

# **GDPR Privacy Policy 2024**

Written by: Claire Boulter Date completed: 08/07/2024 Due for review: 01/08/2025



# Introduction

We (Wildflowers Play therapy) will only collect information in accordance with the Data Protection Act 2018. Our contact details are listed below. Wildflowers Play therapy's Privacy Statement follows: Wildflowers Play therapy (ICO registration: ZA447423) takes your privacy very seriously. This Privacy Notice is intended to set out your rights and answer any queries you may have about your personal data.

Our personal information handling policy and procedures have been developed in line with the requirements of the General Data Protection Regulation (in force from 25 May 2018) and applicable national law. If you do not want your information to be collected and used as described below, you may revoke your consent, please contact our Data Protection Officer; Claire Boulter at <u>claire.boulter@wildflowersplaytherapy.co.uk</u>.

# Definition

**Personal data -** Personal data is any information that relates to an individual who can be directly or indirectly identified. Pseudonym data can also fall under the definition if it's relatively easy to ID someone from it.

**Data controller -** The person who decides why and how personal data will be processed. Within this document this is: Claire Boulter (Wildflowers Play Therapy therapist).

**PTUK – Play Therapy UK is an official professional body.** PTUK was established in October 2000. Our main activities are:

- Managing the Register of Play and Creative Arts Therapists which is accredited by the Professional Standards Authority.
- Quality assuring our registrants through a stringent revalidation process and managing standards of clinical supervision.
- Accrediting training courses for the initial training required to meet the standards of the register and for continuous professional training (CPD).
- Extending our clinical evidence base to improve the quality of our registrants' practice and to demonstrate the effectiveness of play therapy delivered to PTUK standards.
- Providing a range of services to support the career development of our registrants.

# What information do we collect?

We collect and process the following personal data about yourself;

- Your name and names of family members if requires.
- Your home or work address, email address and/or phone number.
- Any relevant medical information.



• and/or any other information you provide you feel is relevant to the therapeutic journey.

### How do we use this information and what is the legal basis for this?

- With your consent we assess the need for therapy with the information provided. We only hold the minimum amount of information required to carry out affective therapy sessions.
- With your express consent to respond to any comments or complaints we may receive from you, and/or in accordance with our legitimate interests including to investigate any complaints received from you or from others, about our web site or our products or services.
- The information is also used for administrative and business purpose to ensure we fulfil our contractual and legal obligations.
- To analyse our effectiveness as a business.

#### With whom and where will share your personal data?

- Only to the extent necessary to run our business, to our service providers, to fulfil any contracts we enter with you or where required by law or to enforce our legal rights will data be shared with third parties.
- All practitioners on the Register of Play and Creative Arts Therapists, managed by PTUK and accredited by the Professional Standards Authority, must have a set number of hours of clinical supervision. The therapist makes a verbal report on each child to a clinical supervisor who is very experienced in working in therapy with children. The child's progress, including their problems, what they do in the sessions, any significant themes in their play and anything else that is relevant, is discussed. The clinical supervisor assesses and reviews a therapist by providing support and advice, identifying any problem areas and, if necessary, suggesting action to be taken.
- Notes may be taken during the discussions between the therapist and supervisor. If these notes contain your or your child's name, we will mark them as confidential and store them securely. If we send any part of these notes to anyone else or another organisation, we will make your or your child's personal details anonymous so that you can't be traced.

#### How long will we keep your personal data?

- Wildflowers Play therapy follow data regulation guidelines and will retain personal data until a client's 26th birthday if services are used.
- Information gained from enquires but not used for services will only be retained for a 12 month period if services may be required.



## Where is my data stored?

- Wildflowers Play therapy uses a data processing system called Fortuna. This system had been developed by PTUK. Fortuna is a highly secure system provided by PTUK for me to record your and your child's information. Your and your child's name and address are only processed by me (your therapist), for communication purposes. They are not processed by PTUK except, if relevant, when our computer system is being repaired. Neither are they released by PTUK to any other organisation or person.
- Any paper copies of personal data are stored in a locked metal filing cabinet within a locked room. These can only be accessed by the therapist themselves or their therapeutic executor.
- When you contact us by phone, we collect your phone number and any information provide to us during your conversation with us. We do not record phone calls. Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation) Legitimate interest(s): responding to enquiries and messages we receive and keeping records of correspondence. Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation). Reason why necessary to perform a contract: where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).
- Wildflowers play therapy uses JotForms as tool with aspects of paperwork/forms. Jotform takes the security of your data very seriously. All Jotform standalone form links and embed codes are secure (SSL) by default, and we give all users the option to encrypt their data. Jotform also adheres to strict European data protection laws by allowing users to store their data on secure German servers if they choose.
- External services and discussions as a registered member of the PTUK and accredited by the Professional standards Authority, therapist must complete a set number of clinical supervision hours. This involves a verbal report to a clinical supervisor who is both experienced and qualified in the therapeutic industry. The supervisor assesses and reviews a therapist progress while support and guiding them. The information shared within these sessions are based around themes within the play and any relevant observations. During the sessions if information is shared, such as your child's name, then these notes will be marked confidential and store securely and appropriately.

## What are my rights in relation to personal data?

Under data protection law you have the rights in relation to your personal data that include the rights to: –



- Request Access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check we are lawfully processing it.
- Request Correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected; thought we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. ("also known as the right to be forgotten") This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete to remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request for erasure for specific legal reasons which will be notified to you, if appliable, at the time of your request.
- Object to processing of your personal data where we are relying om a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing of your personal data. This enable you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personal data to you or a third party. We will provide you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain



products or services to you. We will advise you if this is the case at the time you withdraw your consent.

## How does the Website use personal data?

- Wildflowers Play Therapy website only uses personal data for improving the site. By using the Site, you agree to the collection and use of information in accordance with this policy.
- While using our Site, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. Personally identifiable information may include but is not limited to your name ("Personal Information").
- Like many site operators, we collect information that your browser sends whenever you visit our Site ("Log Data"). This Log Data may include information such as your computer's Internet Protocol ("IP") address, browser type, browser version, the pages of our Site that you visit, the time and date of your visit, the time spent on those pages and other statistics.
- We do not sell data to third parties.
- The use of cookies ensure the optimal functionality of the website and to provide a personalized user experience. A brief explanation of how cookies are managed;

1.When you visit a IONOS generated and supported website, a cookie is placed on your device. This is a small text file that allows us to recognize your device when you return to the website.

- 2. The cookies we use do not harm devices and do not contain any viruses. They do not allow us to access your device or personal data.
- 3. We use both session cookies, which are deleted when you close your browser, and persistent cookies, which remain on your device for a set period of time or until you delete them.
- 4. You have the ability to manage and delete cookies through browser settings. You can choose to block all cookies or only certain types.
- 5. We use cookies for various purposes, such as to remember your preferences, provide personalized content, and analyze website usage to improve our services.