Silver Springs Counselling & Psychotherapy Privacy Notice

Introduction

Your privacy is very 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 (EU/2016/679) (the GDPR), the Data Protection Act 2018 and the Privacy and Electronic Communications (EC 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, including:

• Why I am able to process your information and what purpose I am processing it for

• Whether you have to provide it to me

• How long I store it for

• Whether there are other recipients of your personal information

• Whether I intend to transfer it to another country

• Whether I do automated decision-making or profiling, and

• Your data protection rights

I am happy to chat through any questions you might have about my data protection policy and you can contact me via email.

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

I am registered with the Information Commissioner's Office – Registration number ZC066164. My phone number is: 07751 480209. My email address is: silverspringstherapy@outlook.com.

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 may include your name, address, phone number, email address, date of birth, GP details, an emergency contact and any relevant health information. You may also wish to share other aspects of your identity, where relevant, such as your religion or ethnicity. 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 all your personal data is deleted within one calendar 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 in the following circumstances:

- If I have reason to believe that you, or somebody else, is at risk of serious harm

- If information is disclosed by you which indicates that the safety and welfare of a child or other vulnerable person is at risk.

- If information is disclosed by you related to crimes of money laundering, drug trafficking or acts of terror.

- If information from your therapy notes is requested by police, prosecutors, or a court.

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. These details are kept securely using Microsoft 365, with multiple layers of protection in place. Multi-Factor Authentication is enabled to verify identity and provide access protection, as well as Microsoft Defender to protect against cyber threat. All cloud-stored information is encrypted. I access Microsoft 365 via a laptop protected by a PIN and a phone secured with pattern/fingerprint authentication.

I will keep written notes of each session to support your care. These notes are stored securely on Microsoft 365, separately from your personal details. To further protect your privacy, I use pseudonyms in my notes, so you are referred to by a pseudonym rather than your name.

I keep a session log to record the date, length, and format of each session (online, in-person, or by telephone). This log is stored on Microsoft 365. Your name does not appear on the log; you are referred to by a pseudonym instead.

For security reasons, I do not retain text messages for longer than the duration of our work together. If a text message contains relevant information, I will record it in your client file within Microsoft 365. Similarly, any email correspondence is deleted at the end of our work together. If an email contains relevant information, I will record it in your client file within Microsoft 365. I use Microsoft Outlook as my email provider, which encrypts emails to protect your privacy. Call logs and phone contacts are deleted at the end of our work together. Phone contacts are stored using a pseudonym rather than your name.

Online sessions are conducted via Microsoft Teams, which is an encrypted service to help keep our sessions secure.

After counselling has ended - Once counselling has ended your records will be kept for seven years from the end of our contact with each other and are then securely destroyed. This retention period is a requirement of my insurance provider. At the end of our work together, your record will be minimised as far as possible to protect your privacy.

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.

The third-party suppliers I use include;

- Microsoft 365: Used to collect and store your information and to carry out the administrative tasks required to provide a counselling service. This includes Microsoft Forms, OneDrive, OneNote, Word, Excel, Teams and Outlook.
- Lebara: My mobile phone network provider, used for telephone contact and voicemail.
- Wix: My website provider. If you contact me via the form on my website, your message and any personal information shared may be processed by Wix. These are forwarded to my Microsoft 365 account.
- WhatsApp Messenger: If you contact me via WhatsApp, your messages and any personal information shared may be processed by WhatsApp. WhatsApp messages are encrypted.
- Supervision: I have clinical supervision as required by the BACP (British Association for Counselling and Psychotherapy, a professional body for counsellors and psychotherapists). Supervision supports safe and ethical practice and is a formal arrangement in which therapists regularly discuss their work with an experienced supervisor. I do not disclose identifiable client information in supervision, except for a first name.
- Balens Ltd: My professional indemnity insurer. If a claim is made against me, certain details about our work together may need to be shared with them to handle the claim.
- HMRC: I am required to provide details of income and expenditure, which may include banking transactions, receipts, or invoices. Where possible, names will be redacted to protect confidentiality.
- Starling Bank: My banking provider, which processes any payments you make to me via BACS.
- PayPal: If you choose to pay via PayPal, your payment will be processed by PayPal.
- Mortgage applications: Occasionally, I may need to provide income details for mortgage applications. Names on banking transactions will be redacted where possible. This is a legal requirement under Anti-Money Laundering regulations.
- BACP: I am working towards accreditation with the British Association for Counselling and Psychotherapy (BACP). As part of this process, the BACP require client and supervision logs. Your identity is protected in these logs by using a pseudonym, rather than your name

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 ico.org.uk/your-data-matters.

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 its, 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 put the request in writing addressing it to silverspringstherapy@outlook.com.

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 contact details given above. I would welcome any suggestions for improving my data protection procedures.

If you 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 ico.org.uk/make-a-complaint.

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. This Privacy Notice explains the measures I take to protect your information. If for any reason any of your data is received or recorded in paper format, it will be scanned into your client file in Microsoft 365 on the same day, and the original document will then be securely shredded.

Legal requests for notes - Counselling records are normally treated as confidential. However, in rare and specific circumstances, information from your therapy notes may be requested by police, prosecutors, or a court. If this happens, I will inform you promptly and discuss what is being requested and why, how it will be used, and the legal basis for the request. If a court orders the production of records, I may be required to comply, but I will continue to act in your best interests and seek to limit disclosure to what is strictly necessary.

Clinical Will – In the event that I am suddenly unable to practise, for example due to serious illness or death, I have appointed a clinical executor. This person will contact you to inform you that I am unable to continue counselling and to discuss your options, such as onward referral. They will be given access to my Microsoft 365 account solely to make this contact and to manage my records, including their secure destruction according to the retention periods described above. The clinical executor is a qualified counsellor/psychotherapist and is bound by confidentiality requirements. They will only access the information necessary to carry out these duties.

Complaints

You have the right to make a data protection complaint directly to me. I take all complaints seriously and will investigate and respond within 30 days.

To make a complaint, you can contact me by telephone on 07751 480209 or by email at silverspringstherapy@outlook.com.

If you are not satisfied with my response, you may escalate your complaint to the Information Commissioner's Office (ICO).

Website: ico.org.uk

Telephone: 0303 123 1113

Consent

To confirm that you have read, understood and agree to this privacy notice, please sign, print, and date below. Or alternatively, email silverspringstherapy@outlook.com stating "I consent to the Silver Springs Counselling & Psychotherapy Privacy Notice".

Signature: Date:

PRINT name: