



GDPR data privacy policy

How I manage data from people who use my website or become my patient.

Please save this document as your record.

If you have questions then please ask.

GDPR (the General Data Protection Regulation) comes into play whenever your personal data is collected, processed or stored. It is essentially about ensuring that you can trust me to look after your data and use it responsibly. Under GDPR, you exercise rights over the information that I keep about you. This section explains why I collect data about you and how I protect it. I am required to both inform you about how I collect and manage your data and gain your consent for this.

Why collect and store personal data?

There is overall a very high level of confidentiality and privacy in psychological therapy. To organise my practice, I must keep personal information such as your name and phone number. Psychologists must also record sensitive personal information such as session summaries. This forms part of a psychologist's high standard of care towards you. I am unable to work with you unless you allow me to keep information about you.

I am registered with the Information Commissioners Office (ICO) to lawfully hold information about you and protect your interests. If you think I may be mishandling your information, or acting unlawfully, you can approach the ICO (ico.org.uk/concerns or call 0303 123 1113). You have the right to ask for all your information and to receive this, at no fee, within a month. If you think the information that I hold about you is inaccurate then you also have the right to have it corrected.

I keep:	Contact information	Sensitive personal information	Electronic and paper-based information
	Information on payment of fees	Information on attendance	Information from others, if applicable, e.g. GP

So that you can make an enquiry via the contact form on my website, I ask for your name and email address. You can provide any additional information around your enquiry. I need this information to consider the nature of your enquiry and respond to you. My website does not track users or collect information such as IP addresses.

If we agree to meet for assessment then I will ask for additional information such as your date of birth, phone number, GP details and next of kin. I need this information so that I can invoice you, and contact you in the unlikely event of needing to cancel a session e.g. due to illness. On extremely rare occasions, psychologists are ethically required to break confidentiality so that immediate concerns about the safety of a patient can be communicated to another health professional. I also ask for your information so that, in the unlikely event that I cannot provide therapeutic services, a nominated psychologist colleague can assume clinical responsibility for my patients and take over data protection duties.

I store paper session notes in a secure filing cabinet. Electronic information may be stored in my mobile phone, laptop and on my email system. These are password protected. Six months after our work ends, I erase or shred your contact information. I erase or shred my session notes seven years after our work ends, in line with the British Psychological Society's *Practice Guidelines*.

I hope this information is both clear and useful. If you are working with me and have any questions or concerns about my management of your data then please let me know directly.



Working relationship agreement

I am only able to work with clients who will agree to these terms.

Please read this through carefully. I welcome any questions. Please save this document as your own record.

Contacting me

Email: drheidiashley@protonmail.com

I check messages during fixed times within office hours only. I aim to respond the same day. I avoid checking emails at evenings and weekends. I use Protonmail which is end-to-end encrypted, making it virtually impossible for anyone else to read the email, even when you don't use a Protonmail account to message me. Unless you need to change an appointment or make an enquiry, I don't encourage you to email. If you do, I am likely to delay my response until we meet so that we keep most of our conversations "inside the therapeutic room". Please email if you are (for example) running late for a session. *Please note that I **cannot provide an emergency service** and that it is **never safe** to email, text, phone or leave a voicemail to let me know that you feel in crisis. In urgent circumstances, you should seek immediate support by contacting your GP or using the crisis information at the very end of this sheet.*

Professional registrations

I am registered as a counselling psychologist with the **Health and Care Professions Council** (HCPC), a regulator that protects the public. I observe their standards, ethics and professional practice guidelines, plus those of the **British Psychological Society** (BPS), the professional body for psychologists. I am a full member of the **International Society for Schema Therapy** (ISST), who provide standards of excellence for the practice of schema therapy. I am certified by them as an Advanced Level Schema Therapist.

