



Privacy Policy for Counselling Clients

This is CCC's Privacy Policy outlining how and why CCC wish to process your personal data, as well as how CCC intends to keep it safe. Your CCC Counsellor will do all they can to keep information they hold about you confidential.

Overview

This privacy policy outlines your rights, and CCC's obligations to you, with regard to the recording and storage of your personal information. In this privacy policy CCC will let you know what information CCC needs to collect from you *before* beginning counselling, and what information CCC needs to collect from you *during* counselling. This also sets out how CCC will look after your personal information, how long CCC will store it, and who CCC will share it with. In addition, CCC will let you know what you are able to request from me with regard to this information.

What is personal information?

The Data Protection Act 1998 (DPA) defines personal information as any information that can be used to identify a living individual. Individuals can be identified by various means including their name, address, telephone number or email address for example.

Why does CCC want to process my personal information?

CCC needs to process your personal information in order to fulfil CCC's contractual obligations to you as a counselling service, for example to assess whether CCC is able to offer you counselling in the first place, and then to deliver effective counselling to you if therapy commences. Your personal information helps guide both your CCC Counsellor's assessment process, and their clinical decision-making during counselling. CCC's contractual obligations to you as a counselling service are the lawful basis for CCC's processing of your personal information.

What are the laws that protect my personal information?

The DPA and the General Data Protection Regulation (GDPR) require that all organisations that store personal information about people may only do so provided that the information is: processed lawfully, fairly and in a transparent manner; collected for specified, explicit and legitimate purposes; adequate, relevant and limited to what is necessary; accurate and, where necessary, kept up to date; kept in a form that permits identification of information subjects for no longer than is necessary for the purposes for which the personal information are processed; and processed in a manner that ensures appropriate security of the personal information.

How will you collect my personal information?

CCC will collect your personal information in the following ways: via email or over the telephone to arrange an initial consultation, in writing, and in person during counselling sessions.



How will you treat my personal information?

CCC will treat your personal information confidentially in a way that is compliant with the DPA and the GDPR. The lawful and proper treatment of your personal information is important to CCC. We will notify you promptly in the unlikely event of any breach of your personal data that might expose you to serious risk.

How will you store my personal information?

CCC have implemented and require from their counsellors generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction.

CCC will store your personal information both electronically and physically. Your email address and correspondence will be stored in CCC's email account if that is a method you used to contact CCC to arrange sessions. Your telephone number may be stored in your counsellor's mobile phone's SMS should you exchange messages to arrange/cancel sessions this way but not under your name.

CCC Counsellors and officers agree to follow CCC's information governance procedures. These include only storing personal data electronically on devices that are password protected, and in files that are further password protected and only accessible by the counsellor/officer. Personal information that is stored physically using paper records will be held securely in locked storage only accessible by the counsellor and their Therapeutic Will Executor should the counsellor become incapacitated. The Therapeutic Executor agrees to only access your details under these circumstances when the counsellor cannot.

How long will you store my personal information?

According to the GDPR, your personal information should be stored for no longer than is necessary. In practical terms, CCC will usually store your information for a minimum of 7 years following the termination of your treatment. However, CCC may need to store your information for longer than this, for instance to comply with insurance terms and conditions.

What types of information will you collect about me?

CCC will collect several types of information about you and in several different ways.

If you phone CCC or contact CCC to request a call back, CCC will collect the following information: name, telephone number, date and time.

Before committing to provide you with counselling, CCC will ask you to provide the following information: name, telephone number, address, date of birth, email address, GP's name and surgery, your availability and roughly the psychological issues that you would like to address. If your employer is paying for sessions then we take your employer's name and the code your employer supplied you. If you are paying for the sessions then we take your annual income to provide you with how much you will need to pay for sessions.



Your CCC Counsellor will collect initial information during your first session and during therapy that may include: goals for therapy, G.P. contact details, previous therapy, current medication, previous criminal convictions, network of support, financial and employment circumstances, health and physical issues, alcohol and drug use, appetite and sleep, family structure, overview of your family situation, and early memories of caregivers.

What is 'special category' information, and why do you need to process this too?

Special category information is defined by the GDPR as being information that is more sensitive than other personal information, and therefore requiring of higher levels of protection. Examples of this type of information could include information about your health, race, sexuality, sex life, or religion. In order to lawfully process special category information, CCC is obliged to identify a specific condition for processing it under Article 9 of the GDPR and communicate this to you. With this in mind, the condition of the GDPR that CCC is applying to the processing of your special category information is that it is 'pursuant to contract with a health professional'. This means that, if you begin counselling with CCC, or ask CCC to assess whether or not you are eligible for CCC to offer counselling to you, then CCC will likely need to process some special category information about you. Usually, this is information about your mental health, and CCC needs to process it in order to fulfil my contractual obligations to you in delivering safe, effective counselling.

What is a 'data controller', and who is the 'data controller' for CCC?

The GDPR defines a 'data controller' as the person in an organisation who: 'determines the purposes and means of processing personal data'. For the purposes of the GDPR, the 'data controller' is CCC's Management Group and Trustees (MG&T), with trustee Kirstin Bicknell the main contact.

Who will my personal information be shared with?

Your CCC Counsellor will share personal information during regular consultations with their professional supervisor, who is also a member of professional bodies, approved by CCC and bound by confidentiality. Your CCC counsellor will only give your first name along with details from sessions relevant to ensuring good practice. If you know your CCC Counsellor's supervisor personally or professionally then they will not share this information with them and will see another independent supervisor.

Otherwise CCC will only share your information if CCC has a legal obligation to do so e.g. court order and by law information on drug money laundering or terrorism. CCC will always seek legal advice before releasing any information to the courts or police authority and will only do so if compelled by law or with your consent.

If your employer is paying for your sessions some information may be shared with them e.g. number of sessions you have attended. Your counsellor will explain what if any information will be passed to your employer.



Under very exceptional circumstances and only to prevent immediate substantial harm to yourself or others (vital interest), some of your personal information may be shared with your G.P. or relevant public authority e.g. the police. CCC will always seek to discuss this with you first.

What are my rights under data protection law?

You have the following rights:

- to access a copy and explanation of your personal data

You can contact CCC's Counselling Co-ordinator to request a copy of the personal data CCC holds on you. CCC will respond to your request within one month. We usually suggest you sit down with your counsellor or CCC's Counselling Co-ordinator who will go through and explain the information we hold.

- to request correction or erasure, in certain circumstances though CCC has the right to refuse your request for erasure, for example in order to comply with CCC's insurance terms. CCC will respond to your request within a month of receiving it.
- to request limiting or ceasing data processing, where applicable
- to compensation for substantial damage or distress caused by data processing, where applicable

Can I object or complain about the processing of my personal information by CCC?

Yes. Whilst CCC hope that the policy outlined above will be sufficient to reassure you of the security of your personal information, should you wish to object or complain about the way that your personal information is being handled by CCC, then do please communicate this to CCC at the earliest possible opportunity.

You can do this by talking to your CCC Counsellor or contacting CCC's Data Protection Officer, Kirstin Bicknell via the main CCC contact number.

CCC will do our best to address your concerns and take steps to try and resolve whatever issues you may raise.

Should you wish to take the matter further, please contact the Information Commissioner's Office on 0303 123 1123, or visit <https://ico.org.uk/concerns/> for more information.

Registered with the Information Commissioner's Office - Registration Number: **ZA064724**