking Assessment for the purpose of 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 information regarding:

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

Job applicants, current and former CTC employees and associates

When individuals apply to work at CTC, we will only use the information you supply to us to process your application and to monitor recruitment statistics. 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.

How do we use the information that we collect?

We use the data we collect from you in the following ways:

- To communicate with you, so that we can inform you about your appointments with us, we use your name, your contact details such as your telephone number, email address or postal address;
- To deliver the correct service to you, we use your name, your contact details and the details about the service you are using;
- To create your invoice using our accounting package, we use your name and address
- To process your payment (through Bacs Payment Schemes Limited (Bacs), cheque or cash);
- To optimise our website so that users can find the information they need.

With whom do we share your personal information?

Your information is kept confidential within the service at all times 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.

If we become aware of your intent to cause harm to yourself or another person/organisation (eg terrorism), the law may require that we inform an authority without seeking your permission. In such a situation, the law may require that we share your personal information without your knowledge.

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 social worker or insurer if they are funding your treatment, your GP, or other healthcare professionals 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 your health is in jeopardy (with your agreement) we may share your contact information with an emergency healthcare service (eg Mental Health Crisis Team). In many circumstances we will not disclose personal data without consent.

However, when we investigate a complaint we may need to share personal information with other relevant bodies. If we do need to share your information, we will always try to 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.

Clients undertaking Assessment for the purpose of Court Reports

Your information is likely to be shared with organisations directly involved in your care/case, for instance, your solicitor, the defendant's solicitor, a guardian and the court.

You should contact your solicitor to find out with whom they might share information collected at your assessment.

Undertaking Research

Personal information is also processed in order to undertake research. For this reason, the information processed may include sensitive types of information such as physical or mental health details, racial or ethnic origin and religious or other beliefs.

We endeavour to make a contribution to scientific research and publication, to advance knowledge and skills in working with adults and children. For some of the continuing professional development of our staff this is an essential requirement for achieving further qualifications. In order to do this, we would like your permission to make use of artwork and other clinical material arising in the course of our work.

We abide by the ethical standards of The British Psychological Society [BPS]; The British Association for Counselling and Psychotherapy [BACP]; the United Kingdom Council for Psychotherapy [UKCP] and the Health and Care Professions Council [HCPC]. Any material would be used anonymously. Often material is disguised or embedded in other material so that it illustrates a particular concept, rather than the person. If any material or information provided by you or your family were used in a book or article, it would be done in a way that would prevent identification.

Where do we keep the information?

We keep your information in the stores described below.

- On our company Servers: Data stored electronically is password protected, with restricted access in line with GDPR. This includes electronic data relating to your case records and any psychological reports. All back-up is encrypted electronically;
- As a paper copy: We take hand written notes during your sessions. These notes are used to create reports that we provide to you, or for session notes with a therapist. The client notes are used for clinical supervision (to comply with the professional body and good ethical practice). Shared details include case specifics, but not the client's personal details, unless a legal or safeguarding requirement requires us to do so;
- Non-electronic data is secured in a locked-cabinet when not in use.

How long do we keep the information?

We will keep the personal information you provide for as long as it is reasonable and necessary for the purpose of the processing. On request, or at seven years after our last contact, we delete by electronic means and destroy paper records by shredding. For clients under the age of eighteen, notes are kept until your 26th birthday or seven years after last contact whichever is the later. For adoption cases the records are stored for 100 years.

Clients undertaking Assessment for the purpose of Court Reports

If your case is for a court report for litigation purposes, we will keep your information until

the end of your case, unless instructed otherwise by your solicitor. We do rely on solicitors informing us when your case has ended, but we will contact them every 12 months in order to ascertain whether your case is ongoing and whether we are at liberty to destroy some of your records. We will retain data that forms the basis of our report for the required number of years.

Job applicants, current and former CTC employees and associates

Personal information about unsuccessful job candidates will be held for up to 6 months after the recruitment exercise has been completed, it will then be destroyed or deleted.

Once a person has taken up employment with CTC, we will compile a file relating to their employment. The information contained in this will be kept securely and will only be used for purposes directly relevant to that person's employment. Once their employment with CTC has ended, we will retain the file in accordance with the requirements of our retention schedule and then delete it.

Who do we send the information to?

