



# Privacy Policy

As a BACP Registered and Accredited Counsellor/Psychotherapist I am also registered with the Information Commissioners Office (ICO) as follows:

**Mrs Sarah Lyn Urwin**

Registration Number **ZA342623**

Date registered **15/4/2018**

As such there is a lawful basis for me to hold and process your personal details as this is legitimate for my work, however I am required to tell you:

- what data I am collecting from/about you
- what I will use that data for
- how I will store the data
- how you can get access to your data
- how I will dispose of the data

## **What data do I keep and what do I use it for?**

I collect information about my clients, supervisees and students in a number of different ways. I ask for contact and other referral information when you first approach me and use this information to help me provide a service to you, further the work we do together, and keep a record of our communications. If you make regular payments to me I need information to help me administer these payments, including your name, address, email and telephone number.

When I am working with clients and in case of an emergency during a session, I keep an additional contact name and telephone number. I also keep the name of your GP and their contact details, however I will only use this information where absolutely necessary and after consultation with you.

I make notes of our sessions together and also during my supervision sessions (you will not be personally identified in supervision sessions). My notes are brief, hand written, made at the end of each session and you cannot be identified by them. They include details of what you would like to gain from therapy. These notes are a way of recording what happens in our collaborative work together so that I can provide a safe, ethical service.



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## **Are there any circumstances where my data might be shared?**

It is very unlikely that I will share your data with others, and I will definitely not sell it or use it for unethical purposes. The only exceptions to sharing data are:

- if I am obliged to share information by a court of law, or to represent myself
- when I am expected, by law or my professional association, to break confidentiality where there is a risk of serious harm to you as a client or supervisee, or to the safety of others
- if children or vulnerable adults are involved and at risk. In such a situation I would contact your GP, the emergency or social services as necessary
- where I am required to comply with Safeguarding legislation, Child and Vulnerable Adult Protection, Traffic, Money Laundering, and Terrorism legislation

In all these situations I would try hard to contact and discuss this with you beforehand.

## **How will I store your data?**

All records that I store on my computer or mobile phone are encrypted and password protected. Your telephone number and email address may sometimes be kept on my mobile phone but you cannot be personally identified. All the paper records that I store will be kept securely in a lockable filing cabinet in my office and filed under a coded system. Notes taken following sessions are hand written, coded, with the date and session number also recorded.

## **How long will I store your data, and how will I dispose of it?**

I will keep your session notes and your name for 6 years following the end of your therapy, in accordance with guidelines provided by my insurance company. Your personal information, collected on my initial referral form, will be shredded within 6 months of our final session together and your telephone number and email address will also be deleted within 6 months of our work ending.



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## **What if you have been referred via another organisation?**

If this organisation have policies which differ from mine I will comply with their policies as well as my own. It is possible that they may have given me more information than I would normally collect, for example your place of work and a reference number. I need this information when I am sending my invoice to the organisation so they can recognise your case. This information is usually contained in an email and I will delete this extra data once the organisation has reimbursed me for our work together.

## **Do I have a right to see the information that you hold?**

Yes you do. If you ask me for the information that I hold about you I am legally bound to give you a copy free of charge within one month of your request. I will make sure you are in control of your information and you can ask me to stop using it whenever you wish.

Because I run a small business I also act as Data Protection Officer so if you are not happy with the way I use your data please contact me on: 07792887870 or 01363 85154. My website also has details of my Privacy Policy.

## **Our Contract/Agreement and Consent**

When we contract to work together and draw up our agreement for this, you consent to me using your data in this way when we both sign the contract. The contract explains that I will always treat your personal details with care and respect but if you do not wish me to use your data in the ways I have described here, it is unlikely that I will be able to work with you.

## **Sending you information**

I will ensure that if you request printed or verbal information from me, I will only send or give that which is relevant to our work together and the services I provide. I will supply this information by post, email or telephone, depending on your expressed preferences.