

**Privacy Policy**

**Introduction**

Your privacy is very important to me and you can be confident that your personal information will be kept safe and secure and will only be used for the purpose it was given to me. I adhere to current data protection legislation, including the UK General Data Protection Regulation (the UK GDPR), the Data Protection Act 2018 and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

This privacy notice tells you what I will do with your personal information from initial point of contact through to after your therapy has ended, including:

* Why I am able to process your information and what purpose I am processing it for
* Whether you have to provide it to me
* How long I store it for
* Whether there are other recipients of your personal information
* Your data protection rights

I am happy to chat through any questions you might have about my data protection policy and you can contact me via 07845 686728.

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

I am registered with the Information Commissioner’s Office, registration number ZB855497

**Initial contact**

When you contact me with an enquiry about my counselling services, I will collect information to help me satisfy your enquiry. Alternatively, your GP or other health professional may send me your details when making a referral or a parent or trusted individual may give me your details when making an enquiry on your behalf. If you decide not to proceed, I will ensure all your personal data is deleted within one week of you confirming. If you would like me to delete this information sooner, just let me know.

**While you are accessing counselling**

Rest assured that everything you discuss with me is confidential. That confidentiality will only be broken if your consent is given or where I am compelled to break confidentiality by a court of law. I will always try to speak to you about this first, unless there are safeguarding issues that prevent this.

**How I use your information**

If you choose to work with me, the information I will need is as follows:

* Your name
* Your address
* Your date of birth
* Next of kin contact details
* A contact telephone number and whether it is permissible to leave you a voicemail or text
* Your email address
* The name and surgery of the GP you are registered with
* Previous or current health issues
* Current medication
* Details of any other relevant health professionals who’s care you may be under

If you are currently having 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.

**My lawful basis for holding and using your personal information**

The 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:

If you have had therapy with me and it has now ended, I will use legitimate interest as my lawful basis for holding and using your personal information.

If you are currently having 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.

The GDPR also makes sure that I look after any sensitive personal information that you may disclose to me appropriately. This type of information is called ‘special category personal information’. The lawful basis for me processing any special categories of personal information is consent initially. I will then retain any counselling records in case of the need to reference them in the future (the official legal basis is to defend against potential legal claims).

**After counselling has ended**

Once counselling has ended, your records will be kept for a period of five years and are then securely destroyed, this is in line with my insurance requirements. If you want me to delete your information sooner than this, please tell me.

#### **Third party recipients of personal data**

Sometimes your personal data may get shared with third parties, for example where you pay by bank transfer, **your details will be shown as a transaction on a statement**. I have done everything I can to check that such third parties are also data protection compliant.

**Your rights**

I try to be as open as I can be in terms of giving people access to their personal information. You have a right to ask me to delete your personal information, to limit how I use your personal information, or to stop processing your personal information. 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 [ico.org.uk/your-data-matters](https://ico.org.uk/for-the-public/).

If I do hold information about you I will:

* give you a description of it and where it came from
* tell you why I am holding it, tell you how long I will store your data and how I made this decision
* tell you who it could be disclosed to
* let you have a copy of the information in an intelligible form.

You can also ask me at any time to correct any mistakes there may be in the personal information I hold about you.

To make a request for any personal information I may hold about you, please put the request in writing addressing it to jane@janesteadmancounselling.co.uk.

If you have any complaint about how I handle your personal data please do not hesitate to get in touch with me by writing or emailing to the contact details given above. 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 information you can contact the ICO which is the statutory body that oversees data protection law in the UK. For more information go to [ico.org.uk/make-a-complaint](https://ico.org.uk/make-a-complaint)

**Data security**

I take the security of the data I hold about you very seriously and as such I take every effort to make sure it is kept secure. I will keep a record of your personal details to help the counselling services run smoothly. These details are kept securely on my devices (phone and laptop), are password protected and are not shared with any third party. I keep very brief written notes of each session, these are kept securely on my laptop, and are password protected. Any notes are kept separate from your personal details.