

## Dr Isobel Gammer, Clinical Psychologist Data Protection & Privacy Policy

I take your data protection and privacy very seriously, both in terms of keeping your / your child and family's information confidential, and in how I process your data.

This document explains how I use the information I have about you / your child and family, and your rights over your data.

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## Document Summary

The following summary outlines the key points that are most important to think carefully about and ensure you fully understand prior to starting an assessment or therapy with me. Please don't hesitate to ask me if you would like to know more about these. The terms 'you' and 'your' data are used throughout this document to refer to data shared by clients about themselves or by parents about themselves, their child and their family and information shared directly by a child or adolescent. This policy should be read in conjunction with my Client Therapy Contract and Contact Details Form, which describes my policy regarding confidentiality and information sharing.

I collect the following information from you in order to provide you with a service:

- Personal information such as names, contact details, and details of payments you make to me.
- Sensitive information, such as details of your mental health, experiences, and beliefs or the mental health and experiences of your child.

I collect this information from several sources. I collect it from you / your child, for example when you make an enquiry or see me for assessment or therapy, and from other people, for example your insurance company or someone you / your child bring to therapy with you / them.

I store information about you / your child securely, in paper form (in a locked cabinet) or digitally (on a password-protected computer or password-protected encrypted hard drive or secure GDPR-compliant online clinical notes system). If I need to send information about you electronically (e.g. sending you a letter, or communicating with your insurer) I use encrypted email (IONOS mail, which is SSL/TLS encrypted) to securely send emails and attachments.

I keep the minimum information needed, for the minimum amount of time I need it. Because some of the data I hold forms part of your / your child's health record, I need to keep this data for seven years. I delete information about you as soon as I no longer need it.

Your data will be kept confidential, meaning that only you and me (Dr Isobel Gammer) will be able to see it, with a few exceptions, notably including:

- You ask me to share it, or you share your information yourself
- The law requires that I share it (exceptional circumstances)
- Not sharing it would likely result in serious harm to you or someone else
- I may share carefully anonymised, therapeutically-relevant information relating to you with my clinical supervisor/s, because this is necessary to maintain a safe, high quality service
- If you are claiming the cost of our services through your health insurance, they require me to share basic information about assessment outcome and treatment

You can ask to see the information I keep about you anytime, for free. You have several other rights over your information (see 'Your Rights over the information I hold about you', below).

## Full Data Protection & Privacy Policy

### Data controller

Dr Isobel Gammer (referred to as "I" or "me" within this document) is the data controller for 'Dr Isobel Gammer Clinical Psychologist'. Dr Isobel Gammer is responsible for the personal data collected from clients. Dr Isobel Gammer is registered with the Information Commissioners Office (ICO).

### What information do you collect about me?

#### Personal Data

Personal data refers to any information that is capable of identifying you / your child as an individual. It does not include data that have been anonymised.

Personal data I may process about you may include:

- Identity data, such as names, titles, and dates of birth
- Contact data such as telephone numbers, email addresses and home addresses
- Financial and transactional data, which may include details about your payments made to me for our services

#### Sensitive Data

Sensitive Data is defined as personal data that reveals: racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; genetic data; biometric data; data concerning health; data concerning a person's sex life; and data concerning a person's sexual orientation.

I usually enquire about some sensitive data in order to deliver professional psychological services. In order to process sensitive data I require your explicit consent (or the consent of the person with parental responsibility for children unable to consent themselves).

## How do you use information about me?

I use the information I have about you to provide any psychological services that you request from me. This includes:

- To register you / your child / adolescent / family as a new client
- In performance of my contract with you, relating to the delivery of psychological assessment and therapy
- In managing services to you in line with my contract with you, including booking appointments, notifying you about changes to our terms and conditions, and my privacy policy, management of payment, fees and charges relating to this service and to collect money owed
- Disclosure of personal information to third-parties if I am under a duty to disclose or share your personal data in order to comply with a legal obligation (please see 'Who is my information shared with?' below for more information)

Occasionally, I may use data which has been **anonymised** for service-audit, business development or marketing purposes (e.g. sharing anonymised satisfaction scores, or feedback with your explicit prior consent). I will never share your information with another company for marketing purposes.

The lawful grounds most commonly used to process data are as follows:

- Where it is necessary to perform the contract between us
- Where it is necessary for legitimate interests
- Where needed to comply with a regulatory or legal obligation
- Where I have your explicit consent to process sensitive information

## Where do you get information about me?

I mainly get information about you / your child from you / your child. It is usual to gather lots of relevant information about you / your child to enable me to provide psychological services to you / your child.

