

# Dr Anna Chiara Sicilia, Clinical Psychologist

Psychological Therapy and Services

---

Website: [www.psychologybrighton.com](http://www.psychologybrighton.com) | Email: [dr.anna.sicilia@gmail.com](mailto:dr.anna.sicilia@gmail.com) | Telephone: 07402232214

## **Privacy Policy - September 2019**

The Data Protection Act 1998 and General Data Protection Regulation 2018 set out the framework for data protection law in the UK. This document explains how Dr Anna Chiara Sicilia, Chartered Clinical Psychologist, will use any personal data collected about you, as a past, present, or future client, or when using the website, in line with the The General Data Protection Regulation (GDPR).

I am committed to protecting your privacy in accordance with the Data Protection Act and the GDPR 2018. I will not use any information I may hold about you for any purpose other than that for which it was collected. For GDPR purposes, Dr Anna Chiara Sicilia is the data controller.

### **1. What information I collect**

#### **1.1. Website data**

When you complete the online contact form available from my website ([www.psychologybrighton.com](http://www.psychologybrighton.com)), I will collect information about you, which will include your name, email address, telephone number and the information contained in your 'message' field. This information is collected so that I can respond to your query.

The website software used to provide the contact form also automatically collects your internet protocol (IP) address. All web services and software used are GDPR compliant. My website uses cookies. If you do not wish to have cookies placed on your computer, you can set your browser to refuse cookies before using the website. My website is linked with a third party service called Google Analytics, to collect standard internet log information and details of visitor patterns when using the website. This information is processed in a way that will not identify you. Under no circumstance will I make or allow Google to make any attempts to find out the identity of my website visitors.

By visiting our website you are deemed to have agreed to section 1.1. Website Data of our privacy policy.

#### **1.2. Data gathered during the process of therapy**

If you decide to engage in a therapy contract with me, basic personal information will be collected (e.g. your name and contact number or email) for contact and identification purposes. During the process of therapy, I will collect personal data about you, which will include personal and sensitive details about your life. Notes will be taken during the session to ensure that I have an accurate record of our discussions, in order to provide you with an appropriate and adequate service.

On occasions, I may audio record our therapy sessions for the purpose of clinical supervision. I will only do this with your explicit consent and this data will not form part of your client record.

I will record all contacts that you have with me. This will include telephone, email and letter contacts and all documentation associated with your contact (e.g. therapeutic letters and/or reports). This data is used solely for the delivery of a psychological therapy service to you and to ensure that I meet my professional and legal obligations.

Depending on your chosen method of payment, bank account details and/or insurance details may also be collected. Personal data pertaining my legitimate interests in running my business, such as invoices and receipts, accounts, VAT and tax returns, will also be processed.

If you are referred by your health insurance provider, I will also collect and process personal data provided by that organisation. This includes basic contact information, referral information, and health insurance policy number and authorisation for psychological treatment.

## **2. The lawful basis for processing your data**

In order to provide psychological services as a Clinical Psychologist, it is necessary for me to process your personal data. Under the GDPR it is necessary to identify a lawful basis for processing this information. The lawful basis in this case is that it is in my **legitimate interest** to do so. In addition, there may also be occasions when the processing of your information may be required due to a **legal obligation**, for me to be able to comply with the law, for example in the case of a litigation claim or when there is a court order.

The data collected about you will include special category data place (for example data concerning your health, sexual orientation). I am required to process this data for the purpose of providing you with the psychological treatment you have requested.

There may be occasions when it may also be necessary for me to process your personal and special category data due to **vital interests**, in order to protect your life or the life of another adult or child. I will make every attempt to discuss this with you and gain your consent. However, there may be occasions when you are physically or legally unable to provide consent.

## **3. How I process your personal information**

I will only use your personal information to provide the services you have requested. Your data may also be used for the purpose of statistics (for example, in reviewing the number of referrals I have received in a year – this will not be shared with third parties). If you do not provide the personal information required, as outlined above, I may be unable to provide a therapy service for you.

I will ensure that your personal information is stored securely and confidentially. Your personal data will be stored either electronically, using password protection, or in paper format in a locked cabinet.

Your personal data will be stored with the aim to ensure effective communication during the therapy process. It will be stored and used in line with the General Data Protection Regulations (GDPR) 2018 and the Data Protection Act.

