

# UK Mindfulness Centres Collaboration

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

2022-2023



## ***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 practices concerning 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 British Association of Mindfulness-Based Approaches (<https://bamba.org.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 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 the National Institute recommends 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 2022 and March 2023 and is being provided by the *UK Mindfulness Centres Collaboration*. The training 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 pieces of training, it is standard practice for trainees to record the clinical sessions they deliver and use these recordings for reflective practice and as material to discuss in supervision. During this year-long training programme, trainees will need to teach two complete MBCT 8-week clinical courses.
6. Trainees will deliver these MBCT courses face to face or online. Any COVID-related service guidelines in place at the time of teaching these two groups should be followed. Considerations of clinical suitability, COVID-related safety, feasibility and service restrictions on the 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 using zoom as a platform because, at the time of writing, it allowed the most excellent functionality, particularly in its use of break out rooms. Where zoom is not permitted, a discussion should occur with the supervisor and training lead about the best allowable online options. The 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 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 according to the guidance outlined in this document and 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 best practices (see form in Appendix 3).

### *Patient privacy and consent*

10. Trainees will consult their workplace supervisor and manager in good time to ensure they can act in full accordance with their employer's policies and procedures. This will include recording, marking, transporting, storing and deletion of recordings, and they 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 occur

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 and 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 form. These forms will contain identifiable patient information and therefore need to be kept securely in the workplace.
13. After consent has been gained from all group participants, trainees must sign the 'confirmation of consent to recording' form (Appendix 2) and submit it to their supervisor and 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 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 that is encrypted and compliant with your own Trust's policies. The following USB stick will hold a total of 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 be seen or heard by other people under any circumstances.

#### *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 unlocked storage. Recordings should never be sent by email.

#### *Submission of recordings*

17. Trainees will submit the 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 two 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 later. 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 the 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. Failure 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 organisation 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 2022-2023

#### Why am I being asked for permission to record?

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

The training programme that your therapist is currently undertaking aims to provide 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, following 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 that can be used within training collaborations 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 training where recordings are used will agree to utmost confidentiality regarding the identity of teachers they see. The viewing of such recordings is conducted respectfully, emphasising 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 training participants do not know the teacher they see. All recordings will be stored securely.

[www.ukmindfulnessnetwork.co.uk/guidelines/](http://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 ensure 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 certain 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 assessment and supervision. The recordings are used to study precisely how the MBCT teaching was provided to you. The therapist is a supervisor/assessor to monitor skills, give feedback, and provide proper supervision to fine-tune the teaching sessions to enhance the therapist's skills.

The UK Mindfulness Centres Collaboration also uses recordings of teaching sessions as part of the formal assessment on the training programme in conjunction with the Oxford Mindfulness Centre. With your permission, recordings could also be used to train 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 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). 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 selecting what identifying information I display online about my identity.*

All recordings will be stored following the Data Protection Act (DPA), 2018. I give my consent to understand that the recording will be kept confidential and stored securely.

I know 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 this training programme, but sections of the recording may be kept for ongoing use if used for future training cohorts. Recordings kept for supervision and assessment of your teacher will be kept for 6 months. I understand that if I consent to recordings for training too, these may be kept for up to 5 years. I know I can consent to recordings for supervision and assessment but not training. 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 supervision by my therapist's supervisor/s.

**Purpose: Assessment**

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

**Purpose: Training**

I consent to use selected sections of recordings being used to train future mindfulness teachers, supervisors, and assessors.

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  
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2022-2023

#### 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 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)
  
- I further give my consent for the recordings to be retained for up to 5 years and used for training purposes.

Signed:.....(Trainee/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 competency assessment.*

*The required representatives of both organisations must sign this agreement before any data is transferred.*

This agreement binds the University to maintain the 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. There is explicit patient consent for them to be seen as stated on the consent to recording' form.
3. Recordings may only be transported between Trust/employer and the University site by an encrypted USB safe stick. 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. 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 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 follow this policy's requirements.
6. The University will delete all 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

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

*This must be signed by both supervisor and trainee below.*

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#### **Responsibilities**

*Once agreed and signed, 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 on time 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.*

*The UK Mindfulness Centres Collaboration will investigate any breach of this procedure.*

<b>Name of trainee:</b>
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<b>Date:</b>	<b>Signed:</b>
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<b>Name of supervisor:</b>
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<b>Date:</b>	<b>Signed:</b>
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<b>Recording certified as deleted:</b>
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<b>Date:</b>	<b>Signed:</b>
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