



## Inner Compass Therapeutic Services Privacy Notice

This Privacy Policy is in accordance with de facto web site standards. Inner Compass Therapeutic Services will only collect information in accordance with the Data Protection Act 1998.

Data is collected (more details below) for the purposes of providing therapeutic services as described with you in person or on the website. Some of this data is recorded on a system (called Fortuna) provided to me by Play Therapy UK (PTUK) and with whom I am registered with as a Play Therapist. It is collected when I renew my annual membership and revalidation.

Inner Compass Therapeutic Services and PTUK's Privacy Statement follows:

ICO registration ZA203217

We take 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. If you need more information, please contact:

Data processor Sam Lewis at: [sam@innercompasstherapeuticservices.co.uk](mailto:sam@innercompasstherapeuticservices.co.uk)

Data Controller Eileen Braham at: [clinical@ptukorg.com](mailto:clinical@ptukorg.com)

This personal information handling policy and procedures have been developed in line with the requirements of the 1995 European Union Data Protection Directive (Directive 95/46/EC) and the General Data Protection Regulation (in force from 25 May 2018) and applicable national law.

### 1. What information do Inner Compass Therapeutic Services collect?

Inner Compass Therapeutic Services collect and process personal data about you as clients of potential or actual therapy services or clinical supervision. The personal data processed includes:

- Your name
- Your child/ren's name/s
- Your home address, email address and/or phone number
- Your job title
- Your child/ren's school address
- The age and gender of the child/ren
- Ethnic group
- Goodman's Strengths and Difficulties questionnaire data
- Referral reasons, which may include information about illness or behavioural needs pertaining to well-being.
- The name and contact details of other professions involved in your case.

**Sam Lewis - Play and Creative Arts Therapist**



- If appropriate, second addresses or contact details for the child who is being treated.
- Information related to the browser or the device you use to access my web site
- Internet browser cookies and operating system data
- And/or any other information you provide.

## **2. How do Inner Compass Therapeutic Services use this information and what is the legal basis for this use?**

Inner Compass process the personal data listed in section 1 above for the following purposes:

as required to establish and fulfil a contract with you to receive our services. This may include verifying your identity, taking payments, and communicating with you. Inner Compass Therapeutic Services require this information in order to enter into a contract with you and are unable to do so without it and to comply with applicable law and the requirements of the Professional Standards Authority in the accreditation of the 'Register of Play and Creative Arts Therapists'.

## **3. With whom and where will Inner Compass share your personal data?**

Inner Compass Therapeutic Services will not share personal data with anyone but PTUK and PTUK only collect part data, no names or full addresses are collected from them. PTUK are only interested in what treatment (type of play) was provided and length of services, ethnic group, age and gender, so as to add to evidence-based research.

PTUK's professional advisors such as our auditors and external legal and financial advisors may see this data; and data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if needed for the legal protection of our legitimate interests in compliance with applicable laws;

Within the referral, I (the therapist) will write, at the minimum, an end report on the treatment received. This will only include data the referrer is aware of, such as date of birth, where the therapy has taken place, the number of sessions. It will include the stated referral issues and progress measured against the referral issues. No other personal information will be included that has not already been passed to me by the referrers.

In the case that other interested parties ask for reports or updates, such as agencies like social care, court psychologists etc the therapist will always seek permission first from the client.

**Sam Lewis - Play and Creative Arts Therapist**



#### **4. How long will you keep my personal data?**

Neither Inner Compass Therapeutic Services nor PTUK will keep your personal information for any purpose longer than is necessary and will only retain the personal information that is necessary in relation to the purpose. We are also required to retain certain information as required by law or for as long as is reasonably necessary to meet regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our terms and conditions.

#### **5. Where is my data stored?**

Inner Compass Therapeutic Services store your data in a locked filing cabinet at the office address. Any notes or reports made are stored on my PC under password access only or within the Fortuna system, also password protected.

Any personal notes about treatments and sessions which may travel to and from the venue where treatment is taking place and my office will be anonymised and coded whenever possible. Files are marked Strictly Private and Confidential. Full names are not included in emails. Reports sent are password protected whenever possible.

After your data has been extracted from the Fortuna system by PTUK at annual revalidation it is stored on PTUK's server located in the UK which is not directly connected to the Internet. The personal data that is collected may be transferred to, and stored outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers, in which case the third country's data protection laws will have been approved as adequate by the European Commission or other applicable safeguards are in place.

#### **6. What are my rights in relation to my personal data?**

If the information Inner Compass Therapeutic Services hold about you is inaccurate or incomplete, you can notify Inner Compass and ask for it to be corrected or supplement it. You also have the right, with some exceptions and qualifications, to ask Inner Compass to provide a copy of any personal data I hold about you. Where you have provided your data to me and it is processed by automated means, you may be able to request that I provide it to you in a structured, machine readable format.

If you have a complaint about how Inner Compass Therapeutic Services have handled your personal data, you may be able to ask to restrict how Inner Compass Therapeutic Services use your personal data while your complaint is resolved. In some circumstances you can ask to erase your personal data (a) by withdrawing your consent for us to use it; (b) if it is no longer necessary for us to use your personal data; (c) if you object to the use of your personal data and Inner Compass Therapeutic Services don't have a good reason to continue to use it; or (d) if Inner Compass Therapeutic Services haven't handled your personal data in accordance with our obligations.

**Sam Lewis - Play and Creative Arts Therapist**



### **7. Where can I find more information about PTUK's handling of my data?**

Should you have any queries regarding this Privacy Notice, about PTUK's processing of your personal data or wish to exercise your rights, you can contact Inner Compass or PTUK's Data Controller using this email address: [clinical@ptukorg.com](mailto:clinical@ptukorg.com).

If you are not happy with our response, you can contact the Information Commissioner's Office: [ico.org.uk](http://ico.org.uk)

Amended: 15<sup>th</sup> May 2022