

**Data Protection Policy and Privacy Policy
for Dr Wendy Jane Broad, Mind-Body-Awareness and Mindfulcalm
25 May 2018**

The Policy

This is a statement of the data protection policy adopted by Dr Wendy Jane Broad (sole-trader operating with the names Mind-Body-Awareness and Mindfulcalm). To perform its function, Dr Wendy Jane Broad, Mind-Body-Awareness and Mindfulcalm needs to collect and use certain types of information about people undertaking lessons, courses and classes in the Alexander Technique and in Mindfulness-based approaches and also from people having Bowen Technique therapy treatments.

Client data held:

Paper-based

Client data is held in paper-based client records for:

- Alexander Technique lessons, courses and workshops
- Bowen Technique therapy treatments
- Mindfulness-based courses, lessons, workshops and classes

Electronic

Where clients have 'opted in' to receive marketing information about special offers or events, client data is held electronically as the client's name and email contact address.

The 'Lawful Basis' for data collection and use

1) Client data held in client records

Personal information provided by you in your client record is held and processed by Dr Wendy Jane Broad, Mind-Body-Awareness or Mindfulcalm on a contractual lawful basis. This means that you are contracting with Dr Wendy Jane Broad, Mind-Body-Awareness and Mindfulcalm to provide a service for you in exchange for payment. This allows the information to be processed in the run up to the contract, during the contract and after the contract. The terms of the contract are agreed when your client record form is signed. Where client data is processed for persons under 18 years of age, the young person is also a party to the contract as well as the parent or guardian.

2) Client data held as client's name and email address for marketing purposes

Client data held as the client's name and email address for marketing purposes is held on a consensual basis. This means that you are consenting for your data to be used according to the terms of our privacy agreement. It gives you the power to decide whether or not you want to continue with the privacy agreement. You can withdraw your consent for your data to be retained at any time.

Processing of 'Special Category' client data

Special category data relates to the collection and use of sensitive personal data held in client records. Dr Wendy Jane Broad, Mind-Body-Awareness and Mindfulcalm processes special category data under the GDPR Article 9 category (i) for reasons of public interest in the area of

public health to ensure high standards of quality and safety of health-care provision. This is necessary for the purposes of storing health records for the provision of Bowen Technique treatments, Alexander Technique lessons, courses and workshops and for the delivery of Mindfulness-based approaches.

Retention of client data

Alexander Technique and Bowen Technique client data is held for a period of 8 years from the date of the client's last visit or if the client is a child, until his or her 25th birthday, or 26th birthday if the client was 17 at the last visit.

Client data for Mindfulness-based approaches is held for 5 years for people over 18 years from the date of the client's last visit or, if the client is under 18 years of age, data is held for 5 years after the client's 18th birthday.

Reasons for holding client data

- 1) To comply with Complementary and Natural Healthcare Council (CNHC) registration
As a registrant of the CNHC, Dr Wendy Jane Broad, Mind-Body-Awareness and Mindfulcalm have a legitimate interest' in retaining Bowen Technique and Alexander Technique client records. Section B8 of the CNHC Code requires registrants to keep client records safely and in good condition for 8 years from the date of the client's last visit or, if the client is a child, until his or her 25th birthday, or 26th birthday if the client was 17 when the treatment ended.
- 2) Insurance purposes
It is a requirement of Holistic Insurance Services, who provide insurance cover for Dr Wendy Jane Broad that client data is collected and stored for 5 years for people over 18 years old and for people under 18 years old, data is to be kept for 5 years following their 18th birthday. Client records for Mindfulness-based approaches are held for 5 years for people over 18 years from the date of the client's last visit or, if the client is under 18 years of age, data is held for 5 years after the clients' 18th birthday.
- 3) To help Dr Wendy Jane Broad to respond to your needs
People taking Alexander Technique lessons and courses or receiving Bowen Technique treatments Dr Wendy Jane Broad, Mind-Body-Awareness and Mindfulcalm, agree to provide personal information in their client records to assess their physical health status prior to starting treatments, lessons or courses. The personal information allows activities or treatments to be tailored to the needs of the individual.
- 4) To assess course suitability
People taking mindfulness-based courses with Dr Wendy Jane Broad, Mind-Body-Awareness or Mindfulcalm, agree to provide personal information in client records to assess their mental and physical health status in order to determine the type of mindfulness-based activities, which are appropriate to their needs. Mindfulness courses may not be suitable for people experiencing major depression or other clinically diagnosed psychiatric illnesses, such as bipolar disorder, psychosis or current self-harming.
- 5) To identify and protect those at risk from harm
- 6) To enable contact to be made with family or friends in the event of an emergency
- 7) To maintain and ensure accuracy of our records
- 8) To allow us to respond to enquiries you make
- 9) To administer any events in which you participate or wish to participate

