

Privacy Notice for Counselling Clients (Child)

This privacy notice supplements our main privacy notice provided on our website.

This Privacy Notice is addressed to the 'Data Subject' who is the client (child).

Your child may be too young to understand the details of this notice. However, in keeping with our values of respecting the child's ownership of their information, and in adherence to the requirements of the GDPR, we request that a parent/ guardian explains this privacy notice to them in simplified language they can understand.

'Data' = information

'Data collection' = information that we receive or write down

'Data processing' = how we handle your information, ie. collect, store, use and share (where and if necessary)

The protection and security of your information is extremely important to us. We are committed to protecting your privacy and confidentiality as far as we are able whilst providing a safe and ethical service.

Special Categories of Data

Due to the nature of counselling, some of the data we collect is sensitive. Information relating to health, ethnicity, religion, and sexual orientation are considered to be Special Categories of Data and we are required to take extra care when handling this information. We may only process this type of data with your explicit consent.

Data Collection

Initial contact: We collect your data when you and/ or your parent/ guardian contacts our service and gives us information about you. We collect information such as your name, date of birth, address, parent/guardian's name, contact telephone numbers and email address, school and GP details. We also collect information related to the difficulties you are experiencing.

Referral: You may be referred to our service by a healthcare professional, social worker, or other agency that is providing services to you. Where they refer to us they will usually

ask for your consent to do so. As part of the referral they may share with us your contact information and the reason for their referral. If you choose not to participate, the referral information will be removed, otherwise it will be added to the information we collect about you as part of providing the service to you.

Assessment: Information collected during an assessment will be collected directly from you and your parent/guardian.

During your therapy: We keep brief handwritten notes of each therapy session. We keep content notes very brief and vague so as to protect the confidential information you have shared in the session. The exception to this is if you share information that gives us cause for concern that you or somebody else is suffering or is likely to suffer in the future, or has suffered in the past, significant harm. In this case we are required to take detailed notes.

Data storage, security and retention

Details that are collected on the 'Client Details' form, such as name, date of birth, contact details, parent/guardian names, GP, etc., in addition to total number of sessions attended and therapy outcome are kept in a secure locked environment and are kept for three years after the end of therapy.

Brief handwritten therapy notes are kept in an anonymised file in a separate locked filing cabinet.

It is our policy to securely destroy any sensitive information we have collected after the end of therapy. This includes therapy notes, assessment notes, referral information. However, in rare circumstances information may be kept longer. In such circumstances information will be kept only for as long as is needed to discharge our responsibilities to you safely and effectively and/ or for the purpose of compliance/ the law.

Emails and texts from parents/ guardians are kept for no longer than is necessary in the communication, before being deleted. In some circumstances texts and emails may be printed out and kept with therapy notes as above.

Inner Focus uses Proton Mail as its email provider. Proton Mail is GDPR compliant and has zero access encryption which means any emails stored on its server are completely secure and are inaccessible to anybody other than the recipient. When necessary to send sensitive information via email we will use Proton Mail's end-to-end encryption service which also enables encrypted replies, thus keeping sensitive data secure.

How we use your data

- To communicate with you and/or your parent/ guardian where necessary in relation to the service we are providing. We may communicate via phone, text, email, mail.
Legal basis: performance of contract
- We will use your information to provide you with the service you and/or your parent/ guardian have agreed to.
Legal basis: performance of contract
- To refer you for services provided by other agencies. We will only do this at your and/ or your parent/guardian's request and consent.
Legal basis: consent
- To fulfil a duty of care and/ or legal obligation.
Legal basis: performance of contract/ public task/ legal obligation

Information sharing

Your details and notes will be treated confidentially.

In rare circumstances - such as legal obligations or if we are concerned for your safety or wellbeing, or that of somebody else - client details and relevant information about the content of therapy sessions may be shared with parents/ GP/ social services/ courts/ police/ other relevant agencies. We would always seek to speak with you and/ or your parent/guardian first if it became necessary to share your information with any of the above, although we are not able to guarantee that this would always be possible.

With your consent and at your request, we may share information about your therapy sessions with parents/ guardians.

Only relevant and necessary information will be shared in any of the situations above.

Your rights

You and/ or a parent/guardian who has parental responsibility have the right to ask to see the information we hold about you. We will provide all information except for that which qualifies as being exempt (DPA 2018, Schedule 2). You can ask us to change any information that we hold about you that is incorrect. You have the right to ask us to delete information that we hold about you, which we will do save for that which we have a legal obligation to keep. You have the right to ask us to transfer your information to another party.

Please contact Sara Bradly at admin@inner-focus.co.uk if you would like to exercise any of these rights.

For the purposes of the General Data Protection Regulations (GDPR) 2018, the Data Controller at Inner Focus Ltd is Sara Bradly (Director).

Complaints

If you wish to complain about how we handle your data, in the first instance please contact Sara Bradly, who is the Data Controller at Inner Focus Ltd. If your complaint is not resolved to your satisfaction you can contact the Information Commissioners Office <https://ico.org.uk> or 0303 123 1113

Declaration

- I have read this privacy notice and explained it to my child in a way they can understand.
- My child and I explicitly consent to the processing of Special Categories of Data as described above.
- I confirm that I have parental responsibility.

Name of parent:

Signed: Date:

Child can 'sign' here if they wish to:

