



GDPR Privacy Policy – Inside Out Psychotherapy

Last Updated: 30th May 2025

1. About This Policy

Inside Out Psychotherapy is committed to protecting your privacy and complying with data protection laws, including the General Data Protection Regulation (GDPR). This privacy policy explains how we collect, use, store, and protect your personal information.

2. Who We Are

Data Controller:

- **Company Name:** Inside Out Psychotherapy
- **Services:** Integrated Arts Child Psychotherapy
- **Address:** 5 Clos Nant y Cwm, Pontprennau, Cardiff. CF23 8LG
- **Phone:** 07986 264 543
- **Email:** c.bowring@io-p.org
- **Data Protection Officer:** "The Practice Owner serves as the primary contact for data protection matters"

3. What Information We Collect

3.1 Child Client Information

- Full name, date of birth, and address
- Contact details for parents/guardians
- Medical history and current medications
- Mental health assessments and treatment notes
- Educational information and school reports
- Family circumstances and social history
- Audio/video recordings of sessions (where consented)
- Artwork, creative expressions, and therapy materials created during sessions

3.2 Parent/Guardian Information

- Contact details (phone, email, address)
- Emergency contact information
- Relationship to the child
- Relevant family history
- Consent records and signatures

3.3 Administrative Information

- Appointment scheduling data
- Payment records and invoicing information
- Insurance or funding details
- Correspondence records



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4. Why We Process Your Information

4.1 Primary Purposes

- **Therapeutic Care:** Providing psychological assessment, treatment, and support
- **Treatment Planning:** Developing and monitoring therapeutic interventions
- **Progress Monitoring:** Tracking therapeutic outcomes and adjusting treatment
- **Professional Development:** Supervision and continued learning (anonymized)
- **Legal Compliance:** Meeting professional and regulatory requirements

4.2 Lawful Basis for Processing

We process personal data under the following lawful bases:

- **Article 6(1)(e) - Public Task:** Provision of healthcare services
- **Article 6(1)(f) - Legitimate Interests:** Practice administration and professional development
- **Article 9(2)(h) - Healthcare:** Processing special category health data for healthcare purposes
- **Article 9(2)(g) - Substantial Public Interest:** Child protection and safeguarding

4.3 Special Category Data

Health and mental health information constitutes special category data. We process this data because:

- It is necessary for healthcare purposes
- We have appropriate safeguards in place
- Processing is carried out by professionals bound by confidentiality

5. Children's Data

5.1 Special Protections

As we primarily work with children, we provide enhanced protections:

- Parental consent is obtained for children under 16
- Age-appropriate explanations are provided to children
- Children's best interests are prioritized in all decisions
- Regular review of consent as children mature

5.2 Transition to Adult Services

When clients reach 18, we will:

- Discuss continued consent for data processing
- Provide information about transferring to adult services
- Obtain fresh consent for continued treatment if appropriate



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6. How We Use Your Information

6.1 Direct Care Activities

- Conducting assessments and therapy sessions
- Creating treatment plans and progress notes
- Communicating with parents/guardians about progress
- Coordinating care with other professionals (with consent)

6.2 Administrative Activities

- Scheduling appointments
- Processing payments
- Maintaining clinical records
- Meeting insurance or funding requirements

6.3 Quality Improvement

- Clinical supervision (anonymized where possible)
- Professional development activities
- Service evaluation and improvement

7. Who We Share Information With

7.1 Professional Network

We may share information with:

- **Clinical Supervisors:** For professional oversight (anonymized where possible)
- **Healthcare Professionals:** GPs, psychiatrists, or other specialists (with consent)
- **Educational Professionals:** School counsellors or teachers (with consent)
- **Social Services:** When required for child protection

7.2 Legal Requirements

We may share information without consent when:

- Required by law or court order
- Necessary to prevent serious harm to the child or others
- Required for child protection purposes
- Mandated by professional regulatory bodies

7.3 Third-Party Processors

- **IT Support Providers:** For secure data systems maintenance
- **Administrative Support:** For scheduling and billing (under strict confidentiality)
- **Secure Storage Providers:** For backup and archive services



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8. Data Security

8.1 Technical Measures

- Encrypted storage systems
- Secure, password-protected networks
- Regular software updates and security patches
- Multi-factor authentication where applicable

