

Alison Sutcliffe Counselling & Psychotherapy

GDPR: for new and current counselling clients

As from 25th May 2018, under the General Data Protection Regulations (GDPR), I am required by law to inform you (as my current counselling client or potential counselling client) about how I process and keep safe the data I hold about you.

I am also required to gain your explicit consent to my holding and processing your data in certain ways (they're detailed below).

I am an accredited practitioner with the British Association for Counselling and Psychotherapy (BACP) and I am bound by their code of ethics. You may be interested to find more about this on their website at http://www.bacp.co.uk/ethical_framework/.

My details can be found on the BACP Register (<https://www.bacp.co.uk/search/Register>) by searching for me via my name or my Certificate Number 107659 – counsellors have to meet a specified standard to join.

I am registered as a data controller with the ICO (Information Commissioners Office) and I follow their guidelines for storing and handling sensitive data (such as identifiable data and session notes) – my registered number is ZA097150

Here's what you need to do...

Please read all of the information below and, if you are happy to do so, please tick the box when you get in contact with me via the website contact form.

If you do not wish to give your consent, you have the option to discuss with me, and it may be possible to create a bespoke agreement between us.

You have the right to withdraw your consent at any time. We would need to discuss what this might mean in practice, with the primary aim being to keep you safe. However there may be certain situations that require certain information to be retained, and I may need to seek legal advice in this case.

What data do I hold about you?

I keep certain data so that I can work safely and professionally with you, in line with the guidelines of professional organisations that I belong to: BACP.

I will not sell your data to 3rd parties or use for it for any unethical reasons.

I may have to share your data if my notes are subpoenaed by a court of law.

If you, or anyone you tell me about, is at harm or risk of harm, I may have to pass this information on to your GP or the police.

You have the right to know what data I hold, why I hold it, and for how long I hold it. You also have the right to know who sees it.

You have the right to view your data, and to ask for changes to be made and/ or have any data destroyed. I will respond to any such request made within 1 calendar month.

Alison Sutcliffe Counselling & Psychotherapy

Sensitive data held on paper will be destroyed via shredding when it is no longer due to be held.

If I discover there has been a data breach of your personal information, that could put you at risk, I will undertake to tell you as soon as possible. I am obliged to inform ICO of this with 72 hours of becoming aware of the breach, where feasible.

The data I hold may include:

- Your name
- Your telephone number
- Your email address
- Your date of birth
- Your home address
- Your GP name and contact details
- Relevant medical information
- Session notes
- Payment information
- Your emails to me and mine to you
- Your text messages to me and mine to you

How, why & for how long is your data held? & who can see it?

To try and make things as clear as I can, I've divided this into sections. You'll need to consider each section individually.

1. Your name & telephone number

How I keep this data

I keep your name in electronic form in an encrypted location on my laptop. This information is kept separate from your session notes. I also have a back-up of this information held on an encrypted USB that is kept in my locked filing cabinet in my office of which I am the sole user.

I keep your first name and your telephone number in my work mobile telephone. This telephone is used for work only and is kept in my locked filing cabinet when not in use. On the limited occasions that I am away from my office for the whole day, during the working week, my telephone is secured via security code that is known only by me.

The executor of my Clinical Will has an electronic file containing your first name and telephone number. This electronic file is kept on a USB that is kept in their locked filing cabinet.

Why I keep this data

I keep this data to enable me to make contact with you during our work together e.g. rescheduling sessions.

I keep this data after our work is complete in order to fulfil a legal duty as defined by my professional liability insurer.

Alison Sutcliffe Counselling & Psychotherapy

I keep this data in case you return to work with me in the future.

I keep this data so that, in the unfortunate event that I can suddenly no longer work with you, the executor of my Clinical Will can make contact with you to inform you of this.

How long I keep this data

My professional liability insurer advises that I keep this data for five years. After that time it is destroyed.

Who sees the data

I am the only one who sees this data. In the case of the unfortunate event that I can suddenly no longer work with you the executor of my Clinical Will will access this data.

2. Email address

How I keep this data

Your email address is held in my business email account - this email account is completely separate from my personal email account.

My computer is not shared with anyone else unless this is required by a technician for maintenance.

Why I keep this data

This is needed in case I have to contact you e.g. rescheduling sessions.

How long I keep this data

I will remove this data within 1 month of us finishing our work together.

Who sees the data

I am the only one who sees this data.

3. Your date of birth & home address

How I keep this data

I keep this data in electronic form in an encrypted location on my laptop. This information is kept separate from your session notes. I also have a back-up of this information held on an encrypted USB that is kept in my locked filing cabinet in my office of which I am the sole user.

