

General Data Protection Regulation changes from the Data Protection Act 1998

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Collection and storage

Although I hold extremely limited information about you, my aim is to be as transparent as possible and I am required to inform you what I do with your data.

It is important to know that any of my brief, factual client notes (which I am required to write after each of our sessions as a BACP requirement) keeps you anonymised, and that there is no reference to any of your personal details in these notes.

I have a monthly consultation supervision with my BACP registered supervisor (again, a BACP requirement) and you are also anonymised in any such discussions. They will not know you professionally or personally.

Who else has access to your data?

I as the sole Data Controller and registered with the Information Commissioner's Office (ICO) have access to this and keep my records stored safely at my practice premises. The only other person who is aware of where this information is, is my Therapeutic Executor. This is so that if I die whilst you are still in therapy, you will be notified.

What I retain:

Paper – working agreement (signed), brief session notes, GDPR Agreement (signed)

Online/ Electronic/ Smartphone - Depending on how we contact one another we may end up communicating via the means of the following online systems:

Facebook, Hotmail, WordPress (my online web contact form), Counselling Directory contact form, Skype or FaceTime.

Any details you choose to share (e.g. initial contact and correspondence) will be stored on each of these platforms. In the case of my smartphone I will hold your first name and telephone number in my contacts. This may also be stored as an SMS should we communicate via text messages.

I will ensure that I maintain strong hard to guess passwords so that our data is kept as securely as possible and inform you immediately if I believe there has been any breach of data (hacking/ cybercrime for example). No other person has access to any of the platforms listed above. Should I need to send you anything private and confidential I will use encryption. For telephone purposes I also require permission to send SMS and leave voice mail for you (please sign at the end of this statement).

Why do I need this data?

It is important I have a signed copy of our working agreement which has your basic contact details so that I may contact you, and emergency details should anything happen to you during our work.

The only times I would ever need to share your information is if I thought you were at significant risk of harm to yourself or others. If your health is in jeopardy (provided I have your consent) I may share your contact information with an emergency healthcare service (e.g. Mental Health Crisis Team/ GP). Although I would prefer to discuss this with you first, please note it might not always be possible to gain your consent depending on the severity of the situation.

If I have become aware of your intent to cause harm to another person/ organisation (e.g. terrorism, drug money laundering), the law may require that I inform an authority without

seeking your permission. In such a situation, the law may require that I share your personal information without your knowledge (known as whistle-blowing).

Disposal

When we have finished working together, I will erase electronic copies of your information and correspondence within one month. I will hold onto your written information for up to seven years past the end of our working together. This is so that I have a reference of our work in situations such as you returning to counselling in the future. After this time has passed, I will shred the written information.

Data Subject Access Requests

Should you wish to see my client notes, whether for access and explanation, to correct or erase in certain circumstances, to request time-limiting or ceasing data processing where applicable, you are free to do so at any time. In this instance please do so in writing so I have a formal record.

Your Rights

You have the following rights:

- To be informed what information I hold (i.e. this document).
- To see the information I hold about you.
- To rectify any inaccurate or incomplete personal information.
- To withdraw consent to me using your personal information.
- To request your personal information be erased (though I can decline whilst the information is needed for me to practice lawfully and competently).

Summary

- I will only ask for personal data relating to basic contact details, date of birth, an emergency contact, GP details in case of emergency/ serious concern.
- I will not keep your information for any longer than necessary.
- I will not send any of your information to any third parties/ share your data.
- All your data will be stored securely – both paper and electronically.
- I will delete any data for which I have no contractual or lawful reason to hold and review this on a regular basis.
- I will encrypt data where it is possible and sensible to do so.
- Your privacy and confidentiality are of paramount importance to me and I take this very seriously.

NB: You have been directed to this statement following our initial consultation and will be required to sign a copy at our first session.

Clients signature	
Date	
Counsellor's signature	
Date	