Digital Policy

This document is made for the benefit of my psychotherapy clients and supervisees, but may also be of use to other psychotherapists or counsellors who would like to develop a policy to manage boundaries in the digital world. This digital policy aims to address and contain the most likely eventualities that may arise by way of digital exposure, also with reference to maintaining 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 my own research and the 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 to read through this document so they can be familiar with these positions.

My media activities:

It is important for you to be aware that a substantial part of my working life outside the clinic is in the public domain. I am an author, blogger and public speaker with a various public and media roles. As part of this work, I maintain an active social media presence.

Online resources such as Twitter, Facebook, and Instagram enable me to reach a broad swath of people to whom I can communicate psychological concepts that I hope can be useful in their lives. I hold my duty of care and confidentiality to my psychotherapy clients and supervisees as sacrosanct and consider my media work to be related to, but completely separate from my clinical work.

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 clinical work in the consultation room as much as possible. However, the nature of the digital world can sometimes stretch these boundaries, so I offer the best clarity I can below.

Data Protection:

If you are a client or supervisee you will have been asked to sign a GDPR compliant data protection policy – a copy of which can be seen at the end of this document.
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 telephone instead.

I check emails only at fixed 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.*

**E-invoicing:** I use an online software application to process my invoices that are then sent out to your chosen e-mail address. If you would prefer not to receive these invoices by email, please let me know and I can bring you a printed copy at the beginning of each calendar month.

Text messages:

You may feel free 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.

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 Skype:

While I do not generally run my practice remotely, there may be times when we have a session by telephone or video conferencing, for example, if either one of us is abroad. Any such sessions will be discussed in advance. I use the Stillpoint Spaces video conferencing system, which is fully encrypted. Should we ever decide to work together remotely I will give
you further instructions about how to join. When engaging via video conferencing, we both agree not to record sessions. It is also crucial that you’re sure your environment from which you are conferencing with me is safe, secure, and private.

**Social Media:**

I maintain a public Twitter profile, Facebook Page, and Instagram as a way of promoting psychological ideas through the media, and to make people aware of workshops, conferences, or other events that I may be taking part in, or that might be of interest to followers. I frequently send across relevant links and sometimes engage in public conversations on these topics.

Despite my online presence, I would prefer that our relationship remain as much as possible between us in the consultation room, therefore I will not knowingly engage with clients over social media. Whether you follow me or not is of course to your discretion, though I would suggest for reasons of confidentiality and preserving our therapeutic relationship that it’s advisable not to.

I, 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.

As the above, I have decided that it would not be appropriate to add current or former clients as “connections” on LinkedIn.

**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. Going forward, I have found it is best to find out from each other what we need to know face-to-face.
Addendum:
General Data Protection Regulation

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

I may keep written notes which are stored in a lock-box or as encrypted digital documents. These 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 the period to which I am obliged which can be anywhere from 3 to 7 years, after which they will be destroyed.

You have the right to request any information I keep about you. As these notes are handwritten 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 also keep your contact information, email, phone number, address, and GP details in my digital contacts so I can contact you if necessary. These contacts may be vulnerable to hacking. So if you prefer, I can refrain from keeping them digitally and instead keep them in a locked file. Please circle the relevant response below:

I would prefer you DO/DO NOT keep my contact details in your digital address book.

Emails may also be vulnerable to hacking or miss-sending by human error. If you would prefer not to communicate by email, please let me know. Otherwise, it is best to use email only for logistical purposes (changing session times, etc.). I use Quickbooks for invoicing which, by default emails out invoices every month. Should your email be compromised, these invoices would show that you are in therapy with me. If you would prefer that I not send invoices via email but instead print you a copy on paper each month, please circle the relevant response below:

I would prefer my invoices via email: YES / NO

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, 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.

I am registered with the Information Commissioners Office to hold such records.

I consent and understand the data protection provision: __________________________