Assessment process

It is important to work with someone you trust, and our early sessions will help you decide if we're a good fit. If you choose not to continue with me, I may instead be able to guide you to an alternative qualified practitioner. I will carry out an initial assessment of your difficulty and your needs. This usually happens over more than one session. It is important to bear in mind that assessment does not automatically lead to therapy being offered. If I do not think that my approach is likely to be helpful to you, then I will explain my rationale and I will make alternative supportive recommendations for you.

Therapy process – schema therapy takes time

If, following assessment, moving into therapy seems appropriate, we will contract together. The length of therapy depends on various factors e.g. your goals, the nature of your difficulties and a pace of work that feels right for you. It is important to be clear that schema therapy is not intended to be a brief intervention. It usually continues over several months, sometimes years. This is because it helps people move beyond symptom management to address difficult childhood experiences that contribute to the long-term difficulties in their life. This is not usually a quick process. I therefore provide spaces to clients who are ready to work on long-term issues and who will commit to a minimum of 20 sessions, although frequently schema therapy will be longer than that. I emphasise building self-awareness and will help you understand what may underpin your behaviours. I use active techniques to help you to overcome stuck patterns so that you can make healthier choices that better meet your needs. Regular feedback and reviews along the way establish whether the work remains productive for you.

Your own commitment to therapy

A successful psychological therapy can make a real difference to how you are feeling. However, whilst I will do all I can to facilitate the best possible outcome for you, specific results can never be guaranteed in psychological therapy. At the heart of therapy is the helping relationship, based on your active participation and collaboration. This means that the factors that you bring – such as commitment, openness, and your willingness to practice new changes between sessions - are also important for therapy to be effective.

I only work with clients who can regularly attend a weekly or fortnightly session. This is because irregular or infrequent attendance prolongs and disrupts therapy and tends not to support good therapy outcomes.

It may help to know that therapy can - especially in its initial stages - sometimes *increase* feelings of unease and distress.

I will seek your feedback regularly as to whether our work feels useful to you. Your feedback to me is really important. If therapy persistently feels unhelpful then we can discuss other options to better meet your needs.

You can of course choose to stop therapy at any time but it is usually most helpful if you can give me notice of your wish to end so that we can stop in a planned way.

Confidentiality – and its limits

What you discuss remains confidential *except* in the following limited circumstances:

1. If you consent to me informing a third party, e.g. your GP. It is always best practice for me to let your GP know that we are meeting
2. If I am concerned that you may be a risk to yourself or another person. I would then disclose minimal information sufficient to address any significant risk that I identify. It is best practice for me to first gain your consent although in practice sometimes this is not possible.
3. If you initiate civil or criminal action against me
4. If I am obliged by relevant legislation or other legal requirements to disclose to the appropriate bodies

Supervision

All psychologists engage in regular clinical supervision to ensure our practice remains safe and effective. Your identity remains confidential. My supervisor is a clinical psychologist and advanced schema therapist, trainer and supervisor. She upholds HCPC, BPS and ISST standards and ethics.

Clinical executor

In the unlikely event that I could not provide therapy services, my nominated psychologist colleague – who adheres to the same ethical standards and frameworks - would take care of contacting you on my behalf. He would only access your contact details in an emergency and would discuss with you when I am able to resume work with you or determine appropriate onward arrangements for you if appropriate.

Appointments and fee

Appointments are made at my discretion. The current fee is £90 per session (lasting 50 minutes). Please note that to meet rising business costs, my fee is reviewed routinely. Generally, my fee increases each year in line with inflation and other costs. I will invoice you after each session. Fees are gratefully accepted by bank transfer; my bank details appear on my invoice. The contract is between you and I, meaning that you are responsible for paying my fee. I do not work with any insurance companies. Please do all you can to arrive on time. If you attend late, I will see you until the scheduled end of the session. I cannot overrun to make up for missed time. In these circumstances, you remain liable for my full fee.

Process for missed payments

Ethically, I cannot allow you to fall into financial arrears with me, and so I cannot continue to schedule sessions if you have outstanding fees. If payment of my fee is missed then I will prompt you by email and verbally in our session. If the fee remains outstanding then I will send a second reminder, then a third and final reminder with a date for payment. If a debt is 90 days old then I may begin legal proceedings to recover unpaid fees plus any associated costs, or pass your debt to a collection agency.

