

Laura Adlam Therapy Solutions: Data Protection and Information Governance Policy

Section A: Introduction, Aim, and Purpose

Introduction

At Laura Adlam Therapy Solutions, I take your privacy and data security seriously. The personal data I hold is processed and stored in accordance with applicable data protection laws, including the General Data Protection Regulation (GDPR). The data I collect and process may include:

- Written documents
- Spreadsheets
- Hardcopy case notes and files
- Database entries
- Images and recordings
- Emails and text messages
- Supervision notes
- Website visits
- Social media communication

Aim and Purpose

The purpose of this policy is to outline the framework for the collection, use, storage, and retention of personal data. My goal is to ensure that I respect and uphold the rights of individuals regarding their personal data, in accordance with GDPR and best practice in the management of client information.

This is a living document and will be regularly reviewed and updated to reflect changes in data protection laws or the growth of my business. You will be notified of significant updates, especially those that may affect how I process your personal data.

I, Laura Adlam, as Data Protection Officer (DPO) and Data Controller, am responsible for ensuring compliance with data protection legislation at Laura Adlam Therapy Solutions.

Section B: Privacy Notice, Use of Information, Retention Schedule

Privacy Notice

At Laura Adlam Therapy Solutions, I am committed to being transparent about how I collect, use, and store personal data. I process your personal data primarily for the provision of therapy services, administrative purposes, and business operations.

I collect and process personal data under the lawful basis of consent, performance of a contract, legal obligation, or legitimate interest, as outlined below.

I do not use automated decision-making or profiling, and any third-party services I engage, such as website hosting or payment processing, also comply with GDPR.

Your personal information will be retained for a period of time as detailed in the Retention Schedule below. When data is no longer required, I will ensure it is securely deleted or destroyed.

Third-Party Services and Data Sharing

I use third-party services to support the operation of my business. These include:

- Web Hosting (IONOS): Hosted by IONOS (IONOS SE, Elgendorfer Str. 57, 56410 Montabaur, Germany). They may collect technical data such as IP addresses for website functionality. For more details, see IONOS's [privacy policy](#).
- Barclays Bank: For processing payments and managing financial transactions. Barclays may process your data under their own privacy policy. See [Barclays Privacy Policy](#).
- Google Services: I use Google Analytics, Google Fonts, and reCAPTCHA. These services may collect data such as IP addresses and browser details. I have configured Google Analytics to anonymize IP addresses, and data may be transferred to Google servers outside the UK. For more details, see [Google Privacy Policy](#).

I have data processing agreements in place with these third parties to ensure they comply with GDPR.

Anonymised Data

In certain cases, personal data may be anonymised (for example, when a client provides a testimonial). Once anonymised, this data is no longer subject to GDPR regulations, as it cannot be re-identified.

Retention Schedule

I retain personal data for specific periods, aligned with legal and business requirements. Below is the retention schedule for different types of information:

Information Asset	Retention Period	Trigger for Disposal
Client Records (Session Notes, Consultation Forms)	8 years after the final treatment session (or until the client's 25th birthday, or 26th if the client is 17 at the time treatment ends)	End of retention period
Safeguarding Records	5 years after the final treatment session or as per the insurance policy	End of retention period
Email Records	Annual review, delete remaining data after the review period	End of retention period
Promotional Materials	Until superseded, with re-checking of consent prior to reissue	End of retention period
Subject Access Requests	8 years from submission/completion, or 2 years after case closure if after 6 years	End of retention period
Incident/Accident Reports	40 years from the date the report was closed	End of retention period

Secure Data Destruction

When data is no longer required, it will be securely destroyed. Physical data will be shredded using a cross-cut shredder, and electronic data will be permanently deleted.

Section C: Data Protection Rights and Procedures

Right to Access (Subject Access Request)

You have the right to request access to the personal data I hold about you. A Subject Access Request (SAR) must be responded to within one month. If the request is complex, I may extend the time frame to two months, and I will inform you if this happens.

SARs should be submitted in writing to Laura Adlam Therapy Solutions. I will provide a copy of your personal data in an intelligible format and inform you about:

- Why I hold your data
- Who it may be disclosed to
- The processing activities related to your data

Right to Erasure (Right to be Forgotten)

You have the right to request the erasure of your personal data when it is no longer necessary for the purposes for which it was collected or if you withdraw your consent. In such cases, I will ensure the complete and secure deletion of your data, both physical and electronic.

Data Breach Notification

In the event of a data breach, I will notify the Information Commissioner's Office (ICO) within 72 hours, as required by GDPR. If a breach poses a risk to the rights and freedoms of individuals, I will also notify affected clients without delay. The notification will include:

- A description of the breach, the affected data, and the number of individuals involved
- The consequences of the breach
- Measures taken to mitigate the impact

Complaints Process

If you believe that I have mishandled your personal data, you have the right to make a complaint. You can contact me directly, and I will investigate your concern in line with my internal procedures. If you're dissatisfied with the outcome, you can escalate your complaint to the Information Commissioner's Office (ICO) at 0303 123 1113.

Supervision in Case of Serious Illness

In the event of my serious illness or death, my supervisor will ensure that client data is archived according to GDPR regulations, and all clients will be informed appropriately.

Security Measures

To protect your personal data, I use various security measures, including:

- Encryption for electronic data
 - Password protection for devices and documents
 - Secure storage of physical data in locked cabinets
 - Regular review and updating of my security protocols to ensure compliance with GDPR
-

Conclusion

This document outlines how I, Laura Adlam Therapy Solutions, process and protect your personal data in compliance with the General Data Protection Regulation (GDPR). By engaging with my services, you acknowledge your understanding of and consent to the practices outlined here.

If you have any questions or concerns about how your data is handled, please contact me.

Email: info@adlamtherapy.com

Telephone: 07749 813600