

## **KBW Therapy Privacy Statement**

Your privacy is important to KBW Therapy Privacy Statement and we take every measure to protect your identity under the Data Protection Act of 1998.

We are committed to complying with the terms of the General Data Protection Regulation, and to the responsible and secure use of your personal data. Confidentiality and Privacy are at the very foundation of our counselling service and we endeavour to explain how seriously we take your privacy in this notice KBW Therapy Privacy Statement has a legitimate interest in processing personal data in order to provide enquirers helpful information about our counselling services. The lawful reason for KBW Therapy Privacy Statement to process and store client data is by obtaining your consent which is “Best Practice” as spelled out in the British Association for Counselling and Psychotherapy (BACP) Ethical Framework.

The purpose of this Privacy Notice is to let you know what personal information KBW Therapy collects and holds, why we collect this data, how we keep that data secure, who we share this data with, how long it is kept and your rights over your personal data. It is our hope that with this notice you may be able to give consent for us to process your data should you choose to seek counselling with one of our counsellors.

This policy only applies to data collected by KBW Therapy via our own forms, emails and website. Third party agents, and websites which are linked to ours, are not covered by this policy. If you have any queries concerning your personal information or any questions on our use of the information, please ask your counsellor directly.

### **1. 1. Data Protection Lead**

1.1 The Data Protection Lead is the Stephanie Smith who is registered with the Information Commissioner’s Office (ICO) and holds the ICO registration number: ZA142054

### **2. 2. Information About You**

2.1 We collect personal information from you when you enquire about our counselling services on the phone, via text/SMS, email or when you fill in our contact form on the website in order to answer your enquiry and set up an initial consultation if desired. This information includes your name, contact details, your IP address, your availability and other relevant personal information. We request this information to help us understand your needs and to provide the best service to you. This initial contact data is deleted within 30 days if you do not use our services. If you do become a client of KBW Therapy, then we retain the initial contact details. We also collect information provided to us when you communicate with us for any reason. This may be collected in conversations (phone or in person), emails, text/SMS, sessions, when you complete our Client Contract, Intake Form and other forms that may be of therapeutic benefit to you.

### 3. 3. Reason for Keeping Data

3.1 The lawful reason for KBW Therapy to keep client data is to comply with the British Association for Counselling and Psychotherapy Ethical Framework and is done through the Client Contract where we obtain your consent. Having a counselling contract demonstrates to the client the ethical principle of “Autonomy: respect for the client’s right to be self-governing” (BACP 2018).

Dale (2003:4) states that having a contract with the client:

*“.. Means that you have given the client all the information they need in order to decide whether or not to work with you. This includes your terms and conditions, and some explanation of your working style..”*

Client data which consists of names, contact details (phone numbers, email address), Client’s GP, GP Surgery and emergency contact are collected on the Client Contract. Further information is often collected at the time of the initial consultation and may include: age, background, family history, ethnicity, political opinions, religious views or beliefs of a similar nature, family members and partners names, financial details, sexual life, physical and mental health details and details of past or current situations in life, work, relationships etc. These details are helpful for constructing a case conceptualization and treatment plan and every effort is made to keep all client information confidential. Client notes for further sessions are also recorded and stored.

### 4. 4. Our Use of This Information

4.1 Your personal information will be used to provide you counselling and to give you information relating to our services.

- To allocate you a counsellor for counselling and to offer suitable counselling appointments.
- To provide you with the professional counselling service requested from and contracted with us.
- To notify you about changes to your appointments and other changes to our services.
- To seek feedback from you on your experience of counselling with us.
- To improve our service to ensure that it is provided in the most effective manner for you and for us.
- To administer our service, including the arrangement of appointments, the handling of payments for the service, for data analysis, research, statistical and survey purposes.