Cancellation and non-attendance policy

I want you to prioritise your therapy and minimise any absences.

Unattended sessions (no message to me) will be charged in full. Sessions cancelled with less than 24 hours' notice are also charged in full.

Online platform

I use Doxy for online work. I follow professional guidance from the British Association for Counselling and Psychotherapy and the Information Commissioner's Office to maximise security settings when using video conferencing.

Engaging in psychological therapy online

I will provide you with appointments: From a confidential room, free from interruptions or distractions
At the agreed appointment time

You will need to:

- Create privacy for yourself. Use a separate room and close the door.
- Ask anyone you share a home with not to disturb you
- Try and minimise other noise and distractions e.g. turn off TVs, washing machines
- Make sure that your electronic device is plugged in or charged
- Turn off Siri / Alexa / similar as part of creating a secure and confidential environment for your session
- Have tissues and water available but please don't smoke or eat during our appointment
- Use headphones or ear buds if you can – it will improve sound and privacy

My procedure if you seem to be late for online sessions

For the first session only: if I cannot see you in the online waiting room when it is time for us to meet, then after 10 minutes I will assume that you are having trouble connecting and I will give you a ring. So, please keep your mobile to hand. I will either talk you through the procedure to connect online, or we can decide to hold our session by telephone instead. I will call you three times and if there is no response, I will consider our session cancelled from your point of view. For ongoing sessions it is helpful for you to email me (drheidiashley@protonmail.com) to let me know if you are unable to connect or are running late.

After the remote session

When accessing therapy from home, it can be tricky to detach and unwind mentally afterwards. Before each session, plan for how you'll spend the time after the session ends: an activity that will gradually bring you back to a place from which you can resume your usual routine. You might for example stretch, walk around, make yourself a hot drink, fulfil a hobby/enjoyable activity or play with a pet.

Social media policy

I do not knowingly engage with clients over social media. This is to protect our therapy work by keeping it within the (virtual) consultation room.



Crisis and supportive contact numbers

I provide these routinely as part of good practice, because I am not able to provide an emergency service.

Please retain these numbers in case you should need them for additional support or crisis management.

Third sector services	NHS services nationwide	Local NHS services	Specific services
<p>SANEline: National out-of-hours mental health helpline offering specialist emotional support, guidance, information. All week 4.30pm – 10.30 pm. SANEline 0300 304 7000. Visit www.sane.org.uk</p> <p>Samaritans: Open 365 days a year. Call free day or night on 116 123. Or, send an email to jo@samaritans.org (they will reply within 24 hours). Visit www.samaritans.org</p> <p>Breathing Space (Scotland only): free, confidential phonenumber. 0800 83 85 87. Open Mon – Thurs 6pm – 2am and open between Fridays 6pm and 6am on Mondays. www.breathingspace.scot</p>	<p>Out of hours Crisis CPN Service: Mon-Fri 8 pm-9 am. Saturdays, Sundays and public holidays 4:30 pm – 9 am. Direct access on 0845 650 1730</p> <p>NHS 24 Dial 111. Provides urgent mental health advice out of hours when your GP practice is closed.</p> <p>Use link to search: www.nhs.uk/service-search/mental-health/find-an-urgent-mental-health-helpline</p>	<p>Your GP may see you same day if you explain that you are very distressed.</p> <p>IN EMERGENCIES ONLY If you need an immediate response, call 999. Or, go to your local A&E: there they will assess and arrange for you to see a specialist if needed. But A&E can be a busy and stressful place and you may have to wait a long time. It can be quicker to phone NHS 24 on 111, who can arrange the right help.</p>	<p>Police: In an emergency, i.e. if you are in immediate danger, dial 999. Otherwise, use the police non-emergency number: 101</p> <p>The main contact number for Police Scotland (non-emergency) is: 0141 532 2000.</p>