

DR HANNAH BASHFORTH

Privacy Policy

Practice	Dr Hannah Bashforth – Psychological Services
Data Controller	Dr Hannah Bashforth
Address	213 Ashley Road, Hale, WA15 9TB
ICO Registration Number	Z3401641

1. Introduction

Dr Hannah Bashforth (referred to as "we", "us", or "our") provides psychological assessment, intervention, therapy and medico-legal/expert witness services. We are committed to safeguarding your privacy and processing personal data in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the Data (Use and Access) Act 2025, and applicable guidance from the Information Commissioner's Office (ICO).

This Privacy Policy explains how we collect, use, store, retain, share and protect personal data, including information processed where AI-assisted digital note-taking is used.

2. Why Do We Collect Personal Data?

We process personal data only where we have a lawful basis for doing so. The applicable lawful basis depends on the nature and purpose of the processing.

- Legitimate Interests – Article 6(1)(f) UK GDPR: we may process personal data where necessary for the legitimate interests of providing and administering psychological assessment/therapy and medico-legal/expert witness services, provided those interests are not overridden by your interests, rights or freedoms.
- Legal Obligation – Article 6(1)(c) UK GDPR: we may process personal data where necessary to comply with a legal obligation to which we are subject, including applicable court, regulatory, professional, safeguarding or taxation requirements.

Where we process special category personal data, including physical or mental health information, we must also identify an appropriate condition under Article 9 UK GDPR. Depending on the purpose and circumstances, these may include:

- Provision of Health or Social Care – Article 9(2)(h) UK GDPR: where necessary for the provision or management of psychological assessment, therapy, treatment or other health-related services, subject to the applicable requirements of UK data protection law.
- Legal Claims – Article 9(2)(f) UK GDPR: where processing is necessary for the establishment, exercise or defence of legal claims or where courts are acting in their judicial capacity. This may apply to relevant health and psychological information processed in medico-legal and expert witness work.

Where we rely on consent for a particular processing activity, including where explicit consent is required, you will be informed and consent will be obtained as appropriate. The lawful basis and special category condition used will depend on the purpose and circumstances of the particular processing.

Recognised Legitimate Interests

We may also process personal data under a "recognised legitimate interest", a lawful basis introduced by the Data (Use and Access) Act 2025. This allows us to use your data in ways that support important public or organisational aims, while respecting your rights and freedoms. Examples include helping prevent fraud or

misuse of our services, supporting safeguarding and professional standards, responding to emergencies or protecting wellbeing and improving the accessibility and inclusivity of our resources. We always carry out a balancing test to ensure our interests don't override yours, and you have the right to object to this type of processing at any time, please contact us using the details in Section 18 to do so or to find out more.

3. What Data Do We Collect?

We may collect personal and sensitive data, including:

- Personal details: name, date of birth, gender, address, telephone number, email, next of kin and GP details.
- Health and psychological data: psychological concerns, mental health history, medical history, background, relationships, education and occupation.
- Communication records: emails, text messages and voice messages.
- Legal and assessment data: court-related information, reports, records, instructions and assessments.
- AI transcription records: where AI transcription is used, a written transcript of an assessment or therapy session.
- Billing information: invoices, receipts and financial records.
- Technical information: if you use our website, we may collect your IP address, browser type and version, time zone setting, operating system and platform, and other technology on the devices you use to access it.
- Account and marketing information: your preferences on receiving communications from us, and any feedback or survey responses you provide.

Information may be provided directly by you or shared by professionals or organisations involved in your care, assessment or legal matter, such as GPs, solicitors, insurers or occupational health providers.

'Personal data' is information that identifies you. If we've removed your identity (by making the data anonymous), it won't be classed as personal data.

4. How Do We Collect Your Personal Data?

We use different methods to collect data from and about you. In most cases this is collected directly, including:

- When you enquire about or apply for our services;
- When you complete any new client or onboarding forms;
- When you complete forms before or during an appointment (including psychometrics);
- Verbally during discussions, assessments and therapy sessions;
- Via AI-assisted transcription, where you have given consent as set out in Section 6;
- Correspondence with us via post, phone, email or otherwise; and
- When you give us feedback or contact us.

We may also receive data about you from third parties, such as your GP, solicitor, insurer or another professional involved in your care or legal matter, and, where our website uses them, analytics providers.

