

Privacy Policy

Sarah Langstaff Counselling sarahlangstaffcounselling.com

Please read this information before your initial appointment.

The General Data Protection Regulation (GDPR) is new legislation which came into effect in 2018. Under this law, you have a right to know what information I collect, how I use it and the circumstances in which it may be shared.

The personal information you provide to 'Sarah Langstaff Counselling' will be used for legitimate business interests, that is, to provide you with a professional counselling and psychotherapy service.

Before your initial appointment, you will be asked to sign that you have seen this privacy notice to confirm that you have received and understood this policy.

Your Personal Data Information kept includes:

- Your signed acknowledgement of the privacy notice
- Your signed counselling/psychotherapy agreement
- A brief record of each counselling/psychotherapy session (which may contain sensitive personal data – see below)
- Your signed Intake Assessment form

Sensitive Personal Data (“Special Category Data”)

Some of the information collected may be sensitive personal data including ethnic origin, religious beliefs and physical and mental health. Such data will only be used to provide a counselling/psychotherapy service in accordance with legal

obligations. Sensitive personal data is stored as part of your clinical notes which are anonymised with a unique code. Your Intake Assessment form which contains your name, address and other Sensitive Personal Data is stored in a separate place to your client notes. The record of your unique code is kept in a separate place to your Intake Assessment form and client notes.

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 explain 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 the provision of health treatment (in this case counselling/psychotherapy) 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/psychotherapy services I will collect information to help me satisfy your enquiry. This will include your name, address, email address and telephone number. Alternatively, your GP or other health professionals may send me your details when making a referral or a parent or trusted individual may give me your details when enquiring on your behalf.

If you decide not to proceed I will ensure all your personal data is deleted within twelve months. If you would like me to delete this information sooner, just let me know.

While you are accessing counselling everything that happens in your therapy session remains confidential. That confidentiality will only be broken under the following circumstances:

- I will discuss aspects of the work with my Supervisor, but your identity will remain protected.
- I may be required to discuss the work if required by law (this is very rare). For example, if you discussed acts of terrorism or serious crime or risk of serious harm to others, I would discuss this with the police. Similarly, if you reveal information about children or vulnerable adults being seriously at risk, I would report to that to the relevant authorities.
- If subpoenaed to give evidence in court, I would have to do so.
- I may contact your GP or other medical professionals if I believe that you were likely to cause serious injury to yourself.

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

I will keep a record of your personal details to help the counselling/psychotherapy service run smoothly. These details are kept securely using OneDrive and will not be shared with any third party. I will keep typed notes of each session, these are kept within a Dropbox folder. For security reasons, I do not retain text messages for more than three months. If there is relevant information contained in a text message I will copy it and store it in your personal notes in Dropbox. Likewise, any email correspondence will be deleted after three months if it is not important.

After counselling has ended.

Once counselling has ended your records will be kept for seven years from the end of our contact with each other and are then securely destroyed. This period is in line with the expectations of my insurance company, Oxygen.

The following will be shredded or deleted within three months of our work finishing:

- Your Intake Assessment Form
- Your phone number from my mobile phone
- Emails regarding appointment arrangements

Data/Why it is kept

- Name, date of birth, occupation - *basic information about yourself that helps me to get to know you.*
- Address, email address and telephone number - *I use this as a way of contacting you about my sessions. - Address is also kept in case I felt you were at risk and needed to request a police safety check.*

- GP Details - *If I felt you were at risk then I may need to contact your GP. Where possible, and if appropriate, I will discuss this with you first.*
- Session Notes - *Standard professional procedure requires summary notes to be made of each session which refreshes your counsellor's memory of what was discussed in sessions.*
- Sensitive Personal Data ("Special Category Data") - *This information helps me to get to know you and make an initial assessment of your circumstances including any history of mental health issues.*
- Session Notes – *I have a legal obligation to keep and I am required by my insurance company to keep session notes for 7 years after the end of therapy, after which they are destroyed by either deletion or shredding.*

What are your rights?

You have a right to request to see or have amended any personal information I may keep about you. You also have the right to request that I delete information that I hold about you. You also have the right to object to the processing and use of your personal data.

What information do I share?

