



## **Privacy Policy**

We understand how important your privacy is. We take care to maintain your confidentiality in accordance with current data protection laws (GDPR, 2018) and the ethical guidelines of Health and Care Professions Council (HCPC). These guidelines have been set up to protect your confidential material and ensure that your therapist always conducts themselves with professionalism and integrity.

In order to provide you with the best service possible, we will hold your personal contact details and records of your therapy sessions. Please find below important information about how this information will be held and used.

### **Your personal information**

We use the secure, encrypted and password protected practice management platform Halaxy, to collect and store your personal data. At the point of booking your initial consultation with us, you will be asked for your personal contact information, for example your name, address, email address and telephone number and you may also choose to share details of the issues you are looking for help with.

Your contact information is stored securely in Halaxy and can only be accessed by your therapist.

In order to be able to fulfil our duty of care to you, in your initial consultation or first treatment session, your therapist will ask you for contact information for your GP and elected Emergency Contact person. These details will be stored securely in Halaxy and will only be accessible to your therapist.

Please note that we will need to keep a record of your name and client reference number for seven years after the end of your therapy, so that we can respond effectively to any potential requests regarding your clinical notes and treatment.

We will never pass on your contact details to any third party organisations for the purposes of sales, marketing or research and will never use your personal data for any purposes other than the administration of the counselling service we are providing to you i.e. to arrange, cancel and rearrange appointments and collect payment for sessions.

### **Online Bookings**

When you make an online booking or payment, Halaxy will send a booking notification to your therapist via email and the Halaxy messaging system.

Anonymised payment details are recorded in our Halaxy financial income reports. These reports will only hold your first name, last name initial and unique client reference number. The HMRC requires that we retain this information for 5 years after the end of the financial year.

You can view Halaxy's Privacy Policy here: <https://www.halaxy.com/article/privacy>

Our website uses cookies. You can find the details of our cookie policy on the website.

### **Your therapy sessions**

Everything that you discuss with your therapist is confidential. Confidentiality will only be broken if there is concern about your safety or the safety of someone else or we are instructed to do so by a Court of Law. We will always endeavour to speak to you about this first.

During remote working your therapist will ensure that they are conducting online and telephone sessions in a quiet, private and confidential setting. We have selected video calling platforms that offer end to end encryption to ensure maximum privacy. Please note however that we cannot be held responsible for any breaches that occur due to failures in this technology.

Your therapist discusses their clinical work with a supervisor. This is to ensure that they are offering you the best service possible. These conversations are bound by confidentiality and you will only be referred to by your first name.

Your therapist will also keep notes of each session. These are anonymised and are stored within a password protected file within the secure Halaxy system. These notes are for your therapist's use only and help to keep a track of everything that is being discussed. In line with industry guidelines, these notes will be kept securely for up to seven years after your therapy comes to an end. After this time, they will be confidentially destroyed.

If your sessions are paid for or arranged via a third party, (e.g. your employer, a friend, or a family member), other than payment requests, invoices or receipts your counselling information will not be shared. Details about what is discussed in your sessions will remain confidential between you and your therapist. Any other information can only be shared if you provide your written consent.

### **Your communications with us**

All of our email accounts use the secure GSuite server and are double password protected. If you send an email to your therapist's email address, only they will have access to it.

All phones, tablets and laptops used to respond to your emails are encrypted, fully protected with anti-virus software and password protected.

### **Data Usage**

We will only use your email address and telephone number to contact you about your appointments. Your therapist may also contact you directly via email in order to share information with you that is pertinent to your therapeutic process.

Your phone number may also be used to issue appointment reminders via text message.

### **Your rights**

Any personal data retained by our service or your therapist is kept in accordance with the GDPR, 2018.

Under these guidelines you have the following rights:

1. The right to request access to your data

You can request to view the information that we hold about you (contact details, appointment logs etc.) at any time. If during therapy you would like to see your session notes, please make this request to your therapist directly. Should you require a copy of your notes after your therapy has come to an end you can make this request by emailing [joyce@cheltenhampsychology.co.uk](mailto:joyce@cheltenhampsychology.co.uk).

2. The right of rectification

At any point during your time using our service or during the seven years thereafter, while we retain your records, you have the right to request amendments to your contact details or session notes. This right can be exercised either by speaking directly to your therapist or by contacting us in writing.

3. The right to be forgotten

You can request that we delete and confidentially destroy the information that we hold about you and your sessions at any time. This request can be made by contacting us / our admin office at [joyce@cheltenhampsychology.co.uk](mailto:joyce@cheltenhampsychology.co.uk).

Instances where we would not be able to comply with your request are as follows:

- a) It is necessary for us to retain these records in order to continue providing an effective service
- b) We are compelled to retain these records by a Court of Law
- c) We require these records in order to establish, exercise or defend legal claims

## **Consent**

When you book your first session, you will be asked to provide a (digital) signature to confirm that you consent to the storage and processing of your personal data for the purposes of providing therapeutic services.

You are entitled to withdraw this consent at any time and can do so by emailing our office at [joyce@cheltenhampsychology.co.uk](mailto:joyce@cheltenhampsychology.co.uk)

### **Breaches of data protection**

In the event of any breach of our data protection policies, we will notify you and the Information Commissioner's Office (ICO) within 72 hours and will seek to rectify this immediately.

### **Raising concerns**

Should you have any concerns about our data protection practices, you can raise these directly with us.