



Seraph Psychology Privacy Notice

This privacy notice explains how Seraph Psychology uses the information we collect from you, including when you use our website. This includes:

- What information we collect
- How we collect your information
- Why we collect your information
- The legal basis
- How we store your information safely and securely
- How long we store your information for
- When, why and how we share your information
- What your data protection rights are
- Other websites
- Changes to our privacy notice
- How to contact us

What information do we collect?

Seraph Psychology collects your *personal* data, e.g. your name, address and contact details. We also collect your *sensitive* data, e.g. your health history and notes about our sessions.

How do we collect your information?

You directly provide Seraph Psychology with most of the data we collect. This is collected when you:

- Complete our website 'Contact Us' form
- Contact us via email
- Provide us with information during a session with Seraph Psychology



Seraph Psychology may, on occasion, receive your data indirectly from those who are aware you're working with our service. This might include:

- Your GP or other healthcare professionals/services you're working with
- Your insurance company (if sessions are funded in this way)
- Your family members
- Your employer
- The education sector, such as a school or university
- The legal system, such as the police or solicitors

Although we can receive your data from the above sources, we will not give the information you've shared with us to these sources, unless you've given us explicit consent to do so or there are exceptional circumstances (see **When, why and how do we share your information?** for further details).

Why do we collect your information?

As clinical psychologists, our professional registration requires us to keep information about the clients we work with and the work that we are doing. We collect your data to: provide you with a service; process payments; audit/evaluate our service; help prevent serious harm to you or others. We cannot offer you a service unless you allow us to keep data about you and the work we are doing.

What is the legal basis for this?

Under the General Data Protection Regulation (GDPR), Seraph Psychology has a *legitimate interest* for processing and keeping data. We are registered with the Information Commissioner's Office (ICO) and follow the code of practice set out by the Health and Care Professions Council (HCPC), our professional regulatory body.



How do we store your information safely and securely?

Seraph Psychology stores your data in the following ways:

- 'Contact Us' form on our website – the information you put into this form is automatically transferred to our email account and is deleted from the server, which means no personal information is stored on our website.
- Emails – all our email accounts in Seraph are password-protected and require two-step verification to be accessed. Please bear in mind that, unless encryption is used, emails are not an entirely secure form of communication. Any information you send to us is done so at your own risk and we cannot be responsible for the security of your information while it is in transit. We will handle your data securely when we receive it in line with our Privacy Policy and Information Governance procedures. If we have agreed to email you, please let us know if you would like us to encrypt this email. If you have a Microsoft 365 or Outlook account, you will be able to access the email as usual. For other accounts, you will be sent an email with instructions for how to access the encrypted email.
- Mobile phones – the only information we may keep about you in our mobile phones is your telephone number to contact you. All our phones require a strong password, pin and/or fingerprint to be accessed.
- Team cloud storage – we use Microsoft 365's storage system to store some of your personal data. This data can be accessed by all members of the Seraph Psychology team for administrative purposes; no one outside Seraph Psychology can access this information. Data held here is encrypted when at rest and in transit, meaning no one can read this data while it is being sent to or coming from our accounts. Access to the accounts requires a password and two-step verification.



- Individual cloud storage – occasionally, we might receive sensitive information about your care in an electronic format, such as a letter from your GP. This data will be stored on the individual therapist's OneDrive account and cannot be accessed by anyone else in the Seraph Psychology team. Access to these accounts requires a password and two-step verification.
- Laptop security – we use our laptops to access the storage cloud, where your data is kept. Each laptop is password-protected.
- Paper notes – the sensitive information we hold about you, such as details you give us in therapy sessions, is kept in paper notes. These notes are only available to the therapist you're working with. They are pseudonymised by replacing your name with a unique reference number (this number can only be linked to your name via the secure Seraph Psychology account in Microsoft 365's cloud system). All paper notes are stored in a locked cabinet, in a secured building.
- Online video sessions/meetings – we can use a variety of programs for videocalls, including Microsoft Teams, Zoom and Skype. All these systems are free for you to use and have end-to-end encryption for videocalls. We are happy to discuss which system would work best for you, and how to download this for your use.

How long do we store your information for?

Seraph Psychology keeps your information while you're working with the service and for a 'retention period' after this, in keeping with professional guidance. The current 'retention period' is:

- 7 years after completion of your work, for those over 18 who received a service from Seraph Psychology



- 7 years after you turn 18 (i.e. your 25th birthday), if you finished working with us when you were 16 or under
- 8 years after you turn 18 (i.e. your 26th birthday), if you finished working with us when you were 17
- 1 year for people who only enquire about working with the service

This allows you to access your information in the event of a claim against Seraph Psychology. Your information will be securely deleted no longer than three months after this retention period ends.

When, why and how do we share your information?

As clinical psychologists, we are required to have regular supervision with an experienced supervisor(s), who oversee(s) our clinical practice. The work we are doing with you will be discussed, to ensure that we are working safely and effectively, and providing you with the best possible care we can. These supervision sessions are bound by confidentiality. Confidentiality means that your personal and sensitive information will not be shared with third parties without your permission. At times, it may be helpful to talk to your GP, another healthcare professional or service who is already involved in your care, or your insurance company. In such cases, we will only pass on information that we believe is directly relevant to your care and we will agree this with you in advance.

As we have a duty of care, there are special circumstances where we have to break confidentiality, even if we haven't gained your permission. These are limited to:

- If there is serious and immediate risk of harm to you, or significant threat to your life
- If there are serious risks or danger towards other people
- If any danger towards children is identified



- If there is another legal requirement to share information

In these circumstances, we will try to discuss this information sharing with you in advance if possible. We will only ever share information that is necessary with the appropriate person/service.

What are your data protection rights?

You have the right to:

- Request details of the information Seraph Psychology keeps about you and receive this within one month. If you would like a copy of some or all of your information, please email us at hello@seraphpsychology.co.uk or write to us at Seraph Psychology Ltd, Gowran House, 56 Broad Street, Chipping Sudbury, Bristol BS37 6AG. We may charge a fee for this to cover the administrative overhead.
- Request that your information is changed, if you believe it be inaccurate or incomplete.
- Complain to the Information Commissioner's Office (ICO), if you believe that Seraph Psychology is acting unlawfully. To do so, visit <https://ico.org.uk/make-a-complaint/> or phone 0303 123 1113.

What about other websites?

Seraph Psychology's website contains links to other websites. This privacy notice only applies to our website. When you link to other websites, you should read their own privacy notices/policies for further information about how your data is used.

Changes to our privacy notice



We keep our privacy notice under regular review and we will place any updates on this webpage. This privacy notice was last updated on 14/03/2021.

How to contact us

If you have any questions about our privacy notice or the information we hold about you, please contact us by email at hello@seraphpsychology.co.uk or write to us at Seraph Psychology Ltd, Gowran House, 56 Broad Street, Chipping Sodbury, Bristol BS37 6AG.