5. What Happens If You Don't Provide Us With the Required Data?

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you don't provide that data when requested, we may not be able to perform the service or assessment we have agreed, or are trying to agree, with you. Where this is the case, we will let you know at the time.

6. What Are the Purposes for Which We Use Your Personal Data?

The purposes for which we use your data include:

- To register you as a new client and provide our psychological services, assessment or medico-legal services;
- To manage payments, fees, invoicing and, where necessary, to recover money owed to us;
- To manage our relationship with you, including notifying you of changes to our services or this policy;
- To administer and protect our practice, including troubleshooting, record-keeping and system maintenance; and
- To comply with our legal, regulatory and professional obligations.

We rely on the lawful bases set out in Section 2 for each of these purposes and may rely on more than one basis at a time depending on the purpose in question. If you would like more information on the specific ground we rely on for a particular activity, please contact us.

7. Use of AI-Assisted Digital Note-Taking

We may use AI-assisted tools for digital note-taking to support the efficiency and accuracy of documentation during psychological assessments and interventions, including therapy sessions. These tools may be used for limited purposes such as transcription and summarisation.

- You will be informed where AI-assisted recording or transcription is to be used and, where required, your explicit consent will be sought.
- AI does not make independent decisions about your care and does not replace professional clinical judgement at any point.
- AI-generated transcripts, notes or summaries are reviewed and verified by Dr Hannah Bashforth as appropriate before being relied upon.
- Audio recordings created for transcription purposes are deleted promptly once the transcript has been checked and the recording is no longer required. Where a recording is made as part of a medico-legal assessment, it may be retained for the duration of the associated litigation, in case it is needed to verify the transcript or address any challenge to our evidence and will be deleted once it is no longer required for that purpose.
- We only provide AI tools with the information strictly necessary for the intended purpose, in line with data minimisation principles.
- Appropriate technical and organisational measures are used to protect personal information processed through these services.

Where AI-assisted transcription is used, Plaud may be used to produce the transcript. Our AI provider acts only as our data processor: it is contractually prohibited from using your information for its own purposes, and your recordings, transcripts and summaries are not used to train or develop AI models. Plaud publishes information about how data is processed when its AI services are used, including information about AI providers, data retention and use of customer data for AI model training:

<https://support.plaud.ai/hc/en-us/articles/57744162858009-How-your-data-is-used-in-AI-processing>

The table below sets out the AI tools we currently use, their purpose, the types of data involved, and our legal basis for processing:

AI Tool	Purpose	Types of Data Used	Legal Basis
Plaud (AI voice recording and transcription)	To support digital note-taking during psychological assessments and interventions, including producing a written transcript for review.	Audio recordings and transcripts, which may include identifying details and special category data (including health information).	Legitimate interests; Provision of health or social care; Legal claims (medico-legal work)

Further information about our use of artificial intelligence, including the purposes for which AI may and may not be used, human review and professional accountability, is contained in our Artificial Intelligence Use Policy, available on request.

We do not make any decisions about you based solely on automated processing. Where we use AI tools, the output is always reviewed by Dr Hannah Bashforth, and any opinion, decision or report remains a matter of her own professional judgement.

8. How Do We Store and Protect Your Data?

We prioritise data security and use appropriate measures to protect personal data, including:

- Encrypted electronic storage, including Tresorit, which uses end-to-end, “zero-knowledge” encryption so that files cannot be read by the storage provider itself.
- Secure email communication, including Proton Mail.
- Password-protected portable devices and appropriate access controls.
- Data minimisation and regular deletion of information that is no longer required.

Only authorised individuals who need access to your data in order to provide your care or manage your case are granted it, and they are bound by our confidentiality requirements.

Please be aware that ordinary email is not a completely secure method of communication. Where we need to send particularly sensitive information, we will use appropriate secure means, such as password-protected attachments or a secure encrypted link. If you would prefer we use a particular secure method to contact you, please let us know.

Where a personal data breach occurs, we will assess it in accordance with UK data protection law. Where the breach is likely to result in a risk to individuals' rights and freedoms, we will notify the ICO without undue delay and, where feasible, within 72 hours of becoming aware of it. Where a breach is likely to result in a high risk to you, we will also inform you without undue delay where required.

