Rachel Crawford
THERAPY

PRIVACY POLICY

Privacy Policy and Therapy Agreement for R Crawford Talk Therapy (includes Sage Hypnotherapy).

These are some brief notes from the privacy policy. The full document is also available for you below. If you have any questions, please just ask. Your privacy is important to me: if we meet outside the therapy session I may smile but otherwise, I will not acknowledge you to maintain your privacy. If we meet socially, I will not talk about our sessions together. I will do my best to assure that we are not overheard in my clinic or at my end of a Zoom call. Here is a link to zoom's privacy policy.

https://zoom.us/docs/en-us/privacy-and-security.html?zcid=3747&creative=431306240810&keyword=zoom%20privacy%20policy&matchtype=e&network=g&device=c&gclid=EAIaIQobChMI9M2iqaCB6gIVCevtCh1TowEf-EAAYASAAEgLpTfD_BwE

▪ Confidentiality - I have an obligation to report to relevant authorities any concerns if I believe the client may be intending to cause harm to themselves, the therapist or others.
▪ A query on suitability or conflict of therapy with other treatment practitioners may have to be sought occasionally, with client permission.
▪ As part of my therapy practice, I keep a brief written record of some information from our sessions. Your privacy is important to me, and I keep these records securely. I will keep these records for 8 years. You are always welcome to see a copy of these records.
▪ I have a privacy policy and am compliant with General Data Privacy Regulations (GDPR) **https://ico.org.uk/for-the-public/** and with the Code of Conduct and Ethics of the CNHC, my professional association **https://www.cnhc.org.uk/code-conduct-registrants**
▪ Data held by Sage Hypnotherapy will be held lawfully and for the retention periods set out in section B of this policy document.
▪ Spreadsheets - I keep my accounts on spreadsheets, but do not use clients' full names.
▪ Hardcopy case notes and files – For the initial consultation my client notes are both handwritten as hard copies and stored in a locked filing cabinet in a locked building. No one else has access to these. I transfer these notes onto digital files and keep digital files only for subsequent sessions. Each of these files are password protected and no one else has access to them. You have the right to amend these notes, and you also have 'the right to be forgotten'. If you would like more details, please see the full handout and feel free ask me for further information and explanation.
▪ Recordings: In the event of wanting to record a session with you, I would ask for your written consent before recording any sessions. For certain sessions, such as Gut Hypnosis sessions, I will offer to record the trance work (hypnosis) section of the session, where I am the only one doing the talking.
▪ Emails - I delete emails from clients every three months. I do not keep a record of your initial enquiry to me.
▪ Text messages - I do not store your number with a name attached on my phone. If you message me, the first line of the message does not appear on my locked screen.
▪ Supervision notes - In accordance with my professional association's code of conduct I have regular supervision sessions, these are for my professional development, and I do not identify my clients.
▪ AI tools - To help prepare personalised session materials such as scripts, I use a third-party AI service (Claude, provided by Anthropic). I enter only your first name or reference number and general session goals, never your surname, contact details or case notes. I review everything it produces, and you can ask me not to use AI in your care. See "Use of AI tools" in Section B for details.
▪ Visits to the organisations' website: my website www.rcrawfordtherapy.co.uk (alternate address: www/sagehypnotherapy.co.uk) also has a privacy policy. The privacy policy of WIX, the website host is available through the link below in the full document.
▪ Social media communication - I use social media for promotional purposes but never talk about clients. The posts are about hypnotherapy or SFBT in general. A link to Facebook and Instagram's privacy policy is below in the full document.

If receiving medical treatment of any kind, it is recommended that proper diagnosis is sought where relevant. It is always best to consult your doctor before having any complementary therapy, including hypnotherapy and SFBT. It's important to note that results may vary from person to person.

Introduction
My name is Rachel Crawford; I am a Solution Focused Therapist working under Rachel Crawford Therapy and Sage Hypnotherapy. I am the named data controller, and I am registered on the ICO website in accordance with the rules of the General Date Protection Act May 2018. https://ico.org.uk and in accordance with the Code of Conduct and Ethics of the CNHC, my professional association: https://www.cnhc.org.uk/sites/default/files/Downloads/CodeofConductEthicsandPerformance.pdf

Data held by R Crawford and Sage Hypnotherapy will be held lawfully and for the retention periods set out in section B of this policy document.

