

UK Mindfulness Centres Collaboration

Mindfulness-Based Cognitive Therapy (MBCT) Teacher Training for Improving
Access to Psychological Therapies (IAPT) Services

2021-2022



Information governance guidance relating to the creation, storage, transmission and deletion of clinical recordings

Introduction

1. This document has been developed with reference to national best practice in relation to information governance, information security, confidentiality, records management and data protection. The document was informed by exemplar guidance from other NHS Trusts and has been aligned with relevant policies and practice of Sussex Partnership NHS Foundation Trust (the lead Trust for this training collaboration), the UK Network of Teacher training Organisations (<https://www.ukmindfulnessnetwork.co.uk/>), the Mindfulness Network (<https://www.mindfulness-network.org/>) and the Oxford University Department of Psychiatry (<https://www.psych.ox.ac.uk/>). This policy is compliant with the General Data Protection Regulation (GDPR) and Data Protection Act (2018).
2. We are aware that technological developments progress quickly and this document is therefore subject to revision should technological advances offer more secure means to store and transmit data.
3. Mindfulness-based Cognitive Therapy (MBCT) is a group-based intervention that is recommended by the National Institute for Health and Clinical Excellence for relapse prevention in individuals with recurrent depression (NICE: 2004, 2009). Health Education England has commissioned MBCT training for High Intensity therapists working in Improving Access to Psychological Therapy Services (IAPT) in IAPT services across England.
4. The programme of training runs between March 2021 and March 2022 and is being provided by the *UK Mindfulness Centres Collaboration* which comprises four MBCT training centres, working together with the UK Mindfulness Network, the Oxford University Mindfulness Centre and the Centre for Mindfulness Research and Practice at Bangor University. See: <http://sussexmindfulnesscentre.nhs.uk/train-to-teach-mindfulness/> for further information.

MBCT course requirements

5. In MBCT training, as in many other therapeutic trainings, it is standard practice for trainees to record the clinical sessions which they deliver and to use these recordings for reflective practice and as material to discuss in supervision. During the course of this year-long training programme, trainees will need to teach two full MBCT 8-week clinical courses.
6. Trainees will deliver these MBCT courses face to face or online. At the time of writing, government restrictions were in place to ensure safe social distancing to prevent COVID-19 transmission. Any service guidelines in place at the time of teaching these 2 groups should be followed. Considerations of clinical suitability, corona-related safety, feasibility and service restrictions on recording should be taken into account in deciding whether to run the courses face to face or online. At the time of writing, the training programme permits the submission of face to face and online groups. This policy will be kept under review.
7. The delivery of online MBCT groups should be conducted in line with service governance. Where possible, the training programme recommends the use of zoom as a platform because at the time of writing, it allowed the greatest functionality, particularly in its use of break out rooms. Where zoom is not permitted, a discussion should take place with the supervisor and training lead about the best allowable online options. Online recording will also need to follow service governance requirements.
8. Trainees will be expected to record both courses and share excerpts of the material with their supervisors. Supervision will generally be one to one or one to two, and via video conferencing. The entirety of the recording of the one of these courses will need to be submitted to the Oxford University Mindfulness Centre for an assessment of competency using the Mindfulness Based Interventions-Teaching Assessment Criteria (MBI-TAC) rating tool.
9. All recordings must be made, stored, transmitted and deleted in accordance with the guidance outlined in this document and in adherence to policies of the employing organisation. The trainees, their supervisors and involved staff at the Oxford University Mindfulness Centre have agreed to adhere to these guidelines and to best practice (see form in Appendix 3).

Patient privacy and consent

10. Trainees will consult their workplace supervisor and manager in good time to ensure they are in a position to act in full accordance with their employer's policies and procedures relating to recording, marking, transporting, storing and deletion of recordings, and must participate in relevant mandatory training recommended by their employing organisation.
11. When groups are conducted face to face, every attempt must be taken to exclude images of group participants in the recordings but participants' voices

must be audible. When groups are conducted online, recording can take place similarly with the camera pointing at the trainee teacher with participants audible but not visible. Online recordings on the online platform itself are permissible where the trainee's Trust's policies allow it and where consent to be made visible as well as audible has been gained from all participants.

