

Data Protection and Privacy Policy

This Policy is compliant with UK GDPR and GDPR 2018.

Contact details	
Name	Sue Goodwin, Goodwin Therapy
Address	Eastbourne, BN22 (full address available by request)
Phone	07540 431545
E-mail	info@goodwintherapy.co.uk
Website address	www.goodwintherapy.co.uk
Date Privacy Notice Reviewed	June 2024

Type of personal information collected
Personal identifiers, e.g. name, date of birth
Contact details, e.g. address, phone number
Ethnicity, disability and, as relevant, criminal record, clients' history and aims for therapy, etc.

How and why Goodwin Therapy (GT) obtains clients' personal information	
How	Why
GT obtains personal information, including contact details, etc. via written and/or electronic questionnaires and as part of the counselling process	<p>The personal information processed is provided directly by clients or other agencies¹ in order for GT to:</p> <ul style="list-style-type: none">• contact clients about matters relating to their therapy, such as appointments and relevant information• provide effective therapeutic care; records of sessions are essential for the benefit of the client and for in case of legal issues• forward information, articles, worksheets, etc. which GT believes the client may find useful or interesting
Clients' contact details will not be used for marketing, advertising or promotional purposes.	

Sharing clients' information
<p>With the following caveats below, clients' personal information will not be shared with other individuals or organisations, without their express consent. Personal information may be shared only where:</p> <ul style="list-style-type: none">• GT has reason to believe that the client or others could be at risk• there is a legal obligation to disclose it, or• a client has been referred by an agency and there is a requirement for GT to share brief notes of each session, together with related details as appropriate, and to inform that agency of the therapy outcome (e.g. via an Impact of Events Questionnaire, etc.)• technical assistance is required by GT regarding ICT issues

Lawful bases on which GT relies for processing this information, under the UK General Data Protection Regulation (UK GDPR), are:
(a) Clients' consent which can be removed at any time by contacting GT Goodwin by email or letter
(b) GT has a contractual obligation
(c) GT has have a legal obligation
(d) GT has a vital interest
(e) GT needs it to perform a public task
(f) GT has a legitimate interest

¹ GT may also receive personal information indirectly from other healthcare professionals and agencies, such as Red Poppy and PTSDResolution and other companies, in terms of a referral for treatment in which case the information would be used as laid out above.

How GT stores client's personal information

Clients' information is securely stored either electronically (all devices are passworded or similar) or by hard copy in which case the information is stored securely.

In line with HGI requirements, GT retains clients' information for seven years (or, in the case of minors, for seven years after they reach the age of majority) in compliance with professional requirements. Records are disposed of by deleting electronic records or (for records prior to 2018) by shredding/burning. Hard drives, etc. are professionally cleared of data before disposal.

Clients' Data Protection Rights

Clients' right of access	Clients have the right to ask GT for copies of their personal information
Clients' right to rectification	Clients have the right to ask GT to rectify if they believe that any personal information is inaccurate or incomplete
Clients' right to erasure	Clients have the right to ask GT to erase their personal information in certain circumstances
Clients' right to restriction of processing	Clients have the right to ask GT to restrict the processing of their personal information in certain circumstances
Clients' right to object to processing	Clients have the the right to object to the processing of their personal information in certain circumstances
Clients' right to data portability	Clients have the right to ask that GT transfers the personal information they provided to another organisation in certain circumstances

Clients are not required to pay any charge for exercising their rights. Any request should be sent, via email or letter, to the address given at the top of the first page, GT will respond within one month. It may be that GT will not be able to provide therapy sessions if clients object to certain clauses in the above Clients' Data Protection Rights table.

In the event of the therapist's permanent incapacity or death, clients' records (current and historic) will be sent to Malcolm Hanson, who is also a Human Givens Therapist and will have similar DP policies and procedures.

How to complain

If clients have any concerns about GT's use of their personal information, they can discuss the matter with Sue Goodwin informally, make a formal complaint to GT at the contact details given at the top of page 1 or complain to the ICO.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>