



The Centred Occupational Therapy Practice Ltd

Rhona Harkness
Occupational Therapist and Director

<p>The Centred Occupational Therapy Practice Ltd is located at 7 Ladylands Terrace, Selkirk, TD7 4BB. (“The Centred Occupational Therapy Practice Ltd”, “The Centred OT Practice”, “We” or “Us” or “Our”). The Centred OT practice has an additional trading arm of the Equi-OT. We are registered on the Information Commissioner's Office Register registration number ICO: ZB258389.</p>	
Distribution:	<p>Policies and Procedures Manual Internet: The Centred Occupational Therapy Practice Ltd website.</p>
Version Number:	1
Approved by:	Rhona Harkness, Director
Author:	Rhona Harkness, Director
Relevant Compliance:	<p>The purpose of this policy is to ensure that The Centred Occupational Therapy Practice Ltd complies with the Data Protection Act 2018 and the General Data Protection Regulation (Regulation (EU) 2016/679) and/or any relevant law implemented because of General Data Protection Regulation and E Privacy Law.</p> <p>https://www.legislation.gov.uk/ukpga/2018/12/contents/enacted</p>
Policy Purpose:	<p>This Policy lays out the commitment of The Centred Occupational Therapy Practice Ltd as a company to adhere to the Data Protection Act 2018 and the General Data Protection Regulation (Regulation (EU) 2016/679) and/or any relevant law implemented because of General Data Protection Regulation and E Privacy Law (together, "Data Protection Laws"). It makes a clear statement of intent to do so and then lays out how this will be achieved.</p>

Data Protection Policy 2021-2024

The Centred Occupational Therapy Practice Ltd Statement of Intent:

The Centred Occupational Therapy Practice Ltd is required to collect and use personal information about people with whom it deals to be able to operate. The Centred Occupational Therapy Practice Ltd takes confidentiality and privacy rights very seriously and is committed to ensuring that the legal framework provided by GDPR for the appropriate handling and disclosure of personal data is adhered to.

The Centred Occupational Therapy Practice Ltd is a limited company registered in Scotland. Company Registration No. SC708084. Registered Offices: 7 Ladylands Terrace, Selkirk, TD7 4BB, Scotland.

Tel: 07792951701 rhona@thecentredotpractice.co.uk

For the purpose of the Data Protection Act 2018 and the General Data Protection Regulation (Regulation (EU) 2016/679) and/or any relevant law implemented as a result of General Data Protection Regulation and E Privacy Law (together, "**Data Protection Laws**"), The Centred Occupational Therapy Practice Ltd are a:

1. data controller in respect of any personal data that is shared with us by an individual, or that we collect, through our website (including any personal data that is provided to us by an individual, or that we collect, during an individual's registration for, and subscription to, the services we provide) or otherwise in an individual's communications with Us; and
2. data processor in respect of personal data that an individual shares with us as part of that individual's use of the services that we provide, and in respect of which the individual is the data controller. Our and the individual's respective obligations in relation to that personal data are set out in this Data Protection Policy and Our Terms and Conditions.

Personal data is any information relating to a living individual who can be identified from that information. Please note that personal data includes expressions of opinion and indications of intention in respect of an individual.

Policy Objectives

The Centred Occupational Therapy Practice Ltd is committed to:

1. Explaining to service users by means of a privacy notice what personal data is held about them and how it is collected.
2. Taking care of service users and respecting their privacy.
3. Reviewing this policy on a 3-year cycle or when a significant change or legislative change takes place.

T In line with the Six Principles of GDPR personal data will be:

4. Processed fairly and lawfully, and in a transparent manner in accordance with at least one condition set out in the GDPR.
5. Collected for specified, explicit and legitimate purposes and not further processed in any way incompatible with those purposes.
6. Adequate, relevant, and not excessive in relation to the purpose for which it was collected.
7. Accurate and up to date.
8. Kept for no longer than is necessary.
9. Protected by appropriate technical and organisational measures which guard against unauthorised or unlawful processing of personal data, or accidental damage to, or loss or destruction of, personal data.

Policy Responsibilities:

Prime responsibility for data protection lies with the director of The Centred Occupational Therapy Practice Ltd. Anyone contracted by The Centred Occupational Therapy Practice Ltd will be provided with a copy of this policy and held responsible for adherence. The individual currently designated as the data protection officer is Rhona Harkness.

Responsibility of the Director

1. Accountable to oversee and be responsible for The Centred Occupational Therapy Practice Ltd activity.
2. To provide all service users who access The Centred OT Practice with the Privacy Notice.
3. To make key information available to Service Users at the time we collect information from them.
4. Develop and maintain good quality records about the service users we are working for and with.
5. Managing when service users uphold their right to see all the information recorded about them by the company.
6. Maintain the process for ensuring that data is deleted or destroyed routinely at the appropriate time.
7. Manage risks when data is "in transit"
8. Password-protected all relevant documents and sending the password in a separate email.
9. Ensuring external organisation can give us satisfactory guarantees about the security measures they take.
10. Notify the Information Commissions Office (ICO) of any breaches.
11. When working in collaboration with other organisations we will sort out clearly (and in writing) who is responsible for what, in order that there are no Data Protection gaps.
12. When engaging external suppliers to handle data for us in any way, our contract will set out their responsibilities to handle data in a way that will not cause us to be in breach
13. To be transparent with the identity and contact details of our company and the person who is responsible for Data Protection.

Useful Links

Information Commissions Office: Independent authority (UK)
<https://ico.org.uk/about-the-ico/who-we-are/scotland-office/>

Approved: Rhona Harkness, Director

Date: Nov 4th, 2021

Review Date: Nov 4th, 2024