8.2 Organizational Measures

- Staff training on data protection
- Clear confidentiality policies
- Secure physical storage of paper records
- Regular review of access permissions
- Incident response procedures

8.3 Data Minimization

- We only collect data necessary for treatment
- Information is reviewed regularly and updated as needed
- Irrelevant or outdated information is securely deleted

9. How Long We Keep Your Information

9.1 Retention Periods

- **Child Client Records:** Retained until the 26th birthday (or 8 years after treatment ends, whichever is longer)
- **Adult Client Records:** 8 years after treatment ends
- **Financial Records:** 7 years after final transaction
- **Consent Records:** For the duration of treatment plus 3 years

9.2 Secure Disposal

When retention periods expire, records are:

- Securely shredded (paper records)
- Completely deleted from digital systems
- Wiped from backup systems
- Disposal is documented and auditable

10. Your Rights

10.1 Individual Rights

You have the right to:

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- **Access:** Request copies of personal information we hold
- **Rectification:** Correct inaccurate or incomplete information
- **Erasure:** Request deletion in certain circumstances
- **Restriction:** Limit how we process your information
- **Portability:** Receive information in a structured format
- **Object:** Object to processing based on legitimate interests

10.2 Limitations on Rights

Some rights may be limited when:

- Information is required for ongoing treatment
- Deletion would compromise clinical care
- Legal or professional obligations require retention
- Information is needed for safeguarding purposes

10.3 Exercising Your Rights

To exercise your rights:

1. Contact us using the details in Section 2
2. Provide identification to verify your identity
3. Specify which right you wish to exercise
4. We will respond within one month

11. Children's Rights

11.1 Age-Appropriate Information

We provide children with:

- Simple explanations of how we use their information
- Information about their rights in language they can understand
- Opportunities to ask questions about data processing

11.2 Developing Capacity

As children mature, we:

- Regularly review their understanding and wishes
- Involve them increasingly in decisions about their data
- Respect their growing autonomy while maintaining safeguards

12. International Transfers

Currently, we do not transfer personal data outside the UK/EU. If this changes, we will:

- Inform you before any transfer

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- Ensure adequate protection measures are in place
- Only transfer to countries with adequate protection or under appropriate safeguards

13. Automated Decision Making

We do not use automated decision-making or profiling that would significantly affect you. All clinical decisions are made by qualified professionals based on individual assessment.

14. Data Breaches

In the unlikely event of a data breach:

- We will assess the risk and take immediate action
- Serious breaches will be reported to the ICO within 72 hours
- You will be informed if the breach poses a high risk to your rights
- We will document all breaches and our response

15. Complaints and Contact

15.1 Contact Us

For any questions about this policy or your data:

- **Email:** c.bowring@io-p.org
- **Phone:** 07986 264 543
- **Post:** 5 Clos Nant-y-Cwm, Pontprennau, Cardiff. CF23 8LG

15.2 Regulatory Complaints

If you're unhappy with our response, you can complain to:

- **Information Commissioner's Office (ICO)**
- **Website:** ico.org.uk
- **Phone:** 0303 123 1113
- **Post:** Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

15.3 Professional Body Complaints

You can also contact our professional regulatory body:

- UKCP

16. Changes to This Policy

We may update this policy to reflect:

- Changes in legislation

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- Updates to our practices
- Feedback from clients or regulators

When we make significant changes:

- We will notify you directly
- The updated policy will be available on our website
- We will explain what has changed and why

17. Consent Management

17.1 Obtaining Consent

We obtain clear, informed consent by:

- Explaining what data we collect and why
- Describing how we will use the information
- Identifying who we might share it with
- Explaining your rights and how to exercise them

17.2 Withdrawing Consent

You can withdraw consent at any time by:

- Contacting us using the details above
- Specifying what consent you wish to withdraw
- Understanding that this may affect our ability to provide treatment

17.3 Record Keeping

We maintain records of:

- When consent was given
- What was consented to
- How consent was obtained
- Any changes or withdrawals

This policy demonstrates our commitment to protecting your privacy while providing high-quality therapeutic care. We regularly review our practices to ensure continued compliance with data protection requirements.

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Next Review Date: 30th May 2026

Approved by: Clive Bowring MA Integrative Child Psychotherapist