



## Privacy Notice

This privacy notice outlines what personal information I collect, why I collect it and how I use it. I also outline your rights over your personal information and what procedures I use to protect your personal information. I adhere to the General Data Protection Regulation (EU/2016/679) when processing your personal information and I, Helen Young, am the sole data controller. I am registered with the Information Commissioners Office: registration number ZA866089. I also adhere to the policies of British Association for Counselling and Psychotherapy.

### My commitment to you

I am committed to using your personal information lawfully, fairly and transparently which includes using your personal information for the lawful purposes that were explained to you and not used for other purposes. I ensure your personal information is kept up to date, accurate, secure, protected, retained only for as long as necessary and for the purposes outlined.

### How your personal information is collected

Personal information about you is provided to me at your initial point of enquiry, during our counselling sessions and when you visit my website.

### What personal information is collected

I collect personal contact information (including name, address, telephone numbers, email address, emergency contact, GP address) and special category information (including medical information, gender).

### Lawful basis for processing your information

To comply with the GDPR I must have a lawful basis for processing your personal information. There are different lawful bases depending on the stage at which I am processing your data. If you are currently having counselling with me or if you are in contact with me to consider beginning counselling with me then the legal basis to process your personal information is for the performance of our contract for the specific purpose of providing a counselling service to you. If you used to have counselling with me which has now come to an end, then the legal basis for me processing your personal information would be for a legitimate interest. 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 legal basis for processing your special category personal information is for the establishment, exercise or defence of legal claims.

### How I use your information: Initial contact

I use your personal information, including your name and contact details, to process your enquiry for counselling services. I may also receive your personal information by someone making an enquiry or a referral on your behalf. If you decide not to progress to an initial assessment, then I delete your personal information within three months. Please let me know if you prefer your personal information to be deleted before the three months.

### How I use your information: While you are accessing counselling

- I collect your personal information to provide you with the counselling service outlined within the working agreement. Your personal information is stored securely and in accordance with GDPR in a locked filing cabinet. I collect contact details that can be used in an emergency. I keep a record of any information relating to the safety of

yourself or others including suicide risk and child protection concerns. For your safety it may be necessary for me to contact your GP while we are working together.

- I also keep short factual notes of each session for the purpose of assisting our work together to keep track of the issues we are working on and are for my use only. The notes do not include any information that could identify you. Your therapy notes are kept securely in accordance with GDPR and are stored separately from your personal information.
- Like all counsellors I am required to have regular supervision, so I may discuss our work with my supervisor. This would be done without identifying you and my supervisor is a counsellor who also abides by the same ethical code regarding confidentiality.
- If an accident, illness, or death prevents me from being able to contact you I have nominated a trusted therapeutic executor who will contact you to notify you of this and who is bound by the same level of confidentiality as myself. Your contact details are stored on a password encrypted file on a memory stick that is stored in a locked filing cabinet. A copy of this file is provided to the therapeutic executor for the duration of counselling.

#### **How I use your information: After counselling has ended**

- Your identifiable personal information is kept for a period of 7 years after the ending of counselling sessions.
- Safeguarding information is also be kept for a period of 7 years after the ending of counselling sessions.
- Anonymised session notes is kept for a period of 7 years as required by my insurer. In the case of young people, 7 years after your 18th birthday.
- Email correspondence is retained for a period of 7 years after the ending of counselling sessions.

#### **Processing data**

- I will never use your personal data for any purposes other than the administration of the therapy service that I am providing to you.
- Your personal information will not be actively shared except where required by law, such as being summoned by a court, or if life or safety is seriously threatened. In these instances, I have the right to contact your GP or relevant authorities. Whenever possible I will endeavour to discuss this with you beforehand unless there are safeguarding issues that prevent this.
- Some of your personal information is also retained for as long as legally required in respect of tax or accounting purposes.

#### **Data security**

- My email account, mobile phone and laptop are password protected.
- Hand-written information is locked in a filing cabinet that only I have access to.
- Electronic-written information is stored on a password encrypted cloud storage (Office 365) or on a password encrypted memory stick that is locked in a filing cabinet that only I have access to.
- I store your email address electronically and delete it within three months of us no longer working together.
- I store your phone number on my mobile phone using your initials. Your phone number is deleted from my mobile phone within three months of us no longer working together.
- I do not retain text messages for more than one month and instead relevant information contained in a text message is recorded within your personal file.
- Email correspondence is retained for a period of 7 years after the ending of counselling sessions.

### **Your rights relating to your personal information**

You have the right to:

1. **Request access** to see your personal information and to check that I am processing it lawfully.
2. Request that personal information held about you is **corrected**.
3. Request **erasure** by asking for the deletion or removal of personal information where there is no legitimate ground for retaining such information.
4. **Object to me processing** your personal information.
5. Request **restriction** towards the processing of your personal information:
6. Your personal information to be **transferred to another party**.

If you wish to exercise your rights, then please submit your request to me in writing.

### **How to contact me**

Please contact me if you have any questions about this Privacy Notice or if you are unhappy with how I have used your personal information: 122 Sunlight Gardens, Fareham, Hampshire, PO15 6DQ [info@hycounselling.co.uk](mailto:info@hycounselling.co.uk) 07874810357. You also have the right to contact the Information Commissioner's Office if you are not happy with how I used your personal information <https://ico.org.uk/concerns/>.