

Hannah Russell Counselling - Privacy Policy

Introduction

In line with General Data Protection Regulations (GDPR; 2018) and the National Counselling Society's Code of Ethical Practice¹, this policy outlines how, as a Data Controller, I collect, store and use your information and how I protect your privacy and data rights.

What types of information do I hold and how do I use it?

Initial Enquiry

If you send me an email, text or call my phone with an enquiry about counselling services I will use this, and any further information you provide, to understand your needs, answer any questions you might have and arrange or send confirmation of your initial appointment.

If you have placed an enquiry about counselling services via a third-party or third-party website to which I respond, I will use this, and any further information you provide, to understand your needs and answer any questions you may have. If you have contacted me via a third-party or third-party website, I am not responsible for how any personal data is used, stored or protected by that third-party.

Depending on how you contacted me, the information outlined above is stored either within my password-protected email account and/or within my password-protected mobile phone and/or personal computer. I delete all enquires and contact details, along with any response/s to those enquiries, no longer than one month after the last enquiry contact, including whether we go on to work together or not.

Working together

In order to confirm an Initial Consultation appointment I require receipt of a completed and signed Client Information Form and signed Working Agreement for each client.

Information requested within the Client Information Form is as follows:

- Biographical information: your first name, last name, gender and date of birth.
- Contact details: postal address (including postcode), email address and phone numbers.
- Next of Kin and GP contact details.
- Ethnicity and sexual orientation.

I use this information to:

- Contact you about my service via your agreed methods of communication. This may include making, confirming and changing appointments, sending invoices, communicating with regard to any queries that arise from our work together.
- Contact you to update you with information about my service and/or to provide you with information about external services/organisations.

¹ <https://nationalcounsellingsociety.org/assets/uploads/docs/National-Counselling-Society-Code-of-Ethics.pdf>

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- Understand the demography of those using my service.
- Run my business; for example, generating invoices, recording payment for tax purposes.

The information provided within your signed Client Information Form is inputted into BACPAC² and allocated an anonymised case number. BACPAC is a secure client management and record-keeping software system designed for use by counsellors and psychological therapists. The original copy of the signed Client Information Form is uploaded to BACPAC as a document and stored as part of your casefile.

Your signed, named and dated Working Agreement is also uploaded to BACPAC as a document and stored as part of your case file.

During the Initial Consultation appointment I take brief, anonymised notes and, if we agree to work together as a result of the Initial Consultation, I continue to take brief, anonymised notes during all subsequent counselling sessions. These are called casework notes and include the case number, date, time, number of clients present and state whether the appointment was via Zoom or face-to-face. After each appointment I transfer the content of handwritten casework notes onto your casefile in BACPAC. The original, handwritten casework notes are stored securely in a locked filing cabinet until securely disposed of within 24 hours of your appointment.

Your BACPAC casefile is kept for seven years in line with professional standards.

A note of your appointments with me (anonymised case number, date and time) are logged within my password-protected computer and kept for no longer than two weeks after the end of the month in which each appointment was held.

Any emails, texts or voicemails received from you relating to the arrangement of appointments, payment of invoices or providing other information, along with any responses, are deleted within one month of receipt. If they contain important information this may be saved within your BACPAC casefile.

Your invoices are generated on my password-protected computer and are anonymised via use of your casefile number and date of appointment. Anonymised invoices are then uploaded to my secure web-based and password-protected accounting software, SAGE. They are also stored on my password-protected computer. I am required to keep financial records for seven years.

Payment for appointments made directly from your bank account to my bank account via electronic transfer may mean that your name is listed within the record of transactions in my account summary. I am not responsible for how your personal or banking details are used, stored or protected by my banking provider as a result of you sharing them with them as part of the electronic transfer of funds process.

² BACPAC has been developed in association with the [British Association for Counselling and Psychotherapy \(bacp.co.uk\)](http://www.bacp.co.uk) and has been vetted by the NHS for hosting confidential medical information as outlined here: [bacpac - Security \(bac-pac.co.uk\)](http://www.bacpac.co.uk) BACPAC's Privacy Policy can be found here: [bacpac - Privacy Policy \(bac-pac.co.uk\)](http://www.bacpac.co.uk)

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When hardware used to manage and administrate Hannah Russell Counselling (e.g.; personal computer and mobile phone) are decommissioned, this will be managed in a way that will ensure no data breaches can occur. In the case of my personal computer, I will remove the hard drive and have it securely destroyed. In the case of my mobile phone, any unrequired/outdated SIM cards will be securely destroyed and the phone returned to factory reset settings.

Confidentiality

Confidentiality is an important feature of our working alliance and will be maintained in accordance with General Data Protection Regulation (GDPR; 2018) and the National Counselling Society's Code of Ethical Practice. Exceptions to confidentiality are as follows:

- It is a professional requirement of the National Counselling Society's Code of Ethics that I have regular supervision to ensure that my work with you is as good as it can be. When I discuss casework during supervision, I have a duty to keep references to your material anonymous. I will add any notes taken by me during supervision, relating solely to your case, directly to your BACPAC casefile. I am not responsible for any notes that my supervisor may take, keep and store as a result of the supervision process. However, my supervisor is accredited by the British Association of Counselling and Psychotherapy (BACP) and abides by their Ethical Framework for the Counselling Professions³, including their standards for confidentiality.
- I belong to a peer supervision group comprised of similarly qualified colleagues, practicing as relationship counsellors, who are also bound by strict confidentiality rules. I discuss casework with my peer supervision group in order to gain other professional views which support and develop my own practice. When discussing casework I do so using anonymised information and do not disclose information that would enable you or others to be identified. If you would prefer that your material is not discussed within my peer supervision group, then you can let me know prior to us working together.
- If I am concerned that you or someone else may be at significant risk, I may need to share information you have shared with me with external agencies; e.g.; your GP, the Police or local Children's Services. If possible, I would discuss this with you first unless I felt that this would increase the risk.
- When working with couples, sometimes it is helpful to have some individual sessions as part of the initial consultation process or ongoing couple counselling. If this is something we agree to then all information shared within individual sessions will be confidential within that session (except in the case of significant risk, as outlined above) and will not be shared with the other member of the couple unless:
 - I have sought express permission to do so with the relevant individual.
 - It is raised by the individual themselves in future couple sessions; in which case I would take that individual's lead.