This document refers to:
• Written Documents - I keep brief notes of our sessions together. I am the only person who has access to them.
• Spreadsheets - I keep my accounts on spreadsheets; I do not use your full name.
• Hardcopy case notes and files - My consultation notes are written down without a client name, then transferred to password-protected digital copies, whilst the handwritten notes are stored in a locked filing cabinet in a locked building.
• Emails - I delete emails from clients every three months.
• Text messages - I do not store your number with a name attached on my phone. If you message me, the first line of the message does not appear on my locked screen.
• Supervision notes - In accordance with my professional association's code of conduct I have regular supervision sessions, these are for my professional development, and I do not identify my clients.
• AI tools - I use a third-party AI service to help prepare personalised session materials, using only a first name or reference number and general session goals.
• Visits to the organisations website - my website www.rcrawfordtherapy.co.uk also has a privacy policy.
• Social media communication - I occasionally use Facebook and Instagram but never talk about clients. The posts are about hypnotherapy, or Neuroscience/SFBT in general.

Aim and Purpose
The purpose of this document is to ensure that Sage Hypnotherapy has a framework that ensures the rights and freedom of individuals in relation to their personal data (Article 1) and adheres to best practice in the management of client information and business records.
Information Governance sets out the way in which information collated by an organisation is managed and ensures that any information collected:

• is the right information - you have the right to see any information I have on you, and the right to make any corrections.
• is in the right place - I make sure your data is secure.
• at the right time - I will keep your data in accordance with the CNHC code of conduct
• with the right people - my therapy room is within my private home, near the entrance and away from the rest of the property's rooms. No one else enters this room or has access to hard or digital files.
• for the right reasons - I will only ask you details that I think may be useful for our therapy sessions together.

This is a live document and may be updated at any time to reflect changes in law or growth of the business and therefore should be revisited regularly to check for any updates. Sage Hypnotherapy is fully committed to ensuring clients privacy and data protection rights.
For the purpose of this policy Rachel Crawford is the named Data Protection Officer/Controller and Head of Organisation.

Compliance with GDPR Article 5 Principles
All processing of your personal data complies with the following principles under GDPR Article 5:
•Lawfulness, fairness and transparency: Your data is processed lawfully with your consent, fairly, and with complete transparency about how it is used
•Purpose limitation: Your data is processed only for the provision of hypnotherapy services and related communications
•Data minimization: I collect only the data necessary to provide you with safe, effective therapy
•Accuracy: You have the right to request correction of any inaccurate data held about you
•Storage limitation: Data is retained for 8 years (or longer if required by law) and securely destroyed thereafter
•Integrity and confidentiality: Your data is protected with encryption, password protection, and secure physical storage
•Accountability: I maintain detailed records of all processing activities (as outlined in this policy)

Data Protection Impact Assessment (GDPR Article 35)
What is a DPIA?
A Data Protection Impact Assessment (DPIA) is a process to identify and mitigate risks when processing personal data in new or risky ways.

Do I carry out DPIAs?

As a solo complementary healthcare practitioner processing limited data for therapy purposes, I do not routinely carry out formal DPIAs, other than for my use of an AI tool (see below), as the processing poses minimal risk:

•Data is processed for a single, clearly defined purpose (therapy delivery)
•The volume of data is small
•Only I have access to data (the AI tool described in Section B receives only a first name or reference number and general session goals)
•Clients have explicitly consented to processing
•Data is held securely with multiple layers of protection

If I introduce new processing methods (e.g., online therapy platform, video recordings, client database software), I will carry out a DPIA to assess risks and implement appropriate safeguards before introducing the new method.
I have carried out a short DPIA for my use of an AI tool to help prepare personalised session materials. Safeguards include entering only a first name or log number and general goals, switching off model training and memory, and deleting conversations after use. [Insert date of DPIA. Complete this before publishing the policy.]

You can request a copy of any DPIA I carry out by contacting me in writing.

