

# Core Aviation Psychology Privacy Policy

## GDPR Privacy Notice

The General Data Protection Regulation (GDPR) which is EU wide and far more extensive than its predecessor the Data Protection Act, along with the Privacy and Electronic Communications Regulations (PECR), seek to protect and enhance the rights of EU data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU and its storage within the EEA.

## Who we are

Core Aviation Psychology is the trading name of Core Business Psychology Ltd., a company registered in Scotland as SC386846.

I am Paul Dickens a Registered Clinical Psychologist and Accredited Aviation Psychologist and I approach my work with the utmost regard for a client's wellbeing and rights. The Health and Care Professionals Council (HCPC), The British Psychological Society (BPS) and the European Association for Aviation Psychology regulate and inform my practice. You can find out more about my professional and legal responsibilities on their respective websites.

[www.hcpc-uk.org.uk](http://www.hcpc-uk.org.uk)

[www.bps.org.uk](http://www.bps.org.uk)

[www.eaap.net](http://www.eaap.net)

## Information we collect and how we use it

For the purpose of undertaking psychological assessments:

Where we are asked to provide a psychological assessment we will collect basic personal information. Psychometric test data may also be collected on individuals being assessed, and notes will be taken during interview and this will be used to inform the assessment, formulation and report. A copy of any report produced with that data will be provided to you should you wish.

For the purpose of providing support and treatment:

Upon initial contact, basic personal information will be collected for contact and identification reasons. Psychometric test data may also be collected on you. During any therapy meetings, an assessment of your psychological health will be completed, and notes will be taken during sessions. These may include personal and sensitive details about your life. The assessment and notes are used solely for the delivery of a support or therapy service to you.

## Website Cookies

Our website uses cookies. A cookie is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. Cookies help us to identify and track visitors and their website access preferences. Website visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using this website.

We will only collect the information needed so that we can provide you with the services you require. We do not sell or broker your data.

## Confidentiality

The information about confidentiality in no way contravenes your rights under the General Data Protection Regulation May 2018 to access personal data that we hold about you. We keep confidential records and statistics about the clients we work with. Information but not names may be shared with other relevant agencies, including the Civil Aviation Authority and appropriate operators. These records are subject to the General Data Protection Regulation May 2018. Your personal data will only be used in order to provide the service to you and for managing and quality assuring the service.

Psychological assessment and psychological therapy is a private and confidential form of help. We hold information about each client, their assessment results and reports and any therapy they receive in confidence. This means that we will not normally give your name or any information about you to anyone outside Core Aviation Psychology. However, there are exceptional cases where we might ethically or legally have to give information to relevant authorities such as the Civil Aviation Authority, for example if we had reason to believe that someone is at serious risk of harm to themselves or others, or to aviation and aircraft safety. We will discuss any proposed disclosure with you unless we believe that to do so could increase the level of risk to you or to someone else. There are other supervening legal and ethical obligations, such as our duty to assist and comply with requests from the Air Accident Investigation Branch investigations and criminal investigations when we are legally obliged to do so.

## Your rights

We recognise that on rare occasions my clients may wish to exercise their rights under the General Data Protection Regulation May 2018 and make a subject access request in respect of their personal information held by me. You have rights relating to the information we hold to verify the accuracy or to ask for them to be supplemented, deleted, updated or corrected. You have the right to request a copy of the information that we hold about you. If at any time you wish to exercise your right under the Act you should put your request in writing to us and provide evidence of your identity such as a copy of your passport or driver's license and proof of your address. When we receive evidence of identity we will respond to your request within 30 calendar days. Our response to a valid subject access request will normally be in the form of a schedule listing and describing the personal data we hold on you. You have a right to request the transfer of your data to another individual or company. We want to make sure that your information is accurate and

up to date. You may ask us to correct or remove information you think is inaccurate. You have a right to request the transfer of your data to another individual or company.

### **Lawful basis for processing your information**

The lawful basis for us holding and using your information is in relation to the delivery of a contract to you as a qualified psychologist, and as a Registered Psychologist and as an Accredited Aviation Psychologist I operate under a strict code of confidentiality.

### **Data storage**

All Data is held in the United Kingdom. We do not store personal data outside the EEA. All data storage services used are fully GDPR compliant and available on request. Paul Dickens is the nominated Data Protection Officer and Data Processor for Core Aviation Psychology. We undertake to ensure that any third party data storage – for example psychometric test provide sites – are fully compliant with GDPR.

### **How long is information stored for - data retention**

Your information is kept for the time necessary to provide the assessment or therapy service requested. However we will securely store psychological test data indefinitely where that data relates to aviation safety related individuals who are in possession of appropriate licences from national aviation regulatory bodies. This is to facilitate any future safety-related investigations carried out by the Air Accident Investigation Branch or equivalent.

### **Privacy**

Occasionally we are asked by clients or by external agencies such as the Civil Aviation Authority to write reports on the progress made in assessment and/or therapy. We are not normally in a position to do this because of our duty of confidentiality. However in some circumstances, and on receipt of written consent from the client, we can provide brief information about the dates and number of sessions attended.

There may be times where your information needs to be legitimately shared with 3rd parties. I will explicitly ask your consent before doing so, and the data will be sent to 3rd parties securely.

Paul Dickens  
BA(Hons) MPhil AFBPsS CPsychol FRAeS  
Registered Practitioner Clinical Psychologist: PYL04207  
Accredited Aviation Psychologist: AP091  
Chartered Psychologist

1<sup>st</sup> December 2020