

# Dr Francesco Bernardi Counselling Psychologist

## Privacy Notice

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The aim is to be as clear as possible about how and why information about you is used so that you can be confident your privacy is protected.

This policy describes the information that Dr Francesco Bernardi collects when you use our services. This information includes personal information as defined in the General Data Protection Regulation (GDPR, 2016).

I use the information in accordance with all laws concerning the protection of personal data, including the Data Protection Act 1998 and the GDPR 2016. As per these laws, I am the data controller. If another party has access to your data I will tell you if they are acting as a data controller or a data processor, who they are, what they are doing with your data and why I need to provide them with the information.

This document should be read in conjunction with the Data Protection Policy (this can be accessed at [www.francesco-bernardi.com](http://www.francesco-bernardi.com)).

### **Why do I need to collect information?**

Personal information is details about you which can identify you, such as your name and contact details. I may also process additional sensitive data such as information about your health. This information is required to provide assessment and treatment services.

I am required by the Health and Care Professions Council (HCPC) to keep documentation of your personal data to allow me to provide assessment and treatment services to you.

## **What information will I hold?**

Information about you will be held in the form of emails, invoices, letters, written notes and questionnaires. Information is also held on my practice management software system.

Information could be collected at any point during your contact with me. Your information will be collected, managed and stored only for the purposes of my providing you with psychological treatment services.

## **How do I use information that is collected?**

I use this information to:

- To communicate with you so that I can inform you about your appointments with me. This includes using your your name and contact details such as your telephone number, email address or postal address;
- To enable you to be informed of, and sign up to assessment and treatment terms and conditions;
- To ask for feedback on the services that I have provided;
- To process your payments and/or raise invoices, I use your name, address and payment card details, or details of your bank account if paying by direct debit;
- To optimise my website so that users can find the information they need.

## **Where do I keep this information?**

I keep your information in the locations outlined below. All the companies listed below have stated that they are GDPR compliant.

*Dr Francesco Bernardi 18th May 2018 v5 Review date: 18th May 2020*

- On business computers: I use computers that are located on the business premises. The computers are password protected. Passwords are changed regularly and are not shared with those that are not authorised to access to the computer.
- Your client records: I use WriteUpp Clinic Management Software. This is a computer programme that records information including session notes, appointment times, name, address, date of birth and GP information. Hand written notes are taken in the session using a tablet called Remarkable, or on paper by hand. These notes provide a summary of sessions to support the continuity of treatment. At the end of treatment these notes are destroyed or shredded, or if need to be kept will be uploaded to the Clinic Management Software. If paper copies of sessions are kept, they are locked in a secure cabinet.

### **How long will I store your information for?**

Information will be held for as long as you are engaged in services from me and for six years following the date of my last treatment contact with you. When working with children and young people under the age of 18, I will hold information for six years after the age of 18. These timeframes are governed by legal requirements.

You have the right to ask for your information I hold on you to be erased prior to this time. However, in this event, I do have to determine if I need to keep the data. Reasons for this could include legal issues or if the request falls within the timeframe that there is a professional regulatory reason to hold data for, in which case the governing practice body has a requirement that I hold data for. In this instance, I may not be able to erase your data before that time has passed, or until legal issues are finalised.

Please contact me by email to [fbernardi.psychology@gmail.com](mailto:fbernardi.psychology@gmail.com) if you would like to request that your data is removed.

## **Can you access the information I hold?**

If you would like to access the information I hold, you can make a Subject Access Request. Please contact me by email on [fbernardi.psychology@gmail.com](mailto:fbernardi.psychology@gmail.com). You can also ask for your information to be transferred to another provider of psychological services. I will respond to your request within 30 days. If you make a Subject Access Request, your identity may need to be verified.

## **What if you believe the information I hold about you is incorrect?**

I will aim to keep the information I hold about you up-to-date. Please let me know as soon as possible if your personal data changes so that I can update our records.

If you believe the information I hold about you is inaccurate, needs changing or updating, please contact me ([fbernardi.psychology@gmail.com](mailto:fbernardi.psychology@gmail.com)). I will aim to update your information within 72 hours.

## **How can you have your information removed? How is your information protected?**

To protect your data, I follow the guidelines and recommendations in line with professional and regulatory bodies Health and Care Professions Council and the Information Commissioners Office. Please refer to my Data Protection Policy, which complies with the requirements detailed in the Data Protection Act (1998) and the General Data Protection Regulations (2018).

If you would like to have your data removed, I will have to determine if I need to keep the data. I will consult with organisations such as HMRC who may wish to inspect my records, as well as professional and regulatory organisations including the Health Care Professions Council (HCPC). If a decision is reached that the data can be deleted, I will act on this as soon as possible.

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I have a range of procedures in place to protect your data. In the unlikely event of our security processes being compromised leading to a significant breach of your information, I will aim to inform you within 72 hours.

### **Is your data confidential?**

All the information you share with me is strictly confidential. However, the following exceptions apply:

- If significant risk towards yourself or others is identified, confidential information may be shared with the NHS or other statutory services;
- If you are referred from a case management organisation, an insurance company or if your sessions are funded by an organisation such as a local authority, they may require information about the assessment, treatment plan and outcome of treatment to be shared.

### **If you have concerns about my data management, who can you contact?**

For further information about GDPR please visit - <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>

If you have any concerns, please get in contact with me ([fbernardi.psychology@gmail.com](mailto:fbernardi.psychology@gmail.com)). If I am unable to resolve your concerns, you can complain to the Information Commissioner's Office: <https://ico.org.uk/for-the-public/raising-concerns/>