



Privacy Statement

Your privacy is 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 (GDPR) and the Data Protection Act (DPA) 2018 and the Privacy and Electronic Communications (ED 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.

'Data controller' is the term used to describe the person/organisation that collects, stores and has responsibility for people's personal data. In this instance, the data controller is me (Debbie Radford).

I am registered with the Information Commissioner's Office -Registration No.ZB143227. See <https://ico.org.uk/> for more information.

My lawful basis for holding and using your personal information: 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 enquiry about my counselling services, I will collect information to help me satisfy your enquiry. This will include your name and contact information. Alternatively, your GP or other health professional may send me your details when making a referral or a parent or trusted individual may give me your details when making an enquiry on your behalf. If you decide not to proceed, I will



ensure 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. That confidentiality will only be broken if the exclusions in the **Counselling Contract (Item 5)** apply. I will always try to speak to you about this first, unless there are safeguarding issues that prevent this.

I will keep a record of your personal details to help the counselling services run smoothly. This information is taken at the assessment appointment and includes your full name, your address, your contact information, your GP details, medication information, your date of birth and your emergency contact. I will keep brief written notes of each session which will be anonymised. All information will be kept securely and are not shared with any third party (unless Section 5 of the contract applies – see above) or in event I am unable to work due to illness or death (see contract under Endings).

After counselling has ended: Once counselling has ended your records will be kept for five 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.

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>

Third party recipients of personal data: I sometimes share personal data with third parties, for example, where I have contracted with a supplier to carry out specific tasks. 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. See below for third parties I contract with.



Third Parties: Who I use and for what purpose. Links to their privacy/GDPR policy.

Visitors to my website: Wix.com. If you fill in a form on my website, that data will be temporarily stored on the web host before being sent to me. Wix collects standard internet log information and details of visitor behaviour patterns. This information is only processed in a way that does not identify anyone.

<https://www.wix.com/about/privacy>

Payment for appointments: Appointments are paid for in advance via bank transfer and payable to my **Mettle** account (part of NatWest).

<https://www.mettle.co.uk/docs/mettle-natwest-privacy-notice/4.0.pdf>

Accounting software in line with HMRC's making tax digital requirements:

Freeagent accounting software that links directly to my Mettle account to extract income data for the purpose of paying tax.

<https://www.freeagent.com/privacy/freeagent-and-gdpr-compliance/>

Online appointments: Zoom. All appointments are titled with first names so individual clients cannot be identified. Links to appointments are sent to clients only and the waiting room option activated so no other persons can enter the online meeting. <https://www.zoom.com/en/trust/privacy/privacy-statement/>

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 email a request to the address given on your contract.



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 by using password protected electronic devices and locked filing cabinets.

Complaints: If you have any complaint about how I handle your personal data, please do not hesitate to get in touch with me by emailing to the address on your contract. I will acknowledge your email within 30 days and respond without undue delay.

If you remain unsatisfied or 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>.

If you have any questions about this privacy statement, please do let me know.