12. Trainees are required to gain informed consent from all participants in their MBCT groups using the form provided in Appendix 1 (if acceptable to the employer), or otherwise using the employer's own form. These forms will contain patient identifiable information and therefore need to be kept securely in the workplace.
13. After consent has been gained from all group participants, trainees must then sign the 'confirmation of consent to recording' form (Appendix 2) and submit this to their supervisor and to the Oxford University Mindfulness Centre (for their assessed course). The confirmation of consent form must not contain any patient identifiable information.

Transfer of recordings

14. If a recording has been made from a standalone recording device or from an online platform, it may record straight to the machine's hard drive. If this is the case, the recordings should be transferred without delay onto either i) a USB encrypted Safestick or ii) a secure, password-protected section of the employer's network. Recordings should be immediately deleted from the machine's hard drive once they have been transferred.
15. Recordings should be shared with supervisors using the employer's secure network when this is feasible. See the form in Appendix 4. Where recordings need to be transported physically, this must be done on an encrypted USB Safestick. Please use a USB stick which is encrypted and compliant with your own Trust's policies. The following USB stick will hold the full 16 hours of your recordings. It will allow you to set up a password-protected private folder and will secure your files with 128-bit AES encryption:
SanDisk SDCZ48-128GU46 Ultra UAB Flash Drive USB 3.0.
It should be reiterated that the recorded material is confidential, and must not under any circumstances be seen or heard by other people.

Storage of recordings

16. Recordings held on USB Safesticks should be kept safely with the trainee or in an appropriate locked cabinet. They should never be left unattended in cars or in unlocked storage. Recordings should never be sent by email.

Submission of recordings

17. Trainees will submit their recording of their assessed MBCT course to the Oxford University Mindfulness Centre (OMC) on an encrypted USB Safestick via secure delivery service or courier. Submission of the recording should

occur within 2 weeks of completion of the course. Site leads should be informed when the submission takes place.

18. Please read the accompanying OMC document: 'Applying for an assessment of competency to teach MBCT: for IAPT trainees' document for further information about the assessment process.

19. If a trainee fails to pass the competency assessment, one further submission may be made at a later date. Any re-submissions should also follow the guidance outlined in this document.

Deletion of recordings

20. As soon as a recording is no longer needed, it must be deleted. Bear in mind that if you record the whole of the first MBCT group, you should keep this until completion of your second group in case you choose to submit the first for assessment. Recordings sent to Oxford University Mindfulness Centre for assessment should have a retention period of no more than six months from submission and the expected date of deletion should be recorded on the consent form.

Adherence to information governance policy

21. Any failures to follow the guidance outlined in this document will be highlighted to the training lead and trainee in the first instance, followed by the trainee's manager. Where there is a continual failure to follow the agreed process, this will be escalated to the Caldicott Guardian or person responsible for Data Protection at each organization so they may undertake a review.

Appendix 1

UK Mindfulness Centres Collaboration



Consent to Recording Form

Mindfulness-Based Cognitive Therapy (MBCT) Teacher Training for Improving Access to Psychological Therapies (IAPT) Services 2021-2022

Why am I being asked for permission to record?

It is important to ensure that staff providing Mindfulness Based Cognitive Therapy (MBCT) receive supervision and that their skills are assessed and monitored to ensure quality of service to clients.

