

## Privacy Notice

### Introduction

This privacy notice tells you what I will do with your personal data that can identify you such as your full name, date of birth, address, telephone number, and email address. This privacy notice will highlight how I use your personal data, why I need it, how I store it and when I destroy it.

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### Data controller

'Data controller' is the term used to describe the person/organisation that collects, stores and has responsibility for people's personal data. In this instance, the data controller is me.

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### The Information Commissioner's Office

I am registered with the Information Commissioner's Office. Registration reference: A8219665

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### My lawful basis for holding and using your personal data

The 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. I have explained these below:

I will use **legitimate interest** as my lawful basis for holding and using your personal information under the following circumstances:

- If you have had therapy or supervision with me and it has now ended
- If you booked group work or professional training that has now taken place

If you are currently having therapy or supervision with me or if you are in contact with me to discuss group work, professional training or the possibility of having therapy or supervision, I will process your personal data where it is necessary for the performance of our agreement/contract.

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### Special category personal data

The GDPR also makes sure that I look after any sensitive personal data that you may disclose to me appropriately such as ethnicity, religion and sexual orientation. This type of information is called 'special category personal data'. The lawful basis for me processing any special categories of personal data is that it is for provision of health treatment (in this case counselling) and necessary for a contract/agreement with a health professional (in this case, a contract/agreement between me and you).

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### How I use your data: Initial contact

When you contact me with an enquiry I will collect information to help me satisfy your enquiry. This will include your name, phone number, email address and details regarding your enquiry. Alternatively (in regards to counselling) your GP, EAP provider, private medical insurer or other health professional may send me your details when making a referral, or a parent/carer or trusted individual may give me your details when making an enquiry on your behalf.

If you decide not to proceed with your enquiry I will ensure all of your personal data is deleted within one month. This includes deleting emails from deleted folders and deleting text messages. If you would like me to delete this information sooner, just let me know.

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## **How I use your data while you are accessing counselling or supervision**

Rest assured that everything you discuss with me is confidential. Confidentiality will only be broken if:

- I am legally required to inform the police if I am made aware of information relating to drug trafficking, money laundering and/or an act of terrorism
- I am made aware of information relating to you or someone else being at risk of immediate or serious harm
- You are a supervisee and I feel concerned about your welfare and/or aspects of your practice

I may also be required to provide the notes of our counselling or supervision sessions to a member of the legal profession when presented with a warrant/court order. If I feel the need to break confidentiality I will, where possible and appropriate, talk with you before taking any action. If you are accessing counselling via a third party provider I will be required to discuss this matter with them.

I will keep a record of your personal details to help the counselling or supervision run smoothly. These details are kept securely in a locked filing cabinet and on a laptop and mobile phone which are both password protected.

I will keep written notes of each counselling and supervision session. These are stored in a locked filing cabinet. If you are accessing counselling via an EAP, I may be required to store session notes on the EAPs secure online system.

For security reasons I do not store your name and number directly into my phone and I do not retain text messages or emails to/from you unless there is a clear reason for me to do so (e.g. in relation to disputes or payment issues).

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## **After counselling and supervision has ended**

Once counselling and supervision has ended and all relevant matters are resolved (e.g. payment issues, complaints, disputes or concerns regarding practice) your identifiable information including your full name, date of birth, address, telephone number, and email address will be destroyed.

I will store the notes of our sessions for six years, after which time these notes will be shredded. If you are accessing counselling via an EAP, I and/or the EAP may be required to store notes (and potentially your personal identifiable information) for a longer or shorter period. Please ask if you'd like further details.

Any emails and text messages will be deleted within a month after our final session, unless I deem any important for me to keep (e.g. in cases relating to concerns, disputes or payment issues). Where this is the case emails and text messages will be stored for six years from the date of our final session and will be deleted after this time.

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## **Once group work and professional training has ended**

Once group work and professional training has ended and all relevant matters are resolved (e.g. disputes and payment issues) the identifiable information of the person who made the booking, such as their full name, address, telephone number, and email address will be stored for six years on a password protected laptop, after which time the information including emails, will be deleted.

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## **Your rights**

I try to be as open as I can be in terms of giving people access to their personal data. You have a right to ask me to delete your personal data, to limit how I use your personal data, or to stop processing your personal data. You also have a right to ask for a copy of any information that I hold about you and to object to the use of your personal data in some circumstances. You can read more about your rights at <https://ico.org.uk/your-data-matters>

To make a request for any personal information I may hold about you, please put the request in writing addressing it to [phil@counsellingwithphil.co.uk](mailto:phil@counsellingwithphil.co.uk)

If you have any complaint about how I handle your personal data please do not hesitate to get in touch with via email. I would welcome any suggestions for improving my data protection procedures.

If you want to make a formal complaint about the way I have processed your personal data you can contact the ICO which is the statutory body that oversees data protection law in the UK. For more information go to <https://ico.org.uk/make-a-complaint>

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### Visitors to my website

When someone visits my website, I use a third party service, Google LLC to collect standard internet log information and details of visitor behaviour patterns. I do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way that does not identify anyone. I do not make, and do not allow Google LLC to make, any attempt to find out the identities of those visiting my website.

I use **legitimate interest** as my lawful basis for holding and using your personal information in this way when you visit my website.

I use Google Analytics so that I can continually improve my service to you. You can read Google Analytics privacy notice here: <https://policies.google.com/privacy?gl=IN&hl=en-GB>

I use WordPress as the content management system for my website - find out about WordPress and data protection here: <https://wordpress.org/about/privacy/>

Like most websites cookies are used to help the site work more efficiently. To find out more about the use of cookies view: <https://privacy.microsoft.com/en-US/privacystatement#maincookiessimilartechnologiesmodule>  
For reference see <https://bacp.co.uk/notices/cookies>

No user-specific data is collected by me or any third party. If you fill in a form on my website, that data will be temporarily stored on the web host before being sent to me.

Quick Reference Guide	
Counselling	Session Notes: Shredded after six years Identifiable Info: Shredded after last session/once payment is made
EAP Counselling	Session Notes: Requirements vary. Please ask for further details Identifiable Info: Requirements vary. Please ask for further details
Supervision	Session Notes: Shredded after six years Identifiable Info: Shredded after last session/once payment is made
Training	Identifiable information stored for six years on password protected laptop and then deleted
Group work	Identifiable information stored for six years on password protected laptop and then deleted