Why I keep this data

You and I may agree together on some reason that I might contact your GP based on your best welfare e.g. if we feel that you might benefit from additional support. I

Alison Sutcliffe Counselling & Psychotherapy

would use your date of birth and home address to help identify you when liaising with your GP.

I request your date of birth initially to ensure that I am able to work with you as I only work with over 18's in my private practise.

How long I keep this data

I will remove this data within 1 month of us finishing our work together.

Who sees the data

I am the only one who sees this data.

4. Your GP name & contact details

How I keep this data

I keep this data in electronic form in an encrypted location on my laptop. This information is kept separate from your session notes. I also have a back-up of this information held on an encrypted USB that is kept in my locked filing cabinet in my office of which I am the sole user.

Why I keep this data

You and I may agree together on some reason that I might contact your GP based on your best welfare e.g. if we feel that you might benefit from additional support.

If I feel that you are at risk, or putting others at risk, I would always try and speak with you about this prior to contacting your GP. In some scenarios it may not be possible to speak with beforehand.

How long I keep this data

I will remove this data within 1 month of us finishing our work together.

Who sees the data

I am the only one who sees this data.

5. Relevant medical information

How I keep this data

I keep this data in electronic form in an encrypted location on my laptop. This information is kept separate from your session notes. I also have a back-up of this information held on an encrypted USB that is kept in my locked filing cabinet in my office of which I am the sole user.

Why I keep this data

It may be relevant for you to share, and for me to store, certain medical information when:

Alison Sutcliffe Counselling & Psychotherapy

- (a) Your mental health history, diagnoses etc may inform our work together
- (b) There is any risk that health conditions such as seizures, diabetes, etc may impact a session
- (c) Your medications may affect our work

How long I keep this data

This data will be retained, alongside a brief overview of our work together, for five years as per the requirement of my professional liability insurer.

Who sees the data

I am the only one who sees this data.

6. Session notes

How I keep this data

I keep your this data in electronic form in an encrypted location on my laptop. This information is kept separate from your personal identifiable details - I use a code to link to this information. I also have a back-up of this information held on an encrypted USB that is kept in my locked filing cabinet in my office of which I am the sole user.

Notes include dates of attendance, and brief notes on important themes from the session. I do not keep detailed session notes. I keep a 'clear desk' policy, which means that session notes and other information are not left unattended.

Why I keep this data

Brief notes may remind me of important points I want to be sure to remember to discuss in our next session, and/or in supervision.

I retain session notes in case we work together in the future.

How long I keep this data

My current policy is to destroy session records three years after our work finishes.

A brief overview of our work together will be retained for five years as per the requirement of my professional liability insurer.

Who sees the data

I am the only one who sees this data.

8. Payment information

Alison Sutcliffe Counselling & Psychotherapy

How I keep this data

Details of bank transfer payments are collected by my business bank account.

I use an accountancy package Wave (<https://www.waveapps.com/>) to collate my business accounts. Details of bank transfer payments are uploaded to Wave via encrypted methods that align to those utilised by online banking systems. Data held on Wave is made secure utilising bank-grade security measures. As an additional security measure I anonymise all newly uploaded data once a month.

Cash payments are recorded in Wave utilising your initials.

Why I keep this data

As a small business owner, I am required by law to retain certain financial information, primarily for tax purposes.

How long I keep this data

I keep financial information for 7 years as advised by HMRC.

Who sees the data

I see this data. Banking transactions may also be viewed by employees of the bank and tax officers (HMRC).

When a transfer is made between bank accounts your account name or reference (or the name of the person who is paying) may show up on my online bank statements. You have the right to discuss alternative payment options with me.

Wave store my accounting data on servers that have strict physical access protocols, meaning there are rules in place limiting access to only the people who need it to do their jobs. For more information on Wave's security measures please see <https://my.waveapps.com/security/>

9. Your emails & texts

How I keep this data

Emails and texts are retained during the initial stages of us working out whether we are a good fit. If we decide not to work together your emails and texts are deleted. If we decide to work together I delete emails and texts after sharing our signed contractual counselling agreement. 'Admin' emails and texts are deleted after I have noted the contents e.g. messages around scheduling.

Why I keep this data

I keep this data to ensure that I can keep track of our initial communications through the stages of us working out if we are a good fit to the point of us signing a contractual counselling agreement.

Email Counselling emails are covered under Online Counselling Session Transcripts.

Alison Sutcliffe Counselling & Psychotherapy

How long I keep this data

I review and remove this data on a weekly basis.

The exception is if we have worked together via Email Counselling - this is covered under Online Counselling Session Transcripts.

Who sees the data

I am the only one who sees this data.

Complaints

If you wish to complain about how your data is stored please contact Alison Sutcliffe who is the Data Controller for www.alisonsutcliffe.com and www.brighongroupptherapy.co.uk

07541237578

info@alisonsutcliffe.com