The training programme that your therapist is currently undertaking aims to provide a post-qualification training in evidence-based MBCT for adults who have experienced recurrent depression. The training aims to equip therapists to become skilled and effective MBCT practitioners, in accordance with The British Association for Mindfulness-based Approaches Good Practice Guidelines:

<https://bamba.org.uk/wp-content/uploads/2020/01/GPG-for-Teaching-Mindfulness-Based-Courses-BAMBA.pdf>

The Centre for Mindfulness at Brown University, USA, and the Oxford Mindfulness Centre, the Centre for Mindfulness Research and Practice (CMRP) are building a bank of teaching practice recordings of teachers and students which can be used within training collaborations including this MBCT in IAPT Training. The recordings will be used in carefully selected ways in training i) assessors to reliably use the Mindfulness-Based Interventions: Teaching Assessment Criteria (MBI:TAC) and ii), mindfulness-based teachers who train with CMRP, Brown and Oxford (who are partners in the MBCT in IAPT collaboration). All participants in trainings where recordings are used will agree to utmost confidentiality regarding the identity of teachers they see. The viewing of such recordings is conducted respectfully with an emphasis on the teaching process rather than the teacher. It is understood that the recordings are of one moment in time, and do not reflect more broadly on the teacher. So for example, in any recordings shared, trainees will be aware that this may be one of the first times that person has taught. As far as possible recordings will be selected to ensure that participants in trainings do not know the teacher they see. All recordings will be stored securely.

www.ukmindfulnessnetwork.co.uk/guidelines/

How will my data be protected?

There will be no identifying written material and therapists will take all reasonable steps to make sure that the external camera is focused solely upon themselves during the sessions. Where recording takes place on an online platform, your consent will be sought explicitly for this. Anyone viewing a recording is required to maintain confidentiality concerning its content. The recording will be stored under secure conditions.

To help ensure high standards of practice, your therapist is receiving regular supervision from trained and experienced MBCT teachers and is required to regularly video record their teaching for the purpose of assessment and supervision. The recordings are used to study exactly how the MBCT teaching was provided to you and are observed by the therapist's supervisor/assessor so that they can monitor skills, give feedback and provide useful supervision in order to fine tune the teaching sessions and enhance the therapist's skills.

Recordings of teaching sessions are also used by the UK Mindfulness Centres Collaboration as part of formal assessment on the training programme in conjunction with the Oxford Mindfulness Centre, and with your permission, for training future mindfulness teachers.

What am I consenting to?

You can consent to recordings of your MBCT sessions being used for clinical supervision, assessment and training. Consent can be withdrawn at any point without a reason being given. If you agree to participate, please tick the box next to the purpose(s) for which you consent to the recording being used and sign and date the consent form.

Feel free to ask your therapist to explain anything above or below that you have difficulty understanding.

I (insert client name) _____

understand that (insert therapist name) _____

is currently undertaking specialist post-qualification training in Mindfulness Based Cognitive Therapy (MBCT) and as part of this training, his/her supervisor/assessor will observe recordings of their therapy practice.

I consent to sessions being video recorded for the purpose(s) indicated below. I consent to my chosen on screen name being visible in online recordings where this is unavoidable. The facilitator has discussed this with me and I am aware of how to select what identifying information I display online about my identity. All recordings will be stored in accordance with the Data Protection Act (DPA), 2018. I give my consent on the

understanding that the recording will be kept confidential and will be stored securely. I am aware that the recording will be erased once the specified purpose(s) have been fulfilled. Most recordings will only be used for supervision and assessment during the course of this training programme, but if used for future training cohorts, sections of the recording may be kept for ongoing use. I may withdraw my consent at any time and have any contributions I may have made edited out. I understand that it will not form part of my health record or be subject to any requests I may make to access my health record.

Purpose: Supervision

- I consent to the use of recordings for the purpose of supervision by my therapist's supervisor/s.

Purpose: Assessment

- I consent to the use of recordings and accompanying written material for the purpose of assessment on the programme which my therapist is undertaking.

Purpose: Training

- I consent to the use of selected sections of recordings being used for the purpose of training future mindfulness teachers, supervisors, and assessors.

