

Psychology Plus Privacy Notice and Digital Policy

(up-dated Jan 2026)

Psychology Plus is committed to protecting your privacy. Psychology Plus (Dr Lindsey Macleod) will only use the information collected in accordance with all laws concerning the protection of personal data, including the current Data Protection Act (DPA, 1998) the requirements of EU General Data Protection Regulation (GDPR, 2018) and the Data (Use and Access) Act (2025).

This policy describes the information that Psychology Plus collects and how information is managed when you contact or use the service. This information includes personal, sensitive personal and financial information as defined in the General Data Protection Regulation (GDPR, 2018).

For the purpose of the DPA and GDPR Dr Lindsey Macleod is the data processor and data controller for Psychology Plus. She is registered with the Information Commissioner's Office (ICO) – registration reference ZA109176. The ICO register can be searched at: www.ico.org.uk. Any enquiry regarding the collection or use of your data should be sent to Dr Macleod (lindsey@psychologyplus.scot).

1. Why do I need to collect your personal data?

I need to collect information about you for the purposes outlined below. I will only collect information about you for reasons of legitimate interest, or where there is a legal basis for doing so:

- To verify your identity so that I can be sure we are dealing with right person.
- To know who you are so that I can communicate with you in a personal way.
- To deliver a service to you under the terms of an agreed clinical contract and as required by my regulatory body (HCPC).
- To contact you, should I need to share information. As outlined in Psychology Plus terms and conditions, I only do this where there is a concern regarding a risk of harm to you or others or under other specific circumstances as outlined in this policy.

2. What personal information do I collect and when do I collect it?

- Personal data: Your name, date of birth, and contact details including a postal address, telephone number(s) and electronic contact information such as email address. I will also ask for contact details of your GP and other professionals who have been, or are still currently, involved and your next of kin or emergency contact. This information is collected at our initial contact and the first few face-to-face appointments.
- Sensitive personal data: Information required to deliver a clinical service to you under the terms of an agreed clinical contract and in line with HCPC requirements. This includes a signed contract, clinical notes, letters, reports and outcome measures. This information is collected at our initial contact and at subsequent face-to-face appointments. I may also collect information about you from third parties. If I need to gather information from another health professional (such as your GP or Psychiatrist) to provide a complete health assessment, I will only do this with your consent.
- Medical insurance data (if applicable): This will include your health insurance provider, policy number, authorisation for treatment and billing information.

3. Use of your personal information.

Your information is held in strictest confidence and will not be shared unless:

- You provide consent, e.g. to share information with your GP, psychiatrist or school or other professionals involved in your care.
- It is required by law, e.g. under court order or legal duty.
- There is serious risk of harm – to yourself or others e.g. safeguarding or emergency situations.
- For administrative purposes, e.g. where necessary billing or reporting to health insurers or referrers, for invoicing and tax purposes.

I use the data I collect from you in the following ways:

- To communicate with you so that I can inform you about your appointments - I use your name, your contact details such as your telephone number, email address or postal address.
- To deliver the correct service to you - I use your name, your contact details and the details gathered at your initial assessment appointment and subsequent appointments.
- To maintain accurate clinical records.
- I may use your anonymised data in supervision with other mental health colleagues to ensure that my practice is safe, appropriate and as effective as possible. This is in line with the Health Profession's Council's regulations that stipulate regular clinical supervision as a pre-requisite of registration for clinical psychologists and is in line with the British Psychological Society's Practice Guidelines.
- To communicate with insurance companies if the therapy is being funded by a third party.
- To communicate with other family members or professionals if there is a risk of harm to self or another or if the client and I agree it might be helpful to do so.
- To meet legal, ethical and professional obligations where there is risk of harm to self or another, e.g. to comply with safeguarding obligations or for tax purposes.
- If you, the client, and I agree it might be helpful to do so.

Your data will never be sold or used for marketing.

4. Cookie Policy

- Like most websites, I use cookies to track user interaction. I use this data to determine the number of people using my site, to better understand how they find and use my web pages and to track their journey through the website.
- Although the cookies record data such as your approximate geographical location, device, internet browser and operating system, none of this information personally identifies you to me.

5. Where do we keep your personal information?

- Most of your personal information is held in paper documents but if digital documentation is required (e.g. for the creation of a report) it is stored temporarily on a single computer which is password protected and encrypted. All electronic copies of notes or reports relating to you are securely deleted immediately after they have been printed out (within approximately three hours) and filed in your paper file.
- Mobile phone storage: I may keep your mobile or other contact telephone number stored in the memory of my mobile phone. This would be for contacting you at short notice should the need arise. Only your first name is stored. Your contact details will be removed from my phone when we finish working together. The mobile phone I use is 4 digit pin protected.
- Paper files are stored in a locked filing cabinet in a secure office. During therapy appointments I am required to record relevant information that you provide to me. I do this by taking handwritten notes during and after sessions which are stored in a physical file. I

may use this information to create a report, should you or your insurance provider request it. Your psychology therapy notes/file are securely stored in a locked filing cabinet, accessible only to me.

- In the event of death or incapacity of the therapist, arrangements have been made for records to be held by a named professional colleague who will continue with the above obligations.