9. Do We Ever Transfer Your Data Internationally?

We may transfer your data outside of the United Kingdom, but only where we can be satisfied it is protected to an appropriate standard. Some of the service providers we use to run our practice are based outside the United Kingdom, or process data through data centres located outside the United Kingdom, meaning their processing of your personal data may involve an international transfer.

Whenever we transfer personal data outside the United Kingdom, we ensure this is protected by at least one of the following safeguards:

- Transferring data only to countries that have been deemed by the UK to provide an adequate level of data protection; or

- Using contracts approved by the UK Information Commissioner's Office, such as the UK Addendum to the EU Standard Contractual Clauses, which give personal data the same protection it would have in the UK.

Where AI-assisted transcription is used (see Section 7), our provider processes data through regional data centres and operates under a data processing agreement together with appropriate transfer safeguards. Our encrypted storage provider primarily stores data within the UK/EEA or Switzerland (which benefits from a UK adequacy decision); because this storage uses end-to-end “zero-knowledge” encryption, the content of your files cannot be read by anyone, regardless of where the encrypted data is held or transmitted. Our email providers may also process data outside the UK/EEA under approved international transfer safeguards.

10. How Long Do We Keep Your Data?

We retain personal data only for as long as necessary, taking account of the purpose of the processing and applicable legal, professional and taxation requirements.

Type of Data	Retention Period
Psychological assessments, therapy records and interventions	7 years from completion of the assessment or end of treatment
Medico-legal reports and case files	7 years from the end of the legal matter, or until the case is resolved if longer. Where the applicable limitation period for a legal claim extends beyond this.
Assessment and therapy session transcripts	7 years from the date of the session
Audio recordings	Deleted promptly once the transcript has been checked and the recording is no longer required. Where a recording forms part of a medico-legal assessment, it may be retained for the duration of the associated litigation before deletion.
Financial records (invoices and receipts)	7 years for tax and accounting purposes

At the end of the applicable retention period, information is securely deleted or destroyed unless there is a continuing lawful reason to retain it.

11. Who Do We Share Your Information With?

We maintain confidentiality and share personal data only where necessary and lawful. This may include:

- Your GP, solicitor or another relevant professional, where appropriate and lawful;
- Courts, tribunals, legal representatives, insurers or regulatory bodies where relevant to medico-legal work or required by law;
- Professional supervisors, with information minimised and de-identified as far as reasonably practicable;
- Professional advisers, such as accountants, bankers, auditors and insurers, who support the running of our practice;
- Service providers acting as processors on our behalf, for example for secure storage or IT and system administration;

- If you are referred by your health insurance provider, your insurer, for the purposes of billing and providing treatment updates;
- If you are referred to another psychologist or healthcare professional for specialist care or assessment, that professional, to ensure continuity of care;
- HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances;
- Debt collection agencies, in the event that payment is not received for services rendered, solely for the purpose of recovering the outstanding debt; and
- Appropriate authorities or other persons where disclosure is required or permitted by law, including in relation to serious safeguarding concerns or risks of serious harm.

All third parties we share your data with are required to respect its security. We do not permit them to use your personal data for their own purposes, they may only process it for the specified purposes we authorise, in line with our instructions. We do not sell personal data or share it for commercial marketing purposes.

12. Confidentiality and Information Sharing

Your information is treated confidentially. Identifiable information is minimised where reasonably practicable. There may be circumstances in which information needs to be disclosed without consent, including serious concerns about your safety or the safety of another person, concerns regarding the health, welfare or safety of a vulnerable adult, a serious threat towards another person, a court order or other legal requirement, or another overriding professional or legal obligation.

Where practicable and appropriate, we will discuss such a disclosure with you. This may not always be possible, particularly where doing so could increase risk or conflict with a legal obligation.

13. Professional Supervision

Professional supervision is an important component of safe and effective psychological practice. Relevant clinical or professional matters may be discussed during supervision. Information is minimised and de-identified as far as reasonably possible, and supervisors are subject to professional duties of confidentiality.

14. Do We Use Your Data for Marketing Purposes?

We do not sell personal data or share it for commercial marketing purposes. If we ever send you marketing communications, our lawful basis for doing so will be either your consent or our legitimate interests, and you will be able to opt out at any time by contacting us or using the unsubscribe option provided.

15. Do We Use Third-Party Links?

Our website may link to third-party websites, tools or apps. Clicking on these links may allow third parties to collect or share your data. We do not control these websites and are not responsible for their privacy policies. When you leave our website, we encourage you to read the privacy policy of every website you visit.

