Privacy Statement & Notice

Hannah Coupland-Smith

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Introduction

Privacy is very important to me in counselling work. You can be confident that your personal information will be kept safe and secure and will only be used for the purpose for which it was given. I adhere to the current UK data protection legislation, including the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

Professional Standards

I am committed to maintaining high standards of professional and ethical practice and work in accordance with the Ethical codes and Professional Conduct of the British Association for Counselling and Psychotherapy (BACP). Including maintaining confidentiality, practising within my competency, undertaking regular clinical supervision and continuing professional development (CPD), plus complying with UK GDPR.

The "Data Controller" is the person responsible for collecting, storing, safely managing your personal data and in this instance, the data controller is myself: Hannah Coupland-Smith

Lawful Basis for Holding and Using Your Personal Information

UK GDPR requires me to have a lawful basis for processing your personal data, which changes depending on the stage of our work together:

- **Enquiry and/or active Therapy Stage:** I process your personal data because it is necessary to take steps to enter into a contract to provide you with counselling/psychotherapy.
- **Post-Therapy Stage:** Once our work and sessions have ended, I use legitimate interest to retain your records, such as insurance, legal or BACP professional body purposes
- **Special Category Data:** If counselling/psychotherapy involves sensitive health data I retain this for the provision of health or social care or treatment pursuant to a contract with a health professional.

Use of 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 may include your name, contact number, age, email address, previous therapy experience, past/present mental health diagnoses, your current psychological concerns and medication. If you decide not to proceed, any personal data collected during the enquiry stage will be retained for a limited period in accordance with professional, legal, and insurance requirements, and then securely deleted (typically up to a month). You may also request erasure of your personal data, which will be considered in line with UK GDPR requirements.

During active counselling/psychotherapy

Everything you discuss with me is confidential. I will always try to speak to you about this first, unless there are safeguarding issues that prevent this.

That confidentiality will only be broken when/if:-

1. In accordance with codes of ethics and professional practice, material from our sessions may be discussed with my clinical supervisor and/or in training in a confidential and anonymized manner.
2. If I believe you are at risk of harming yourself or someone else, I reserve the right to break confidentiality in order to prevent harm. I would only do this in extreme circumstances and would discuss it with you first if possible.
3. If you give me information which is required by law to be disclosed. For example, I am required to make disclosures under The Terrorism Act 2000 and the Children's Act 1989.
4. If required by a court of law to give evidence.
5. Occasionally there may be a need to write letters or reports. For example, you may also be speaking to your GP. Wherever possible, if I need to write a letter or report, I will talk to you first beforehand.

Personal data is stored securely in password protected electronic systems and, where applicable, in paper records kept in a locked cupboard. My email accounts, mobile phones, and laptops are password-protected, encrypted, and equipped with anti-virus software.

I will keep written notes of each session, these are kept securely. Text messages are retained for a short period for administrative purposes then deleted as part of routine data management.

After our counselling/psychotherapy has ended

Once sessions have ended, clinical notes are retained for a standard period of up to seven years following the end of therapy in accordance with professional, legal, and insurance requirements, after which your records are securely destroyed/deleted.

Your Data Protection Rights

Under UK data protection law, you have specific rights regarding your data. You can ask me to:

- Provide a copy of the information I hold about you called a 'Subject Access Request' (SAR)
- Correct any mistakes or inaccuracies in your personal data.
- Delete your personal information or limit how I use it (Although this would be limited by my legal and insurance requirements to retain clinical notes)
- Object to the processing of your data.

(SARs are provided free of charge. However, I reserve the right to charge a reasonable administrative fee or refuse the request if it is manifestly unfounded or excessive)

To make a formal request regarding your data, please contact me in writing at hannahpsychotherapy@gmail.com I will respond within 30 days. You can read more about your rights at ico.org.uk/your-data-matters. If you want to make a formal complaint about how I have processed your personal information, you have the right to contact the Information Commissioner's Office (ICO)... Website: ico.org.uk/make-a-complaint. Helpline: 0303 123 1113

Clinical Will: In the event of my sudden death or serious illness, I have appointed a Clinical Executor (a qualified colleague bound by the same confidentiality rules) who will be granted secure access to your minimum contact details. They will only use this to contact you to inform you of the situation and assist you in finding alternative support if needed.

I take the security of the data I hold about you seriously and as such I take every effort to make sure it is kept secure.