**FAMILY AND THERAPY**

**DATA PROTECTION, CONFIDENTIALITY, RECORD KEEPING**

**Privacy Notice for clients**

This Policy tells you what we will do with your personal information , from initial point of contact through to after your therapy has ended. All of the directors of the company are responsible for data protection.

**How and why we hold your personal data**

Family and Therapy (F&T) is committed to complying with the terms of the General Data Protection Regulation (GDPR) and to the responsible and secure use of your personal data. F&T has a legitimate interest in processing personal data in order to provide Playtherapy/ Counselling and other therapeutic services and requires us to ’keep accurate records that are adequate, relevant and limited to what is necessary for the type of service being provided’, and to ’comply with the applicable data protection requirements’ (BACP 2018: Good Practice 15)

Your personal information will be used only to provide you with the therapeutic support and to information you have sought, relating to our services, and to meet the legal requirements of GDPR and professional standards of our therapy body. We will not share your personal details with any other person or organisation without your knowledge and permission, except in exceptional circumstances.

**Where we get the data from.**

All referrals, such as from clients, or GPs , are shared with us digitally via a secure platform and stored centrally in a secure password protected digital folder by one of our F&T Directors. Contact and referral details are then shared by secure email to each of our team so that they may then get in touch with you, by phone, or email. All counsellors must have a separate phone from their personal one, for this purpose, or will use 141 before dialling, and they must be password protected.

**What records do we keep**

A record is any form of document, whether paper-based, creative or electronic kept whilst working with the client and may include: all appointment dates, including non-attendance by client, names, contact detail, surgery , clients referral form, contract with consents to all activities and passing of confidential information, counsellor’s minimum working record of client work, copies of any correspondence to/from client, assessment outcomes e.g CORE/CORS/TPM, clients’ drawings etc, recorded on our F&T client databases

**While you are accessing counselling**

Please be assured that everything you discuss with us is confidential. The information disclosed during the course of counselling is confidential. However, there are legal exceptions. For example, if you reveal a threat of harm, or there is a threat of harm to self or to others, if you reveal knowledge of terrorist activity or if a court order is received and a legal obligation arises. We will always try to speak to you about this first, if possible. Each therapist will keep a record of your personal details to help our service run smoothly. These details are kept securely.

On completion of counselling, together we reflect on outcomes with the client . If a 3rd party referral has been made on the client’s behalf, with the clients consent and full knowledge, we may share outcomes via email to the GP/agency referrer, briefly, to respect confidentiality, using only the client’s initials, NHS number/DOB. In any correspondence no names are used. No confidential information a client has shared is disclosed other than that which is deemed necessary in our professional view, with the permission of the client, to aid the agencies in supporting the client further. Client’s creative work is given to them on completion. Minimal quantitative data is gathered by all our team on outcomes of interventions and shared with the client and F&T Directors, via our digital database, to meet client needs and inform our knowledge of our effectiveness.

**Retention and Disposal of Records**

The GDPR does not set specific time limits for storing different types of data. This is determined by our professional framework and how long we need the data for.

For contracted counsellors or play therapists, clients’ names, dates of session and therapists own working diary notes are kept for the length of the F&T contract with the client and for 1 year after or such time as their own insurance/professional body specifies. Digital client correspondence is also kept for this length of time unless digital access to this data is not possible. All client databases and other personal identifiable data such as referral forms, outcome letters etc must be deleted from counsellors digital devices once each contract with F&T is terminated. If clients’ want us to delete their information sooner than this, they can request this.

F&T will keep evidence for our financial records of all bank transactions with therapists for 6 years. We will also centrally store all client databases which contain name, surgery, DOB, NHS number, appointment dates, outcome data on a secure protected back up device for 3 years.

Counselling students are required to delete all clients details and communication with them or about them, via text or email, once they have completed working with them. They may keep their own anonymised working client notes as long as their University requires this. The databases may be stored on their devices until they complete their placement with us, and then need to be deleted.

**Secure Storage**

We make every effort to keep all information confidential. Your personal information is stored securely and confidentially**. We are ICO data compliant. All counsellors have a password, firewall and virus checking on their computers.** We will take all reasonable precautions to prevent the loss, misuse or alteration of information you give us.

**Right to Access**

You have the right to ask for a copy of your personal information, free of charge, in an electronic or paper format. If you would like to see the information we hold about you, or would like to correct, update or delete any records, please email us at enquiries@familyandtherapy.co.uk. If you have any concerns about our use of your data, please contact us. We will do our utmost to resolve any concerns you have, but if you not resolved to your satisfaction, you may choose to contact the ICO at [www.ico.org.uk/make-a-complaint](http://www.ico.org.uk/make-a-complaint)

**Sharing information with another**

If a request arrives from a legal representative or the police asking for disclosure (in standard lawyers’ letters the wording may ask for ‘all notes and records’ relevant to the work with their client), if they have attached a client consent form, or a court order, we are legally authorised to disclose the information requested. We will think through information sharing carefully, If possible speaking to you and in consultation with a supervisor, trusted colleague, professional body and possibly seeking legal advice from an insurance company.

**Right to be Forgotten**

You have the right to ask us to erase any information that we hold about you. This includes your personal information that is no longer relevant to original purposes, or if you wish to withdraw consent. In all cases and when considering such requests, these rights are obligatory unless it is information that we have a legal obligation to retain.

**Data Portability**

As the client, you have the right to receive your personal information which you have previously provided, and also have the right to transfer that information to another party.