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**Privacy Notice**

**Introduction**

My name is Tim and I am the sole proprietor of Horizon Therapies. I am a registered member of The British Association of Counsellors and Psychotherapists and adhere to their Code of Ethics.

Your privacy is important to me and I understand how important it is to you. The purpose of this document is to be as clear and open as possible about what will happen with your personal information and why. I am registered with the Information Commissioner’s Office (ICO) as a Data Controller.

**How is your information used?**

When you first sign up to use this counselling service, you are required to provide me with some basic contact information about yourself, including your name, address, date of birth, phone, email, and the name and contact details of your GP. I will also retain clinical notes of our sessions, assessment notes including background information relevant to the counselling process, holding of any writing/drawings you wish me to keep, and the signed contract and permissions.

Horizon Therapies complies with its obligations under the General Data Protection Regulation (GDPR) by keeping your personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

**What is our lawful basis for using your information?**

While not intended to be onerous, a simple **contract** exists between us, under which you and I have some basic obligations and responsibilities. You agree to pay for using of our service, to attend the agreed sessions and to participate. In order to serve you effectively, I am required to maintain information about our sessions. That personal information along with your contact details is considered **special category data** and I therefore require your **consent** in order to keep such records.

**Sharing your information**

Your information will only be used for the purpose for which it was collected. The information held about you will be treated as strictly confidential and I will only share your data with third parties with your prior consent, or unless required to do so by law - for example, information may be shared with other agencies if there is an immediate risk of substantial harm to self or others.

**How secure is your information?**

I take security and confidentiality very seriously and will do everything within my power to keep your information safe.

* When not being used during our sessions, personal data relating to your name, address, date of birth, religion, ethnicity and health, is kept in a locked, fireproof filing cabinet.
* Paper notes taken of the content of each session will be kept for the sole purpose of my recollection and service in our therapeutic work. These note will be locked away.
* These paper notes are coded (pseudonymised).
* Some data may be kept electronically, such as, emails or texts to arrange appointment times and will be deleted within a month.
* Other electronic data such as letters will be kept for the required number of years – see below.
* All electronic information kept will be kept on a laptop which is protected by a password and as far as possible your name will be under a code. Your phone number will not be kept in my address list on my smartphone.
* No one else has access to your personal data or notes.

**How long do I keep your information?**

* I keep information in accordance with the guidance set out by the GDPR. I endeavour to maintain only information that is relevant, accurate and up to date. I have internal processes to periodically review the information held and I destroy all information that is no longer relevant to my purpose for processing. All paper notes and personal information are destroyed by cross shredding.
* As required by my Insurance Company, notes of each session will be kept for 7 years. If a minor, notes will be kept for 7 years after the client reaches the age of majority (age 18).
* For accounting purposes I am required to maintain accounting records, and invoices for up to 5 year.
* In the event of the counsellor’s death, all personal information will be destroyed by a delegate person who understands confidentiality.

**Your rights and your information**

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data: -

* **Access to your information**: You have the right to request a copy of the personal information about you that I hold.
* **Correcting your information**: I want to make sure that your personal information is accurate, complete and up to date and you may ask me to correct any personal information about you that you believe does not meet these standards.
* **Deletion of your information**: You have the right to ask me to delete personal information about you where:
	+ you consider that I no longer require the information for the purposes for which it was obtained or that I no longer need to retain it in accordance with my statutory obligations;
	+ you have validly objected to my use of your personal information - see ‘Objecting to how I may use your information’ below;
	+ My use of your personal information is contrary to law or my other legal obligations.
* **Objecting to how I may use your information**: Where I use your personal information to perform tasks carried out in the public interest then, if you ask me to, I will stop using that personal information unless there are overriding legitimate grounds to continue.
* **Restricting how I may use your information**: In some cases, you may ask me to restrict how I use your personal information. This right might apply, for example, where I am checking the accuracy of personal information about you that I hold or assessing the validity of any objection you have made to my use of your information. The right might also apply where there is no longer a basis for using your personal information but you do not want me to delete it. Where this right is validly exercised, I may only use the relevant personal information with your consent, for legal claims or where there are other public interest grounds to do so.
* **Withdrawing consent using your information**: Where I use your personal information with your consent you may withdraw that consent at any time and I will stop using your personal information for the purpose(s) for which consent was given. Please contact me if you wish to exercise any of these rights.
* **Lodging a complaint**: If you feel I have used your information incorrectly or without lawful basis, or you dispute my lawful basis, you have the right to lodge a complaint with the Information Commissioner’s Office (ICO).

**Further processing**

If I wish to use your information for a new purpose in the future, not covered by this Privacy Notice, then I will contact you to provide you with a new notice explaining that new use prior to starting the processing and setting out the relevant purposes and legal basis for processing. Where and whenever necessary, I will seek your prior consent to new processing.

If you have a data protection, security or privacy-related question or complaint, please contact me by email in the first instance, where I will do my best to assist you or resolve an issue.

**Client consent**

I have read and understand this GDPR document with regards the information kept about me and agree to sign it.

Name ………………………………………… Signed …………………………………………. Date …………..

DOB ……………………………………………

Counsellor, Tim Rooke Signed ………………………………. ……… Date …..…………………………..