

## Privacy & Data 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 General Data Protection Regulation (EU/2016/679) (the 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
- Whether I intend to transfer it to another country
- Whether I do automated decision-making or profiling
- 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 by email: [elementscounsellingyork@gmail.com](mailto:elementscounsellingyork@gmail.com). '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, Rachel Tillet. I am registered with the Information Commissioner's Office Reference No: ZB349119. My postal address is: 2 Sherringham Drive, York My phone number is: 07743 177 258.

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

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 that it is for provision of health treatment (in this case counselling) and necessary for a contract with a health professional (in this case, a contract between me and you).

### How I use your information

### ***Initial contact***

When you contact me with an inquiry about my counselling services I will collect information to help me satisfy your enquiry. This will include your name, preferred contact details and your initial request. Alternatively, an affiliate may send me your details when making a referral or a parent or trusted individual may give me your details when making an inquiry on your behalf. If you decide to book an introductory call I will then take a further note of your previous counselling history, a little more depth about your presenting issues and counselling aims. If you decide not to proceed I will ensure all your personal data is deleted within 1 month. 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. I am a registered member of the British Association of Counselling & Psychotherapy (BACP) and I abide by their professional code of ethics. That confidentiality will only be broken if there is any threat of harm to yourself or another, or if you disclose criminal activity. I will always try to speak to you about this first, unless there are safeguarding issues that prevent this.

Counsellors are required to have regular supervision support therefore I may discuss our work, without identifying you, with my clinical supervisor. My supervisor is also an experienced counsellor and tutor who abides by the BACP's code of ethics regarding confidentiality.

Within the first counselling session I will conduct a formal assessment, noting your date of birth, address, GP information or emergency contact, relevant medical history, past and present risks of harm to self, details of your support network and information about your views/expectations of counselling. I will keep a record of your personal details to help the counselling services run smoothly. These details are kept securely on a password protected laptop/in a locked filing cabinet in a safe location and are not shared with any third party. I will keep notes of each session as an aide-memoire to ensure rigour and good practice. For privacy reasons I use a dedicated work mobile which is password protected and locked away in a safe location outside of my working hours. If there is relevant information contained in a text message or emails I will note this within my session notes for continuity enclosing a printed screenshot of the material will be made and stored in a paper file which is locked away in a safe location. Any email correspondence/text messages will be deleted after 1 month if it is not important.

### ***After counselling has ended***

Once counselling has ended your records will be kept for 7 years from the end of our contact with each other and are then securely destroyed. If you want me to delete your information sooner than this, please tell me.

## Third party recipients of data

I sometimes share personal data with third parties, for example if we have been introduced through an affiliate (eg. workplace scheme or charity). In such cases I have carefully selected which partners I work with. I take great care to ensure that I have a contract with the third party that states what they are allowed to do with the data I share with them. I ensure that they do not use your information in any way other than the task for which they have been contracted. Information exchange will remain as minimal as possible. If you would like to know more about your personal case please feel free to ask.

## 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 <https://ico.org.uk/your-data-matters>.

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 [elementscounsellingyork@gmail.com](mailto:elementscounsellingyork@gmail.com). 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 <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. (See Whilst you are accessing counselling above for further details)

## Visitors to my website



When someone visits my website, I use a third party service, Google Analytics to collect standard internet log information and details of visitor behaviour patterns. You can read Google Analytics privacy policy here [Privacy Disclosures Policy - Analytics Help](#). 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 third parties to make, any attempt to find out the identities of those visiting my website. I use legitimate interests as my lawful basis for holding and using your personal information in this way when you visit my website. I use Wordpress as the content management system for our website. Like most websites we use cookies to help the site work more efficiently - find out about our use of cookies here: <https://www.elementscounselling.co.uk/cookie-policy/> . 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.