

## **Privacy Policy**

July 2023

Information gathered by Dr Hannah Ranaldi (Health Psychology Scotland) is handled in accordance with laws concerning the protection of personal data (UK Data Protection Bill 2018 and General Data Protection Regulation 2018). Dr Hannah Ranaldi is the data controller and is registered with in Information Commissioners Office (ZB326330).

This policy covers the procedures followed by Dr Hannah Ranaldi (and Associate Practitioners of Health Psychology Scotland) to protect the information of therapy and coaching clients and any other clients contracting with Dr Hannah Ranaldi (and Associate Practitioners of Health Psychology Scotland) for professional psychological services. For the purpose of this policy, the term “client” covers each and all of these client groups.

### **1. What information is collected?**

When submitting an enquiry about services, the client’s name, e-mail address and a brief description of the client’s query are required. You may also be prompted to send an email from your personal email account when enquiring about some of the services listed on the website. It is recommended that prospective clients provide only minimal information about their mental health, physical health and other personal circumstances when making an initial website or e-mail enquiry. The purpose of the initial enquiry is to arrange an initial consultation (either via telephone or online), where there will be an opportunity to discuss presenting concerns or service requirements in greater detail.

Further information is collected and stored at the assessment appointment. This includes a full name, residential address, date of birth, phone number, e-mail address, referrers details, emergency contact details, GP information and insurance provider details (if appropriate).

Clinical notes are a requirement of professional psychology and are taken within sessions. They include sensitive information relevant to therapy and stored on an encrypted digital drive. Notes taken during therapy are either directly stored in a password protected document, or on paper. Notes taken on paper are transferred to a password protected document at the end of the clinic, and paper notes are shredded.

Additional therapy or supervision documents such as psychological outcome measures, or formulation information completed between the client and Dr Hannah Ranaldi (or designated Associate Practitioner of Health Psychology Scotland) are handled in the same way.

Clients are given the opportunity to complete a feedback form at the end of therapy, supervision and training. These are anonymised and stored securely. Clients are not obliged to complete a feedback sheet.

Dr Hannah Ranaldi (Health Psychology Scotland) strongly advises that clients do not include sensitive information in e-mails, text messages or any other method of written communication.

## **2. Why is this information collected?**

Information is collected by Dr Hannah Ranaldi (and Associate Practitioners of Health Psychology Scotland) in order to provide professional services.

Contact details are kept so that clients can be contacted for appointment scheduling or other arrangements pertaining to organising service delivery. Dr Hannah Ranaldi (and Associate Practitioners of Health Psychology Scotland) will use the client's e-mail address as the primary mode of contact for matters relating to appointments. E-mail is vulnerable to viruses and human error. Dr Hannah Ranaldi (and Associate Practitioners of Health Psychology Scotland) accepts no liability for any damage caused by any virus transmitted by this email. E-mail transmission cannot be guaranteed to be secure or error-free. It is possible that information may be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. The sender does not accept liability for any errors or omissions in the contents of this message, which arise as a result of e-mail transmission.

E-mail is used to provide clients with an online invitation to join sessions via Zoom. E-mail may be used to share password-protected documents pertaining to therapy, pending mutual agreement. For self-funding clients, e-mail is used to provide a record of payment for services.

GP details are required to allow Dr Hannah Ranaldi (and Associate Practitioners of Health Psychology Scotland) to share information with a client's GP should this be required to safeguard physical and/or emotional health.

Emergency contact details are stored should an emergency situation related to a client's health and wellbeing arise during an appointment, and notification it is deemed essential to the client's wellbeing and safety.

If applicable, details of the client's insurance policy are collected in order to allow Dr Hannah Ranaldi (Health Psychology Scotland) to verify the client's insurance cover and process payment from the insurance provider.

Information, including any sensitive information provided by the client, deemed relevant to clinical work is stored in order to support the delivery of safe and effective psychological therapy. As a Health and Care Professions Council (HCPC) registered Psychologist, Dr Hannah Ranaldi (and Associate Practitioners of Health Psychology Scotland) are required to keep records of clinical practice.

Feedback is collected to improve and refine existing services. Anonymised client feedback may be used for marketing and promotional purposes. Permission is sought from the client prior to feedback being shared in this way. Permission for the anonymous sharing of client feedback can be withdrawn by the client at any point. Client feedback will not be shared without their permission. Clients are under no obligation to provide feedback.

### **3. Data Storage**

All client information is held in password-protected documents, stored in secure cloud storage and accessible only through password protected devices to which only Dr Hannah Ranaldi (and designated Associate Practitioner of Health Psychology Scotland) has access. Any client information held in hard copy (e.g. signed contract or completed feedback sheet) is held in a locked file box. Any written notes made during sessions are handled in the process outlined above.

Client mobile numbers may be stored in a device which is the property of Dr Hannah Ranaldi (and designated Associate Practitioner of Health Psychology Scotland). This device is passcode protected. Client numbers will be saved under initials only, and will be deleted at the end of therapy.

In the event of information relating to a client being provided by a third party (e.g. if referred by another professional) only information pertinent to assessment and therapy will be kept. This information will be password protected and stored on an encrypted system. Clients are made aware that this information is held, and that they have the right to access it.

