

## Privacy, Data Processing and Protection Policy

Professionally we are obliged to comply with the Data Protection Act 2018 and the General Data Protection Regulation [GDPR] in respect of information held about you, and your child, as our client or service user. Providing a safe, reliable and effective service requires us to process and store a range of personal data.

The purpose of this consent document is to outline how we will use your information.

Juniper Tree Therapy is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when working with Juniper Tree Therapy, you can be assured that it will only be used in accordance with this Privacy Statement.

<b>NAME AND CONTACT DETAILS OF THE DATA CONTROLLER</b>	<b>Nick Smith - Director</b> <b>T:</b> 07739310088 <b>E:</b> <a href="mailto:nick@junipertreetherapy.com">nick@junipertreetherapy.com</a> <b>P:</b> PO Box 501, Leeds, LS17 1LL
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### Why We Collect and Process Your Data

- Contract – By undertaking our services, we have a contract in place with you, which requires us to process your personal data in order to meet that contractual obligation.
- Legal Obligation – as healthcare professionals, we are required to keep appropriate clinical records by law.
- Consent - We ask for your consent to process your data in certain ways, such as sharing it, or using videos for training purposes.

We collect personal information because, by agreeing to undertake our services, we have a Contract in place with you, for which we require personal details in order to provide an effective specialist occupational therapy service. We also have a Legal Obligation to keep clinical records. We will ask for your Consent with regards to certain data processes, such as sharing personal data with third parties.

### How and What Information Is Collected About You

We may collect the following information by email, telephone call, by post, questionnaires / forms, or in person.

We may collect the following information:

- Name;
- Date of birth;
- Contact details (phone, email, address);
- Parent/Guardian/significant family members/carers names, contact details (phone, email, address) and relationship to client;
- Personal health and lifestyle information, including reports and letters from healthcare professionals;
- Educational plans;
- Child Services Records / Court Orders;
- Employer or School information;
- Photographs / Videos.

### What we do with the Information we Gather and What is it Used For

We collect personal information so you as a client, or as the person[s] with parental responsibility [PPR] of the client are identifiable on their care record. Care records include any reports and background information received, video, audio or photographic recordings, hand or electronically recorded notes relating to the therapy process and treatment programme.

We also require personal information for the purposes of:

- Communicating with you/ your representative regarding your/ the client's treatment

- Creating fully informed reports and treatment plans
- Professional record keeping of client information
- Provision of Occupational Therapy services
- Sharing your information with relevant parties or health professionals, when necessary, with your consent or as required by law

### Sharing of Information and Disclosures

We may disclose information about you to any of our employees or subcontractors insofar as reasonably necessary to facilitate the therapeutic process. This may include referrals to other services.

In addition, we may disclose information about you:

- a. To the extent that we are required to do so by law;
- b. In connection with any legal proceedings or prospective legal proceedings; and/or
- c. in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

We will not provide your information to third parties without your express permission.

Recordings may be shared with an external organisation for transcription as part of the therapeutic process. Recordings sent for transcription will not include identifiable information other than any shared in the interview such as your first name.

### Video, Photographic, and Audio Data

As part of the therapeutic assessment and intervention process we use video, photographic and audio recordings for the following reasons; to focus on conversing during consultations and reduce the need for note taking, for clinical analysis after sessions take place in order to inform intervention planning and also give visual feedback to parents and other professionals.

***You may ask for recording devices to be switched off at any time and for recordings and images to be deleted.***

Juniper Tree Therapy is dedicated to Continuing Professional Development and supporting Evidence-Based Practice. We take an active role in clinical and academic research in order to help contribute to this. We provide training both as a part of the service offered by Juniper Tree Therapy, and on behalf of other organisations such as Sensory Attachment Intervention Consultancy ([www.sensoryattachmentintervention.com](http://www.sensoryattachmentintervention.com)) for parents, other Health, Social Care and Education Professionals. This means at times we may ask your permission to use your information anonymously for research, professional development and/ or teaching purposes. This may include audio, video, photographic and transcripts. If you consent to use of your information for this purpose, we will agree with you specifically which pieces of information, data or recordings can be used and by whom.

### How you can Control and Access your Information

You may request details of personal information which we hold about you under the General Data Protection Regulation. If you would like a copy of the information held on you, please write to;

Nick Smith Juniper Tree Therapy, PO Box 501, Leeds, LS17 1LL  
*(There is no longer a charge for this service)*

If you believe any information we are holding on you is incorrect or incomplete, please email or write to us as soon as possible at the above address. We will promptly correct any information found to be incorrect.

### How you can Withdraw Consent or Request to be Deleted from our Files

If you do not wish us to make use of your or your child's personal information in this way, please contact Nick Smith via email [nick@junipertreetherapy.com](mailto:nick@junipertreetherapy.com). You have the right to withdraw consent, where it has been given.

## How Long we Keep your Information for

The Regulation does not set out any specific minimum or maximum periods for retaining personal data. Instead, it says that: Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

See this link: <https://ico.org.uk/for-organisations/guide-to-data-protection/principle-5-retention/>.

Juniper Tree Therapy will retain personal data for 7 years for adults and 7 years following their 18<sup>th</sup> birthday for children, unless upon review it is deemed necessary to retain it for a longer period.

## Data Transfer Outside the European Union

In some instances, it may be necessary for us to transfer your data outside of the European Union, or to countries not approved by the ICO. Where this is the case, we may seek further consent from you to do this. In all instances, we will take all steps necessary to safeguard your information and ensure that your data protection rights are maintained.

## Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place highly secure electronic systems and managerial procedures to safeguard and secure the information we collect.

Juniper Tree Therapy will continue to meet its GDPR obligations in relation to the security of processing, the notification of personal data breaches and data protection impact assessments.

## Audits and Inspections

Juniper Tree Therapy will submit to audits and inspections, providing all necessary information to ensure it meets the Article 28 obligations, always cooperating with supervisory authorities (such as the ICO).

## Right to Complain

If you have a concern about our information practices, you have a right to complain. You can do so by contacting the Information Commissioner's Office on 0303 123 1113 or by visiting [www.ico.org.uk](http://www.ico.org.uk).

## Security

- We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information. We take great care to ensure any confidential information remains protected, but we cannot guarantee the security of data sent over the internet.
- Any paper records are stored in a locked cabinet in the therapy office.
- Electronic records are stored on password protected, encrypted storage devices.
- Juniper Tree Therapy uses only GDPR compliant systems and services.

## Your Rights

- If you have given your consent to us processing your data, you have a right to withdraw your consent to any further processing.
- Unless we are operating under a Legal Obligation, you have a right to request your data to be transferred to another organisation or erased from our records.

If you wish to withdraw consent or request a transfer or erasure of your data, please email [nick@junipertreetherapy.com](mailto:nick@junipertreetherapy.com). If you are concerned that we have breached a privacy law or code binding on us please send an email marked "Urgent" to Nick Smith, Director, at [info@junipertreetherapy.com](mailto:info@junipertreetherapy.com). We aim to respond in a reasonable time (normally 24 hours). Our Data Controller will manage your complaint and will give you additional information about how it will be handled.

We will always give you the opportunity to opt out of future marketing whenever we send you marketing material, or you can opt out at any time by contacting us.