Information Governance Framework Principles for Rachel Crawford Therapy (including Sage Hypnotherapy)
I have undertaken training in GDPR regulations.

1.Assessment needs for Information Governance (IG) Training have been identified and fully met, with a 75 minute GDPR CPD Course provided by Tania Taylor through the Clinical Hypnotherapy School (www.clinicalhypnotherapyschool.com)

2.Any changes to the business processes and/or operations will be planned and will comply with the framework to ensure any risks to personal and sensitive information are minimised.

3. Any data collected is solely for the purpose of providing a person-centred service to an individual client.

4. The Caldicott Principles are used to provide guidance in best practice when handling personal data, alongside the ICO's Office Codes of Practice. (https://www.igt.hscic.gov.uk/Caldicott2Principles.aspx)

5. All technology [Microsoft Office products including Outlook, and the AI service Claude] used to store or facilitate information and communication is maintained according to the Data Retention Policy for Sage Hypnotherapy.

6. All records are identifiable, locatable, retrievable, and intelligible according to regulations set out by GDPR.

7. It is the responsibility of the Data Controller (Rachel Crawford) to ensure sufficient resources are in place to prioritise adhering to Data Protection Legislation in the business.

9. Any electronic devices where personal or sensitive, confidential information is
held will be password protected. Individual documents stored electronically will also contain individual passwords.

10. Procedures have been put in place to ensure the General Data Protection Regulations are met. These can be found in Section C.

Section B
Privacy Notice: Use of information
In accordance with this data retention schedule there may be occasions when data is not destroyed due to ongoing investigation, ligation or enquiry. The data will be deleted upon confirmation that it is no longer required.
On some occasions anonymised personal data will be retained whereby a client has provided a testimonial for use on the organisation's website. When data is non-identifiable GDPR law is no longer applicable. [Non-identifiable means that if this data was left on a bus, no one, including the data subject would be able to identify that this data was relating to them.

• Personal information is collated and stored in hardcopy in a locked filing cabinet.
• Any document containing personal data will state "Official-sensitive, private and confidential" clearly.
• All emails will contain a privacy statement. Under the General Data Protection and Retention (2018) legislation, regarding how your personal data is processed, all individuals have;
• the right to be informed:
• the right of access; - to see your data, this is called a "subject access request'
and there are more details about this below. Essentially it means you have the right to see information I may have about you.
• the right to rectification; - to make corrections to your data if you need to.

• the right to erasure; to be forgotten. Please make this request in writing to me, Rachel Crawford, 10 Bude Street, Appledore, Bideford EX39 1PS or email me at rachel@sagehypnotherapy.co.uk I may not be able to comply with your request, depending on the rules of my insurance company (Holistic Insurance http://www.holisticinsurance.co.uk) and CNHC regulations on client records, 8 years after final treatment session has ended. Child records should be held until after 25th birthday, or 26th birthday if aged 17 when treatment ends.
• the right to restrict processing; There is a full description on this below, a very brief explanation is that I would need your explicit consent to email you for anything other than something directly related to our therapy sessions. For example, I could email you about an appointment change but not about another service unless you had agreed to that first.
• the right to data portability
• the right to object, and
• the right not to be subject to automated decision-making including profiling.

Please note that Sage Hypnotherapy does not use automated decision-making tools, including profiling. AI is used only to help draft materials, which I review; no decisions about your care are made by AI.

Website visitors
When an individual visits www.rcrawfordtherapy.co.uk I use Google analytics who are considered a third-party service, to collect information about what visitors do when they click on my website, e.g. which page they visit the most.
Google analytics only collect non-identifiable data which means I or they cannot identify who is visiting. Sage Hypnotherapy will always be transparent when it comes to collecting personal data and will be clear about how that data is processed.

