

Privacy Notice for Clients Andrea Hochgatterer RCST, dip CCST, dip CNM

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Subjects covered:



What kind of data do I hold?

Why do I hold your data?

Legal obligation for holding information:

How is this information used?

Where do I store it?

How long do I keep your information?

What else do I use it for?

Who has access to it?

In order to comply with data protection laws including the new GDPR (General Data Protection Regulation), there are a few things I need to let you know about the information I will hold about you and the reasons for this. Everything I do follows normal good practice for holding data generally as well as for a therapeutic practice, but it's important and your legal right to read and understand the information before you come for treatment with me.

Information I hold about you:

Name, DOB, address, preferred contact details,

GP name and address (if you want to give it)

Notes about your health and personal history you chose to share

Anything else you feel like sharing with me

Notes that are taken by me about our sessions together e.g. what treatments you had, what subjects were discussed and what we are planning for the future; how you feel things are working for you and what you would like to see happening, what advise and recommendations I give you.

The date and time and length of sessions for the records

Any personal thoughts and impressions I take from the session.

Personal impressions and info as perceived during a CST/ Coaching where it applies.

Why do I hold this information:

[Note: The overall 'purpose' of processing: in particular why provision of CST may require processing of information about physical and mental health as these are 'special categories'. As there is an assumption in the GDPR of minimising the data held to what is needed, this section is also explaining why this information is needed for good practice.]

The reason for all of these details is in order to give you the best CST Therapy, Coaching, Nutritional advice that I can. Because the work we do together is to support your health and wellbeing whether physical, mental or emotional spiritual, it's important to hear some of your history in order to work with you responsibly and carefully, as well as to track your progress with you over time. You can choose how much you wish to share about your history and you should never feel obliged to talk about anything that you don't want to.



The Legal Basis for holding your information

[Note: Personal data processing relies upon the GDPR condition under Article 6.1.b because it is necessary to the 'performance of a contract'. Processing of 'special categories' personal data meets the condition under Article 9.2 health care purposes]

Under the new GDPR regulations, there are specific legal reasons which have to be met in order to hold information and which you have the right to know. In legal terms, the main reason for holding information about clients is in order to fulfil a 'contract' with you to give a treatment, Coach you, see you for nutritional purpose or all three. In addition, because the information that is talked about in any kind of therapy can be very personal including information about physical or mental health, this is called 'special categories', and there is a separate legal basis for this with strict conditions such as confidentiality which must be met.

I am obliged for insurance purpose with very stringent rules and regulation imposed by governing bodies to keep a record of who I see,

where and when and what takes place. I need to know about your medical record and if/what kind of medication you take to make sure there are no contraindications to your treatments and in case of nutrition, no contraindication to any supplement advice.

All of this information will be given directly by you, I do not rely on third party info.

Some, such as your name and contact details, you may have supplied when we initially made contact and most will then be given in our session. Over time in future sessions, I will add to this information as you talk more about your circumstances or the issues you are seeking help with. I will also note down my impressions from our sessions including what I perceive through the CST treatment to build a case history for my own record to be able to track your progress, understand your situation and supply you with the best and most informed treatment possible.



How is this information used?

Your contact information is used only in order to arrange appointments or to follow up and touch base with you where necessary. I will occasionally send out important info or a newsletter and will have sought your consent before I do so.

I do not send out promotional e-mails or group contacts on a send to all basis or pass on your details to a third person for advertising or promotional purpose.

I work strictly on a one to one basis via e-mail, mobile/phone calls and texts and in case of coaching via Skype or Zoom.

I do not share your contact details with anybody else on any media unless you ask me to do so.

The case history information I take down is important in order to understand your situation, get to know you and give you the best treatment possible, as well as to be able to track your progress over time. I do not share this with anybody apart from you if you wish to do so.

If you want me to share the information with anybody I would need a written and signed consent from you.



In general, your information is never shared with anyone else unless you ask me to do so and I will need your written and signed consent for this.

As you would expect within a therapeutic relationship, and as a requirement of the Code of Ethics of my professional bodies, you can be assured that all of the information I receive about you is treated in complete confidence and will not be shared with others or used for any other purposes.

