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CLIENT and PROFESSIONAL PRIVACY NOTICE

A) WHO THIS PRIVACY NOTICE IS FOR

In accordance with the General Data Protection Regulation (GDPR), this privacy notice informs our NHS and private clients, professional correspondents involved in client care, and professionals on our continuing professional development (CPD) mailing lists (our Data Subjects) of the types of data we process about you. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

B) DATA PROTECTION PRINCIPLES

Under GDPR, all personal data obtained and held by Oakwood Psychology Services must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- a) processing is fair, lawful and transparent
- b) data is collected for specific, explicit, and legitimate purposes
- c) data collected is adequate, relevant and limited to what is necessary for the purposes of processing
- d) data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- e) data is not kept for longer than is necessary for its given purpose
- f) data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- g) we comply with the relevant GDPR procedures for international transferring of personal data

C) TYPES OF DATA HELD

We keep several categories of personal data on our NHS and private clients, as well as professional correspondents involved in the care of our clients, in order to carry out effective and efficient processes. We also hold information on professionals who have requested to be on our e-mail list for information about CPD events. We do not hold personal information on people making enquiries about our services, or professionals attending training events,

Where change is possible

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Service

NHS

Oakwood Psychology Services Limited
Director: Caroline Vermees M.Ed., MBACP (Accred.)
Company Number: 9191591
Registered Office: c/o Bennett Verby,
7 St. Petersgate, Stockport SK1 1EB

beyond the time necessary to deal with the purpose of the contact, after which the information is securely destroyed.

Specifically, we hold the following types of data:

NHS and private clients	Professional correspondents involved in client care	Professional email list
<p>Identity and contact details Name, gender, date of birth, phone numbers, email address, postal address, NHS number. Carer/parent name and contact details where relevant.</p> <p>GP or other referrer details GP name GP surgery GP contact details</p> <p>Referral information GP letter or other correspondence detailing reason for referral, health conditions or disabilities Payments (private clients)</p> <p>Clinical correspondence and notes Pre-consultation notes and session notes Records of phone calls and emails from, to, or about you Letters to you and your GP, and other correspondence received or sent about you</p> <p>Attendance Sessions booked, attended, cancelled and not attended</p> <p>Psychometric outcome data Responses you give to routine questionnaires about your mental health</p> <p>Complaints Records of any informal or formal complaints you might make about the service and the response supplied</p>	<p>Identity and contact details Name, address of surgery or agency where you work, phone numbers, fax number, email address</p> <p>Clinical correspondence Documented communication we might have with you regarding client care</p>	<p>Identity and contact details Name, email address</p>

D) **LAWFUL BASIS FOR PROCESSING: NHS and private clients**

The law on data protection allows us to process your data for specific reasons only. The information below categorises the types of data processing we undertake and the lawful basis we rely on.

Activity requiring your data	Lawful basis
Identity and contact details, referrer details, payment details	Performance of the contract
Storing information about your care including referral, session attendance and notes; correspondence with you and professionals involved in your care	Performance of the contract
Processing psychometric outcome data to monitor personal change and service quality	Consent
Holding information about any complaints you might make	Performance of the contract
Making reasonable adjustments for clients with communication or learning issues	Legal obligation

E) LAWFUL BASIS FOR PROCESSING: Professional correspondents involved in client care

The information below categorises the types of data processing we undertake and the lawful basis we rely on.

Activity requiring your data	Lawful basis
Clinical liaison and continuity of care	Performance of contract

F) LAWFUL BASIS FOR PROCESSING: Professional email list

The information below categorises the types of data processing we undertake and the lawful basis we rely on.

Activity requiring your data	Lawful basis
Marketing CPD events	Consent

G) SPECIAL CATEGORIES OF DATA: NHS and private clients

Special categories of data are data relating to your:

- a) health
- b) sex life
- c) sexual orientation
- d) race
- e) ethnic origin
- f) political opinion
- g) religion
- h) trade union membership
- i) genetic and biometric data

We might carry out processing activities using special category data:

- a) for the purposes of equal opportunities monitoring
- b) to provide culturally sensitive care
- c) to determine reasonable adjustments

Most commonly, we will process special categories of data when the following applies:

- a) you have given explicit consent to the processing
- b) we must process the data in order to carry out our legal obligations
- c) we must process data for reasons of substantial public interest
- d) you have already made the data public.

H) FAILURE TO PROVIDE DATA

If a client declines to provide us with necessary personal data where the legal basis for processing is any other than consent, this may mean that we are unable to fulfil our requirements for entering into a care agreement.

I) WHO WE SHARE CLIENT DATA WITH

Oakwood Psychology Services shares NHS client personal data with third parties for the following reasons:

Referrers (usually your GP) for clinical liaison and continuity of care

Other providers involved with your care, or to whom we refer you for care

NHS commissioners when decisions must be made about funding your care

We do not share your data with bodies outside of the European Economic Area.

J) PROTECTING YOUR DATA

We ensure your data is protected against accidental loss or disclosure, destruction or misuse. Client records are stored in PCMIS, a highly secure clinical database. We store some client

records in paper files kept in a securely locked filing cabinet that can be accessed by authorised Oakwood workers only. Our professional mailing list is stored in our Dropbox.

K) RETENTION PERIODS

Record	Statutory Retention Period
Children/young adults clinical records	Retain until the patient's 25th birthday or 26th if young person was 17 at conclusion of treatment; or 8 years after death; or until service is wound up.
Adult clinical records	20 years after the last entry in the record or until service is wound up.
Records of professional correspondents involved in client care	20 years after the last entry in the record or until service is wound up.
CPD mailing list	5 years from date of initial entry onto the mailing list or until consent withdrawn/unsubscribed

L) AUTOMATED DECISION MAKING

Automated decision making means making decision about you using no human involvement e.g. using computerised filtering equipment. At Oakwood Psychology Services, no decision will be made about you on the basis of automated decision making.

M) DATA SUBJECT RIGHTS

Data Subjects have the following rights in relation to the personal data held by Oakwood Psychology Services:

- a) the right to be informed about the data we hold on you and what we do with it;
- b) the right of access to the data we hold on you.
- c) the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as 'rectification';
- d) the right to have data deleted in certain circumstances. This is also known as 'erasure';
- e) the right to restrict the processing of the data;
- f) the right to transfer the data we hold on you to another party. This is also known as 'portability';
- g) the right to object to the inclusion of any information

N) CONSENT

Where Data Subjects have provided consent to Oakwood Psychology Services use of personal data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data. Depending on what we need the data for this may restrict our ability to provide some services to you.

O) MAKING A COMPLAINT

If you think your data rights have been breached, you are able to raise a complaint with the Information Commissioner (ICO). You can contact the ICO at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 (local rate) or 01625 545 745.

P) DATA PROTECTION COMPLIANCE

Our appointed compliance administrator in respect of our data protection activities is:

Caroline Vermes

cvermes@oakwoodgroup.org

0161 456 6799