10) To enable us to contact you about events and offers available from Mind-Body-Awareness and Mindfulcalm by post, online or by phone (where you have indicated that you are happy to hear about these).

What information do we record?

The information we request from you may include personal and sensitive information such as:

Personal information

- First name or given name
- Family name or surname
- Address
- Telephone numbers
- Email address
- Emergency contact number
- GP's name and address
- How you found out about the services offered
- Reasons for seeking the services
- Previous experience of Alexander Technique, Bowen Technique or Mindfulness practice
- Willingness to engage in daily practice for mindfulness courses

Sensitive Personal Information:

You may be asked to provide sensitive personal information regarding:

Mindfulness-based approaches

- Whether you are comfortable in a group setting
- If you experience major depression or other mental health conditions
- Whether you have recently experienced stressful or traumatic life events
- If you have ever made a suicide attempt
- If you have restricted mobility, hearing or visual impairment

Alexander Technique

- If you have restricted mobility, hearing or visual impairment
- Accidents, illnesses and medical conditions
- Medication, treatments or medical investigations

Bowen Technique

- Accidents, illnesses and medical conditions
- Medication, treatments or medical investigations
- General health, diet, sleep patterns, exercise, energy levels, water intake

PRIVACY POLICY

This is a statement of the privacy policy adopted by Dr Wendy Jane Broad (sole-trader operating with the names Mind-Body-Awareness and Mindfulcalm).

Information Security

We recognise that the information you provide may be sensitive and we will respect your confidentiality. We keep information about you confidential, unless there is a legal requirement to share information with other parties, such as with your GP or other health care professional. This means that we store your information securely and control who has access to it.

Personal information provided by you in your client records prior to Mindfulness courses, lessons, workshops and classes may be shared between Dr Wendy Jane Broad and her
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supervisor. Wendy operates according to the terms of the UK Mindfulness Teachers Good Practice Guidelines, which requires ongoing supervision. Discussions between Dr Wendy Jane Broad and her supervisor remain confidential, unless there is a legal requirement to share information with other parties.

Personal information provided by you prior to Alexander Technique lessons and Bowen Technique therapy treatments is confidential, unless there is a legal requirement to share information with other parties.

Client data held in client records is stored in a paper-based, structured filing system in a lockable filing cabinet. This includes Alexander Technique, Bowen Technique and Mindfulness client records. Personal information received as email attachments and electronic booking forms are printed and stored in the paper-based, lockable filing system, after which the electronic copy is deleted.

Email enquiries to Mind-Body-Awareness and Mindfulcalm are retained electronically on a password protected computer, until processed, after which they are deleted.

Where you opt in to receive marketing information or newsletters by email from Dr Wendy Jane Broad, Mind-Body-Awareness or Mindfulcalm your email address will be stored electronically. Even after consenting to receive marketing information or newsletters from Dr Wendy Jane Broad, Mind-Body-Awareness or Mindfulcalm, you still have the right to withdraw your consent to receive this information. To do this please contact Dr Wendy Jane Broad, Mind-body-Awareness and Mindfulcalm. Contact details are below.

Corrections and concerns

If you believe that the information we hold about you is incorrect or out of date, or if you have any concerns about how we are handling your personal information, please contact us and we will try to resolve those concerns. You have the right to view personal data being held about you for 8 years after the submission of the information for Alexander Technique and Bowen Technique approaches and for 5 years for clients undertaking mindfulness-based approaches, after which time it will be destroyed. If we become aware of any ongoing concerns or problems concerning our privacy practices, we will take these issues seriously and work to address them.

Data controller

We are also known as the data controller. We are responsible for collecting and processing your personal information. Processing includes the organisation, retrieval, consultation, use and deletion or destruction of information and its disclosure to other parties.

If you have difficulty understanding this information or want to ask more questions, please contact us.

Contact Us

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