tomnorfolk@proton.me : 07592 616169 : St Mary's Works, Duke Street, Norwich NR3 1QA

Privacy Policy

Introduction

Your privacy is very important to me and you can be confident that your personal information will be kept safe and secure and will only be used for the purpose it was given to me. 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 privacy notice tells you what I will do with your personal information from initial point of contact through to after your therapy has ended.

I am happy to chat through any questions you might have about my data protection policy and you can contact me via tomnorfolk@proton.me.

'Data controller' is the term used to describe the person/ organisation that collects and stores and has responsibility for people's personal data. In this instance, the data controller is me. I am registered with the Information Commissioner's Office [ZB360253].

My lawful basis for holding and using your personal information

The GDPR states that I must have a lawful basis for processing your personal data. There are different lawful bases depending on the stage at which I am processing your data. I have explained these below: If you have had therapy with me and it has now ended, I will use legitimate interest as my lawful basis for holding and using your personal information. If you are currently having therapy or if you are in contact with me to consider therapy, I will process your personal data where it is necessary for the performance of our contract. The GDPR also makes sure that I look after any sensitive personal information that you may disclose to me appropriately. This type of information is called 'special category personal information'. The lawful basis for me processing any special categories of personal information is that it is for provision of health treatment (in this case counselling) and necessary for a contract with a health professional (in this case, a contract between me and you).

How I use your information

Initial contact

When you contact me with an enquiry about my counselling services I will collect information to help me satisfy your enquiry. This will include contact details and why you are seeking counselling. Alternatively, your GP or other health professional may send me your details when making a referral or a parent or trusted individual may give me your details when making an enquiry on your behalf. If you decide not to proceed I will ensure all your personal data is deleted within 3 months. If you would like me to delete this information sooner, just let me know.

Whilst you are accessing counselling

Confidentiality

Everything we discuss will be confidential, but please be aware that I may need to break that confidentiality if I believe you or someone else is at risk of serious harm, or for certain crimes where I have a legal duty to report them (terrorism, drug trafficking, money laundering, or if a court of law requires me to disclose information). Depending on the circumstances this may be to your General Practitioner (GP), the NHS mental health service and/or the Police. If possible, I would always speak to you first about the need to break confidentiality, however I retain the right to break confidentiality without prior consultation with you should I consider that the urgency of the situation requires me to act immediately to safeguard the physical safety of yourself or others.

Supervision

I have monthly supervision as part of the British Association of Counselling and Psychotherapy (BACP) regulations and sometimes some content of our sessions may be shared in these sessions. No identifying personal details will be shared, so you will remain anonymous; the focus is on supporting me to support my clients. My supervision is from counsellors who also abide by the BACP's code of ethics regarding confidentiality.

Notes

I keep brief notes of our therapy sessions for the purpose of assisting our work together. The notes help me to keep track of the issues that we are working on and they are for my use only. The notes do not include any personal details that could be used to identify you. The notes are stored securely on wearekiku.com, an online platform for counsellors to manage their practices. Legally I need to keep your records for up to 7 years once we have finished working together.

Personal details

I will keep a record of your personal details to help the counselling service run smoothly. These details are kept securely on wearekiku.com and are not shared with any other third party. Any email correspondence will be deleted within 3 months if it is not important, otherwise it will remain as part of your records and held for up to 7 years (see next section).

After counselling has ended

Your information is kept for the duration of our therapy sessions, however I must also legally hold your details and session notes for a period of up to 7 years following the end of therapy to comply with the legal obligations required by my insurers. After this period all data will be securely deleted.

Third party recipients of personal data

I sometimes share personal data with third parties, for example, where I have contracted with a supplier to carry out specific tasks. In such cases I have carefully selected which partners I work with. The details and their privacy policies are below:

Wearekiku.com / Konfidens.com
https://www.wearekiku.com/privacy-notices
https://konfidens.com/
- Storage of client details, session notes, logging payments and diary management

Protonmail
https://proton.me/legal/privacy - Encrypted email

Accounts/Books – If you pay me by BACS/bank transfer then your initials/name may be on my bank statement. These may be requested by HMRC.