You / your child might share this information with me by communicating with me in person, by post, telephone, email or otherwise when you:

- Make an initial enquiry
- Have an initial free consultation
- Complete assessment measures (e.g. outcome measures or psychometric testing)
- Book, change or cancel appointments
- Attend assessment appointments
- Attend therapy sessions

### Third-Parties

You may provide information to third parties which is made available to us. This includes:

- Medical Data which may be shared with me by your / your child's GP or other medical professional. This data will only be shared with me if you have given your consent to your / your child's GP or other medical professional disclosing it to me.
- Medical and insurance data may be shared with me from a referrer or health insurance company, including before I meet with you / your child. I am happy to share this information with you, and will often begin by checking whether you agree with what the referrer has told me.
- If I agree that it may be helpful, I may ask other people such as family members for their input to understanding or helping with a problem you have requested help with. I will only ever do this when in line with your wishes and with your written consent

All online psychological therapy and services will be delivered via the secure video platform called Client Video (or "Sessions by Psychology Today"), hosted by Psychology Today. It's a HIPAA-compliant tool designed for confidential therapy sessions.

### **Who is my information shared with?**

I comply with all relevant data protection legislation, including the Data Protection Act 2018 and the UK General Data Protection Regulation (GDPR).

Your data will be kept confidential, meaning that only you / your child and Dr Isobel Gammer will have access to it, except in the following situations:

- You agree that it would be useful to share some of your information, with someone else involved in your / your child's care (for example, sending an assessment letter to your / your child's GP, at your request, making a telephone call to your child's SENCo, at your request)
- You request your / your child's information and share it yourself
- If you are referred by your health insurance provider, or are claiming through a health insurance policy to fund treatment, then I will share information with that organisation for the purposes of billing. I may also, with your written consent, share information with that organisation to provide treatment updates where that is required by their contract with you. In such cases, I seek to omit any personally sensitive clinical information
- In line with the requirements of my regulatory body (HCPC), I receive regular supervision. In order to provide a high-quality service, I may share limited

therapeutically-relevant information about you with a supervisor. I am always careful to ensure that the information is thoroughly anonymised, so it would never be possible to identify you by the information I share

- If treatment has been instructed by a solicitor, relevant clinical information from therapy records will be shared with legal services as required and with your written consent
- Any secretarial staff I may employ, who will act in accordance with this privacy policy and have access to the minimum amount of personal information necessary to perform their specified tasks. Any secretarial staff I may employ will be required to sign a written agreement that they will handle your / your child's data as confidential in line with this agreement.

#### Exceptional circumstances

- Situations in which not sharing information relevant to reducing risk could reasonably be expected to result in serious harm to you or another person. One example of this could be if I reasonably believe that your / your child's mental or physical health requires urgent treatment or I am concerned about the safety of someone else, including a child or vulnerable adult, in which case I may disclose information to your emergency contacts, GP or other relevant professional/s or contacts.
- You share information about a serious crime which has not been reported or dealt with by the law
- Court subpoena
- Police requests where very serious harm could come to you or someone else if the information was not shared

If one of the above exceptional circumstances were to arise, I would always seek to let you know what information I need to share, with whom and why, and seek to collaborate with you to do this in the way that felt most safe and empowering for you. In highly exceptional circumstances when it is not possible to discuss this with you prior to sharing information (for example, when it is not legal to do so, or would likely place you or another person at significant or increased risk of harm to discuss this with you prior to sharing) I would be extremely careful to only share the minimum necessary to support safety.

#### Contingency arrangements

In the unlikely event of any unexpected and sudden inability to continue practising, arrangements have been made for limited information about you to be shared with a Clinical Psychologist supervisor, whose role it is to support our work together. This information includes:

- Name

- Contact details
- Any relevant information about risk
- Any other professionals involved (if applicable)
- A *very* brief overview of the work I am doing, for example the presenting problem, and therapeutic approaches applied, omitting any especially sensitive clinical details.

In such an event, the clinical supervisor would contact you to explain my absence and offer support in completing your therapy. This, like all data kept about you, is carefully secured. You will be asked whether you would like this to happen at the beginning of our work together. This is in line with the British Psychological Society's recommendations and I recommend it, but whether or not your details are shared in this way is entirely up to you.

### Your responsibilities

You are responsible for making sure that the physical place where you / your child accesses any online therapy with me is confidential. You are responsible for the confidentiality of your /your child's computer and any other electronic equipment that you use.

You / your child are not permitted to live stream or record or distribute any audio or visual images from our sessions without my explicit agreement. I am not permitted to live stream or record or distribute any audio and visual images from the sessions without your explicit agreement. If either party wish to record sessions then both parties must have agreed to this in advance of the session and such agreement must be recorded in writing.

