

Privacy Policy of



Owner and Data Controller (referred to as 'I' throughout)

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Introduction

The purpose of this privacy policy is to explicitly set out my commitment to your rights of privacy and confidentiality, to comply with the requirements of the General Data Protection Regulation 2018 (GDPR 2018) and the UK Data Protection Act 2018 (DPA 2018).

This privacy statement confirms what data I will collect and the reasons why. It confirms how I collect and store data, and the reasons why it may need to be shared.

Counselling Practice

Personal Data

I will collect and store your general personal data for the purposes of providing you with a good, professional and ethical service. The personal details I require from you will include your:

- name and date of birth
- address
- contact number/s
- email address/s
- GP details
- emergency contact details
- relevant medical conditions, and/or medication details
- any other information you feel is relevant or necessary to the provision of good and ethical services by the service

I will record and securely store these personal details in accordance with the requirements of the General Data Protection Regulation 2018 (GDPR 2018) and the UK Data Protection Act 2018 (DPA 2018).

Personal Data Process

My professional service and commitment to protecting your personal data:

- All clients will receive a '*Client Personal Details Form*' at their initial appointment and will be asked to return a completed and signed copy of this form at their next appointment.
- All client personal data will be stored in a secure coded filing cabinet at my place of residence, that only I have access to.
- I will store clients personal and emergency contact phone number/s on my phone, along with their email address/es. This phone is password, thumb print, and face detection protected, and I have sole access to this mobile device. I will not share any of these details with anyone.
- Client personal data will be kept for as long a time as is necessary, in order to provide a good, professional and ethical service – usually up to 6 years after the client has ceased to use my services. At any point all clients can request to view and/or amend their personal details that I hold. Clients can request that the data controller deletes their data at any point after which contracted services have ended.

Clinical notes

At the end of each client session I will record minimal clinical notes of what has occurred within the session. This is to ensure the maintenance of good standards of practice for all my clients.

All client clinical notes will be stored in a secure coded filing cabinet - separate from personal data forms and number coded to maintain each individual's anonymity - at my place of residence, that only I have access to.

Client clinical notes will be kept for as long a time as is necessary, in order to provide a good, professional and ethical service – usually up to 6 years after the client has ceased to use my services.

At any point all clients can request to view clinical notes which are in relation to themselves. I will provide these notes within a time period of no more than 4 weeks.

Confidentiality and sharing of personal information

All personal data provided and stored, clinical notes taken and stored, and our counselling work together, are completely confidential.

However, I do have a professional and legal obligation to protect yours and others well-being, so this confidentiality is within legal limitations i.e. The Children's Act, The Terrorism Act, the Drug Trafficking and Money Laundering Act.

Under GDPR I will only share any personal information you have given me if I feel that there is:

- 1) An immediate risk of substantial harm to you or others, or serious criminal activity,
- 2) A legal requirement – as above or:
- 3) If required to by a court order.

There are also ethical limitations to confidentiality. If I believed that you were a serious danger to yourself, – by this I mean you are posing signs of serious suicidal ideation – to others, or if you were in serious danger, then I might need to discuss breaking confidentiality with you, and potentially contact the police i.e. to request a police welfare check to an address.

I would share any concerns I had with you openly and hope to work to keep yourself and others safe. If we were unable to agree a way forward, I might have to breach confidentiality and seek support from your GP and any other relevant agencies to help to keep you safe.

Consent to share your information – Upon client agreement and instruction, I may contact other professionals who may be able to provide additional support where necessary.

Clinical Trustee – In accordance with the BACP ethical framework point 42 – If I, for any reason, become suddenly debilitated, then my clinical trustee will get in touch with all my currently active clients to inform them of what has occurred and will arrange for my clients to received continued support in line with their current process.

Explicit Client Understanding

All clients will be given two data controller signed copies of this Privacy Policy at their initial appointment and will return one client signed copy at their next appointment. This is to ensure the explicit acknowledgement of receipt and understanding of this policy. Thank you.

Concerns

If any client has concerns regarding the handling of their data, they should discuss this with the data controller as a first point of contact. If they do not feel satisfied that their concerns have been sufficiently addressed and/or resolved, then the client should contact the Information Commissioners Office (ICO), telephone 0303 123 1113.

Changes to this privacy policy

I reserve the right to make changes to this privacy policy at any time by giving notice to its users on my website – address TBC. I will make every effort to inform all clients of any changes to this privacy policy, as and when they occur.

If a client objects to any of the changes to the privacy policy they should bring their concerns to myself in the first instance, and if an understanding can't be reached then the client should contact the Information Commissioners Office (ICO), telephone 0303 123 1113

I, the data controller, acknowledge my complete commitment to the practicing of this privacy policy, in agreement of its terms.

Date: _____ **Data Controller Signature:** _____

I, the client, give my explicit understanding of this privacy policy, in agreement of its terms.

Date: _____ **Client Signature:** _____