CONCORDIA COUNSELLING

APPENDIX B

1. PRIVACY POLICY

1.1 In order to provide you with the best service possible, I need to hold your personal contact details and records of our therapy sessions. This Privacy Policy is designed to inform you of what I will do with your personal information, from initial point of contact to the conclusion of our therapeutic relationship.

1.2 Your privacy is extremely important to me and you can be confident that your personal information will be kept safe and secure. It will only be used for the purpose for which it was given to me and in strict adherence to current data protection legislation and the Ethical Framework set out by the British Association for Counselling and Psychotherapy ("BACP").

1.3 It is important that you read this Privacy Policy together with any other Privacy Policy or Fair Processing Policy I may give you on specific occasions when I collect or process personal information about you. This will enable you to remain fully aware of how and why I use your information. This Privacy Policy supplements other Notices and Privacy Policies and is not intended to override them.

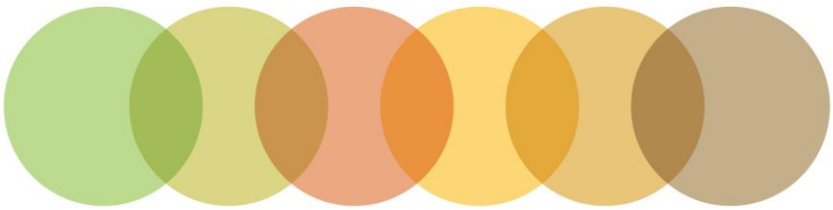
2. Data Controller

2.1 I (Murray Lindley) am the data controller and I am responsible for your personal information. If you have any questions about this Policy or my privacy practices, please contact me in the following ways:

Email address: enquiries@concordiacounselling.org

Telephone number: 07587 123 387

2.2 You have the right to make a complaint at any time to the Information Commissioner's Office ("ICO"), the UK regulator for data protection issues (www.ico.org.uk). I would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact me in the first instance.



3. Changes to privacy notice and duty to inform me of any changes

3.1 This Privacy Policy is regularly reviewed and I may update it from time to time; so please check occasionally for any updates.

3.2 It is important that the personal information I hold about you is accurate and current. Please let me know as soon as possible if your personal information changes.

4. My lawful basis for holding and using your personal information

4.1 The United Kingdom General Data Protection Regulation ("GDPR") states that I must have a lawful basis for processing your personal data. There are different lawful bases depending on the stage at which I am processing your data. If you are currently engaged in therapy or if you are in contact with me to consider therapy, I will process your personal data where it is necessary for the performance of our contract. If you have agreed to enter into a therapeutic relationship with me and it has now ended, I will use legitimate interest as my lawful basis for holding and using your personal information. The UK GDPR also ensures that I look after any sensitive personal information you may disclose to me appropriately. This type of information is called 'special category personal information'.

4.2 The lawful basis for me processing any special categories of personal information is based upon provision of health treatment (in this case counselling sessions) and necessity for a contract with a health professional (in this case, a contract between you and I).

5. The type of information use and how I use it

5.1 I will never use your personal data for any purposes other than the administration of the counselling service that I am providing to you – i.e. to arrange, cancel and rearrange appointments. I will only retain your personal information for as long as is necessary.

5.2 **Initial contact:**

When you contact me to book your first therapy session, I will collect some brief information to help me to process your enquiry. This will include your name (so that I can book the session into my diary) and also a contact method, for example an email address or telephone number. This information is requested so that I could inform you if I was unable to attend a session, due to unforeseen circumstances. If you do not want to be contacted under any circumstances, you do not need to provide a contact method. Alternatively, an organisation such as your employer may send me your details when making a referral or a relative may give me your details when making an enquiry on your behalf. If an enquiry is made and you decide not to proceed, I will ensure that all of your personal data is deleted within one month unless you tell me to delete it sooner.

5.3 **While you are accessing therapy:**

Your email address or phone number will be used to provide you with written confirmation of your appointment times, if you have given consent for this. Your email address and telephone number will only be used to contact you regarding appointment times, unless we have agreed that I will also use your email address to send you information that is relevant to your counselling sessions.

