

Digital Policy

This digital policy aims to address and contain the most likely eventualities that may arise by way of digital exposure, as we increasingly make use of this medium to be in contact, whether that is through online therapy or simply through our text and email contact. It is written to help ensure that our work is held in the most effective way possible, and that we consider how best to maintain privacy and data protection.

This document acknowledges the complex world of digital media and tries its best to address issues that may impact the therapeutic relationship. The guidelines are based on choices I have made with regard to my own online activities; I am open to changing my positions on it. In the meantime, I ask all my clients and supervisees to read through this document so they can be familiar with these positions.

It's always good that we take time to talk through this policy when we meet together. We may find that we continue to shape the contract more personally, if it feels appropriate to do so.

Keeping Boundaries: The nature of an online presence can blur interpersonal boundaries, so it is important to be as clear as possible about how boundaries may be compromised. As a general rule, I like to keep our therapy work in the therapy room as much as possible. However, the nature of the digital world can sometimes stretch these boundaries. This policy is designed to consider the impact of this.

Email:

I am not currently using an e-mail encryption programme, so any emails we send to each other may be vulnerable to viruses or human error. For this reason, it is best to be thoughtful 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 and things like that. 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 text or phone instead.

I check emails only at certain times during office hours – I avoid checking them on weekends and holidays. I endeavour to respond to all emails within 24 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.

Text messages:

It is good 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 leave me a message, if an email does not feel appropriate.

As a private 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, ring The Samaritans: 116 123. If you feel that this may be an issue, please discuss it with me.

Telephone and Video conferencing (Vsee/Zoom):

If we decide that it is appropriate for us to work via Video conferencing, I mainly use the Vsee video conferencing system, which is fully encrypted and complies with the GDPR regulations. If Vsee does not work, for whatever reason, we may decide that Zoom is preferred, as it is also fully encrypted and GDPR compliant. Should we decide to work together remotely (via phone or video app) there is a separate document which gives further instructions about how to join and what to expect, which is also available on my website. When engaging via video conferencing, we both agree not to record sessions. It is also crucial that you're sure that you're in a safe, secure, and private place, which has a reliable connection for phone/internet use, when we meet in this way. I also advise that you either use a device which is for your own personal use and that is passcode protected and/or that you make sure that you have signed out of the app after our session. This is to help protect your confidentiality in your own environment.

Social Media:

Despite my online presence, I would prefer that our relationship remain as much as possible between us in the therapy room. I will not knowingly engage with clients or supervisees over social media, as it creates the potential for our work to feel compromised and uncontained. I currently have a Facebook page for my therapy work, which simply gives contact information and a link to my website. I also, like many others, maintain a private Facebook account for personal reasons, and a LinkedIn account for professional ones. I aim to keep my Facebook as private as possible and it would not be appropriate to be Facebook "friends" with former or current clients. I acknowledge that there can be some overlap across social networks, and that this sometimes comes to light on Facebook. If this were the case, it would be something we would need to discuss in session. Similarly, I have decided that it would not be appropriate to add current or former clients as "connections" on Linked-In.

Google:

I have found it is best to avoid encountering information about you that does not come directly from you, so in general practice I do not Google my clients. I am aware, however, that clients will often Google prospective therapists as part of their process in choosing one. If you did so with me, and this produced any questions, I would be happy to address them with you. I have found it is best to find out from each other what we need to know face-to-face.

General Data Protection Regulation (GDPR):

NB: For more information about how and how long I keep your text, email and written information, please see my client-therapist agreement document. This agreement includes a specific section where you sign to give your permission for me to hold your data in the ways set out. I am registered with the Information Commissioners Office to hold such records.

Please do ask me if there is anything else that you would like to know about my data protection policy, or if anything is unclear.

You have a right to know what information I keep about you. In addition to the information collected during our initial assessments, I also keep brief notes about our sessions together. These notes are kept manually, on pad and paper, and are not kept alongside information that identifies you.

My written notes are stored in a lock-box/locked filing cabinet. I am the only one with access to these. In the event of my death or incapacitation, I have appointed a trusted colleague as executor, who is the only person who has permission to access these details, so that you can be contacted. My notes are not shared with anyone other than anonymously within supervision or other professional confidential contexts. Under rare circumstances, notes can be subpoenaed in a court of law. Because of this, I try to keep my notes to a minimum. I will keep your notes for 3 years after our therapy ends, after which they will be destroyed.

You have the right to request any information I keep about you. As these notes are hand written and for my own use only, I would advise that we discuss together your reasons for requesting them in therapy. After this conversation, should you request a written copy, I will require time to type them up and you can have them within one calendar month.

I store your main contact phone number in my work phone. This phone is passcode protected and only used for work purposes, so that I can contact you quickly should I need to. If you would prefer that I did not hold your number in this way, let me know and I will only keep it in the locked file. If we agree to work together on Vsee or Zoom, you will be asked to give specific permission for me to hold your email address in the app, for the duration of time that we are working together. The devices I use for this work are all passcode protected.

You have the right to have the information I hold about you erased. If you would like me to delete your information, let me know. However, as above, I may need to retain your notes for a required period of time, under legal requirements, after which they will be deleted. In general, I will only hold the minimum of information I need about you to carry out my duties, and will regularly audit and clear such data.