I am in regular Supervision for the purpose of safeguarding my work, as is good practice – this is to support for me in my practice and to give you the best possible service at all times. Although I may at times mention issues that are arising for some clients, nobody is ever mentioned by name so the confidentiality is still maintained.

How do I store your information:

I keep handwritten notes in a secure and locked place designed especially for this purpose of safe keeping.

I endeavour to keep as little as possible of the information on the computer so you might find your e-mail address (if that's how we communicate) kept on the computer or your phone number on my mobile.

In case of dealing with health profiles, questionnaires, test results and similar you have a choice of this being dealt via traditional recorded mail or via e-mail, any test results and profiles will be printed out, safely stored and deleted from the computer.



How long will I keep your information?

I am not allowed to hold on to your personal data for longer than needed, and only related to the original reason for holding the information in the first place. After that I may retain your records for a limited time where needed for business /accounting or legal purposes. This is called the retention period.

My professional bodies the CSTA, FNTP, ILM, and my insurance require me to keep your notes for at least seven years after your last visit if you are an adult, or up to age 21 plus seven years for children. For those who legally lack 'capacity', the rules are more complicated but will usually be at least 15 years rather than seven, sometimes followed by legal advice.

In order to be able to provide follow-up if clients return after a break, as well as to allow time for disposal of notes, the maximum time I will keep your notes is *7 years*. After this time they are securely deleted, shredded or burnt.



Security

I am very aware of the sensitive nature of the information I receive as a practitioner, and I take steps to protect your personal information against loss or theft, as well as unauthorised access, disclosure, copying, use, or modification.

Given that emails can never be guaranteed to be fully secure, and that they may count as 'data processing' under the GDPR, if you want to discuss something personal about your situation or treatment I ask that you contact me to arrange a chat rather than sending personal information by email.



Will your information remain in the UK?

You have the right to know if I expect to remove or send your information outside the UK or the European Economic Area (EEA), and if so the safeguards that have been put in place to protect your information and your rights. This is important because not all countries are governed by the same strict regulations as the UK, and some ways of holding information (such as on a 'cloud') can mean information is stored on computers which may be outside the area governed by the GDPR.

For example – I will never remove your information from the UK/ the European Economic Area.

Data protection and your rights

Data regulations say that anyone who has information held about them has various rights, including the right to know what information is held and to correct anything that isn't right in their records.



Your right to refuse to give information

Under the GDPR, you are not required to give your personal information, and you have right to be informed of any consequences of refusing to give it.

A case history is needed in order to 'fulfil our contract', to give you the best treatment possible, including understanding your situation and any difficulties you are seeking help for, as well as to comply with my Code of Ethics. So if you do not wish to give any information at all I may be unable to work with you but I am always happy to have a chat about what may or may not feel comfortable for you.



Your right to object to me holding your information

If you object to me holding your information, you can ask me to stop. Because my Code of Ethics has a requirement for me to keep notes for a minimum time as described above, I will need to retain your records in order to comply with this.



Your right to see what information I hold about you

You have the right to request a copy of the information I hold about you. This can be in paper or electronic form, and I can explain the notes and respond to any concerns or questions you may have.



Your right to 'rectify' any information I hold which is not correct

If you believe that any of the information I hold about you is inaccurate or incorrect you have the right to tell me about this and request that the information is corrected. Please do let me know if any of your details change so I can keep your records up to date.



Your right to make a complaint

You have the right to complain if you are unhappy about the way I look after your information, or feel I have not properly respected your rights,

Please contact me in the first instance to discuss the issue.

Then also to my professional body the For Craiosacral Therapy: CSTA
admin@craniosacral.co.uk,

For nutrition: FNTP www.fntp.org

For Wellbeing Coaching: ILM www.institutelm.com

Or if you are still unhappy to the Information Commissioner's Office (ICO) <https://ico.org.uk/concerns/> or 0303 1231113



Understanding and agreeing to this information

You should make sure you understand and agree to me keeping this information about you – if you have any questions at all please ask and I'll be happy to answer them.

Changes to this notice

I may make changes to this notice and information from time to time, for example if there are changes in the laws about data protection. While you are a client, I will always let you know of changes via our agreed way of communication.