16. Expert Witness and Medico-Legal Work - Additional Information

Because we are sometimes instructed as an expert witness, some things work differently from our therapy and assessment services. This section explains how we handle your information in that role.

Our role and who instructs us

We are usually instructed by solicitors, courts or other parties to a legal case, and the person we assess is often not the person who instructs us. When acting as an expert, we are an independent data controller in our own right — we are not processing your information on behalf of the instructing solicitor — and we exercise our own professional judgement about what our report contains.

The limits of confidentiality

An expert assessment is not confidential in the way therapy is. The information you give us, and our findings, are prepared for the purpose of legal proceedings and will be set out in a report disclosed to the party who instructed us and, in most cases, to other parties and to the court or tribunal. Our overriding duty is to the court. We will explain this to you before we begin the assessment.

Information we receive about you from others

To prepare our reports we are usually sent information about you from other sources — for example, our instructing solicitor, medical and other records, witness statements, and reports by other professionals. Where we hold information about you that we did not obtain from you directly, you still have the right to be told how we use it; this is normally provided to you by your instructing solicitor and through this policy, and is something we will explain at the start of our interview.

Our legal basis

For this work we rely on our legitimate interests in preparing expert evidence and the proper administration of justice (Article 6(1)(f)), and — for health and other special category information — on the condition that processing is necessary for the establishment, exercise or defence of legal claims (Article 9(2)(f)).

Who we share your information with

In addition to the recipients listed in Section 12, in expert work we may share your information with: the solicitor or party instructing us; other parties to the case and their legal representatives; barristers or counsel; the court or tribunal; any single joint expert or other experts instructed in the case; and our professional regulator, where required.

Your rights in a legal context

Some of your data protection rights work differently where information is processed for legal proceedings. For example, the right to erasure does not generally apply to information we need to keep for, or that forms part of, legal proceedings, and some information may be subject to legal professional privilege or to court rules on disclosure. We will always consider your rights and explain how they apply to your situation. If a Subject Access Request relates to a case we have been instructed on, we will liaise with the instructing solicitor before responding, to inform our approach to release.

Professional standards

We work to the standards of the Health and Care Professions Council (HCPC) and the British Psychological Society (BPS), including their guidance on record-keeping, confidentiality and expert practice.

17. Your Rights Under UK GDPR

Depending on the circumstances and the lawful basis for processing, you may have rights including:

- Access: request a copy of your personal data, including any session transcript held as part of your record.
- Rectification: ask us to correct inaccurate or incomplete personal data.
- Erasure: request deletion in circumstances where the right applies.
- Restriction: ask us to restrict processing in certain circumstances.
- Objection: object to certain processing, including processing based on legitimate interests.
- Data portability: receive certain personal data in a portable form where the legal requirements for this right are met.
- Withdrawal of consent: withdraw consent at any time where consent is the basis relied upon for a particular processing activity.

These rights are not absolute and may be restricted in particular circumstances, including where information must be retained for legal reasons or an exemption applies. We do not use solely automated decision-making to make decisions about your psychological care, assessment or medico-legal opinion that produce legal or similarly significant effects.

If you wish to exercise a data protection right, please contact us using the details below. We will normally respond within one calendar month.

18. Complaints and Contact Information

We're committed to treating your personal data with respect, transparency and care. If you ever have questions or concerns about how your data is used, we want to hear from you, and will do our best to resolve things quickly and fairly. Under the Data (Use and Access) Act 2025, you have the right to raise a complaint about how your personal data is handled. Here's how:

- Step 1: Contact us using the details below with a brief description of your concern — you don't need to use legal language, just tell us what's worrying you.
- Step 2: We'll acknowledge your message and respond without undue delay, normally within one calendar month.
- Step 3: If you're not satisfied with our response, you can escalate your concern to the Information Commissioner's Office (ICO).

Dr Hannah Bashforth – admin@equitaspsychology.co.uk

If you are not satisfied with our response, you have the right to complain to the Information Commissioner's Office (ICO):

Information Commissioner's Office
Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
Telephone: 0303 123 1113
ICO website: ico.org.uk

19. Updates to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in law, regulatory guidance, professional practice, technology or the way in which services are provided.

Last updated: August 2026