Data Privacy Notice

My Details:

Name	Jan Harrison
Contact Details	Telephone: 07739 914661 Email: jan.harrison.counselling@gmail.com Website Address: www.janharrisoncounselling.com
Qualifications	BSc, BA (Integrative Counselling), MA
Registered Professional Bodies	British Association for Counselling and Psychotherapy (BACP) Register No: 409249 Association of Christians in Counselling and Linked Professions (ACC) Register No: R01641
ICO Registration Number	ZB716722

This privacy notice explains what personal information I collect, why I collect it, how I keep it safe, who I may share it with, and what rights you have. If you are a young person reading this, you can ask me or your parent or carer to go through it with you. This notice applies to clients, prospective clients who make enquiries, and parents or carers where they are involved in arranging counselling.

Information and Data Privacy

- Counsellors process special category data for the provision of counselling services. This is stored securely and is subject to the Data Protection Act (2018) and UK General Data Protection Regulation.
- I am registered with the Information Commissioner's Office and am committed to keeping all your personal information safe and secure.
- Your details are kept on a secure online practice management platform, Kiku. You will be asked to complete an intake form to ensure that the information I have is correct.
- I may make brief notes after each session. These notes are securely stored in Kiku.
- Secure authentication is enabled on Kiku and on devices used to access Kiku.
- You may ask to see the information about you that is stored in Kiku. You may also ask for corrections, request deletion where this is possible, or withdraw consent for your data to be used. Deletion may not always be possible if notes need to be kept for legal or

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clinical reasons. Please send requests by email to jan.harrison.counselling@gmail.com. You are entitled to receive this information within 31 days.

- I may also make brief, non-identifying notes after sessions to support my work with you. These are not shared with anyone else, except with my clinical supervisor if this is necessary, and they are kept securely in a locked cabinet.
- When counselling has ended, notes are kept securely for 7 years, unless the law says they need to be kept for longer. They are then shredded.
- This document outlines my Data Privacy Notice. A link to Kiku's Data Privacy Notice can be found at www.janharrisoncounselling.com.

What Personal Data I Collect

I collect and keep some personal information so that I can provide counselling safely, professionally and in line with the law. Some of this is special category data, which can include sensitive information about your health, wellbeing and personal circumstances. It includes:

- Contact details
- Date of birth
- Background information shared during enquiries
- Session notes
- Assessment data
- Special category data, such as information about mental health, trauma history, neurodiversity, sexuality, relationship status or risk
- Emails, texts, voicemail
- Next of kin data
- GP information
- Records of payments, but not card or bank details

Why I Collect It (Legal Bases)

The lawful basis for me to collect data is:

- To provide counselling services under our counselling agreement
- Legitimate interests for practice administration and supervision, in line with the ethical frameworks of my professional bodies
- Vital interests, where information may be needed because there is a risk of serious harm
- Legal obligation, including situations where safeguarding action is required
- Special category data processed under:
    - *Provision of health or social care*
    - *Safeguarding of individuals*

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How I Use the Data

I use this information:

- To provide professional counselling services
- To communicate with clients
- To maintain records, as per the ethical frameworks of my professional bodies
- For supervision (all client data shared in supervision is anonymised)
- For safeguarding or emergencies
- For invoicing and administration

Who I Share Data With

I share data with:

- My clinical supervisor, with client information anonymised
- Your GP or emergency services, but only where there is a serious concern about risk or safety
- My online practice-management system, Kiku
- My email provider – email address only
- My clinical will executor, who would only access my online practice management system, Kiku, if I became incapacitated or died, and only after secure identity verification had been completed.

How I Store and Protect Data

I store data including:

- Encrypted devices with password/biometric protection – phone, iPad, laptop; please note, phone numbers are saved with a code rather than identifying personal information; all WhatsApp chats are locked with biometric access only.
- Two-factor authentication
- Secure practice-management software, Kiku, with password protection and two-factor authentication
- Locked physical storage

How Long I Keep Data

- Session notes are kept for 7 years
- Enquiry emails are kept for 2 years
- Contact details are kept on my devices until therapy ends. They are also kept securely on Kiku, my online practice-management software, for 7 years after therapy ends.
- Financial records are kept for 6 years, as required by HMRC.

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Client Rights

Under the Data Protection Act 2018 and the UK General Data Protection Regulation, clients have the right:

- To access any of their data that I hold
- To correct any of their data that I hold
- To erase any of their data that I hold, within the limits of clinical and legal reasons for holding data
- To restrict access to their data
- To object to any of their data being held
- To be able to transfer data to a new counsellor (data portability)
- To complain to the ICO

Safeguarding & Emergencies

Wherever possible, I will make decisions about sharing information with your consent. If you agree for information to be shared, I will record what can be shared and who it can be shared with on a Disclosure Agreement Form and in your client notes.

However, there may be circumstances where I need to share information without your consent:

- When there is a high risk that your safety, or someone else's safety, may be seriously affected
- Where the law says I must share information without speaking to you first

I make these decisions after completing a Client Risk Assessment to consider the level of risk and how urgently action may be needed. Where possible, I will discuss decisions with my supervisor before taking action.

Client Risk Assessment forms will be completed, and any decisions or actions will be recorded in your client notes.

Cookies & Website Tracking

- My website, www.janharrisoncounselling.com, is built using Weebly and uses analytics and cookies.
- Anyone accessing my website will see a cookie banner at the top of the screen, with the option to reject non-essential cookies or choose which cookies to allow.

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- Some data collected by Google Analytics may be used for personalisation and to measure advertising effectiveness. Google may use IP addresses to measure adverts,

personalise adverts, track visitors across devices and marketing channels, and collect statistical information about visitor behaviour. Website users can opt out of these.

- Square, Weebly's parent company, registers statistical data about users' behaviour on the website and information about how they browse and engage with the website. Website users can opt out of these.
- Marketing cookies are used to personalise and measure advertising effectiveness. Website users can opt out of these.
- Cookies are used by Kiku to detect counselling bookings made via the website. Website users can opt out of these.

Use of AI Tools

- Admin tasks that do not include any client data may involve AI, such as policy writing and preparation of social media content
- Client notes are not entered into AI systems
- Any use of AI does not include identifiable client information.

How Clients Can Complain

- Please send Subject Access Requests or data protection complaints in writing to jan.harrison.counselling@gmail.com.
- Data Protection complaints may also be made through the Information Commissioner's Office website here: Make a complaint about how an organisation has used your personal information | ICO

I have read this privacy notice carefully, and I understand and agree to its contents.

Client Name_____

Date of Birth_____

Client Signature _____ Date_____

Parent Signature_____ Date_____
(if client is under 16 years old)

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Counsellor Signature _____
Date_____