

Privacy Policy

North West Clinical Psychology Partnership (NWCPP) is a group of independent practitioners, registered as sole traders, who offer medico-legal and therapeutic services. Each individual partner psychologist acts as the named data processor for their own client work.

This privacy policy explains how we use any personal information we collect about you as a past, present or future partner psychologist, a service user (client or patient), a referrer to our service, or when you use our website.

NWCPP provides expert witness services and psychological therapy and assessment services at various physical bases. This privacy policy provides information about the personal information we process about you as a group of individual data processors, in compliance with the General Data Protection Regulation (GDPR).

Each individual partner clinician is responsible for their own registration with the Information Commissioner’s Office (ICO). You can search this register by name to check current registration at: <https://ico.org.uk/esdwebpages/search>

Please contact your individual clinician, or the person who referred you to our service (solicitor / case manager) with any questions or requests about the personal information we process, or email us at [admin@nwcpp.co.uk](mailto:admin@nwcpp.co.uk)

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# What are your rights?

We are committed to protecting your rights to privacy. They include:

### Right to be informed about what we do with your personal data

* + Right to **have a copy of all the personal information we process about you** (by submitting a

‘subject access request’ to your psychologist, or the person who referred you to our service. We have 30 days to respond and there should not be a cost attached to this, unless the request is unreasonable to meet without a cost).

* + Right to **rectification of any inaccurate data** we process, and to add to the information we hold about you if it is incomplete
  + **Right to be forgotten** and your personal data destroyed (unless there are mitigating circumstances, such as us needing to retain clinical data in case this is called to court)

### Right to restrict the processing of your personal data

* + Right to **object to the processing we carry out** based on our legitimate interest

# Why do we collect at information about you?

We may collect information about you because you are a patient or client of ours. You may be an associate or employee. You might be a claimant who is part of a legal or litigation claim.

We process the data because it is in our **“legitimate interests”** as an expert witness or clinical psychologist to do so. We need to see, analyse and create documents containing personal information in order to provide our expert advice, to carry out an assessment, or to deliver psychological intervention.

Another lawful reason for us processing your data may be **Legal Obligation**. If we are processing “special category data” about you, this is our second lawful reason to do so. This is likely to apply if you are being assessed as part of a litigation claim.

As a client or patient of NWCPP, our lawful reason for processing “special category data” is that it is necessary for the purposes of the provision of health or social care or treatment. If you are a partner psychologist within NWCPP, our lawful reason to hold/process your data (i.e. to include on our website) will be legitimate interests..

# What information do we collect about you?

We collect information about you that may include personal or sensitive information, such as:

* First name or given name
* Family name or surname
* Address
* Telephone numbers
* Date of birth
* Gender (or preferred identity).
* Age.
* Date of Birth.
* Relationships & children
* Occupation.
* Address.
* Telephone/SMS number
* Email address

To make sure that you are assessed and/or treated safely and appropriately, we record your personal information, such as your name, address, as well as all contacts you have with your NWCPP partner psychologist such as appointments, clinical notes, and the results of assessments and letters relating to your care/report. Your data is kept confidential within your individual NWCPP psychologist at all times.

We also process personal data pursuant to our legitimate interests in running our business such as:

* Invoices and receipts
* Accounts, VAT and tax returns

## Patients/Clients (Therapy or private assessment)

When you are a patient or client of NWCPP, we record all your treatment and details of your appointment so that your clinician can plan your treatment correctly. In addition to the personal information above, we may also collect information regarding:

* + Medical conditions (if relevant)
  + Prescribed medication.
  + Psychological history and current difficulties.
  + Sexuality
  + Offences (including alleged offences)
  + Financial information, including bank account details (if you are a private patient/client of NWCPP)

We may collect some of this information from your insurance company, solicitor or referring clinician (e.g. your case manager), and some of this information will be collected directly from you.

## Clients undertaking Court Reports

In the case of a court report we retain the information as required by the courts or your solicitor. In addition to the personal information above, we may also collect information regarding:

* + Medical conditions (if relevant)
  + Prescribed medication.
  + Psychological history and current difficulties.
  + Sexuality
  + Offences (including alleged offences)

We may be given some of this information from your solicitor or the party instructing us for the purposes of litigation, and some of this information will be collected directly from you.

In many cases, an individual has consented to the transfer of their personal data to us. Where an individual has consented, he or she may easily withdraw it by notifying Name at the Name’s email address out above.

## Web access collection of information

We collect information about you information when you voluntarily complete website contact forms. We also collect minimal data regarding visits to the NWCPP website (e.g. whether a first time or repeat visitor).

