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Kathryn Rogers DipNT mBANT

Registered Nutritional Therapy Practitioner

Riverside Wellbeing

1 Market Street

Whaley Bridge

High Peak

SK23 7AA

E: kathryn.rogers@forkprovoking.co.uk

T: 07798 812735

PRIVACY NOTICE

This document outlines how Kathryn Rogers uses personal information about individuals as part of the Nutritional Therapy service, how it may be shared and how it is kept secure. This notice does not provide exhaustive detail. However, additional information or explanation can be provided. Any requests for this should be addressed to Kathryn Rogers. This Privacy Notice is kept under regular review, and was last reviewed in May 2018.

1. Kathryn Rogers Nutritional Therapy Service

Kathryn Rogers provides nutritional therapy services to clients and patients to support improved health through diet and lifestyle interventions. The focus is on preventative healthcare, the optimisation of physical and mental health and chronic health conditions. Through nutritional therapy consultations, dietary and lifestyle analysis and biochemical testing, the aim is to understand and address the underlying causes of health issues using personalised dietary adaptations, nutraceutical prescription (supplements) and lifestyle advice. An element of the service is group work and workshops.

2. How personal data is obtained

2.1. Personal data may be provided by individuals in the following ways:

- By completing a nutritional therapy assessment questionnaire
- By signing a terms of engagement form
- In conversation during a nutritional therapy consultation
- Via email, over the telephone or by post
- By taking credit card and/or online payment

2.2. This may include some or all of the following information:

- basic details such as name, address, contact details and next of kin
- details of contact such as referrals and appointment requests
- health information including your previous medical history, dietary, lifestyle, supplement and medicine details, biochemical test results, clinic notes and health improvement plans
- GP contact information
- bank details

2.3. This information is used to provide direct healthcare. This means that the legal basis of holding personal data is for legitimate interest.

2.4. Following completion of an individual's healthcare, personal data is retained for the period defined by the registrant body, Complementary and Natural Healthcare Council (CNHC) the professional association, The British Association for Nutrition and Lifestyle Medicine (BANT). This enables the processing of any complaint. In this case the legal basis of holding personal data is for contract administration.

2.5. Sensitive medical information in the form of test results from biochemical testing companies may be obtained. This information is used to provide you with direct healthcare. This means that the legal basis of holding your personal data is for legitimate interest.

2.6. Sensitive information from other healthcare providers may be obtained. The provision of this information is subject to having express consent, without which any element of care depending on this information may be less effective.

3. How personal data is used

- 3.1. To provide direct nutritional therapy services, Kathryn Rogers acts as a data controller for use of directly-obtained personal data, as well as data from third parties such as testing companies and other healthcare providers. In addition, Kathryn Rogers acts as a data controller and processor with regard to the processing of credit card or online payments.
- 3.2. At all times Kathryn Rogers undertakes to protect personal data, including any health and contact details, in a manner which is consistent with a duty of professional confidence and the requirements of the General Data Protection Regulation (GDPR) concerning data protection. Reasonable security measures are taken to protect personal data storage.
- 3.3. Personal data may be used where there is an overriding public interest in using the information, eg in order to safeguard an individual, or to prevent a serious crime, or where there is a legal requirement such as a formal court order.
- 3.4. The use of personal data for marketing purposes, such as newsletters, would be subject to express consent.

