



Client Data Privacy Policy

V3 30 November 2021

1. Definitions

The following definitions are used in this policy:

- Client means any individual who has in the past, is currently, or has expressed interest in, receiving treatment at Magic Hands : Calm Minds.
- Client Data means any necessary information relating to an individual client, including but not necessarily limited to name, address, age/date of birth, email address, telephone numbers, medical history, appointment and treatment details, occupation, diet and lifestyle information, and payments made.
- Consent means written agreement from the Client to hold and process their Client Data as required for the operation of business.
- Processing means using Client Data in order to administer the business, arrange appointments, collect payment, and determine appropriate Client treatment plans.
- Holding means retaining Client Data in hard or soft copy in accordance with Clients' Consent.
- Data Owner and Data Processor means Caeredwen Gregson-Barnes, proprietor and sole employee of Magic Hands : Calm Minds.

2. Reasons for holding Client Data

For the purposes of compliance with General Data Protection Regulations 2016, Client Data is held and processed for lawful reasons of consent, legal obligation and contract.

The table below details the kinds of data held/processed and the reasons for each.

Name	To identify clients
Address	To enable contact with clients by post if necessary
Email address	To enable keeping in touch with clients electronically for marketing and other purposes e.g. informing them of updates to this policy.
Phone numbers (work, home and/or mobile)	To enable contact with clients to make and rearrange appointments, advise of emergencies or pass on other time critical information by phone, text or instant messaging facility.
Age or date of birth	To identify those for whom guardians are required (i.e. under 18) and/or to supplement clients' health information
Medical history	To inform any physical treatment plan and identify any cautions or contra-indications for Bowen Therapy, for the client's safety
Medication taken	To ensure Bowen Therapy will not adversely affect the Client or the efficacy of their medication.
Occupation	To identify any health impacts or factors affecting treatment arising from the kind of work done by the Client.
Diet/lifestyle information	To inform the treatment plan and to enable advice to be given to the client on improving their overall health.
Appointment details	For diary management purposes

Payments made	For debt and financial management, and tax purposes
Photographs of clients	Where specific consent gained, to enable comparison of postural and other physical issues before and after a course of treatment.
Details of GP	To facilitate medical referrals or necessary consultation about the client's receipt of Bowen Therapy or counselling.
Details of each treatment administered	To inform future treatment plans. For counselling, to facilitate legally required professional supervision. To record treatment administered and advice given for reference purposes, including responding to any queries, referrals or claims made by the Client or their representatives.

All Client Data will be held for a period of 7 years after the last treatment administered, to comply with the provisions of Magic Hands : Calm Minds insurance.

3. How is Client Data held and processed?

Only the Data Owner/Processor has access to Client Data except where a third party has legal or other legitimate reason for requiring access. Where this is the case, the clients affected will be informed.

All Client Data is held in hard copy with the exception of the following:

- Appointment details are held in the Data Owner's personal Microsoft Office 365 Calendar.
- Payments made are recorded on a spreadsheet.
- Counselling session records are held in soft copy.

Access to this information is protected by account and device passwords.

While not being processed or updated, hard copy Client Data is kept in a locked cabinet in the Magic Hands : Calm Minds clinic, which is locked while not in use. Out of hours the building is protected by an intruder alarm. Where it's necessary to transfer Client Data to the Data Owner's home (or where a client home visit is being made, to the client's home) hard copy Client Data is kept in the Data Owner's possession or in a locked vehicle.

To prevent loss of information by accidental damage or destruction of paper records, backups of hard copies may be held in soft copy on a password protected laptop and/or in the cloud. Data may also be held in soft copy alone. Information in the cloud will be protected by standard commercial encryption and by password for access.

Client Data may be shared with third parties where a referral to another healthcare professional is made, in which case the individual client concerned will be consulted as to the information to be shared.

Client Data relating to counselling clients may also be shared with the Data Owner's clinical supervisor as required by the provisions of a professional association of which she is a member. Such information is generally shared without any means of identifying the individual client.

The Data Owner has made arrangements through a Lasting Power of Attorney to ensure that Client Data is suitably transferred or destroyed should the Data Owner lose the capacity to manage it herself.