

Privacy Policy

I am committed to protecting your privacy. Any personal data (about you or your family) provided by you (or your child) to me through any means (verbal, written, in electronic form, or by your use of my website) will be held and processed in accordance with this privacy policy as set out below and the data protection principles set out in the Data Protection Act 1998 and the General Data Protection Regulation 2018.

What information do I collect?

I may collect the following information:

- First name and surname
- Contact information including address, phone number, email address
- Job title and place of work
- Demographic information such as postcode, preferences and interests
- Sensitive personal information such as:
 - Gender, ethnicity and marital status
 - Religious or other cultural beliefs
 - Information on your family such as partner and children's names
 - Physical or mental health condition and history
 - Sexuality
 - Offences (including alleged offences)
 - Financial information, including bank account details
- Other relevant information to my service and feedback

What do I do with the information I gather?

I require this information to understand your (or your child's) needs and provide you/them with a service, and in particular for the following reasons:

- To respond to any enquiries
- To provide a professional counselling service
- To offer suitable counselling appointments
- To notify you about changes to your appointments and other changes to my service
- To seek feedback from you on your experience of my service
- To ensure and maintain the accuracy of my records
- To identify and protect those at risk of harm
- To improve my service and ensure it is provided in the most effective manner for you
- To maintain my professional and legal obligations

Client notes, personal contact details and other documentation are kept for as long as necessary and then destroyed/deleted after a long period of no contact or updates.

What information do I share?

I will not share any information about you with other organisations or people, except in the following situations:

- **Consent** – I may share your information with professionals or others whom you have requested or agreed I should contact

- **Serious harm** – If I believe you will cause serious physical harm to yourself or another person or that a child is at significant risk of harm then I may not be able to retain confidentiality and may inform one or more of the following; my supervisor/your GP/social services/police and/or parents if you are under 18. However, I will in most cases discuss this with you first. Confidentiality will also be broken in the event of any awareness of a terrorist act.
- **Compliance with law** – I may share your information where I am required to by law or by the regulations and other rules to which I am subject.
- **NHS Test and Trace** - If you test positive for coronavirus, the NHS test and trace service will ask you about people you've been in contact with. The NHS will then contact them to provide support and testing. Due to the limits of confidentiality relating to the balance of public interest, I may need to share your name and contact details with the NHS if you or another client contract the virus, however I will not disclose in what capacity I know you.
- **Professional supervision** – I am ethically bound by the BACP to have regular supervision for professional practice and so will at times need to discuss my work with my supervisor. I will use a client ID number or your first name only if necessary and avoid where possible other identifying details about you. On very rare occasions if I discover there is a need to communicate with other professionals such as a referral to another professional or organisation, this will only happen by first seeking your permission and knowledge of what is going to be discussed. However, if I believed at any time that you were incapable of providing written informed consent and pose a risk to yourself or others, I reserve the right to waive the need for such consent in order to minimise this risk.

Third parties

I do not use your contact details or any other information gathered, whether this is via verbal communication (by phone or in person), written notes, records or forms or any electrical device (ie mobile phone, laptop, website) for any marketing purposes nor are they provided to any third party for use for marketing purposes. The information I gather from you or your child is solely for the purposes as described above.

Website and Cookies

The collection and use of data provided by you on my website is not used for any marketing purposes nor provided to any third party for use for marketing purposes. It is used solely to make contact with you and respond to your request for my service.

On occasion, I may gather information about your computer for my services and to provide statistical information regarding the use of my website, such information will not identify you personally it is statistical data about my visitors and their use of my site. This statistical data does not identify any personal details whatsoever. Similarly I may gather information about your general Internet use by using a cookie file. Where used, these cookies are downloaded to your computer automatically. This cookie file is stored on the hard drive of your computer as cookies contain information that is transferred to your computer's hard drive. They help me to improve my website and the service that I provide to you. All computers have the ability to decline cookies. Activating the setting on your browser, which enables you to decline the cookies, can do this. Please note that should you choose to decline cookies, you may be unable to access particular parts of my website.

Security

I am committed to ensuring that your information is as secure as reasonably possible. In order to prevent unauthorised access or disclosure I have put in place suitable physical, electronic and

managerial procedures to safeguard and secure the information I collect from you; in person electronically, via phone, email and online (such as locked drawers, computer passwords, encryption, secure servers, two-step verification, mobile and internet security). Any email, mobile, phone or internet (zoom/FaceTime/Whatsapp etc) you may choose to use to communicate with me is subject to limits of confidentiality from providers. Unfortunately, the transmission of information via the internet is never completely secure. Although I will do my best to protect your information I cannot guarantee the security of your data transmitted to me via email, including forms and those completed on my website, any transmission is at your own risk.

Please note my personal home security system will video record you entering and leaving the premises. However, this is routinely deleted and not shared with any third parties.

Your Rights

Under the Data Protection Act 1998 and GDPR 2018, you may request sight of or withdraw your consent for me to hold and process your data at any time, even if you sign a consent form, you still have the right to withdraw your consent. You also have the right to require me to correct any inaccuracies in your information. To do this you will need to contact me (as the data controller) in writing. However, without your consent I will no longer be able to provide a service for you, so if you do this while actively receiving counselling, your counselling with me would have to end.

Corrections and Concerns

If you believe that information I hold about you is incorrect or out of date, please contact me and I will update your records. If you have concerns about how I handle your personal information, please contact me and I will try to resolve those concerns. If you wish to have your personal information deleted, please let me know and I will take reasonable steps to delete it (unless I need to keep it for legal, auditing or internal risk management reasons).

If you have difficulty understanding this information or want to ask more questions, please contact me. I change/update this policy from time to time so please check it occasionally by contacting me and requesting a recent copy.

Updated August 2020

Vicki Morganti – Data Controller
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