4.2 We will not share any information about you with other organisations or people, except in the following situations:

- Consent – KBW Therapy may share your information only with professional carers or others whom you have requested or agreed in writing that we should contact.
- Serious harm – KBW Therapy may share your information with the relevant authorities if we have reason to believe that this may prevent serious harm being caused to you or another person for example if there is a child or adult safeguarding issue.
- Compliance with law – KBW Therapy may share your information where we are required to by court order or lawful regulations and rules to which we are subject.
- As part of the backups of encrypted data processed and held by professional IT security companies.
- For the purposes of receiving supervision, a requirement in abiding with the BACP Ethical Framework. Process data (as opposed to factual data) is destroyed within 30 days of supervision.

## 5. 5. Security

5.1 We will take all reasonable precautions to prevent the loss, misuse or alteration of information you give us. Your identifiable personal information is kept separately from any session notes and other descriptive material collected during the initial consultation and subsequent sessions. Any paper records are kept in locked filing cabinets in the KBW Therapy office or the home office of your counsellor. Any access to electronic records stored digitally is password protected and only accessed via an encrypted (secure end to end) connection. No personal data is stored outside of the European Economic Area (EEA). Where possible, two step authentication access is used to provide another layer of digital security. When obtaining supervision, our counsellors use first names or initials only to protect our client's identities.

Once a client finishes counselling, all data regarding their counselling is stored securely for 7 years and then erased / destroyed. If the client is under age 18 the client records are stored until they reach age 18 and then stored 7 more years. If the client is under age 16 then the young person's parent or guardian must also give consent for counselling to take place.

5.2 For ease of use and compatibility, communications in connection with this service may be sent by e-mail or text/SMS, however these are not always an encrypted form of communication and suggest you only submit information to us using an internet connection that you trust (not a public Wifi service for example). If you require an

encrypted form of written communication please contact us via Whatsapp or iMessage on 07762987403. E-mail, including forms submitted by our website and text/SMS, unless encrypted, is not a fully secure means of communication: any transmission is at your own risk. Whilst we endeavour to keep our systems and communications protected against viruses and other harmful effects, we cannot bear responsibility for all communications being virus-free or being intercepted by hackers.

## 6. 6. Your rights over your personal data

6.1 You have the right to see the information we hold about you. You also have the right to require us to correct any inaccuracies in your information. Please email us at [kirsten@kbwtherapy.co.uk](mailto:kirsten@kbwtherapy.co.uk) and allow up to 30 days for these requests. We will do our utmost to resolve any concerns you have, but if these are not resolved to your satisfaction, you may choose to contact the Information Commissioner's Office.

6.2 You may withdraw your consent for us to hold and process your data at any time. However, if you do this while actively receiving counselling at KBW Therapy, your counselling would have to end. You can withdraw your consent by contacting [kirsten@kbwtherapy.co.uk](mailto:kirsten@kbwtherapy.co.uk)

You will be required to fill in and sign a request for erasure/deletion/destruction of personal data form and this form will be kept on record for 7 years. Under certain circumstances, especially those outlined above in section 4.2 we may not be able to erase or destroy your records:

- If you've requested us to break confidentiality in order to communicate with your GP, another professional carer or another person, we may extend our data retention period for any personal data for which you've consented for us to share and we may not be able to erase or delete your data even if requested.
- Your disclosure of past, present or potential safeguarding issue(s) may nullify any request you ask of us to erase or destroy your personal data especially data pertaining to the safeguarding issue.
- Your disclosure of past, present or intent on future crimes may nullify any request you ask of us to erase or destroy your personal data especially data pertaining to the disclosure.

## 7. Cookies used on this website

A cookie is a small file which asks permission from your browser to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow websites to respond to you as an individual, but do not necessarily identify you personally.

7.1 The only cookies currently used on this website are set by the Google Analytics (GA) service, using the analytics.js implementation of GA. These cookies allow GA to assign users with a unique ID and track visits to our site in our GA account. For full details on what cookies are being set you can visit the [Google Analytics developer pages](#).

7.2 To change how cookies are managed you can learn more by visiting the page linked below relevant to your browser:

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