5.4 At the beginning of your first session, I will ask you to complete a personal details form containing your name, address, date of birth, contact information and also contact information for your GP. The form is stored either in a locked filing cabinet, an internet cloud system requiring two–factor authentication, on a computer which is password protected and / or on encrypted USB, that can only be accessed by me (or reception staff if we meet in person). Please be aware that I will not routinely contact your GP to inform your GP of your attendance, as your attendance is confidential. To fulfil my duty of care towards you while also maintaining your confidentiality, I will only contact your GP if it is necessary and should these circumstances arise, I will wherever possible discuss this with you before contacting your GP. (See Safeguarding Policy at Appendix A).

5.5 As a Member of the BACP, I undertake my requirement to adhere strictly to all relevant professional codes of ethics very seriously. Rest assured that what is discussed during our sessions will be kept confidential, with the exception of circumstances arising which may trigger the Safeguarding Policy (See Appendix A). Such circumstances will involve either legal reasons and / or ethical obligations, which would require me to disclose information discussed. If, during the course of our discussions, it is implied to me that you are in danger of causing serious harm to yourself or others, or if a court of law requires me to disclose information; then I will be obliged to make necessary relevant disclosures either to your GP and / or relevant appropriate third–parties.

5.6 In the event that confidentiality must be broken I will always try to speak to you about this first, unless there are safeguarding or legal issues that prevent this.

5.7 As a Counselling Practitioner, I am required to have regular supervision support, during which I will discuss our work with my supervisor. Any discussions with my supervisor concerning our work would be undertaken without identifying you. My supervisor is a Member of the BACP and therefore also abides by their Ethical Framework; including in respect of the requirement for confidentiality (with exception of safeguarding circumstances, such as those described above).

5.8 I keep notes of our therapy sessions for the purpose of assisting our work together. The notes help me to track issues that we are working on and are for my personal use. They do not include any personal details that could be used to identify you and they are stored securely within an internet cloud system requiring two–factor authentication, on a computer which is password protected and / or on encrypted USB, that only I have access to. Your therapy notes are stored separately to your personal details form.

5.9 **After therapy has ended:**

Counselling Practitioners are required to keep records after therapy has ended for a number of reasons. For example, in the case of financial transactions, personal information must be retained for as long as legally required in respect of tax or accounting requirements.

Retaining your therapy notes ensures that I can continue to offer you an efficient service if you make contact after therapy has ended. Your therapy notes do not include any personal details that could be used to identify you and continue to be stored securely within an internet cloud system requiring two–factor authentication, on a computer which is password protected and / or on encrypted USB, that only I have access to for seven years after therapy has ended. This time frame adheres with current industry guidelines. Seven years after therapy has ended your therapy notes will be confidentially destroyed.

5.10 Your personal details form will be confidentially destroyed upon ending your therapy sessions. Please note that I need to keep a record of your name, date of birth and your client reference number for seven years after therapy ends. Your client reference number corresponds with a client reference number on your therapy notes and therefore enables me to identify your therapy notes if necessary.

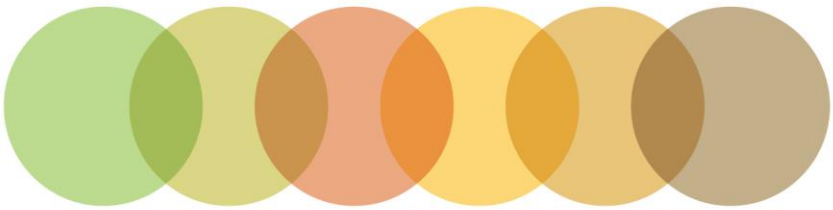
5.11 If I ask you for information which you prefer not to provide to me, I may not be able to offer or continue to offer the services you have asked for. I will notify you if this is the case at the time.

6. Third party recipients of personal data

6.1 I share a limited amount of personal data with third parties, in order to provide counselling services to you and to fulfil legal obligations in respect of tax and accounting purposes. For example, my accountant is permitted access to my invoices as necessary.