6. How long do we keep your personal information?

- I will delete your contact details from my mobile phone once we stop working with each other.
- I retain your paper psychology file/notes for seven years or if you are under 16 years of age, until your 25th birthday (or until your 26th birthday if you are 17 when therapy ends). This is in accordance with the Limitation Act (1980) and guidance issued by my professional body, The British Psychological Society. However, some records may be held indefinitely if there were any issues of concern that could lead to police investigation in the future.
- After this time, I shred your file/notes. All electronic copies of notes or reports relating to you are securely deleted immediately after they have been printed out and filed in your paper file.

7. Who do I send your personal information to?

- I may send a report to you (if applicable) or to anyone I am required by law to inform.
- I may send reports to other health care providers when requested by and authorised by you. I may send a report to insurance providers when authorised by you.
- All reports are sent through the post in paper format.
- If electronic submission of a report is required this will be made via secure, encrypted email, e.g. Egress. This means that files are locked in a digital safe so that only the intended person can open it, preventing the file from being read by hackers while it travels across the internet.

8. Website

- My website is hosted by Easyspace. Easyspace implements appropriate safeguards to protect the Personal Data in accordance with the requirements of UK Data Protection Laws. More details of their website compliance can be found at <https://www.easyspace.com/terms-and-conditions>.
- All traffic (transfer of files) between my website and your browser is encrypted and delivered securely using HTTPS protocol.

9. Email

- I use Google Workspace (including Gmail and Googlemeet) to manage my business communications and operations. Google Workspace is a secure and encrypted email service and is fully GDPR compliant. Data is processed by Google in their data centres, including in the USA. I rely on standard contractual clauses and Google's [EU-US Data Privacy Framework](#) certification for these international transfers.
- However, email may still be vulnerable to viruses or human error. For this reason, it is best to be circumspect about what you include in emails to me, and which email address you choose to use with me. Often, it is best to rely on email for non-confidential communications like setting up appointment times. In an effort to keep confidential and

psychological material “in the room” it is best avoided in emails unless we discuss it beforehand. I will always request your preferred email address from our first session.

- If you choose to communicate with me by email, be aware that all emails are retained in the logs of Internet Service Providers. Furthermore, they can be vulnerable to viruses and unintended forwarding or replication. If you are concerned about the confidentiality of your emails, you may wish to contact me by telephone instead.
- I check emails only at fixed times during office hours – I avoid checking them on weekends and holidays. I endeavour to respond to all emails within 48 hours upon opening them. If I am away for an extended period, you will receive an automated response. Emails should never be used in the event of an emergency, in which case you should contact emergency services.

10. Text messages

- You may feel free to contact me by text message to alert me if you are running late for a session or for similar reasons. However, because of the lack of context of text messages, it is generally not the best method for communicating with me about more important matters, so please do phone and/ or leave me a voice message.
- As an independent practitioner I am unable to offer an emergency service, even by phone. Should you experience an emergency please contact either the emergency services or if you are feeling suicidal, The Samaritans: 116 123 or Breathing Space: 0800 83 85 87.

11. On-line therapy

While I do not generally run my practice remotely, there may be times when this is helpful. I am happy to discuss options with you and to consider the potential risks and benefits of this way of working. Should we ever decide to work together remotely, I will give you further instructions about how to join meetings. When engaging via video conferencing, we both agree not to have anyone else in the room or within ear shot of our sessions. We also both agree not to record sessions. It is crucial that we both agree to take the necessary steps to ensure that the environment from which we are conferencing is safe, secure, and private. Please see the guidance on the PsychologyPlus website on how to get the most out of on-line sessions. I use Googlemeet for online working; this is a secure video conference application and GDPR compliant. However, we can discuss alternatives if these options are not available to you.

12. Record of payments and retention of payment information.

- I keep records of invoices, payments and receipts for accounting purposes. I am required to retain this information for six years in line with HMRC requirements. After six years I delete and/or shred this information.

13. Your rights.

How can I see all the information you have about me?

- You can make a subject access request (SAR) by contacting me. I may require additional verification that you are who you say you are to process this request. Under the Data (Use and Access) Act 2025, I am required to carry out a reasonable and proportionate search when responding to access requests. This means I will search systems where your data is likely to be held (e.g. email, client files) and will aim to provide you with this information within one month of your written request, unless the request is complex.
- I may withhold such personal information to the extent permitted by law. In practice, this means that I may not provide information if I consider that providing the information will violate your vital interests.
- If any data breach occurs that may affect your rights or freedoms, I will notify you and the ICO within the statutory timeframe (usually 72 hours).

What if my information is incorrect?

- Please contact me. I may require additional verification that you are who you say you are to process this request.
- If you wish to have your information corrected, you must provide me with the correct data and after I have corrected the data in our systems I will send you a copy of the updated information in the same format as the subject access request.

How can I have my information removed?

- If you want to have your data removed, I will first have to determine if I need to keep the data, for example in case HMRC wish to inspect our records. If I decide that it is lawful and practical to delete the data, I will do so without undue delay.

How do I make a complaint?

- If you have any queries or wish to raise a complaint on how I have handled your data, you can contact me to have the matter investigated (lindsey@psychologyplus.scot). If you are not satisfied with my response or believe I am not processing your data in accordance with the law you can complain to the Information Commissioner's Office <https://ico.org.uk>. I take all complaints seriously and welcome feedback to improve my procedures.

14. Updating the privacy policy

- This policy is renewed annually, or sooner if legislation or guidance changes. This may entail me making changes to this data protection privacy policy / digital policy. Following any changes, the date at the top of the policy will be updated. If any change allows for the wider access to or sharing of data, such changes will only apply to data collected after the date of the updated privacy and digital policy.