4. Sharing of personal data with other organisations

- 4.1. Information about individuals is kept confidential. It is only disclosed to third parties with express consent, with the exception of the following categories of third parties:
 - The registrant body, CNHC, and the professional association, BANT, for the processing of a complaint
 - Any contractors and advisors that provide a service to us or act as our agents on the understanding that they keep the information confidential
 - Anyone to whom we may transfer our rights and duties under any agreement with the individual concerned
 - Any legal or crime prevention agencies and/or to satisfy any regulatory request (eg, CNHC) if there is a duty to do so or if it is within the law to do so
- 4.2. Personal information, but not sensitive information, may be shared with supplement companies and/or biochemical testing companies as part of providing direct healthcare.
- 4.3. Express consent will be obtained before sharing information with an individual's GP or other healthcare provider. However, if it is deemed that an individual's life is in danger, their information may be passed on to an appropriate authority (such as the police, social services in the case of a child or vulnerable adult, or GP in case of self-harm) using the legal basis of vital interests.
- 4.4. Case histories may be shared in an anonymised form with peers for the purpose of professional development. This may be at clinical supervision meetings, conferences, online forums, and through publishing in medical journals, trade magazines or online professional sites. Explicit consent is obtained from individuals before processing data in this way.

5. The rights of individuals

- 5.1. Every individual has the right to see, amend, delete or have a copy, of data held that can identify them, with some exceptions. Individuals do not need to give a reason to see their data.
- 5.2. To access personal data a Subject Access Request (SAR) in writing is required. Under special circumstances, some information may be withheld. A SAR will be responded to within 20 working days from the point of receiving it. An individual has the right, subject to exemptions, to ask:
 - To have personal information deleted
 - To have personal information corrected or updated where it is no longer accurate
 - To ask for personal information to be no longer processed where it is not required to be processed by law or in accordance with the BANT and/or CNHC guidelines
 - To receive a copy of their personal data provided by them, in a structured, commonly used and machine-readable format, and have the right to transmit that data to another data controller.
 - To object at any time to the processing of their personal data
- 5.3. No automated processing is used that may lead to automated decision-making based on an individual's personal data.

To invoke any of the above rights please make a request (SAR) in writing (email or letter).

6. What safeguards are in place to ensure personal identification data is secure?

- 6.1. Only identification information that is in accordance with GDPR is used. This requires the processing of personal data only if there is a legitimate basis for doing so, and that any processing must be fair and lawful.
- 6.2. Within the health sector, there is a requirement to follow the common law duty of confidence, which means that where identifiable information about an individual has been given in confidence, it should be treated as confidential, and only shared for the purpose of providing direct healthcare. An individual's personal information is protected, and the individual is informed of how their data will be used. Individuals are allowed to decide if and how their information can be shared.
- 6.3. It is ensured that personal information is held in secure locations, access is restricted to authorised personnel only, including the use of encryption and/or passwords for computer held data. It is ensured that external data processors that support the business are legally and contractually bound to operate and prove security arrangements are in place where data that could or does identify a person are processed.
- 6.4. Kathryn Rogers Nutritional Therapy business is registered with the Information Commissioner's Office (ICO) as a data controller. A copy of the registration is available through the ICO website (search by business name).

7. Retention of confidential information

All records held by Kathryn Rogers Nutritional Therapy business will be kept for the duration specified by guidance from the professional association BANT.

8. Website technical details

- 8.1. The electronic forms on the website have built-in features to help ensure privacy. The aim is to use secure forms where appropriate.
- 8.2. Cookies are not used to collect private or personally identifiable information. The technical platform of this website uses cookies to aid the proper technical functioning of the website. The cookies used contain random strings of characters alongside minimal information about the state and session of the website, which in no way collects or discloses any personal information about you as a visitor. Advanced areas of this site may use cookies to store visitors presentation preferences in a purely technical fashion with no individually identifiable information. Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.allaboutcookies.org
- 8.3. Like most websites, this website uses analytics software in order to provide an understanding of the trends in popularity of the website and of different sections or pages of the website. Analytics software also uses cookies to function. There is no use of personally identifiable information in any of the statistical reports used by the analytics software. Google Analytics provide details of their privacy policy on the Google website. To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>

9. Complaints

Please direct complaints regarding the use of personal data to contact Kathryn Rogers in writing (email or letter). If your complaint is not satisfactorily resolved, formal complaints can be made to the Information Commissioner's Office (ICO) by contacting them on 01625 545745 or 0303 1231113.