Wix
Wix is a third-party service that hosts Sage Hypnotherapy's website. Wix also uses anonymised data to collect visitor information such as how long an individual remains on a page of a website. Wix privacy notice can be found here for further information: https://www.wix.com/about/privacy

Retention Schedule

Information Asset	Retention	Trigger for Disposal	Secure Disposal Method
Email (including sent items)	I delete emails from clients every 3 months as part of active management. An annual review period every June provides additional governance oversight of any remaining live data, with untouched data retained until the following June review period	End of 3 month period; additional review every June.	Permanently deleted from email system
Contact details held on mobile devices	All entries to be deleted prior to decommissioning of mobile device or reissue of device	End of retention period	Permanently deleted.
		End of retention period	"
Recordings	5 years or earlier if consent is withdrawn	End of retention period	"
AI tool conversation history	Not retained: deleted when each piece of work is finished	End of retention period	Permanently deleted from the AI service
Images taken	5 years or earlier if consent is withdrawn	End of retention period	"
Promotional materials	Until superseded – consent to be rechecked prior to reissue	End of retention period	"
Paper Diaries	3 months from the period in which its use ends		"
Policies	Until new policy has been put in place		"
Client records including session notes, initial	In accordance with CNHC regulation, 8 years after final treatment session has		"

consultation notes and client overview form	ended. Child records should be held until after 25th birthday, or 26th birthday if aged 17 when treatment ends.	End of retention period	
Safeguarding records	In accordance with the current organisation's insurance policy, 5 years after final treatment session has ended, unless superseded by new insurance policy.	End of retention period	"
Sat Nav records	All entries to be deleted prior to decommissioning of mobile device or reissue of device.	End of retention period	"
Waiting lists	Annual review period every January, old waiting list destroyed and new waiting list developed with any remaining live data transferred to new live document.	End of retention period	"
Continual Professional Development Records	To be retained when worker is in service and until 8 years afterwards.	End of retention period	"
Worker supervision records	To be retained when worker is in service and until 8 years afterwards.	End of retention period	"
Service evaluation records	Transfer to anonymised data within 6 months of collection	End of retention period	"
Tax returns	6 years from the end of the financial period to which they pertain to.	End of retention period	"

Incident/Accident reports	40 years from date report was closed	End of retention period	"
Insurance policies	40 years from date policy ended	End of retention period	"
Complaints	2 years from complaint being resolved	End of retention period	"
Right to Erasure Request	8 years from request being submitted and completed	End of retention period	"
Subject Access Request	8 years alongside session notes, or plus 2 years from case closure if request is made after 6 years of storing data.	End of retention period	"

Hard copy data will be destroyed via a cross shredder owned by the business/ electronic data will be permanently deleted.

Data Processing
Lawful Basis for Processing (GDPR Article 6)Your personal data is processed on the following lawful bases:
1. Consent (Article 6(1)(a))For optional communications such as newsletters, appointment reminders, or feedback requests, processing is based on your explicit consent. You can withdraw this consent at any time without affecting the lawfulness of processing based on consent before its withdrawal.
2. Contractual Necessity (Article 6(1)(b))Processing your contact details, therapy notes, and payment information is necessary for the performance of our therapy contract and to provide you with the services you have requested.
3. Legal Obligation (Article 6(1)(c))

Where required, I may process your data to comply with legal obligations (e.g., safeguarding requirements, court orders, police requests).

Sensitive Data - Health Information (GDPR Article 9)
Your health data is processed under the professional secrecy exception (Article 9(2)(h)), which permits processing of health data by health professionals bound by professional secrecy obligations. I am bound by professional secrecy under the CNHC Code of Conduct, Ethics and Performance, and this privacy policy, in addition to data protection law.

My professional secrecy obligations arise from:
1.The CNHC Code of Conduct, Ethics and Performance, which requires me to maintain client confidentiality
2.The Data Protection Act 2018 (UK)
3.Professional and common law duties of confidentiality
4.This Privacy Policy

Additionally, I obtain your explicit consent (Article 9(2)(a)) to process your health data, providing a second, layered legal basis.

