

# Privacy Notice How your personal information is collected, stored and processed

General Data Protection Regulation (GDPR) is concerned with personal information that we collect about you and/or your child. This document is our GDPR policy.

This policy is about our clients who are children as well as our clients who are adults. Where we say "you" and your child is receiving a service from us, we are referring to your child.

# We keep data so:

- We can offer you the service you have requested, working safely and professionally with you
- The therapists and supervisors in our team can discuss their work with you in their own clinical supervision
- We can keep an up to date record of our financial accounts, including invoicing.

## Your rights and what you need to know:

- You have the right to know what client information we hold, why we hold it, and for how long we hold it.
- You also have the right to view it and to ask for changes to be made.
- You are under no obligation to agree to consents, other than consenting to therapy. If you choose only to consent to therapy, it will not affect your accessing therapy. See our Confidentiality Policy for further information.
- If you do not wish to give your consent, please do consult with us as we may be able to offer a bespoke contract between us.
- You have the right to withdraw your consent at any time. You have the right to request your data be erased, also known as "to be forgotten". To withdraw consent, or request erasure, you may request in writing or verbally to any therapist of Rowan Tree Dramatherapy. We have processes in place, and we respond to your request within one month of receipt. The right to erasure or withdrawing consent may be declined if the information is needed for us to practice lawfully and competently, or if there is an adverse reason (such as a complaint, safeguarding concern or legal reason).
- If we discover there has been a data breach of your personal information that could put you at risk, we will undertake to tell you as soon as possible.
- Secure arrangements are in place should your therapist become incapacitated or unexpectedly die. Another therapist will contact you to inform you of the situation, support you with it if necessary, and then carry out the destruction of data, following our usual procedure.
- In the event of a client taking part in an externally funded project or service, data such as evaluations, feedback forms or work may be shared with a third party with the explicit consent of the participant. This will always be discussed prior to work taking place and is the choice of the client; anonymity is always maintained.
- We will not disclose your data to third parties, unless we have your explicit consent, or are required to do so for legal reasons.
- Your data is used only for its original purpose and all reasonable steps are in place to ensure all data is accurate.
- Records are stored for 7 years after the termination of therapy and then disposed of. In the case of a minor (aged 15 and under), notes will be retained until the client's 26<sup>th</sup> birthday. All data is safely and securely destroyed.



<u>contact@rowantreedramatherapy.co.uk</u> Date reviewed: January 2025

## How we get the personal information we hold

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- You have approached Rowan Tree to enquire about a therapy intervention
- You have entered into a contract of therapy with Rowan Tree, or you are the parent/carer or social worker consenting to therapy for a minor in your care.

We also receive personal information indirectly from the following sources:

- Schools in which we provide a therapy service make a referral into Rowan Tree
- Children's services who make a referral into Rowan Tree

## Client data we hold:

- 1. Name and address
- 2. Phone/mobile number and email address
- 3. Emergency contact details
- 4. GP name and contact details
- 5. Any relevant medical information
- 6. All session notes
- 7. Any artwork you may create
- 8. Payment information including invoices
- 9. Emails and texts sent between us or to other agencies involved in your support

**Personal information**: such as your name, gender, date of birth, relationships, parents, siblings, children, occupation, address, telephone numbers, email addresses, therapeutic history, medical conditions, medication history, employment, education, and social life details.

**Sensitive information**: such as physical and mental health details, racial or ethnic origin, religious or other beliefs, convicted offences, and alleged offences.

### Why we keep this data:

It is a requirement of our professional organisations: Health and Care Professions Council (HCPC); the British Association of Dramatherapists (BADth); and the Information Commissioner's Office (ICO).