### 3.1. Confidentiality

Personal data will be kept confidential between you and I, in the context of our therapy sessions and will not routinely be shared with third party without your explicit consent. There are some situations when I will have to share your data with a third party:

- If you are referred by your health insurance provider, or otherwise claiming through a health insurance policy to fund therapy, I will share appointment schedules with that organisation for the purposes of billing. Some insurance companies may also require details about any diagnosis, treatment plan, progress updates and a treatment summary. I will discuss this with you prior to any disclosure and will only share information with your explicit written consent. It is completely up to you what information I release. It is within your rights to not give consent for this information to be released. However, please note that if you do not release the information required, most insurance companies may refuse to fund your treatment.
- I am occasionally asked by clients, their solicitors, the police and the courts for access to the client's records. The records I keep are not suitable to be used as evidence in legal proceedings. I therefore reserve the right to resist legal requests to produce the records in court. I do this in order to protect the duty of confidentiality of my clients.
- Occasionally I am asked by my clients or by external agencies such as Social Services or the NHS to write reports on the progress made in psychological therapy. My duty of confidentiality means that I am not in a position to do this without your explicit written consent. Therefore any such requests will be discussed with you in the first instance and information will only be shared if I have your explicit consent to do so.
- I will only agree to participate in information sharing with your written informed consent and when it is my professional opinion that it is in a client's best interest.

In exceptional circumstances, I may need to share personal information with relevant authorities, without your explicit consent:

- If I feel you or someone else is at risk of significant harm. I will aim to discuss this with you before disclosing information to third party. However, if the risk is imminent, I may not be able to discuss this with you before sharing information with third party. I have a duty of care for you and members of the public. If there is cause for concern for your safety or the safety of someone else (e.g. someone close to you or a member of the public), I may seek consultation with another professional, such as your GP the NHS or other statutory services.
- If there is a court order in place, concerns over child protection and information regarding fraud, drug trafficking, acts of terrorism and other unlawful acts. I have a legal obligation to report this to authorities.

I will attempt to discuss this with you prior to any disclosure. However, there may be occasions when I will be unable to discuss the disclosure with you (e.g. If it is in my professional opinion that disclosing this information to you may increase the level of risk to yourself or someone else and/or may not be in your best interest).

#### **4. Supervision**

Clinical psychologists are required to have regular and on-going supervision, in line with the Health and Care Professions Council (HCPC) standards of proficiency. Regular supervision is essential for reviewing and monitoring a psychologist's work and gain new perspectives on the therapeutic work undertaken.

#### **5. Your rights under the GDPR and Data Protection Act 2018**

The law requires me to tell you about your rights and my obligations to you in regards to the processing and control of your personal data. I do this now, by requesting that you read the information provided at the following website: [www.knowyourprivacyrights.org](http://www.knowyourprivacyrights.org).

#### **6. How I ensure the security of personal information**

Paper notes / records will be stored in a locked filing cabinet. Electronic records (e.g. reports / letters) are stored on a secure storage system. All documents will be password protected and passwords will be changed at regular intervals. Any email correspondence or correspondence via the website will also be stored. Your contact details (name, mobile number and email address) will be stored on my mobile phone. My mobile phone is encrypted and password protected for extra security.

There will be occasions when I may record our sessions, with your consent, for the purpose of my clinical supervision. These recordings will be stored on a password protected recording device and will be transferred on a secure electronic data storage system after the session. All recordings will be permanently deleted, following use in my clinical supervision session or within 90 days from our session. Recordings will not form part of your client record and will be stored separately.

I take your privacy very seriously. All the data I process is held in the United Kingdom. I do not store personal data outside of the EU. All data storage services I use for the purpose of my business are fully GDPR compliant. Malware and antivirus protection is installed on all computers used for business purposes. Mobile devices are encrypted and protected with a passcode/fingerprint scanner and antivirus software is installed on all mobile devices.

If you require personal / sensitive information to be shared with you or third party, this will usually be done electronically. Sensitive data will be sent to clients or third part as relevant in an email attachment, which will be password protected. The password will be sent in a separate email. My email provider is GDPR compliant. I advise my clients to ensure that their email provider is also GDPR compliant to minimise the risk of a data breach.

I will under no circumstance use open or unsecure Wi-Fi networks to send personal and/or sensitive data electronically.

#### **7. How long is information stored for (data retention)**

Your personal information will be kept for the duration of the therapy process. After our therapy contract terminates, your data will be stored for a period of 7 years (data retention period) from your last appointment with me, to comply with my contractual and legal

obligations. In the case of a child under the age of 13, any records will be kept for 7 years after they reach the age of 18. All personal data will be permanently destroyed at the end of the calendar year in which the data retention period ends.

## **8. Right to complain**

If you have any feedback about the service you receive from me, or you wish to make a complaint, please do not hesitate to contact me directly. I welcome feedback from my clients and I will try my best to resolve your complaint and I will always take it seriously, as it allows me to improve the service that I offer.

If you have reason to believe that I have not complied with data protection laws, you have a right to lodge a complaint with the Information Commissioner's Office (ICO).

If you have a complaint or concern about my professional practice, you can also contact the The British Psychological Society and The Health and Care Professions Council.

## **9. Changes to this privacy policy**

I reserve the right to change this privacy policy as I may deem necessary from time to time or as required by law. Any changes will be immediately posted on the website and a print copy will be available upon request.

## **10. Acknowledgement**

Please do not hesitate to contact me if you have any questions about the content of this policy. You will be provided with a copy of this privacy policy together with your therapy contract and asked to sign that you understand and agree to its contents prior to or at your first appointment.