

## General Data Protection Regulations (GDPR) Privacy Policy

### Introduction

Dudley Counselling Centre (DCC) is committed to protecting your privacy. Please read the following in order to learn more about DCC's privacy policy and our information collection and use practices.

Any personal data provided by you or anyone else making a referral on your behalf through any means (verbal, written, in electronic form, or by your use of our website) will be held and processed in accordance with the data protection principles set out in the Data Protection Act 1998 and the General Data Protection Regulations 2018 for the purposes for which you have given consent, to provide the services you have requested from us, and to meet the legitimate interests of the charity.

This policy only applies to data collected by Dudley Counselling Centre staff and volunteers, via our forms and website. Referrers and any other agencies linked to our service will have their own privacy policy. If you have any queries concerning your personal information or any questions on our use of the information, please contact the Data Protection Lead Amy Matthews on 01384 239222.

When you become an employee, volunteer, user of the service or otherwise and provide your personal details to us, the processing of your data will be made under the terms of this policy unless you tell us otherwise.

### People receiving a service from DCC

**Who is collecting the information?** - DCC members of staff and volunteers will receive the personal information and either complete a referral form or leave a message in the message book. You will be asked for verbal/implied consent for your information to be put into the "cloud based" database PSIAMS. The database is password protected and only accessible to the Manager of DCC and the Administration Officer.

**Counselling Requests**— Contacting DCC to request access to our counselling service can be done via telephone, on paper or in person. The information we take is the name, marital status, date of birth, gender, address, telephone numbers, email address, G.P/any other worker, and next of kin/emergency contact number. We may also request information on your availability, therapeutic issues, and other details which we deem relevant to processing your request.

**Initial Assessment Appointments**— At an initial assessment appointment we ask about your current personal, social, medical and financial circumstances. We may also ask about your background and family history, as well as the issues which are affecting you now. We require this information so that we can decide about our offer of counselling to you, to assign you a counsellor, and to manage the service we provide to you. We will also ask you to complete statistical forms which the organisations funding our services require us to complete.

**Session notes** – Your counsellor/worker will keep notes related to the time they have spent with you in order to provide the most appropriate therapy/intervention for you. These

notes are kept securely in locked filing cabinets and stored in such a way that you cannot be identified. Your notes will be kept for 7 years if you are 18+ from the time you finish sessions. Your notes will be kept for 10 years if you are under 18 from the time you finish sessions.

**Audio-recording** – Your counsellor may need to record your sessions for their training and ongoing professional development only. Each recording will be kept securely on a USB stick and will only be kept for as 'long as necessary' after which it will be safely deleted.

### **Staff and Volunteers**

**Volunteer Placements** – Counsellors and other volunteers may apply for placements using our application form, letter, or email. You will attend an interview will ask you about your background, qualifications, experience, and professional memberships. We also ask for your name, address, d.o.b, telephone numbers and email address. We will also ask for details for referees and people we may need to contact for you in emergencies. These details will be kept for 12 months minimum from the time of enquiry and for the duration of the time you are with us and for 12 months after you have completed your time with us.

**Employed/Self Employed** – In order to apply for job opportunities advertised on our website and elsewhere, and to become an employee of the charity, you will be required to provide your contact details and other personal information contained in your CV (such as employment history and qualifications), as well as contact details of referees. This information is only processed for the purpose of considering your job application, making any offer of employment, and administering your contract of employment. Details pertaining to your pay will be stored securely with an external financial book keeping company.

**Other** - The information you give us on our forms, the message book or when we take an enquiry may include your name, postal address, email address, phone number and other messages to help us to action your enquiry appropriately.

### **What do we use your information for?**

#### **People receiving a service from DCC:**

To provide you with a professional counselling/support service.

To offer suitable counselling appointments, and to allocate you to a counsellor.

To notify you about changes to your appointments and other changes to our services.

To seek feedback from you on your experience of counselling with us.

To administer the handling of donations, and for financial control, data analysis, research, statistical and survey purposes.

To keep in touch with you, for the purposes of organisational, service and professional development.

#### **Staff and Volunteers :**

To fulfil our administrative, legal and contractual obligations as an employer.

To enable us to offer appropriate opportunities and support to our counsellors, staff and other volunteers.

### **What information do we share?**

We will **not share** any information about you with other organisations or people, **except** in the following situations:

- DCC will only share your information with others involved in your care whom you have requested or agreed we should contact.
- DCC will only share your information with the relevant authorities if we have reason to believe that this may prevent serious harm being caused to you or by you to yourself or to another person.
- DCC will share your information where we are required to by law or by the regulations and other rules to which we are subject

### **How do we keep your information safe?**

**People receiving a service from DCC** All information related to you is stored as securely as possible. All paper forms and correspondence are kept in locked filing cabinets on our premises. All electronic information is stored on our on-site computer and by reputable service providers using secure internet 'cloud' technology all access to which requires password-protected authentication.

Your identifiable personal information is kept separately from any session notes and other descriptive material. Client notes for people aged 18+ and other documentation are securely destroyed 7 years after the end of counselling. Client notes for children aged 13 – 18 are securely destroyed 10 years after the end of counselling. Client notes for 3 – 12 year olds are securely destroyed once the child turns 18.

Unfortunately, the transmission of information via the internet is never completely secure. Although we will do our best to protect your information we cannot guarantee the security of your data transmitted to us via email. We will endeavour to encrypt and receive encrypted information as far as is reasonably possible. Any information sent via email will be printed and a hard copy stored securely, it will then be deleted from the computer. Whilst we endeavour to keep our systems and communications protected against viruses and other harmful effects, we cannot bear responsibility for all communications being virus-free.

**USB Sticks** – In the rare occasion the information is placed on a USB we ensure USB sticks are encrypted.

**Mobile phones** – Our volunteers and staff may keep your mobile phone numbers on their own work mobiles in order to contact you to arrange appointments or share information. Your number will be kept securely with their phones password protected and your details submitted in such a way that you cannot be identified.

### **Your rights**

You have the right to ask us to provide a copy of the information held by us of your records known as a “data subject access request”. You also have the right to require us to correct or remove any inaccuracies in your information. If you would like to do this, please contact the Data Protection lead Amy Matthews by calling the office on 01384 239222.

You have the right not to provide us with your details, however this would mean that we would not be able to offer you a service.

You may withdraw your consent for us to hold and process your data at any time. However, if you do this while actively receiving counselling at DCC, your counselling would have to end. You can withdraw your consent by contacting the Data Protection Lead at [amy.dcc@outlook.com](mailto:amy.dcc@outlook.com) or calling the office on 01384 239222.

### **Changes to this policy**

We may edit this policy from time to time. If we make any substantial changes we will notify you by posting a prominent announcement on our website.

v.1 03 May 2018