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

- Consent – I may share your information with other professionals whom you have requested or agreed I should contact.
- Serious harm – I may share your information with the relevant authorities if I have reason to believe that this may prevent serious harm from being caused to you or another person.
- Clinical Executor – If for any reason I become incapacitated and unable to work your information will be

passed onto my Clinical Executor so they can contact you and make suitable arrangements.

- Compliance with the law – for instance, if I am required by a court of law

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. I take great care to ensure that I have a contract with the third party that states what they are allowed to do with the data I share with them. I ensure that they do not use your information in any way other than the task for which they have been contracted.

How your data is stored

Paper forms and correspondence are stored in a locked filing cabinet. All electronic records are encrypted and stored on OneDrive or Dropbox, they require password access. My Laptop is only used by myself and requires fingerprint or password access. Your telephone number may be kept in my mobile phone which is also fingerprint/password protected. Your identifiable information is kept separately from any session notes and is linked by a unique number.

I am registered with the Information Commissioner's

Office: ZA756744. My phone number is: 07870273226. My email address is: sarah.langstaff77@gmail.com

Data Protection Accountability

If you wish to complain about how your data is handled, in the first instance contact me, Sarah Langstaff.

If your complaint is not resolved to your satisfaction you can contact the Information Commissions Office

at <https://ico.org.uk/concerns/handling/> or call 0303 123 1113.

Confidentiality & Zoom

This is a very important aspect of the counselling/psychotherapy relationship. Everything that is discussed in the session is kept in the strictest confidence. If we are working through online sessions I will be using Zoom which has end-to-end encryption. For security both the platform I will be using, Zoom, and my laptop have end-to-end encryption. Recording functionality for participants will be disabled, and the waiting room enabled to prevent unauthorised participants from entering.

Recordings

It is a requirement of my continued training that sessions are recorded. Recordings are kept securely on OneDrive. Audio recordings will only be shared within Supervision and Training settings and your confidentiality will be protected.

If any recordings are to be used for exam purposes and therefore shared more widely your individual consent will be requested. All recordings will be deleted within 7 years of our work completing or unless you request this done sooner.

Cookies In Use on My WebSite Sarahlangstaffcounselling.com

Cookies and how they Benefit You

My website uses cookies, as almost all websites do, to help provide you with the best experience possible. Cookies are small text files that are placed on your computer or mobile phone when you browse websites

Cookies help to:

- Make my website work as you'd expect
- Improve the speed/security of the site
- Continuously improve my website for you

I do not use cookies to:

- Collect any personally identifiable information (without your express permission)
- Collect any sensitive information (without your express permission)
- Pass data to advertising networks
- Pass personally identifiable data to third parties
- Pay sales commissions

You can learn more about all the cookies I use below

Granting us permission to use cookies

When you visit my website you will be informed that the website uses cookies and asked to consent to their use.

If the settings on your software that you are using to view this website (your browser) are adjusted to accept cookies we take this, and your continued use of our website, to mean that you are fine with this. Should you wish to remove or not use cookies from our site you can learn how to do this below, however doing so will likely mean that this site will not work as you would expect.

More about Cookies

Website Function Cookies

We use cookies to make my website work including:

- __cf_bm
- AWSALBCORS [2]
- synthasiteVisitId
- synthasiteVisitorId
- _swa_u

There is no way to prevent these cookies being set other than to not use our site.

Third party functions

My site, like most websites, includes functionality provided by third parties. A common example is an embedded YouTube video. Disabling cookies on my website will likely break the functions offered by these third parties

Anonymous Visitor Statistics Cookies

I use cookies to compile visitor statistics such as how many people have visited my website, how long they spend on the site, what page they look at etc. This helps us to continuously improve my website. These so-called “analytics” programs also tell me, on an anonymous basis, how people reached this site (e.g. from a search engine) and whether they have been here before helping me to put more money into developing our services for you instead of marketing spend. I use: Yola Analytics

Turning Cookies Off

You can usually switch cookies off by adjusting your browser settings to stop it from accepting cookies (Learn how [here](#)). Doing so however will likely limit the functionality of ours and a large proportion of the world's websites as cookies are a standard part of most modern websites

It may be that your concerns around cookies relate to so-called "spyware". Rather than switching off cookies in your

browser you may find that anti-spyware software achieves the same objective by automatically deleting cookies considered to be invasive.