During the first session, clients are informed about how their personal information is handled. Details about the handling and storage of personal information are included in the client contract. Clients are advised to refer to this document to access the full and detailed Privacy Policy for Dr Hannah Ranaldi (Health Psychology Scotland).

Clients are advised that they may request to access their personal information at any time. Clients requesting to access the information held about them will be provided access within one month of the request being made in writing. There is no charge for information access.

GDRP legislation states that individuals have the right to be 'forgotten' i.e. for their information to be erased should they request that. However, Dr Hannah Ranaldi (and Associate Practitioners of Health Psychology Scotland) are Practitioner Psychologists and registrants of the HCPC, and information gathered for the purposes of psychological assessment and treatment form part of a client's health record. Therefore under HCPC guidelines, practitioners are required to store health records for 6 years.

Records are held for six years from the completion of therapy or other service provided. Records are destroyed at the end of the calendar year once seven years have expired.

In the event of a data breach, the ICO will be notified. Clients will be notified within 72 hours in the event of a data breach where their information has been compromised.

Dr Hannah Ranaldi (and Associate Practitioners of Health Psychology Scotland) receives clinical supervision where clinical work is discussed. All client information is anonymised and supervision is protected by a confidentiality agreements.

In the event of death, becoming ill, seriously injured, or otherwise indisposed, Dr Hannah Ranaldi has appointed another Registered Psychologist within Health Psychology Scotland who would act on her behalf to notify clients. In the instance where an Associate Practitioner of Health Psychology Scotland is becomes ill, seriously injured, dies, or otherwise indisposed, Dr Hannah Ranaldi (Founder) will act to notify relevant clients. Therefore, client names and contact details are shared within Health Psychology Scotland for this purpose. No clinical information is shared. This arrangement is bound by a confidentiality agreement, and exists within the confines of professional practice guidelines and GDPR regulations. Clients may notify Dr Hannah Ranaldi if they wish to opt out of having their details shared as part of this arrangement.

Dr Hannah Ranaldi (and Associate Practitioners of Health Psychology Scotland) may speak in general terms about professional activities and experience when delivering training and in other professional contexts. Any information provided in these contexts is general, and does not relate to one specific client case or clinical event.

#### **4. Information Sharing**

Information provided by clients and shared with Dr Hannah Ranaldi (Health Psychology Scotland) is confidential, except in the following instances where some client personal information may be shared (in accordance with HCPC and BPS Professional Practice Guidelines):

- When Dr Hannah Ranaldi (or other Associate Practitioner of Health Psychology Scotland) are concerned about another's wellbeing, this may include risk of harm to the client, or another adult or child. This includes immediate risk due to ill health; disclosure concerning acts of Terrorism under the Terrorism Act; or acts specific to the Children's act whereby Dr Hannah Ranaldi and other Associate Practitioners of Health Psychology Scotland have a duty to disclose to relevant authorities without delay.
- When information is pertinent to treatment being delivered by another health provider, such as client's GP.
- Whereby information is commanded in the event of a court order.
- Client requests for written reports or other evidence of services provided by Dr Hannah Ranaldi (or other Associate Practitioner of Health Psychology Scotland) is

considered on a case-by-case basis. In the event of such documentation being provided, it will be sent by e-mail in a password protected document, in hard copy format handed to the client in person, or posted using Recorded Delivery.

- In the instance a client wishes to use an insurance policy to cover the cost of sessions, Dr Hannah Ranaldi (or other Associate Practitioner of Health Psychology Scotland) will contact the insurance provider to verify the policy and notify the insurance provider of work completed with relevant information provided by the client. Dates of therapy sessions and record of attendance will be shared with the insurance provider for invoicing and to request payment for services.

## **5. Use of Cookies**

Cookies are small pieces of data that help track and analyse web traffic. The website ([www.healthpsychologyscotland.com](http://www.healthpsychologyscotland.com)) uses cookies to help Dr Hannah Ranaldi (Health Psychology Scotland) understand site activity. This cookie collects statistical data about your browsing patterns but does not collect identifying personal information about you as an individual. This information may be used for marketing, including targeted advertising through Facebook.

## **6. Other Websites**

The website ([www.healthpsychologyscotland.com](http://www.healthpsychologyscotland.com)) may contain links to other websites. Dr Hannah Ranaldi (Health Psychology Scotland) has no control over destination websites and is not responsible for the protection and privacy of information provided to destination websites by website users.

## **7. Social Media Accounts**

Dr Hannah Ranaldi (Health Psychology Scotland) maintains a public profile on Facebook, Instagram and Twitter. The purpose and nature of use of the professional social media accounts held by Dr Hannah Ranaldi (Health Psychology Scotland) is primarily to share psychological information and ideas which may be of interest to followers. Social media accounts are also used to promote awareness of the professional activities and services of Dr Hannah Ranaldi (Health Psychology Scotland), including therapeutic activities and services.

Dr Hannah Ranaldi (Health Psychology Scotland) strongly recommends that enquiries are not made through social media accounts, as privacy cannot be guaranteed and social media inboxes are not routinely checked. All enquiries and contact relating to professional services should be through the contact form at [www.healthpsychologyscotland.com](http://www.healthpsychologyscotland.com) or via e-mail at [admin@healthpsychologyscotland.com](mailto:admin@healthpsychologyscotland.com).

