



## The Wiltshire Psychology Service

Brinkworth House, Brinkworth

Swindon, Wiltshire, SN15 5DF

☎ 01666 511791

[info@wiltshirepsychology.co.uk](mailto:info@wiltshirepsychology.co.uk)

---

### DATA PROTECTION AND PRIVACY NOTICE

#### WHO ARE WE?

For the purposes of data protection law, the “controller” is Wiltshire Psychology Service Limited, a company incorporated and registered in England and Wales under company number 7656685, and having its registered office address Wiltshire Psychology Service, Brinkworth House, Brinkworth, Chippenham, SN15 5DF, United Kingdom (from now on referred to as “Wiltshire Psychology Service” or as “WPS”, and words such as “we” and “our”).

We are registered as a data controller with the Information Commissioner’s Office, which is the UK’s supervisory authority for data protection matters. As controller we are responsible for, and control the processing of, your personal data.

If you would like to contact us about this notice, including if you wish to receive further information about any aspect of it, our details are as follows:

#### E-mail

[info@wiltshirepsychology.co.uk](mailto:info@wiltshirepsychology.co.uk)

#### Post

Wiltshire Psychology Service, Brinkworth House, Brinkworth, Chippenham, SN15 5DF.

At the Wiltshire Psychology Service, we are committed to protecting and respecting your privacy.

This policy (together with any ancillary documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be managed.

Please read the following carefully to understand how we will treat and regard your personal data.

#### A. HOW DO WE COLLECT INFORMATION FROM YOU?

1. We obtain information about you directly from you when you contact us to enquire about our services.
2. We obtain information about you when you are referred to us by a third party, such as a doctor or solicitor.

[www.wiltshirepsychology.co.uk](http://www.wiltshirepsychology.co.uk)

3. We may obtain information about you from third parties, for example family members or health professionals who are involved in your care.
4. We take down detailed information from you when we conduct an initial assessment interview and when we see you for therapy sessions.
5. We may ask you to complete questionnaires that provide us with information about you.

## B. WHERE WE STORE YOUR PERSONAL DATA

Wiltshire Psychology Service takes security seriously. In order to protect your information from loss, misuse or unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect. These steps include the following:

- Password best practice
- Security best practice concerning devices (PCs, laptops, mobile devices), physical access and storage
- Staff training and accountability of data protection

We take all steps reasonably necessary to ensure that your data is treated securely.

We keep your information in the stores described below.

1. On our computers – all of our personal computers and laptops are password protected.
2. As a paper copy – we take handwritten notes when we first have contact with you for the purposes of creating your referral. We take handwritten notes during and after therapy sessions. These are used to create your reports that we provide to you and to form your clinical records. We keep paper copies of telephone messages and emails where these contain relevant personal data.
3. Our filing cabinets are all locked, in locked and alarmed offices, in a building that is locked outside of normal working hours.
4. We store a small amount of data on a cloud service to aid communication and information sharing where there are two clinicians who are working together on one case.



## The Wiltshire Psychology Service

Brinkworth House, Brinkworth

Swindon, Wiltshire, SN15 5DF

☎ 01666 511791

[info@wiltshirepsychology.co.uk](mailto:info@wiltshirepsychology.co.uk)

---

### C. HOW WE USE THE INFORMATION THAT WE COLLECT

We use the data we collect from you in the following ways:

1. To inform you about your appointments with us we use your name, and your contact details such as your telephone number, email address or postal address.
2. To perform our contract with you, we use your information to plan, monitor and assess your course of psychological therapy.
3. To create your invoices using our accounting package, we use your name, address and email address, as well as the dates of your therapy sessions.
4. To notify you about changes to our service.

Sometimes you might provide us with another person's personal data, eg. details of your next of kin. In such cases, we require you to inform the individual what personal data of theirs you are giving to us. You must also give them our contact details and let them know that they should contact us if they have any queries about how we will use their personal data.

### D. DISCLOSURE OF YOUR INFORMATION

1. Your personal information is confidential.
2. We send your report to you and to anyone to whom you have given us permission to send it. This report is sent either via the postal service, or by email, or is given to you in person.
3. All reports that are sent electronically are sent through our encrypted email server.
4. We send your contact details and appointment dates to our Accounts Manager for processing of invoices. This person is based within the Wiltshire Psychology Service.
5. We will only disclose your personal information to third parties where we have an appropriate legal ground under data protection law that permits us to do so. This could include situations where we are legally obliged to provide the information, to comply with our contractual duties, or where it is necessary in our legitimate interest.