Your rights

I try to be as open as I can be in terms of giving people access to their personal information. You have a right to ask me to delete your personal information, to limit how I use your personal information, or to stop processing your personal information. You also have a right to ask for a copy of any information that I hold about you and to object to the use of your personal data in some circumstances. You can read more about your rights at ico.org.uk/your-data-matters.

If I do hold information about you I will:
• give you a description of it and where it came from
• tell you why I am holding it, tell you how long I will store your data and how I made this decision
• tell you who it could be disclosed to
• let you have a copy of the information in an intelligible form.

You can also ask me at any time to correct any mistakes there may be in the personal information I hold about you. To make a request for any personal information I may hold about you, please put the request in writing addressing it to tomnorfolk@proton.me. If you have any complaint about how I handle your personal data please do not hesitate to get in touch with me by writing or emailing to the contact details given above. I would welcome any suggestions for improving my data protection procedures. If you want to make a formal complaint about the way I have processed your personal information you can contact the ICO which is the statutory body that oversees data protection law in the UK. For more information go to ico.org.uk/make-a-complaint.
Please be aware that in certain situations counsellors may be unable to comply with the above requests. For example, if compelled to retain the records by a court of law. Please also be

aware that there may be a charge for complying with a request if it is deemed to be excessive in nature.

Data security

I take the security of the data I hold about you very seriously and as such I take every effort to make sure it is kept secure.

My accounts and devices are password protected and my laptop has anti-virus software. Emails are encrypted through Protonmail.

Visitors to my website

When someone visits my website, I use a third party service: Google Analytics. I use legitimate interests as my lawful basis for holding and using your personal information in this way when you visit my website. I use Google Analytics so that I can continually improve my service to you.
Google Analytics is a service provided by Google that gathers anonymous data on how people are using websites and then provides visitor statistics, details of page views etc. This service is used by many website owners as the data helps website owners to improve their websites.

I use Wordpress as the content management system for our website - find out about Wordpress and data protection here: https://en-gb.wordpress.org/about/privacy/

If you fill in a form on my website, that data will be temporarily stored on the web host before being sent to me.

These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged in to that website.

Where we provide links to websites of other organisations, this privacy notice does not cover how that organisation processes personal information. I encourage you to read the privacy notices on the other websites you visit.

Cookies

Cookies are text files placed on your computer to collect standard Internet log information and visitor behaviour information. When you visit our website, we may collect information from you automatically through cookies or similar technology
For further information, visit http://allaboutcookies.org .

How do I use cookies?

My website uses cookies in a range of ways to improve your experience on the website, by understanding how you use the website and for the contact form.

What types of cookies do I use?

There are a number of different types of cookies, however, the website uses:

Functionality – we use these cookies so that we recognize you on our website and remember your previously selected preferences. A mix of first-party and third-party cookies are used.

Usage – we uses these cookies to collect information about your visit to our website, the content you viewed, the links you followed and information about your browser, device, and your IP address. This helps us understand how the site is being accessed to improve the user experience.

Embedded content

Content on this site may include embedded content (e.g. maps, videos, images, articles, etc.). Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website. This makes the website more helpful to you as a site visitor however most of these come with their own cookies. I do not control these cookies so I cannot guarantee what they do. In many cases the cookies are used to generate identical information to Google Analytics and indeed use Google Analytics, so opting-out of Google Analytics will also opt you out of these cookies too. You can opt out of Google analytics and other Google services here – http://tools.google.com/dlpage/gaoptout and https://www.google.com/dashboard/.
You can read Google Analytics' privacy notice here https://policies.google.com/privacy/partners?hl=en-GB&gl=uk .

How to manage cookies

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

Changes to privacy notice

This privacy notice may be updated from time to time, so please check occasionally for any updates.