**Data Privacy Policy**

Alexandra Counselling is committed to complying with the terms of the General Data Protection Regulation (GDPR) made on 25th May 2018 and to the responsible and secure use of your personal data. As a counsellor, I have a legitimate interest in processing personal data to provide counselling services. As part of my commitment to the privacy of existing and future clients, this policy is intended to give insight into the data I collect about you, how I use it, how I store it, about the disposal of your data, and how you can access it and how it is shared.

As a BACP registered Counsellor, I am also registered with the Information Commissioner's Office (ICO) as follows:

**Mrs Alexandra Kiss**Reference Number: **C1181542** Date Registered**: 06/09/2022**

**The type of personal information I collect**

Names, email addresses and telephone numbers when someone contacts me via the website, any counselling directory or directly.

When/If we had an initial conversation before starting therapy, I normally also gather some information about what brings you to therapy.

Before the first session clients are required to complete an assessment form and a contract/agreement form.

I will collect the following information in order to establish if I can provide you with counselling:

* Your name and date of birth
* Contact information including your telephone number(s), email address and postal address
* Your next of kin or emergency contact person’s details (names and telephone numbers)
* IP addresses, location (by country), browser type and other web analytics data when someone visits my website. Basic profile information when someone interacts with my social media profiles, as determined by the individual’s privacy settings (collected by Google Analytics)

During our work together, I make brief notes which are stored in a secure password-protected computer, and you will not be identified in any way by them. My notes include what you want from therapy and our work together, so I can continue practising safely and ethically.

**How is information collected?**

I collect personal information directly when you provide it to me – as described above, also, when you communicate with me through social media or automatically when you visit my website.

Moreover, I normally collect personal information directly from you, at times, I also collect certain types of personal information about you which are coming from other sources, for example, third-party service providers (i.e.: Google) who are based in the US, which may provide basic browsing information as you navigate through my website. This information varies and is controlled by that service provider. It can be the case that you are coming through a third-party organization, in this case, I will have information about you provided by them (please see below (What if you have been referred via another organisation?)

**Why I collect personal information**

To fulfil my contractual obligation to clients

To enable financial transactions between clients and myself (invoicing, payment)

To ensure I am giving you a professional and ethical service that complies with the Ethical Framework of the British Association for Counselling and Psychotherapy (BACP), which I am a registered member of and the requirements of my insurers

When it is required to maintain your safety, the safety of third parties, or my own safety

To maintain own accounts and records

To fulfil my counselling agreement with you and to maintain confidential client notes

Payments are by bank transfer or PayPal or in cash, and the invoice is completed and sent within 10 working days of payment (either a paper receipt or an electronic one)

When it is my legal duty to collect, store, use or transfer information to comply with legislation or the instructions of a court of law.

**Are there any circumstances where my data might be shared?**

I normally do not need to disclose your personal information to any third party, and I will not sell it or use it for unethical purposes.

There may be certain circumstances in which I need to disclose your personal information, for instance:

* If I am obliged to share information by a court of law or to represent myself
* When I am expected, by law/my professional association, to break confidentiality where there is a risk of serious harm to you as a client or to the safety of others
* If children or vulnerable adults are involved and at risk.  In such a situation I would contact the emergency or social services or your next of kin as necessary
* Where I am required to comply with Safeguarding legislation, Child and Vulnerable Adult Protection, Traffic, Money Laundering, and Terrorism legislation
* My ethical membership body, insurers and professional advisers in the case you make a complaint against me
* To regulators and government authorities with our compliance procedures and obligations
* A third party to respond to a request relating to a criminal investigation or allege or suspected illegal activity
* A third party in order to enforce or defend my rights, or to address financial or reputational risks
* A rights holder about an allegation of intellectual property infringement or any other infringement
* Other recipients where we are authorised or required by law to do so

In all these situations I would discuss this with you beforehand if at all possible.

**Where do I transfer/store your personal information?**

I am based in the United Kingdom and your personal information and data are processed and stored in a single location in the United Kingdom according to current GDPR rules and regulations.

**Who I may share anonymised personal information with**

Professional counselling supervisor/s to ensure I am practising effectively, safely and ethically and for developing, purposes required by the British Association for Counselling and Psychotherapy.

Other counsellors who are members of a professional counselling and psychotherapy body in order to gain insight and information from others who may be more experienced than me.

In these cases, your identity will remain anonymous.