6.2 If you contact me to book an appointment in person, I will give your name to reception at the location where your appointment is due to take place, in order to book your appointment at that location.

6.3 Where I have contracted with a supplier to carry out tasks on my behalf in connection with the services, it is on condition that they may only use your information for the specific task for which they have been contracted. I will never pass on your contact details to any third–party organisations for the purposes of sales, marketing or research.



6.4 If your appointments are paid for or arranged via a third–party, for example, your employer, the only information shared is your dates of attendance and any non–attendance, for invoicing and payment purposes. Details about what is discussed in your appointments will remain confidential and can only be shared if you give me your written consent to do so.

7. International Transfers

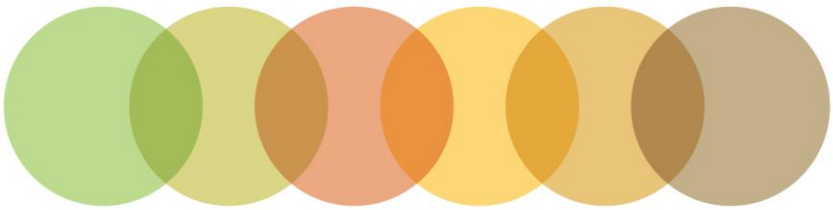
7.1 I do not transfer your personal information outside of the UK.

8. Data security

8.1 I take the security of the data that I hold about you very seriously. My email account is password protected and any mobile telephones and laptops used to respond to your emails are also password protected and have anti–virus software. Any email correspondence will be deleted within one month, if it is not necessary to keep it. If it is necessary to retain the information, I will print the email and store it securely in a locked filing cabinet that only I have access to.

9. Website visitors

9.1 By accessing the website, you understand and acknowledge the information collection and use practices described in this Privacy Policy. Should you choose to contact me using a contact form on the website, the data that you supply will be stored by the website in secure, encrypted format, but not passed to any third–party data processors. The data will be collated into an email and sent to me over the Simple Mail Transfer Protocol (SMTP). SMTP servers are protected by TLS (sometimes known as SSL), meaning that the email content is encrypted before being sent across the internet. The email content is then decrypted by local computers and devices.



9.2 My website uses cookies. Almost all websites use cookies, which are small files that get put on your computer by websites when you access them. These cookies can store lots of information, which can have privacy implications. Google Analytics is a service provided by Google that gathers anonymous data on how people are using websites and then provides visitor statistics, details of page views etc. This service is used by many website owners, as the data helps website owners to improve their websites.

9.3 Some page elements are embedded from trusted third–parties, in order to provide you with Interactive Maps. This makes the website more helpful to you as a site visitor, however most of these come with their own cookies. This applies to Google Maps. I do not control these cookies, so I cannot guarantee what they do. In many cases the cookies are used to generate identical information to Google Analytics and indeed use Google Analytics, so opting out of Google Analytics will also opt you out of these cookies too. You can opt out of Google analytics and other Google services here:

http://tools.google.com/dlpage/gaoptout

and

https://www.google.com/dashboard/.

10. Third–party links

10.1 My website may include links to third–party websites, plug–ins, applications and social media. Clicking on those links or enabling those connections may allow third parties to collect or share information about you. These third–party websites are outside of my control and I am not responsible for their privacy statements or practices. When you leave my website, please read the privacy policy of every website you visit.

11. Your rights

11.1 Data protection laws give you the following rights in respect of your personal information:

11.2 You can request access to the personal information that I store and process about you. You can ask for corrections to be made to the information held or for your personal information to be deleted.

11.3 You can also ask me to restrict the processing of your personal information or object to the processing of it altogether in some circumstances. You can read more about your rights on the ICO's website, linked here.

11.4 If you would like to make a request relating to any of the rights above, please send a request in writing, by emailing enquiries@concordiacounselling.org. Please be aware that in certain situations, I may be unable to comply with the above request(s) (for example, if compelled to retain the records by a court of law). Please also be aware that there may be a charge for complying with a request if it is deemed to be excessive in nature.