#### Ian Rattray



Integrative Counselling and Therapy
Dip. Couns., BA, MSc., Registered MBACP (Accred)

# **Privacy Policy**

Your data and information is important and you have a right to expect it is handled legally, fairly and with care. This document explains what information I keep and why, what happens to it and how you can get a copy.

# What information do I collect about you and how will I use it?

- Your contact details (and/or those of a parent/ guardian if you are under 18 or a vulnerable adult), including name, address, phone number(s), email address. This is so that I can get in contact when necessary, for example to arrange appointments, to share important information or to request payment if applicable.
- If the services I provide to you are funded by a 3rd party, relevant information, such as your insurance details, for invoicing purposes and to maintain a joined up approach.
- Personal information, including that provided by you, a referring organisation or referring person.
  This is likely to include sensitive data, such as information about your mental or physical health.
  This is termed "special categories data" under GDPR regislation. This is used to decide how best I can help you, to support the service I provide to you, and, if needed, to conduct a risk assessment to help keep you safe.
- Where I ask for your GP details, this is in case there is ever a situation where I need to share a serious concern regarding your well being. I don't as a matter of course contact your GP.
- Brief case notes. This is to keep a record of the service provided, such as sessions attended, and to aid progress.
- Reports and other communication in case a copy is requested or I need to refer back.
- If you are under 18 or a vulnerable adult, a record of other professionals or agencies involved in your care. This is to maintain a joined up approach.

#### Will your information be shared?

Any information I store will not be shared with others without your explicit consent (or that of a parent/ guardian on your behalf if you are under 18 and it is appropriate) unless there is a legal or safeguarding requirement, or a legal body such as a court, tells me to. In such a circumstance, I will let you know you if I can.

I do not use your contact information for marketing unless you have explicitly opted in. The only marketing I currently might send is information on courses that may be of interest.

## How is your information stored?

All information I store is kept secure, either in a locked location or in the case of electronic data under appropriate protection, such as password or two factor authentication (2FA).

In case of my incapacity or death, I have a Living Will where a person I have appointed will take ownership of the information I store about you. If this happens, they will notify you and manage safe storage of your information.

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## How long is your information kept?

I keep all information for a period of up to seven years, or if you are under eighteen, seven years after your eighteenth birthday. After this period, it will be destroyed safely and securely and electronic data permanently deleted.

Where I have stored your contact information, or those of a parent/ guardian, on my mobile device, it will be deleted within 3 months following the end of our work together or last contact.

## Updating, accessing and erasing your information

You may want to update or correct information I hold about you, such as contact details, or want to correct information which is inaccurate.

You have the right to request a copy of the information I hold about you, commonly referred to as a subject access request. You also have the right to request that the information I hold about you to be erased, also known as 'the right to be forgotten'.

To make this request you (or if you are under 18 a parent/ guardian on your behalf if appropriate) can do so verbally, in writing by email to <a href="mailto:ian@ianrattray.com">ian@ianrattray.com</a> or to my correspondence address.

In some circumstance there may be reasons, such as ethical or legal, to be taken into consideration in responding to your request or that prevents me doing so.

# **Subprocessors**

To support the services I provide I use the following third party services. Any information shared is kept to a minimum for the required purposes only.

Email: BT, Microsoft Corporation, Proton

Phone: BT, EE

Data and information processing and storage: Cliniko, Apple, Healthcode, eSignatures

Appointment processing: Apple, Google, Zoom, Cliniko

Online meetings: Cliniko, Zoom

Invoicing and payment processing: Squareup, Stripe, Cliniko, Healthcode

Banking: Lloyds

# Who do you contact if you have any questions or want to complain regarding how I use or store your data?

- 1. I invite you to speak to me in the first instance.
- 2. The Information Commissioner is the person responsible for ensuring organisations and individuals such as myself keep your data safe and uphold your rights. Contact information can be found at <a href="https://ico.org.uk">https://ico.org.uk</a>