
Privacy Policy

This Privacy Policy is broken down into 3 sections:

1. What data do I hold and how, why and length of time do I hold it.
2. Your rights in relation to your data - Data Breaches - Complaints
3. Processing Data

Definitions:

“data controller” means a person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data are, or are to be processed

“data processor”, in relation to personal data, means any person (other than an employee of the data controller) who processes the data on behalf of the data controller.

“processing”, in relation to information or data means obtaining, recording or holding the information or data or carrying out any operation or set of operations on the information or data,
including—

- a) organisation, adaptation or alteration of the information or data,
- b) retrieval, consultation or use of the information or data,
- c) disclosure of the information or data by transmission, dissemination or otherwise making available, or
- d) alignment, combination, blocking, erasure or destruction of the information or data

Nia Abbas, as a qualified psychotherapeutic counsellor and trainee Integrative Psychotherapist, registered / member with the following organisations: is both a Controller and Processor and is registered with the ICO; is a member with UKCP; is a member with WPI.

Nia Abbas Qualified Psychotherapeutic Counsellor and Trainee Integrative Psychotherapist
Updated 31 July 2023

Section 1

What data do I hold and how, why and length of time do I hold it? I am a data controller

Data	How?	Why?	How long for?
Initial point of contact details	Either on my password protected mobile or if through an e-mail it is saved to an encrypted USB	In order to assess and respond to your request.	As of the 25 th of May 2018, initial contact information that doesn't develop into a contract is held for 3-12 months. If we contract please see below
Contract	Original Paper copy is kept under lock and key	Legal requirement	6 years after the last session
Clinical notes	Locked filing cabinet currently upgrading to Encrypted USB locked away. All records are coded	These are kept for the ongoing work	6 years after the last session
Audio Recordings	Encrypted USB locked away.	Training Requirement under UKCP and WPP training standards	Tapes are deleted within 2 weeks of the session unless used for learning purposes
Supervision	Recorded within my clinical notes as appropriate. I am required to report to a supervisor	I am required to report to a supervisor under UKCP and WPP training standards	6 years after the last session
Privacy Notice signed	Original Paper copy is kept under lock and key	Legal requirement	6 years after the last session
Opt In	Original Paper copy is kept under lock and key	Legal requirement	6 years after the last session
BACS transfer	Downloads and/or paper records kept under lock and key. Also kept with the bank	Legal requirement	7 years
Register	Coded record of use processing of your data. Stored on encrypted USB with clinical notes. In effect as of 25 th May 2018	Legal requirement	6 years after the last session

As a trainee Psychotherapist it is a requirement that I record sessions for my personal learning purposes and my supervisor will hear a short segment of a recording periodically. I am required to report to my supervisor. This includes if an ethical or legal issue arises.

Please note that under GDPR the data I hold is considered sensitive data.

Section 2

Your rights in relation to your data - Data Breaches - Complaints

Your rights in relation to your data

The first section of this policy informs you of the what data I hold.

As a client you may request a copy of the information.

Due to psychotherapy being contractual work the work is kept up to 6 years at which point it will be destroyed.

An **Opt in** form will need to be completed in the first session (or after if you started prior to 25th May 2018).

Clinical Executor - I am required to have a Clinical Executor in case of emergencies. They do not hold your data. A Clinical Executor will only have access to data in the event of emergencies where I am not able to contact you myself or in the event of my death in order to contact you.

GDPR and Confidentiality is exempt under the following laws in therapy

The Children Act 1989, Prevention of Terrorism Act 2003, and Mental Health Act, 1983 and subsequent acts

Data Breach

Currently installing an extra layer of security to mitigate a Data Breach - I am currently making all Clinical notes electronic in order to store them on an encrypted USB which is locked away.

In the event of a data breach I will be contacting you to let you know and the ICO.

Complaints

In the event of a complaint I would encourage you to contact me and see if we can resolve the matter. If this is not successful you can contact either one of the following

Welsh Psychotherapy Institute

<http://www.welshpsychotherapy.org.uk/>

UKCP

<https://www.psychotherapy.org.uk/>

Section 3

Data Processing -

Provider	Why might they hold your data	Privacy Policy
Three mobile.	If you call or text me or email	http://www.three.co.uk/mobile/Privacy Cookies/Your_privacy
BT internet and SKY	If you e-mail me	https://www.plus.net/help/legal/privacy-policy/
G-mail	If you e-mail me	https://policies.google.com/privacy https://policies.google.com/terms
Wix.com	If you use my website See also Cookies for a breakdown relating to why and how long cookie information is kept.	https://www.wix.com/about/privacy
Google adwords Express.	Clicked on an advert on Google. My website uses cookies.	https://policies.google.com/privacy https://policies.google.com/terms
HSBC	If you pay via cheque or online	http://www.business.hsbc.com/privacy-policy
Accountant	If I decide to use an accountant	Not Applicable on day of update
HMRC	HMRC has the right to audit any business.	http://www.business.hsbc.com/privacy-policy
Oxygen Insurance provider	In the event of a complaint and / or that I need legal advice - the sharing of data will be as required only.	http://www.oxygeninsurance.com
Welsh Psychotherapy Partners	Affordable Therapy Service is a part of WPI and therefore your details are processed here. Under this category WPI is a controller of your initial referral information In the event of a complaint - sharing of data will be as required only.	http://www.welshpsychotherapy.org.uk/
UKCP	In the event of a complaint - sharing of data will be as required only.	https://www.psychotherapy.org.uk/

Cookies

For a website to work cookies must be used. However, not all cookies are essential or contribute to the functioning of a site. Here is a breakdown of cookie types and where and what can be disabled along with purpose and duration.

Essential cookies – These cookies enable core functionality such as security, verification of identity and network management. **These cookies can't be disabled.**

Marketing cookies – **(you can turn this off in the cookie banner on access to the site)** These cookies are used to track advertising effectiveness to provide a more relevant service and deliver better ads to suit your interests.

Functional cookies- **(you can turn this off in the cookie banner on access to the site)** These cookies collect data to remember choices users make to improve and give a more personalised experience.

Analytics cookies – **(you can turn this off in the cookie banner on access to the site)** These cookies help us to understand how visitors interact with our website, discover errors and provide a better overall analytics.

Cookie Name	Purpose	Duration	Cookie type
XSRF-TOKEN	Used for security reasons	session	essential
hs	Used for security reasons	session	essential
SSR-caching	Used to indicate the system from which the site was rendered	1 minute	essential
_wixCIDX	Used for system monitoring/debugging	3 months	essential
Wixbrowser_sess	Used for system monitoring/debugging	session	essential
Consent-policy	Used for cookie banner parameters	12 months	essential
TS*	Used for Security and anti-fraud reasons	session	essential
bS~ession	Used for system effectiveness measurement	30 minutes	essential
Feops.logger.sessionId	Used for stability/effectiveness measurement	12 months	essential
wixLanguage	Used on multilingual websites to save user language preference	12 months	functional

N.B This Policy can and will be updated as the owner sees fit. This includes but is not limited to improving transparency.