Your health data is processed only:

•To provide you with therapy services
•To maintain accurate treatment records
•For clinical supervision (non-identifying)
•To comply with safeguarding/legal obligations
•As necessary for insurance claims or complaints investigations
•To prepare personalised session materials using an AI tool (first name or reference number only)

Use of AI tools
To help prepare personalised session materials (for example, relaxation or hypnosis scripts), I use a third-party AI service, Claude, provided by Anthropic. I enter only your first name or reference number and general session goals. I never enter your surname, contact details or case notes. I review and edit everything it produces, and no decisions about your care are made by AI.
Anthropic handles this information under its own privacy policy for consumer accounts. I have switched off the setting that allows conversations to be used to train its models, and I do not use its memory feature. [Information may be processed outside the UK under appropriate safeguards.] This use is covered by the same lawful basis and Article 9 condition as your therapy, set out above. I do not keep AI conversation history: each conversation is deleted when the piece of work is finished, as shown in the retention schedule.
You can ask me not to use AI in your care and I will prepare your materials without it. If you make a subject access request, I will include details of any information I have entered into the AI tool about you.

Withdrawal of Consent (GDPR Article 7(3))You can withdraw your consent to any form of processing at any time, without giving a reason, and without affecting the lawfulness of processing that occurred before withdrawal.
To withdraw consent, simply contact me:📧 Email: rachel@sagehypnotherapy.co.uk 📞 07876642230 📮 Post: 10 Bude St, Appledore EX39 1PS.

State specifically which consent(s) you wish to withdraw. I will confirm withdrawal within 5 working days and will cease the relevant processing immediately.

Please note: Withdrawal of consent for optional communications (e.g., newsletters, appointment reminders) does not affect the lawfulness of your therapy contract or my legal obligations (e.g., safeguarding requirements).

Section C
Data Breach
Data Breach Notification (GDPR Article 33 & 34)
What is a data breach?
A data breach is an accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data.

My obligations:
If a data breach occurs affecting your personal data, I will:

Within 72 hours (Article 33):
•Notify the Information Commissioner's Office (ICO) unless the breach is unlikely to result in risk to your rights and freedoms
•Provide the ICO with:
•Date and time of the breach
•Description of what happened
•Likely consequences
•Measures taken or proposed to address the breach
•Contact details for further information

Notification to you (Article 34): If the breach poses a high risk to your rights and freedoms, I will notify you without undue delay by:
•Email (to the address I hold for you)
•Phone call
•Registered post (if I do not have an email address)

What I will tell you:
•What data was affected
•What happened
•What risks this poses to you
•What you can do to protect yourself
•What I am doing to address the breach

Documentation:
I will keep a record of all data breaches, including:
•Dates and times
•Facts and effects
•Remedial actions taken
•Why notification was or was not provided
All records are retained for 8 years as part of my accountability obligations.

Exception:
If your data was encrypted or otherwise technically protected in such a way that it cannot be read without the encryption key, I may not need to notify you, as the risk to your rights and freedoms is unlikely.

Subject Access Request
Right of Access (GDPR Article 15)You have the right to obtain confirmation of whether your personal data is being processed by me, and to receive a copy of that data, together with information about:
•The purposes of processing
•The categories of data processed
•Who has received your data
•How long it will be retained
•Your rights under GDPR
How to request access:
Submit a Subject Access Request (SAR) by contacting me in writing (email or post) with 'Subject Access Request' in the subject line: Email: [rachel@sagehypnotherapy.co.uk] Post: 10 Bude St, Appledore EX39 1PS.

Timeframe:
I will respond without undue delay and in any case within one month of receipt of your request. If your request is complex or you have submitted multiple requests, I may extend this by up to two further months, in which case I will inform you of the extension and the reasons for it within one month of receipt.
Cost:
Access to your data is provided free of charge. If your request is manifestly unfounded or excessive, particularly if repetitive, I may refuse to respond or charge a reasonable fee for administration costs.

What you will receive:
A copy of your personal data in a structured, commonly used format, including:•Your therapy notes and records
•All correspondence and communications
•Any recordings or images (if applicable)
•Any data you provided to me

•Details of any third parties your data has been shared with.

Right to Rectification (GDPR Article 16)You have the right to request correction of inaccurate or incomplete personal data held about you.
How to request rectification:
Contact me in writing (email or post) stating which data is inaccurate or incomplete and providing corrected information: Email: rachel@sagehypnotherapy.co.uk Post:10 Bude St, Appledore EX39 1PS.

Timeframe:
I will respond within one month and implement corrections promptly. If your data has been shared with others, I will inform them of the rectification where possible.

