**Policies**

**Ethics**

I am a member of the British Association for Counselling and Psychotherapy (BACP) and abide by their Ethical Framework. For more information please see [www.bacp.co.uk/ethical-framework](http://www.bacp.co.uk/ethical-framework).

**Privacy**

Your privacy is very important to me and I will keep your personal information safe and secure. I will only use it for the reason 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 informs you of what I will do with your personal information from our initial point of contact right through to after your therapy has finished, including:

1. Why I am able to process your information and what purpose I am processing it for
2. Whether you have to provide it to me
3. How long I store it for
4. Whether there are other recipients of your personal information
5. Whether I intend to transfer it to another country,
6. Whether I do automated decision-making or profiling, and
7. Your data protection rights.

‘Data controller’ is the term used to describe the person/organisation that collects, stores and has responsibility for people’s personal data. For the purposes of this website and my counselling work, the data controller is me, Hannah Norman. Data is collected for the only purpose of providing an appropriate service for you, my counselling client. Legally termed as ‘Legitimate Interests’.

I am registered with the Information Commissioner’s Office Registration Reference ZB698216.

**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.

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 with me or if you are in contact with me to consider this service, I will process your personal data where it is necessary for the purpose of our contract.

The GDPR also makes sure that I look after any sensitive personal information that you may disclose to me in an appropriate way. 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 services, I will collect information to help me respond to your enquiry. This will include your name, email address, and phone number.

If you decide not to proceed I will ensure all your personal data is deleted within one year. If you would like me to delete this information sooner, please inform me and I will do so.

While you are accessing my counselling services, everything you discuss with me is confidential. That confidentiality will only be broken in the following instances:

1. Where you give permission for the confidence to be breached.
2. Where I am required to by a court of law.
3. Where the information is of such nature that confidentiality cannot be kept e.g., where there is risk of serious harm to self or others, or in cases of fraud and crime.

I will always try to speak to you about this first, unless there are safeguarding issues that prevent this.

If we both agree to go ahead with counselling, I will keep a record of your personal details. This includes your name, date of birth, email address, phone number, home address, emergency contact and GP practice and address. This is to provide you with the best possible service, and in cases where there is risk of serious harm. These details are kept securely in a locked cabinet, and on a secure encrypted password manager, and are not shared with any third party (excepting the conditions above).

In issues of risk of serious harm, I will contact your emergency contact and may also request information from a professional like your GP. As far as possible, sharing of information would be with your consent.

As a member of the BACP I am required to keep accurate notes, and I will keep brief written notes of each session/meeting. These are stored in a locked filing cabinet. These notes are stored separately from your personal details and will not have any identifying information. They will be linked to your personal information by a client code. In this way, the data will be anonymised. If we use counselling outcome measures, I will store these with the notes above, again, anonymising the data with a code.

As required by the BACP, I am in regular supervision and will discuss my counselling work with my supervisor. I will take all possible measures to preserve your anonymity.

I may request permission for your feedback to use for marketing purposes, this will be anonymised to protect your privacy and you can decline this request at any time if you prefer.

In keeping with the requirements of [BACP’s Ethical Framework](https://www.bacp.co.uk/events-and-resources/ethics-and-standards/ethical-framework-for-the-counselling-professions/) I have appointed a trusted colleague to take over the administration of my work in the event of my death or incapacity, and deal with my appointments and destroy my notes in a confidential manner. This colleague is also a member of the BACP and adheres to the same professional confidentiality rules as set out in their Ethical Framework.

**Telephone and Email**

I do not record phone calls and may only use your phone number to return a call if agreed by you. For security reasons I do not retain text or WhatsApp messages for more than one year. If there is relevant information contained in a message I will put it into my notes. Likewise, any email correspondence will be deleted after one year if it is not important. If necessary, I will put it into my notes. I recommend you do not share sensitive information via email or text. All electronic devices holding personal client data are stored securely and password protected.

**After Services Have Ended**

When counselling has ended your personal details will be kept for seven years from the end of our contact with each other and are then securely destroyed.

**Your Rights**

You have the right to ask me to destroy 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:

1. Give you a description of it and where it came from;
2. Tell you why I am holding its, tell you how long I will store your data and how I made this decision;
3. Tell you who it could be disclosed to;
4. 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 hannahnormantherapy@gmail.com.

If you have any complaint about how I handle your personal data please do not hesitate to get in touch with me by emailing to the contact details given above. I welcome any feedback 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](https://ico.org.uk/make-a-complaint).

**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. Hard copy data (personal information) will be stored in a locked filing cabinet. Digital data will be kept separately and only in encrypted format.

**Visitors to My Website**

My website is hosted by WebHealer. When you visit my website, we may collect data to improve your experience and analyse site performance. This includes information about the pages you view and your browser type. We use this data for purposes like understanding user behavior and creating usage statistics, without sharing it with third parties. Additionally, cookies are used for session management and faster browsing experiences.

My site also employs caching to enhance speed and performance, with temporary storage of page copies that are never shared with third parties except for necessary technical support. You can manage or block cookies via your browser settings, though this may affect access to certain features.

**Social Media**

I recommend that you share no personal information if commenting on any of my social media pages as they can be viewed by the public. To protect your privacy personal information may be taken down in the interests of protecting your privacy.

My Instagram page is processed by Instagram and if you use the instant messaging service your data will be processed subject to Instagram’s own privacy policies which I recommend you to check.

Similarly, my Facebook page is processed by Facebook and all enquiries should be made by email, phone or text not on social media pages, to make sure privacy is upheld and your information is as secure as possible. Again, I recommend no personal information is shared on Facebook, data will be process subject to Facebook’s privacy policy.

**This Policy is subject to amendment**

5Th January 2025