



PRIVACY STATEMENT (February 2024)

I understand that your privacy is important.

I will ensure that all information given to me is stored safely and only used for the purpose specified. I do not sell on any data I collect, and 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 statement should cover any areas of concern or queries that you have, however, should you have any further queries, please feel free to email me.

I am registered with the Information Commissioner's Office.

My registration number is: ZB615350.

I can be contacted at lee@leeellawaytherapy.com and 07540 994957

Lawful basis for holding and using your data:

GDPR states that there must be a lawful basis for holding information.

Before counselling – when you enquire about entering into counselling, I will require access to your basic data in order to contact you and consider you as a client. When collecting data, this will be done by consent which can be withdrawn at any time.

During counselling – If you are having counselling with me, I will need to process your data in line with carrying out our contract.

After counselling – When your counselling has ended, I will keep a secure copy of my session notes and your contact details on the basis of legitimate interest but will only process it if required, for example if you ask to see what data I have on file. I also am required by my insurance to keep notes for five years after the cessation of sessions.

How I use your data:

Initial contact – When you first approach me, I will note basic information about you. I also give you the option to give further details if you choose to. This is to ensure that I can contact you and respond correctly to your enquiry. Basic details are kept on a password protected spreadsheet on a password protected laptop.

Should you wish not to proceed at this stage, I will delete all data within four months of you either stating that you do not wish to proceed or not being in contact. If you would like this to be done immediately, you can request this by email at any time and I will do it upon receipt of your request. Please note however that I do not access my emails every day, and upon receipt of your request here means when I access my emails.

During counselling – Everything that you discuss within counselling is confidential, with a few exceptions that we will discuss prior to signing the contract. These are legal and safeguarding reasons and unless prevented from doing so, I will discuss the situation with you before breaking confidentiality. As part of ethical working, I work with a supervisor. When speaking with my supervisor, I will never refer to you by name. Basic details at this stage are kept on a password protected spreadsheet with a reference number allocated to each person on a password protected laptop. Contracts and client information sheets are also stored digitally.

I keep anonymised, basic notes about sessions in a paper file kept in a locked filing cabinet. Paper files are always either in the locked cabinet, or a locked metal file box when not in use. On these notes you will be identified only by your reference number. These notes are to ensure the smooth

running of the service you are receiving and usually will only be read by me. I would only share these notes if required to do so by law or if you request that I do so.

I use text messaging as part of my business practice but I do not save client telephone numbers on my phone.

After counselling has ended – I am required by my insurance to keep all notes for five years after the end of our contract. During this time they will not be accessed unless required by law or requested by you. I will destroy all notes and contact information within six months after the five year period has elapsed.

Website:

I use Wix as the content management system for my website, please see their data privacy notice if you require further information. The booking form on my website is run by Calndly, please see their data privacy notice if you require further information.

No user-specific data is collected by me or any third party.

Third parties:

I work using Zoom for online sessions.

My email and website are run through Wix.

I manage security across these by using different passwords and two factor authentication for everything. I ensure, as far as is practicably possible, that your data is not used or processed by third party companies outside of what is necessary for running my practice.

Your rights:

You have a right to ask me to delete, limit my use of or stop processing your personal information. You also have a right to request a copy of any information about you that I hold about you and object to the use of your data in some circumstances.

You can request any of the above from me in writing by email.

More information about this can be found at ico.org.uk/your-data-matters.

You can also ask me to correct any information that I hold on you at any time. If you have any concerns or suggestions regarding my data protection, please feel free to contact me about this by email.

If you have a complaint about how I have stored your data, please put this in writing and email it to me in the first instance. If you are not happy with how this complaint is handled, you can contact ICO (the statutory body to oversee data storage in the UK). More information about this can be found at ico.org.uk/make-a-complaint

Data Security:

I take data security very seriously and make every effort to ensure that it is stored securely. Every level of what I work with technology wise has a separate password. All data outside of initial personal details is completely anonymised as well as password protected.