If you require a psychological report, we send your report to you, or the referring agency, and also anyone we are required by law to inform. All reports that are sent electronically are sent as attachments that are encrypted and password protected. We send invoice information electronically to our accountants. The accountancy firm is based in the UK and all their computer systems are in the UK.

How can I see all the information you have about me?

CTC 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 about them, by making a 'Subject Access Request' or 'Right of Access' under the Data Protection Act and the General Data Protection Regulation.

CTC may require additional verification that you are who you say you are to process this request. We may withhold such personal information to the extent permitted by law. In practice, this means that we may not provide information if we consider that providing the information will violate your vital interests.

There may be a 'reasonable fee' when a request is manifestly unfounded or excessive, particularly if it is repetitive. There may also be a reasonable fee to comply with requests for further copies of the same information. The fee may be based on the administrative cost of providing the information.

We will then supply to you:

- A description of the data we hold about you;
- Inform you how it was obtained (if not supplied by you);
- Inform you why, and for 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 CTC 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. You may ask us to correct or remove information you think is inaccurate, please address these changes to the Data Controller, via 'How to contact us'.

Under data protection law, you may have a number of rights concerning the data we hold about you. If you wish to exercise any of these rights, please contact our Data Protection Officer using the contact details set out above. For additional information on your rights, please contact your data protection authority and see below.

- **The right to be informed.** You have the right to be provided with clear, transparent and easily understandable information, about how we use your information and your rights. This is why we're providing you with the information in this policy;
- **The right of access.** You have the right to obtain access to your information (if we're processing it). This will enable you, for example, to check that we're using your information in accordance with data protection law. If you wish to access the information we hold about you in this way, please get in touch (see Contact Details);
- **The right to rectification.** You are entitled to have your information corrected if it is inaccurate or incomplete. You can request that we rectify any errors in information that we hold by contacting us (see Contact Details);
- **The right to erasure.** This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of certain of the information that we hold about you by contacting us (see Contact Details). If you want to have your data removed we have to determine if we need to keep the data, for example in case HMRC wish to inspect our records, or in legal cases that are not yet closed. If we decide that we should delete the data, we will do so without undue delay. Please see further guidance on: <https://ico.org.uk/for-the-public/personal-information>;
- **The right to restrict processing.** You have rights to 'block' or 'suppress' further use of your information. When processing is restricted, we can still store your information, but will not use it further;
- **The right to data portability.** You have the right to obtain your personal information in an accessible and transferable format so that you can re-use it for your own purposes across different service providers. This is not a general right however and there are exceptions. To learn more please get in touch (see Contact Details);
- **The right to lodge a complaint.** You have the right to lodge a complaint about the way we handle or process your information with the national data protection authority. For the UK, this is the Information Commissioners Office (ICO). Further details can be found on page 8 of this document;
- **The right to withdraw consent.** If you have given your consent to anything we do with your information (ie we rely on consent as a legal basis for processing your information), you have the right to withdraw that consent at any time. You can do this by contacting us. Withdrawing consent will not however make unlawful our use of your information while consent had been apparent;
- **The right to object to processing.** You have the right to object to certain types of processing, including processing for direct marketing and profiling.

Clients undertaking Assessment for the purpose of Court Reports

If your concern is related to a case with a solicitor that we are instructed by, 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.

Are my emails secure?

As part of providing our service to you we will send your report, where appropriate, to you via email. The report will be encrypted, and password protected. To protect your information, we prefer to use an end-to-end encrypted messaging service. This means you will log on to a specific service using a password (which we will let you know in advance) in order to view your emails from us. You can reply via the service once you are logged in.

Website security

CTC's website has an SSL certificate. An SSL certificate shows that the data connection to an Internet page is secured with a Secure Sockets Layer (SSL). This ensures that the transferred data cannot be read or modified by third parties. You can recognise the encrypted connection to the lock icon in the address bar of the browser.

Complaints or queries

CTC 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 admin@ctcps.co.uk. If you are not satisfied with the response from CTC, 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]

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

Email: casework@ico.org.uk

Tel: +44 (0) 303 123 1113

Who we are and how to contact us?

CTC Psychological Services LLP is the company that you are supplying your personal information to. Contact details can be found on the last page of this policy.

Review

This policy will be reviewed annually to ensure that it remains up to date and reflects the needs and practices of our service. It may also be reviewed in the interim if legislation changes or if there is any indication that practices should be altered.

Last Reviewed : February 2022

Next Review : February 2023

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