[www.wiltshirepsychology.co.uk](http://www.wiltshirepsychology.co.uk)

## E. IP ADDRESSES AND COOKIES

We do not use any Cookies.

## F. HOW LONG DO WE KEEP THE INFORMATION

We will not keep your personal data for longer than we need it for our legitimate purposes.

We take into account the following criteria when determining the appropriate retention period for clients' personal data:

- The amount, nature, and sensitivity of the personal data
- The risk of harm from unauthorised use or disclosure
- The purposes for which we process your personal data and how long we need the particular data to achieve these purposes
- For how long the personal data might be relevant to possible future legal claims
- Any applicable legal, accounting, reporting or regulatory requirements that specify how long certain records must be kept.

Given the variety of personal data that we use and the varying circumstances in which we use it, it is difficult to specify ahead of time precisely how long we will keep particular items of personal data. We may often keep particular items of information for less time. However, there may also be circumstances in which it is appropriate for us to keep particular items of personal data for a longer period than that set out above. In particular, we will always keep personal data for so long as we are required to do so under legal, accounting, reporting or regulatory requirements.

In addition, in certain situations, it is more appropriate to decide retention periods on a case-by-case basis. We will base these decisions on relevant circumstances.

As a general guide, we have the following data retention periods:

1. We keep personal data from telephone or email enquiries from potential clients for a period of one month.
2. Our Reception Service keeps records of telephone calls to us for a period of one month.
3. We keep personal data from individuals who have been referred to our service but chosen not to opt in for an initial assessment for a period of 6 months.
4. We keep electronic invoices for seven years, as this is the required length to comply with the HMRC requirements. After seven years, we delete the invoices.
5. We keep clinical records for eight years.



## The Wiltshire Psychology Service

Brinkworth House, Brinkworth

Swindon, Wiltshire, SN15 5DF

☎ 01666 511791

[info@wiltshirepsychology.co.uk](mailto:info@wiltshirepsychology.co.uk)

---

### G. CONTROLLING YOUR INFORMATION

You have certain rights concerning the information we hold about you, as defined under the General Data Protection Regulation. If you wish to exercise these rights, please contact the Directors of the Wiltshire Psychology Service in writing. Please note that the rights below are not absolute and in some circumstances, we may be entitled to refuse some or your entire request.

#### 1. Requesting a copy of your information

You can make a subject access request (SAR) by contacting the Directors of the Wiltshire Psychology Service. We may require additional verification that you are who you say you are in order to process this request. We may withhold such personal information to the extent permitted by law. In practice, this means that we may not provide information if we consider that providing the information will violate your vital interests. If we are able to provide your information, we will do so within 30 days of receiving the request.

#### 2. Updating or correcting your information

If you wish to have your information updated or corrected, please contact the Directors of Wiltshire Psychology Service. We may require additional verification that you are who you say you are in order to process this request. You must provide us with the correct data and after we have corrected the data in our systems, we will send you a copy of the updated information in the same format at the subject access request in section G1.

#### 3. Deleting your information

You have the right to request erasure of your personal information. We need to determine if we have a compelling reason to keep the data (for example an HMRC inspection or legal or contractual obligations). If we decide that we should delete the data, we will do so without undue delay.

#### 4. Automated decision-making

We do not use any personal information for automated decision making or profiling. Your data is not subject to automated decision making or profiling.

[www.wiltshirepsychology.co.uk](http://www.wiltshirepsychology.co.uk)

## H. DATA BREACHES

Our Data Security Policy includes a clear process for handling a personal data breach, should one occur. Where appropriate, Wiltshire Psychology Service will promptly notify you of any unauthorised access to your personal information.

## I. COMPLAINTS

If you wish to raise a complaint on how we have handled your personal information, you can contact us directly and we will investigate the matter.

If you are not satisfied with our response or believe we are not processing your personal information in accordance with the law, you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. Find details of how to contact the ICO on their website: <https://ico.org.uk>