NWCPP always tries to minimise the amount of personal information that we require in order to provide a specific service or feature.

# How do we store the information about you?

All partner psychologists within NWCPP take your privacy very seriously.

We are committed to taking reasonable steps to protect any individual identifying information that you provide to us. Once we receive your data, we make best efforts to ensure its security on our systems.

All personal information provided is stored in compliance with EU General Data Protection Regulations (GDPR) rules.

# How long do we keep your information for?

We do not keep your data for longer than is necessary.

Administrative and clinical data is retained for up to six years as necessary, in the unlikely event there are queries from HMRC and the VAT commissioner. Where it is not necessary to retain the data for six years, it is destroyed as soon as possible.

## Patients/Clients (Therapy or private assessment)

Personal data in legal cases is retained, where necessary, for six years in compliance with our professional indemnity obligations. Where this is not necessary, it is destroyed on the conclusion of the case.

## Clients undertaking Court Reports

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# Who do we share your personal information with?

Your information is kept confidential with your individual NWCPP partner psychologist at all times and is only shared, when they need it to carry out their job. For example, a psychologist may discuss your case within a confidential supervision session, where confidential clinical notes are kept and stored in line with GDR rules.

If we become aware of your intent to cause harm to another person/organisation (e.g. terrorism), the law may require that we inform an authority without seeking your permission. In such a situation, the law may require that we share your personal information without your knowledge.

By contacting NWCPP ([admin@nwcpp.co.uk)](mailto:admin@nwcpp.co.uk) by email, you can also get more details on:

* Our data breach policy
* circumstances where we can pass on personal data without consent for example, to prevent and detect crime and to produce anonymised statistics;
* our instructions to staff on how to collect, use and delete personal data; and
* how we check that the information we hold is accurate and up to date

## Patients/Clients (Therapy or private assessment)

In most circumstances we will not disclose personal data without consent. However:

* Your information may be shared with outside organisations if they are directly involved in your care/case, for instance, your insurer if they are funding your treatment, your GP, or others involved in your care. We will discuss with you who we would discuss your care with, and what details we would share with them.
* If your health is in jeopardy (with your agreement) we may share your contact information with an emergency healthcare service (e.g. Mental Health Crisis Team).
* When we investigate a complaint we may need to share personal information with other relevant bodies.

If we do need to share your information, we will always try and ask for your permission for this. We may not be able to ask your permission under special circumstances where we are legally required to do so.

## Clients undertaking Court Reports

We share personal data internally rarely, and in such cases, strictly on a need to know basis. We do not share personal data with anyone external to the organisation, other than with:

* Those who have instructed us as an expert witness
* With others pursuant to a court order

# How you can access your information and correct it, if necessary?

NWCPP tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a ‘subject access request’ or ‘Right of Access’ under the Data Protection Act and the General Data Protection Regulation (GDPR). This would

normally in the first instance be directed to the person who referred you to our service, but in some cases (e.g. a self-referral) we will then supply to you:

* A description of all data we hold about you
* Inform you how it was obtained (if not supplied by you)
* Inform you why, what purposes, we are holding it
* What categories of personal data is concerned
* Inform you who it could be disclosed to
* Inform you of the retention periods of the data
* Inform you around any automated decision making including profiling
* Let you have a copy of the information in an intelligible electronic form unless otherwise requested.

To make a request to for any personal information that an NWCPP partner psychologist may hold about you, you need to put the request in writing, in the first instance to the person who referred you to our service, or directly to your psychologist if this is more appropriate.

We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate.

## Clients undertaking Court Reports

If your concern is related to a case with a solicitor that we are working for, please refer the queries through them. We may not be able to comply with a request to correct information we hold about you where it pertains to a litigation claim – this would need to be discussed with your solicitor.

# Complaints or queries

NWCPP tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures. If you do have a complaint, contact your individual psychologist who will investigate the matter on your behalf.

If you are not satisfied with the response from NWCPP or believe we are not processing your personal data in accordance with the law, you have the right to raise your complaint with the Information Commissioner’s Office (ICO)

Contact information ICO:

Website: <https://ico.org.uk/concerns/> Email: [casework@ico.org.uk](mailto:casework@ico.org.uk) Telephone: +44 (0) 303 123 1113

# Who we are and how to contact us

Your individual NWCPP partner psychologist is who you are supplying your personal information to, and is responsible for its processing and protection under GDPR rules. You can contact your individual psychologist via the individual contact buttons on our website ([www.nwcpp.co.uk](http://www.nwcpp.co.uk/)), or NWCPP centrally via the contact form on our website, or via email at

**Email:** [admin@nwcpp.co.uk](mailto:admin@nwcpp.co.uk)