³ <https://www.bacp.co.uk/events-and-resources/ethics-and-standards/ethical-framework-for-the-counselling-professions/>

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When working with couples, any communication outside of the sessions - including by email - should be three-way between myself and both members of the couple, unless there are safety concerns.

- In line with good practice in the profession I have appointed a qualified counsellor as an executor. In the event of my illness or sudden death during our work together they would be given access to your name and contact details only. This will enable them to contact you to inform you and to support you to find a new therapist if you wish.
- Some laws require me to break confidentiality in certain circumstances, e.g.; Children Act (2004), Terrorism Act (2000) Drug Trafficking Act (1994) Modern Slavery Act (2015). Wherever possible, I would aim to discuss any sharing of information with you in advance.
- I am compelled to give evidence by a court of law; to release my records or to give evidence. Wherever possible, I would aim to discuss any sharing of information with you in advance.
- Should I contract Covid-19 or a similar virus, the NHS may want to track and trace any personal contact that I have had in the preceding days/weeks. It would be in the public interest to share these names of people, including clients, but it is not necessary to share the content of sessions, nor the context in which we meet. However, you may be contacted by the NHS in this event.
- If you are being treated by your GP and/or working with another mental health professional (such as an individual counsellor) for emotional or mental health difficulties, it is important that you inform them about me and me of them, including information about medication that may impact on our work. If we find that there is a need for me to communicate with your GP or other professional, I will only do this with your knowledge and permission (except in the case of significant risk, as outlined above).

Your permission

I will seek your permission to:

- Share information outside of the exceptions detailed above in the 'confidentiality' section.
- Use your anonymised details for continued professional development (case studies or training).
- Publish any marketing material such as case studies or testimonials ensuring the use of pseudonyms throughout.

If I have responded to you following a general enquiry about counselling services received via a third-party or third-party website, you have given me consent to contact you via the contact details you have shared.

Website

This privacy policy sets out how Hannah Russell Counselling uses and protects any information that you provide when you use my website or contact me via other means such

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as phone, email or through a general enquiry about counselling services via a third-party or third-party website.

By visiting the hannahrussellcounselling.co.uk website you accept and consent to the terms described in this privacy policy.

hannahrussellcounselling.co.uk is made by wordpress.com and you can see their privacy policy here: <https://en-gb.wordpress.org/about/privacy/>

Security

Transmission of data and information via my website is not a secure or encrypted transmission method for sending your personal data, unless otherwise indicated on the website.

Information sent or received to and from my password-protected email account and mobile phone (via text, talking or voicemail) are also not secure transmission methods for sharing your personal data.

Your attention is therefore drawn to the fact that, any information and personal data carried by the above means is not secure. Information and personal data may be intercepted, lost, corrupted or accessed by other people.

Cookies

Cookies are small pieces of data, stored in text files, that are stored on your computer or other devices when websites are loaded into a browser. They are widely used to 'remember' you and your preferences, either for a single visit (through a 'session cookie') or for multiple repeat visits (using a 'persistent cookie'). They ensure a consistent and efficient experience for visitors and perform essential functions such as allowing users to register and remain logged in. Cookies may be set by the site that you are visiting (known as 'first-party cookies'), or by third parties, such as those who serve content or provide advertising or analytics services on the website ('third-party cookies').

For further information about WordPress cookies please visit: <https://en-gb.wordpress.org/about/privacy/cookies/>

Google Analytics

Each time you visit a website Google analytics automatically tracks information such as (but not limited to) your geographical location, IP address, browser type, browser version, operating system, referral source, page views, length of visit, the times and dates you visit the site, navigation paths, whether you are a new visitor or a returning visitor.

The information provided by Google Analytics may be used to improve the website and services I offer.

Requesting to see your data

You have the right to ask for a copy of the information I hold about you, free of charge, unless I am prevented from doing so for legal reasons. You would need to request this information in writing and I aim to provide it in digital form within 28 days of receiving your request.

In couple's counselling, both clients are part of the contract and, if one client requests a copy of the notes, they can only ask for the parts relating to them unless the second client gives consent. If one partner does not consent, all information relating to them will be redacted.

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Controlling your personal information

You are free to restrict the collection or use of your personal information in the following way:

If you have previously agreed to me using your anonymised personal information for continued professional development or marketing material you may change your mind at any time by emailing me at hannah@hannahrussellcounselling.co.uk

I aim to keep your personal data up to date while we work together. If you believe that any information that I hold about you is incorrect or incomplete, please email me at hannah@hannahrussellcounselling.co.uk and I will correct any information found to be incorrect. You may ask me to delete information that I hold about you. I will do this except for any information that I need to hold for legal, insurance or business purposes.

If you have concerns about how I hold your data

Please discuss any concerns with me in the first instance. If you feel that I have not addressed them, you can contact the Information Commissioner's Office (ICO) at <https://ico.org.uk/make-a-complaint/your-personal-information-concerns/>

Data breaches

Should there be a data breach I will report this to the ICO and yourself within 72 hours. My data protection registration (ICO) reference is ZB204169.