**How will I store your data?**

I collect client information, in paper hard copy form, which is in a private office and locked in a cabinet, to which only the business owner (myself) and authorised staff have access. Records that I keep on my mobile phone or computer are password protected. Paper and electronic records are anonymised by unique client code and then filed away in a locked filing cabinet accordingly.

**Information about children**

I do not provide counselling services to individuals under 18, so if you are under 18, please do not share with me any information.

**Cookies and web analytics**

I use Google Analytics to collect anonymous web traffic data, such as:

Your IP address or proxy server IP address  
The domain name you requested  
The name of your internet service provider is sometimes captured depending on the configuration of your ISP connection  
The date and time of your visit to the website  
The length of your session  
The pages which you have accessed  
The number of times you access our site within any month  
The file URL you look at and information relating to it  
The website which referred you to our site  
The operating system which your computer uses.

**How long will I store your data, and how will I dispose of it?**

Information I hold about clients includes notes (electronic and/or paper), paper or electronic copies of contact information, contracts, and assessment forms, as well as text messages, emails and invoices.

Contracts, assessment forms and clients’ notes will be shredded 7 years after counselling ends.

Information gathered during the introductory session will be shredded after 14 days if you have not contacted me to arrange paid sessions (including deleting messages/emails we sent each other).

Basic contact information, emails, text messages and calendar appointments - For technical reasons, this information cannot be entirely erased and could therefore remain accessible to a technically competent person until the storage device is destroyed or securely wiped and reformatted. However, once the therapy is finished, I will delete text messages and your phone number from my phone.

In the UK, invoices are legal documents that the issuing business must keep for 6 years from the end of the financial year it was issued.

Evidence of financial transactions such as payment to my bank account cannot be erased.

**What if you have been referred via another organisation?**

If this organisation has policies that differ from mine, I will comply with them and my own.  They may have given me more information than I would normally collect, for example, your place of work and a reference number.  I need this information when I send my invoice to the organisation, so they can recognise your case.  This information is usually contained in an email and I will delete this extra data once the organisation has reimbursed me for our work together.

**Do I have a right to see the information that you hold?**

Yes, you do.  Under the GDPR, you have the right to get a copy of the information that is held about you. This is known as a subject access request. If you would like to see your records, please forward any request to [alexcounsellinguk@gmail.com](mailto:alexcounsellinguk@gmail.com) stating your reason(s). You will be invited to meet with myself within 30 days to view your records and there is a charge of £10.

**Our Contract/Agreement and Consent**

When we contract to work together and draw up our agreement for this, you consent to me using your data in this way when you sign the contract/agreement. The contract explains that I will always treat your personal details with care and respect but if you do not wish me to use your data in the ways I have described here, it is unlikely that I will be able to work with you.

**Information you make public or give to others**

If you make your personal information available to other people, I cannot control or accept responsibility for the way they will use or manage that data. There are lots of ways that you can find yourself providing information to other people, like when you post a public message on a forum thread, share information via social media, or make contact with another via a website or directly by email. Before making your information publicly available or giving your information to anyone else, think carefully. If you’re sharing information via another website, check the privacy policy for that site to understand its information management practices.

**Sending you information**

I will ensure that if you request information from me, I will only send or give that which is relevant to our work together and the services I provide.

**Your rights**

Unless subject to an exemption under the General Data Protection Regulation (GDPR), you have the following rights with respect to your personal data:

* the right to access your personal information
* the right to require me to change any factual mistakes in the information I hold
* the right to lodge a complaint with the Information Commissioner’s Office (see below)
* please note extra charges apply for information request

Please note there are limits to these rights laid down in the legislation. For example, you cannot demand the destruction of records of financial transactions.

**Concerns and Complaints**

If you are concerned about the way that your information is being held, please[**contact me**](https://judyfieldcounselling.com/privacy-policy/#contact)**.**

I am registered with the [**Information Commissioner’s Office (ICO)**](https://ico.org.uk/), please see these details at the top of this form.

If you are still unhappy, you have the right to complain to the [**Information Commissioner’s Office**](https://ico.org.uk/make-a-complaint/handling/) - <https://ico.org.uk/>

If your complaint/concern is about the service you are receiving from Alexandra Counselling, please discuss it with myself in the first instance and you can also request my complaint procedure by emailing – [alexcounsellinguk@gmail.com](mailto:alexcounsellinguk@gmail.com)