Important note regarding therapy records:

Therapy notes record what occurred in sessions as accurately as possible at the time. I cannot alter historical records, but I can add a dated note clarifying your position on any point you believe is inaccurate. This ensures a complete and accurate record while maintaining the integrity of my clinical documentation.

Right to Restrict Processing (GDPR Article 18)
You have the right to request that I restrict (temporarily stop) processing of your personal data in the following circumstances:
•You dispute the accuracy of your data (while I verify accuracy)
•Processing is unlawful and you oppose erasure
•I no longer need the data but you need it for legal claims
•You have objected to processing and I am considering whether my legitimate interests override yours

How to request restriction:
Contact me in writing with your request: Email: rachel@sagehypnotherapy.co.uk] Post: 10 Bude St, Appledore EX39 1PS.

What happens:
I will stop processing (except storage) while the restriction is in place and will inform you before lifting any restriction.

Exceptions:

I may continue processing if:

•You consent
•It is necessary for legal claims
•It is necessary to protect your rights or those of others
•It is necessary for important public interest reasons

Important: If processing is restricted, I may continue to provide your therapy services, as this is essential to your care and contractual agreement.

Right to Data Portability (GDPR Article 20)
You have the right to receive your personal data in a structured, commonly used, machine-readable format and to transmit that data to another service provider without hindrance from me.

When this right applies:
•Processing is based on your consent or contract
•Data has been provided by you (not inferred or generated by me)

How to request portability:
Contact me in writing: Email: rachel@sagehypnotherapy.co.uk Post:10 Bude St, Appledore EX39 1PS.

Timeframe:
I will provide your data within one month of your request, in a commonly used format (such as CSV or PDF).
What you will receive:
•Your contact details
•Your therapy notes and records
•Any data you provided to me

What is not included:

•My clinical assessments and professional opinions
•Supervisor notes (these are my working documents, not data you provided)
•Information compiled from multiple data sources that cannot be disaggregated

Right to Object (GDPR Article 21)
You have the right to object to processing of your personal data in certain circumstances.

Right to object to direct marketing:

You have the absolute right to object to processing your data for direct marketing purposes (newsletters, promotional communications, feedback requests). I will cease such processing immediately upon request, without charge.

Right to object to other processing:
For other processing (such as essential therapy communications), you have the right to object on grounds relating to your particular situation. I will then cease processing unless I can demonstrate compelling legitimate interests that override yours.

How to object:
Contact me in writing stating your objection: Email: rachel@sagehypnotherapy.co.uk Post: 10 Bude St, Appledore EX39 1PS.

Timeframe:

I will respond within one month and confirm cessation of processing or explain my reasons for continuing.

For direct marketing: Processing will cease immediately and you will not receive further marketing communications.

Right to Erasure
Any person may put in a request for their personal data to be removed (the 'right to be forgotten' or the 'right to erasure'). In this instance hard copy data will be shredded using a cross-shredding machine owned by the organisation and any electronic data will be permanently deleted. The client will be notified of the completion. The request for deletion of data and the confirmation of completion will be held securely until eight years after the request was made.

Complaints
Sage Hypnotherapy hopes to the meet the highest quality standards when processing personal and sensitive data. Complaints can help identify areas for improvement and therefore Sage Hypnotherapy would welcome you raising any concerns you have.
These Information Governance Policy documents were created to be as transparent and understandable as possible. It will not be completely exhaustive of all aspects of data collection. If you would like further information about a specific process, please contact Sage Hypnotherapy.

If you feel you would like to make a complaint about how your personal and sensitive data is handled by Sage Hypnotherapy you can contact Sage Hypnotherapy directly. In the event that Sage Hypnotherapy cannot resolve your complaint to your satisfaction you can contact the Information Commissioners Office on 0303123 1113.

Safeguarding your privacy
In the event of my death or sudden illness, my husband at this address will contact existing clients and archive any client files in accordance with General Data Protection Regulations.

Please do feel free to ask me any questions about this or any other aspect of your care.

Rachel Crawford DPH HPD AHD
Solution Focused Therapist
10 Bude Street
Appledore
Bideford
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