



Data Protection Policy, including Key Procedures

HEADING	SECTION CONTENT
Aims of this Policy	<p>Cathy Wood Psychology needs to keep certain information on its clients to carry out its day to day operations, to meet its objectives and to comply with legal obligations.</p> <p>The organisation is committed to ensuring any personal data will be dealt with in line with the Data Protection Act 1998. To comply with the law, personal information will be collected and used fairly, stored safely and not disclosed to any other person unlawfully.</p> <p>The aim of this policy is to ensure that everyone handling personal data is fully aware of the requirements and acts in accordance with data protection procedures. This document also highlights key data protection procedures within the organisation.</p> <p>This policy covers all staff.</p>
Definitions	<p>In line with the Data Protection Act 1998 principles, Cathy Wood Psychology will ensure that personal data will:</p> <ul style="list-style-type: none"> • Be obtained fairly and lawfully and shall not be processed unless certain conditions are met. • Be obtained for a specific and lawful purpose. • Be adequate, relevant but not excessive. • Be accurate and kept up to date. • Not be held longer than necessary. • Be processed in accordance with the rights of data subjects. • Be subject to appropriate security measures.

	<ul style="list-style-type: none"> • Not to be transferred outside the European Economic Area (EEA). <p>The definition of 'Processing' is obtaining, using, holding, amending, disclosing, destroying and deleting personal data. This includes some paper based personal data as well as that kept on computer.</p> <p>The Personal Data Guardianship Code suggests five key principles of good data governance on which best practice is based. The organisation will seek to abide by this code in relation to all the personal data it processes, i.e.</p> <ul style="list-style-type: none"> • Accountability: those handling personal data follow publicised data principles to help gain public trust and safeguard personal data. • Visibility: Data subjects should have access to the information about themselves that an organisation holds. This includes the right to have incorrect personal data corrected and to know who has had access to this data. • Consent: The collection and use of personal data must be fair and lawful and in accordance with the DPA's eight data protection principles. Personal data should only be used for the purposes agreed by the data subject. If personal data is to be shared with a third party or used for another purpose, the data subject's consent should be explicitly obtained. • Access: Everyone should have the right to know the roles and groups of people within an organisation who have access to their personal data and who has used this data. • Stewardship: Those collecting personal data have a duty of care to protect this data throughout the data life span.
Type of information processed	<p>Cathy Wood Psychology processes the following personal information: client's contact details, detailed case notes about the problem that brought the client to therapy and how it impacts upon their lives, and details about the process of therapy.</p> <p>Personal information is kept in the following forms: paper notes, notes on an encrypted tablet and password protected computer (temporarily) and notes held on a password protected hard drive.</p> <p>As I am the only member of staff I will be the only person who has access to this information.</p>
Notification	<p>The needs I have for processing personal data are recorded on the public register maintained by the Information Commissioner. I notify and renew our notification on an annual basis as the law requires.</p> <p>If there are any interim changes, these will be notified to the Information Commissioner within 28 days.</p> <p>The name of the Data Controller within our organisation as specified in our notification to the Information Commissioner is Cathy Wood.</p>
Responsibi	<p>The Data Controller is responsible for:</p>



lities	<ul style="list-style-type: none"> • understanding and communicating obligations under the Act, • identifying potential problem areas or risks, • producing clear and effective procedures, • notifying and annually renewing notification to the Information Commissioner, plus notifying of any relevant interim changes.
Policy Implementation	<p>To meet my responsibilities I will:</p> <ul style="list-style-type: none"> • Ensure any personal data is collected in a fair and lawful way; • Explain why it is needed at the start; • Ensure that only the minimum amount of information needed is collected and used; • Ensure the information used is up to date and accurate; • Review the length of time information is held; • Ensure it is kept safely; • Ensure the rights people have in relation to their personal data can be exercised. <p>I will ensure that:</p> <ul style="list-style-type: none"> • Everyone managing and handling personal information is trained to do so. • Anyone wanting to make enquiries about handling personal information, whether a member of staff, volunteer or service user, knows what to do; • Any disclosure of personal data will be in line with our procedures. • Queries about handling personal information will be dealt with swiftly and politely.
Training	<p>Training and awareness raising about the Data Protection Act and how it is followed in this organisation will take the following forms:</p> <ul style="list-style-type: none"> • General training/ awareness raising
Gathering and checking information	<p>Before personal information is collected, we will consider what details are necessary and how long I need to keep the information.</p> <p>We will inform people whose information is gathered about the following: why the information is being gathered, what the information will be used for and who will have access to their information.</p> <p>We will take the following measures to ensure that personal information kept is accurate: regularly checking with the client that the information is up to date.</p>

	Personal sensitive information will not be used apart from the exact purpose for which permission was given.
Data Security	<p>The organisation will take steps to ensure that personal data is kept secure at all times against unauthorised or unlawful loss or disclosure. The following measures will be taken:</p> <ul style="list-style-type: none"> • paper notes are kept in locked cupboards with myself having the only keys, • electronic notes are kept on a password protected computer and encrypted tablet, which only I have access to, • the only personal data that is taken off site are the notes that are ongoing therapy notes and these are kept in a secure bag.
Subject Access Requests	<p>Anyone whose personal information we process has the right to know:</p> <ul style="list-style-type: none"> • What information we hold and process on them, • How to gain access to this information, • How to keep it up to date, • What we are doing to comply with the Act. <p>They also have the right to prevent processing of their personal data in some circumstances and the right to correct, rectify, block or erase information regarded as wrong.</p> <p>Individuals have a right under the Act to access certain personal data being kept about them on computer and certain files. Any person wishing to exercise this right should apply in writing to Cathy Wood at Cathy Wood Psychology, 88 High Street, Prestatyn, Denbighshire, LL19 9BE.</p> <p>The following information will be required before access is granted: full name and contact details of the person making the request.</p> <p>We may also require proof of identity before access is granted. The following forms of ID will be required: passport or driver's licence.</p> <p>Queries about handling personal information will be dealt with swiftly and politely. We will aim to comply with requests for access to personal information as soon as possible, but will ensure it is provided within the 40 days required by the Act from receiving the written request and relevant fee.</p>
Review	This policy will be reviewed at intervals of 1 year to ensure it remains up to date and compliant with the law.



Declaration

Signature:



Print name: Cathryn Fiona Wood

Date: 20/01/2023



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