A clear record of all therapy sessions, and communications with clients or about the client, are maintained for:
continuity of treatment

- continuity of treatm clarity of thinking
- analysis of process and content
- presentation for supervision
- communication with colleagues
- clarity in the case of litigation

### *How is your data shared:*

- During in house clinical discussions to support the quality of the work your therapist is offering
- During clinical supervision between your therapist and their supervisor, which they are obliged to have in accordance with their professional standards
- Outside agencies, such as NHS mental health teams, your child's school, Children's Services and your GP. You will be asked for explicit signed consent to share data with outside agencies unless there are safeguarding concerns which override this.
- Referrals are also discussed when received, by the Dramatherapy director team, and therefore the directors will each have had sight of all client data.



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### *How is your data stored:*

- Your data is stored electronically in a secure file, accessible by the therapist who is working with you and the directors of Rowan Tree Dramatherapy.
- Individual devices (e.g. laptops, computers, iPad) are all password protected. If paper data needs to be stored, it is kept in a locked cabinet where your therapy takes place or locked in the therapist's home.
- Rowan Tree Dramatherapists each have supervisors who also will have your first name in paper form also kept in locked storage.
- Your phone number may be stored in our mobile phones initialised. Minors' phone numbers will not be stored or used.
- All Rowan Tree Dramatherapists phones are locked with a passcode.

## How long we keep this data:

For those aged 16 and above when therapy ends, records will be kept for seven years after the termination of therapy. If therapy took place with a minor, it will be stored until their 26<sup>th</sup> Birthday. After that time all files are securely destroyed.

## Who sees the data:

Directors of Rowan Tree will see all Rowan Tree client's data and each associate therapist will only see their own client's data. Each therapist's clinical supervisor will only have first names of the clients that are brought to supervision.

Therapy rooms may have security cameras installed by the organisation who hire the room to us. The therapist will inform you if a camera is in operation and how the data is used and stored. You will then be able to discuss with the therapist whether the room is suitable.

# <u>Client's Artwork</u>

### How we keep this data:

Any artwork you create is kept in folders (anonymised)/ drawers / cabinets where the therapy takes place or at the allocated 'workspace' of the therapist.

Where possible artwork will be kept in locked cabinets or drawers; however, this is not always possible. Where possible rooms where therapy takes place will be locked; however, this is not always possible. All attempts are made to keep your work as safe as possible.

### Why we keep this data:

It is our practice that artwork will remain with the therapist while therapy is ongoing, reflected upon towards the end of therapy and taken away by the client at the end of the work. You may agree with your therapist that you will take your work home before that time.

Temporary artwork, for example sand-tray or sculpt models, is dismantled at the end of the session, either by you alone during the session, together with the therapist during your session, or just after your session by your therapist as agreed.

You may choose to photograph your work; your therapist cannot be responsible for the confidentiality or security of the content. Images held digitally may not be secure.

In some cases, your therapist may photograph your work, with your consent, and print or email the document to you. All documents are sent encrypted with a passcode.



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#### *How long we keep this data:*

The therapist will dispose of any unwanted material after the therapy has ended, or the therapist may offer the choice of keeping the work in a secure place for 3 years. After the 3 years, any uncollected work will be securely disposed of. The therapist makes every effort to ensure that the work is unidentifiable as the client's work before disposing of it.

*Who sees the data:* Your Dramatherapist, sometimes their supervisor and, in some cases, Rowan Tree director's team.

## What happens if you make an enquiry but don't go on to receive a service from Rowan Tree?

If you contact us with an initial enquiry and share personal information, we will store this information securely for 16 weeks. If we have not heard back from you after 16 weeks, your personal information will be destroyed. If you contact us within the 16 weeks to let us know you have decided not to work with Rowan Tree, your personal information will be destroyed immediately.

### Any questions about data protection:

If you have any other questions regarding how your therapy client data is processed and handled, please do not hesitate to contact our Data Protection Officer, Justine Staley at <u>contact@rowantreedramatherapy.co.uk</u>

# *If you are unhappy with our data protection procedures:*

We would encourage you to contact our Data Protection Officer as above. Alternatively, you have a right to make a complaint at any time to the Information Commissioner's Office (ICO) (<u>www.ico.org.uk</u>).

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK95AF Helpline number: 0303 123 1113