Expected date of deletion _____

Signed Client: _____ Date: _____

Signed Therapist: _____ Date: _____

This agreement has been discussed with me by

on: / /

Copy to client Date: / / Copy for client file Date: / /

(Adapted from University of Reading Consent Form, 2012)

Appendix 2

UK Mindfulness Centres Collaboration



Confirmation of consent to recording form

Mindfulness-Based Cognitive Therapy (MBCT) Teacher Training for Improving
Access to Psychological Therapies (IAPT) Services

2020-2021

Therapist Statement

I certify that I have conducted this clinical work in line with the appropriate professional practice guidelines, Codes of Ethics [e.g. BABCP Standards of Conduct, Performance and Ethics] and workplace policies, which have been strictly adhered to in terms of making the recording and seeking permission for use.

I confirm that I have gained the consent of all participants in the MBCT group that I have recorded for use in:

- Supervision

- Assessment of my competency

- Training Purposes (as specified in Appendix 1)

Signed:.....(Therapist)

Name:.....

Date:.....

APPENDIX 3

UK Mindfulness Centres Collaboration



Memorandum of Agreement for Transfer of Audio/Visual Recordings of Patients for assessment of competency purposes in the UK Mindfulness Centres Collaboration MBCT Teacher Training for IAPT Services

This agreement sets out the conditions under which audio/visual recordings of patients must be transferred, stored and deleted when transferred from IAPT sites to a university for the purposes of assessment of competency.

This agreement must be signed by the required representatives of both organisations before any data is transferred.

This agreement binds the University to maintain security of patient information at the same level as detailed throughout this policy.

1. The agreement covers the use of Patient recordings for University assessment.
2. The University undertakes only to use recordings for assessment where there is explicit patient consent for them to be seen by as stated on the 'Confirmation of consent to recording' form.
3. Recordings may only be transported between Trust/employer and University site by an encrypted USB safestick. Transport must be undertaken in person or by secure post.
4. The University undertakes only to transfer recordings to one protected location on a University network, where they are only accessible to the examinations administrator and specific examiners required to use them. Access must only be granted for each recording to those University staff who absolutely need it. No recordings should be transferred to local drives, off-site computers or personal computers.
5. University examiners may review recordings away from the University site if they have given written undertaken to maintain the highest level of security and in accordance with the requirements of this policy.
6. The University will delete all copies of recordings as soon as possible once the assessment process is complete (including allowing for any appeal or re-assessment).

7. The University undertakes to pursue appropriate disciplinary action against employees or associates who do not comply with the terms of this agreement.

University Mindfulness Centre Director:

_____ (signed)

Name: _____

Date: _____

UK Mindfulness Centres Collaboration MBCT Teacher Training for IAPT Services Lead:

_____ (signed)

Name: _____

Date: _____

APPENDIX 4

UK Mindfulness Centres Collaboration



Off-site Use of Audio/Visual Recordings Agreement Form

This form must be used when a trainee engaged in the UK Mindfulness Centres Collaboration MBCT Teacher Training for IAPT Services is proposing to take a recording of a client away from Trust/employer premises for the purpose of supervision.

This must be signed by both supervisor and trainee below.

Responsibilities

Once agreed and signed to, the trainee takes responsibility for the safety and security of the recording. The recording should be treated with great care and trainees must ensure that it is not seen or heard by any unauthorised individuals.

They are also responsible for ensuring that the recording is deleted from the recording device and/or storage device after it is no longer needed. This consent form should be updated to show that this has happened. The supervisor must ensure that the recording has been deleted in a timely manner after a decision has been made about which MBCT group to submit for assessment, and s/he has responsibility for making sure this form is signed and completed appropriately.

Any breach of this procedure will be investigated by the UK Mindfulness Centres Collaboration.

Name of trainee:	
Date:	Signed:
Name of supervisor:	
Date:	Signed:
Recording certified as deleted:	
Date:	Signed: