

## **DATA PROTECTION AND PRIVACY POLICY**

**This is the Data Protection and Privacy Policy of Jen Brown - Step-By-Step Counselling & Therapies.**

Your privacy and the security of data is of utmost priority. This Policy details how personal data/information is collected, processed, stored, shared and safeguarded and is written with the guiding principles of transparency and simplicity. Details are as follows:-

### **YOUR PERSONAL DETAILS**

#### **Collected from you:**

You may give personal information by completing my contact form on my website, [www.stepbystepcounselling.co.uk](http://www.stepbystepcounselling.co.uk), or by communicating with me by phone, email or otherwise. At such enquiry stage, I may collect personal information, such as name, contact details and details of your enquiry. All information I collect from you is for the purpose of appropriately and ethically dealing with your enquiry. I do not use your data for anything else.

On our initial meeting I will collect some personal information:

Name, date of birth, address, contact details, family circumstances, occupation, previous therapeutic input, any physiological or psychological conditions / diagnoses, medications and GP details.

#### **Potentially received from other sources:**

Any information I receive from third parties will be disclosed unless they are “ringfenced” (legal and professional statement restricting my disclosure of this information).

#### **Personal data collected on behalf of others:**

Personal data may be conveyed by others to provide relevant services to an individual. This may be shared on someone’s behalf - eg next of kin for health and safety reasons, acting as a parent/guardian for a minor or for those deemed unable to act for themselves, are vulnerable or have safeguarding issues. This information can only be shared with the individuals written consent.

### **HOW INFORMATION IS STORED**

#### **Handwritten:**

Handwritten session notes which act as an aide memoire and track therapeutic goals are only identifiable through a client ID. Your identifiable, signed forms are kept separately. All information is kept in a locked, fireproof cabinet.

#### **Electronic:**

Should you complete the enquiry form on my website, I store your name, contact details and enquiry details. This also applies to enquiries via email, text, telephone, Facebook or other social mediums and is so I can reply ethically to your enquiry.

All your information is stored via my secure website, secure telephone, secure email system and/or on a password-protected computer/telephone. Contact details will be stored with first name only. Any messages are kept until they are noted within the therapy records. I will generally contact you through my smartphone/laptop (to the contact medium to which you consent).

I cannot absolutely guarantee the security of information communicated by email or mobile phone, voice mail, text message, What's App, Facebook, Messenger etc, but endeavour to do so as far as reasonably possible. I will assume that you agree for me to use the communication methods you consented to, unless I hear differently.

### **DATA COLLECTED FOR ELECTRONIC PAYMENT**

Payment data may be collected, if electronic payment methods are used, such as Bacs or PayPal - I will not share this information other than to process payment with your chosen provider - please see your payment providers individual Privacy Policy.

### **DETAILS HELD, HOW IT IS PROCESSED AND RETENTION PERIOD**

In accordance with The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679), the data controller is Jennifer Brown. I am registered with the ICO (Information Commissioner's Office) Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF T - ICO Registered Number A830738. Further information can be found on [www.ico.org.uk](http://www.ico.org.uk).

Information will be kept for a period of 7 years after the close of therapy, and in the case of children and young adults, for 7 years following their legal majority. This is in line with guidance from Balens Professional Health Policy and The BACP Ethical Framework for Good Practice in Counselling and Psychotherapy. Further information can be found on [www.balens.co.uk](http://www.balens.co.uk) and [www.bacp.co.uk](http://www.bacp.co.uk). On the destruction date, your notes and any additional information will be securely destroyed. All information is stored in a locked, fireproof cabinet. All therapy notes contain a non-identifiable ID and all named and signed consent forms are kept separately from the therapy notes. Should there be any breach of security of data, you will be notified within 72 hours of the breach.

### **HOW I MAY SHARE YOUR PERSONAL INFORMATION**

Only myself and potentially my supervisor will have access to client details. In line with my professional guidelines I have regular supervision with a practitioner who is also bound by the same confidentiality regulations as I. During supervision the client's first name will be used. In case of an emergency, my supervisor has instructions on how to contact my clients should needs be.

Confidentiality is of utmost importance and will always be adhered to. However, there are circumstances where confidentiality will be waived, and disclosures made to members of the relevant professional bodies:

- If the Client potentially poses a risk of serious harm to themselves or others
- If the Client discloses details of child abuse, physical abuse, drugs trafficking, acts of terrorism or money laundering

In case of emergencies or where disclosure might be necessary, I will contact the appropriate profession with your knowledge. In cases where there are issues relating to terrorism or money laundering, I may make a disclosure without your knowledge. Information may be shared with my accountant and HMRC on request, client details will be anonymised.

## **RIGHT TO ACCESS**

You have the right to ask for a copy of your personal information, free of charge. You also have the right to ask me to amend, change or make notations on any 'incorrect' information about you. Should your notes be requested by a third party (solicitor etc), I will require a signed declaration form. Before any notes are sent, I would recommend that we have opportunity to sit down together and go through the information due to be sent.

## **RIGHT TO BE FORGOTTEN**

When our therapeutic relationship has come to an end, I will hold your information securely until the date of destruction. Once our therapeutic relationship has come to a formal end, you will not receive any emails or information from me, and if you do not request your information, your notes will be securely destroyed on the destruction date.

## **MY WEBSITE AND THIRD-PARTY MEDIA**

My website is secure and includes the facility to collect basic contact and enquiry information via an electronic enquiry form. No part of my website is structured to attract anyone under the age of 13 years. Whilst I can get an analysis of the number of people who have accessed my site through Google Analytics, I have no access to user specific data information about these hits/people. Please see Google Analytics Privacy Notice - <https://support.google.com/analytics>. My website is hosted by Horizon Media, Star Works, Frederick Street, Wolverhampton, WV2 4DU - please contact [www.horizon.media.co.uk](http://www.horizon.media.co.uk) for further information. You can also link to my Facebook Pages and third-party listings via my website - please see their individual Privacy Policies for further information on their data collection.

## **UPDATES**

This policy will be updated at my discretion, to ensure it continues to comply with the latest regulations and best practice. The date listed below is the latest relevant update. It is your responsibility to read and note any updates.

## **COMPLAINTS PROCEEDURE**

If you are not happy with this Privacy and Data Policy or have a complaint how details are kept, please contact me on: [jen@stepbystepcounselling.co.uk](mailto:jen@stepbystepcounselling.co.uk). Any disputes can hopefully be resolved in good faith through mediation or arbitration. You also have the right to lodge your complaint with the Information Commissioner's Office - <https://ico.org.uk/make-a-complaint>.

**Client Name:** \_\_\_\_\_

**Signed:** \_\_\_\_\_

**Date:** \_\_\_\_\_

Updated: 19<sup>th</sup> October 2019