



PRIVACY POLICY

How does OM Clinic North use personal information?

OM Clinic North (OMCN) complies with the UK General Data Protection Regulation and are committed to protecting your personal information.

This policy describes our procedures for ensuring that personal information about you (as our client) is processed fairly and lawfully. It contains important information about what personal details we collect, what we do with the information, who we may share it with and why; and your choices and rights when it comes to the personal information you have given us. We may need to make changes to this policy in the future and will inform you of any important changes.

OMCN is registered with the information commissioner's office (ICO). Holly Maya Greenwood is the data controller and assistant practitioners (Grace Hoskyn) are registered as data handlers overseen by the data controller. You can view our ICO registration by visiting: www.ico.org.uk and search for ZB024085.

What data does OMCN hold?

To provide you with a meaningful and high standard of care, we need to hold accurate personal information about you. This includes sensitive information about your health. Only personal information which is relevant to your care will be obtained, which would include: Contact details, relevant case history and medical information, information about your consents and wishes for therapy, professional records of care provided, assessment data including video and audio recordings,

records of communications that occur outside of sessions via email, telephone or smartphone messaging, either with you or with other people involved in your care.

How do you collect the data?

We collect information about you through:

- Digital or paper forms.
- Records made by the practitioner(s).
- Video or audio recording (we will always tell you about this).
- Record of correspondence with you or with others via email, text or via encrypted smartphone application messaging.
- Storing documents that you have shared with us or that have been sent to us by professionals involved in your care.

Why does OMCN hold this personal data?

Contact data is used to communicate with you to arrange sessions, raise invoices and provide follow up support where applicable. Background information is essential for creating and planning your bespoke therapy service. Dynamic assessment information helps us to track progress, plan and evaluate care for you and sometimes to seek specialist advice from supervision. In some cases, this may involve audio and / or video recordings, only where appropriate and necessary for the therapy approach that we are using. Case notes form a record of the care provided and allow future care to be planned effectively in the best interests of your wellbeing. Records are also kept for the purposes of meeting legal requirements for professional record keeping.

How do you keep my information safe?

Personal data is stored in a digital records system which is compliant with GDPR security regulations. This is password protected, and we also use password protection on our devices.

Audio and video material are always transferred at the earliest possible opportunity to this drive and not stored on our devices.

We use an encrypted email provider called proton mail which has high quality security features. <https://protonmail.com/security-details>. We also use smartphone applications with password protection and services that use end-to-end encryption.

Please note that although we take reasonable steps to protect against internet security breaches we cannot guarantee 100% internet security. Clients share with us at their own risk.

When would it be shared?

We have a duty of confidentiality to you. Your personal information is NOT shared except under certain circumstances.

OMCN does not currently employ agents to process personal data, for example, administration staff.

When an associate professional is working alongside Holly Maya on your case, then we share information about your care with this associate and receive information from them. This is either with the associate adhering to our policies under our umbrella, or under a specific data sharing agreement. This is for the purpose of providing safe, effective and high-quality care. You will always be made aware of associates working on your case and be part of the discussion around whether they are involved.

Where a local authority or other public body contracts us to provide a service, it is necessary for us to share your personal information with them, and store data that they share with us about you. This is to provide a safe and effective service in the interests of you and/or your child's wellbeing.

With your consent, we may share information about you with other organisations who are also involved in your care for the purpose of providing a quality, holistic service. For example, we work collaboratively with NHS professionals where possible.

We may share information about your care and in some cases audio and video recordings of you, with, other organisations for the purposes of professional development.

This may be:

- As part of professional supervision or consultation from a relevant specialist, in order to improve your care and comply with our continuing professional development (CPD) requirements. Supervisors or consultants will be professionals bound by a duty of confidentiality. When we share information about your therapy as part of supervision, we share anonymously wherever we can. Your name and full identifying details are not given to the supervisor. They will not store your data or share information about you themselves (unless they have a serious concern about risk of harm).
- Using audio and / or video recordings as case studies at a professional development events or study groups. All members of such groups would be bound by a professional duty of confidentiality and would not store or process your data themselves. You would always be informed of our intention to do this and sharing would only happen with your consent.
- Using audio and / or video recordings of therapy sessions as material for training associate members of the OMCN team. These professionals, unless they were directly involved in your case, would not store, process or share this information themselves and would be bound by a duty of confidentiality as a condition of the training.

You have the right to object to your information being shared with other organisations for training and CPD purposes. You also have the option to request that we discuss this kind of sharing with you on a case by case basis. Please use our consents form to tell us your choices.

Sometimes we need to share information so that you or other people are protected from risk of harm. These circumstances are rare. We do not need your consent or agreement to do this.

What is your Lawful Basis for keeping my data?

OMCN processes personal data, including special category data, with the following lawful bases (Data Protection Act, 2018):

Type of data	Lawful basis (Article 9 condition)	Applies where:
Special category data related to health	Health and Social Care	a registered health and care professional provides your care.
	Substantial public interest; safeguarding	we process your data in order to provide a service that is judged to be important to protecting your wellbeing.
Any type of special category data	Substantial public interest; counselling	we provide support, advice or pastoral care to you and you share sensitive personal information with us which is relevant to your care and is recorded confidentially in our professional records.
	Legal claims or judicial acts	we process your data as part of a legal claim or in case of a potential future legal claim.
Type of data	Lawful basis (Article 6 condition)	Applies where:
All types of personal data	Contract	<p>we keep records of care provided;</p> <p>we keep records in line with professional guidance; we collect personal details in order to carry out a service to you; we store video or audio footage of you as a necessary part of assessment and review process for therapy;</p>

		<p>we share and receive information about you as part of a data sharing agreement with any associate(s) contracted to join the Wild Chorus Therapies team to provide you with care.</p> <p>we share and receive information about you with an organisation (eg local authority) because they have contracted us to provide your care.</p>
All types of personal data	Consent	<p>we share information about you with other organisations involved in your care.</p> <p>we share video or audio recordings as part of supervision or training activities.</p>

If you would like more detailed information about our lawful bases for processing different kinds of data, please contact us.

How long will you store my data?

If you make an enquiry, have an initial call or triage assessment, and/or send information relating to making a mutual decision about whether to enter into a therapeutic relationship, and then no further action is taken, your data is deleted within a month of your first contact. If you have one or more sessions then we store digital records of your care. Once you are discharged, your records are archived in accordance with professional guidance for medical records before they are deleted at the end of the required retention period. We commit to not store your data for longer than necessary.

Can I get Access to my data?

Yes. Contact the team at om.clinic@pm.me

Can I withdraw my consent or ask for my data to be deleted?

You can withdraw your consent at any time for our processing data that you have consented to being processed. Contact us to request this.

What are my rights?

Your key rights that will be protected by GDPR are as follows:

The right to be informed

The right to access

The right to rectification

The right to erasure

The right to restrict processing

The right to data portability

The right to object

The right not to be subject to automated decision-making including profiling

For further information, visit www.ico.org.uk/for-the-public/is-my-information-being-handled-correctly.

What happens if there is a data breach?

In the unlikely event that someone unauthorised accesses the data we hold, you will be informed of the breach and the steps taken to address it. Any breach will be reported to the ICO in accordance with the law.