### **How is information about me stored?**

I have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. These are outlined below.

All typewritten letters, session notes and reports will be written on a password-protected computer.

All electronic documents containing personal information, including your contact information, contact preferences and permissions will be stored password-protected, encrypted hard-drive or GDPR-compliant electronic (online) notes system.

Any temporary paper documents such as notes that are hand-written by the clinical psychologist (process notes) will include the minimum personal data needed (e.g. initials can be used in place of names), be stored in a locked filing cabinet or box, and destroyed as soon as they are no longer needed.

I will store your telephone number and initials on my passkey-protected, dedicated practice mobile telephone.

Unless you opt into the contingency arrangements (detailed above), no-one will have access to the sensitive information held about you except Dr Isobel Gammer (except in the case of exceptional circumstances, above). If you have opted into the contingency arrangements, only the limited information outlined above (see 'contingency arrangements') will be accessible to the designated clinical psychologist using a password that will only be released in the event of the contingency plan becoming necessary to action.

I have procedures to deal with any suspected personal data breach and in the unlikely event of a data breach, I will notify you, and the Information Commissioner's Office (ICO) within 72 hours, where legally required to do so.

## **How long do you keep information about me?**

I delete information about you as soon as I no longer need it.

Information about you / your child and your / your child's treatment or assessment with me will be safely and securely stored, usually for seven years, or until you are / your child is 26, whichever is longer. This is for health care, legal and professional reasons. After this time, I will carefully and confidentially permanently delete all the information on a yearly basis (unless it relates to a court case).

I delete information about initial enquiries, where I have no concerns about risk and do not go on to work together, after three months. Where there are concerns about risk that have resulted in me safety planning with you, making recommendations regarding reducing risk, or sharing information with other parties, I retain this information as above.

I delete your information from our practice mobile telephone, and remove your emails, no more than three months after your contract ends with us.

## **Your Rights over the information I hold about you<sup>1</sup>**

Under the Data Protection Act 2018 and the General Data Protection Regulation (GDPR) 2018, you have rights over how your data is used:

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<sup>1</sup> Rights in relation to automated decision-making and profiling and data portability are not directly relevant to the information I hold about you. If you would like to know more about these rights, please visit: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

### **The Right to be Informed**

I will always be clear about what data I have about you, and what I do with it.

### **The Right of Access**

You can request copies of your records at any time. There is no charge, but there may be a wait of up to one month. Please note that sensitive third-party information, or information which might cause harm were it to be shared, may be redacted. Where requests are clearly unfounded, excessive or repetitive, I reserve the right to charge a reasonable fee for the cost of admin, or to refuse to comply with your request.

### **The Right to Rectification**

It is important that the information I hold about you / your child is correct. Please let me know if I need to update or amend it.

### **The Right to Erasure**

You have the right to request that I delete any information I hold about you / your child. Where possible, I will permanently delete information about you / your child if you request it. Please be aware that, as part of your / your child's health record, certain legal and safeguarding obligations mean that it is not always possible, or professionally responsible, to delete data on request. I cannot usually delete a client's personal information where this relates to therapy records. Therapy records are retained for the minimum data retention periods stated above in accordance with the guidelines and requirements for record keeping by The British Psychological Society (BPS; 2000) and The Health and Care Professions Council (HCPC; 2017).

If you would like to request that any of the information I hold on you / your child is erased, please let me know. If it is not possible to completely delete your data, a request to erase your data will result in as much data being deleted as possible, particularly sensitive and identifying data, and you can request that I further protect how it is used, for example putting it in an archive.

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### **The Right to Object**

Your privacy and the protection of your / your child's data is very important to me. If you have any concerns relating to how I collect and use your data I would be grateful if you contact me in the first instance so that I can attempt to resolve it for you. If you feel that I have not addressed your concern in a satisfactory manner, you have the right to complain to UK supervisory authority for data protection issues, the Information Commissioner's Office (ICO; [www.ico.org.uk](http://www.ico.org.uk)).

### **Communicating your wishes to me**

If you wish to exercise any of these rights over your / your child data (e.g. request copies of records, to amend incorrect information, erase your / your child data or object to how I use your data) please let me know; verbally, in writing, or electronically, and I will be happy to help as much and as quickly as I can. Please ask if you would like any more detail about how I process any of the information I hold about you / your child.

### **Changes to my Data Protection and Privacy Policy**

I keep my data protection and privacy policy under regular review and will contact you to inform you of any changes to this policy. This data protection and privacy policy was last updated on the 18<sup>th</sup> February 2026.