



Katie McGill Counselling & Psychotherapy Privacy Policy

Your privacy is very important to me. I hope this policy is everything you need to know about how I use and protect any information that you give to me, from your initial enquiry through to when the counselling / psychotherapy comes to an end.

Personal data includes any information I hold about a person, either electronically or in paper form. This privacy notice outlines the personal data that I collect, why I collect it, how I use and store this information and when the information can be deleted. I will also outline the options you have in sharing this information with me when you visit this website or begin working with me as a client.

I want to reassure you that I adhere to all laws and procedures relating to the General Data Protection Regulation (GDPR) (EU) 2016/679, the Data Protection Act 2018 and other applicable data privacy legislation. I will only use your personal data to provide you with the specific service or services you explicitly agree to and I will periodically review whether I am keeping data collection to the necessary minimum. I follow the ethical guidelines set by the British Association for Counselling and Psychotherapy (BACP), to ensure the protection of client confidentiality and privacy.

The term 'Data controller' is used to describe the person or organisation that collects, stores and has responsibility for people's personal data. The data controller in this instance is myself, Katie McGill. I can be contacted via the email address: contact@katiemcgillcounselling.com

Psychotherapy and Counselling service

I provide psychotherapy and counselling to clients at a private practice in Bramhall, Stockport and online. I am committed to protecting the privacy of my clients and am registered with the Information Commissioner's office (<https://ico.org.uk>) - registration reference: ZA842477.

Legal basis of processing data

GDPR requires any organisation that is processing personal data to have a valid legal basis for that processing activity. There are different lawful bases depending on the stage at which I am processing your personal data.

If you are currently having counselling / psychotherapy with me, or are in contact with me to discuss starting counselling / psychotherapy, I will process your data where it is necessary to perform our contract and to fulfill our agreement to work with one another.

If you have worked with me in counselling / psychotherapy but the sessions have now ended, I will use 'legitimate interest' as the valid legal basis for holding and using your personal information. A legitimate interest in this context means a valid interest I have in processing your personal data, which is not overridden by your interests in data privacy and security.

'Special category personal information' is defined by the GDPR as being information that is more sensitive than personal information. For example, this could be information about your health, sexuality, religion or race. 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 sessions) and that it is necessary for a contract with a health professional (in this case, a contract between you and I).

'Public interest' is the general welfare and rights of the public that must be recognised, protected and advanced. Disclosures in the public interest, based on the common law, are made where this is essential to prevent a serious

and imminent threat to public health, national security, the life of the individual or a third party, or to prevent or detect serious crime. In regards to Covid-19, confidentiality may be broken for reasons of public interest in the area of public health. If you test positive for Covid-19 and have attended a face-to-face appointment, or if I believe you have been exposed to Covid-19 at my office, I may be required to notify the NHS Test and Trace service. If it is necessary to report this, I will provide the minimum information necessary and will not go into any details about the reason for your visit or our therapeutic work. The NHS Test and Trace Privacy notice can be found here:

<https://www.gov.uk/government/publications/nhs-test-and-trace-privacy-information/test-and-trace-overarching-privacy-notice>

What data is collected?

When you make an enquiry via my website or a third party website (such as <https://www.bacp.co.uk/about-therapy/how-to-find-a-therapist/>), I will collect your name, email address and any further information you submit on the enquiry form. Alternatively, a third party may send me your contact details when making a referral or a relative may give me your contact details, if they are making a referral on your behalf. If you call, text or Whatsapp me, I will collect your name and phone number. Please be aware that if you make contact with me on Whatsapp, I will be able to view your profile photo. Upon first contact, I usually ask for your email address so that we can arrange an initial consultation appointment.

If you choose to proceed with counselling / psychotherapy, we will meet for an initial consultation. Prior to this appointment, I will ask you to complete an intake questionnaire and send it back to me via email. This is required as part of our contractual agreement. This will include details of your contact information, such as name, home address, email address and telephone number, as well as contact details for your general practitioner (GP) and an emergency contact. I also ask for some personal information about your previous history of therapy, physical and mental health, family background, living circumstances, occupation, any criminal convictions, alcohol and drug use and your reasons for attending therapy. These details will be used to provide the service of psychotherapy and counselling and to communicate with you (and your GP and / or emergency contact in the rare circumstance that there is an emergency).

As part of my role I am required to keep accurate and relevant records for the duration of our work together. Following each counselling / psychotherapy session, I will make brief and factual notes to summarise our work. These notes do not include any personal details that could be used to identify you and are stored separately to your intake questionnaire.

I may ask you if you are happy for our counselling / psychotherapy session to be recorded, to assist in my professional development. I will ensure I have your written consent before proceeding with a session recording and will always tell you when I plan to record our session.

I may also hold financial information of yours, such as your account number and sort code, when you make a payment in exchange for the service provided. These details will only be visible to me via online banking, which is password protected.

How is your data used?

To protect your confidentiality, your privacy is shielded by:

- Removing identifying information where possible.
- Reviewing processes.
- Adhering to strict contractual conditions.
- Regularly deleting the information of those who do not take up the service.

Any client data collected or stored by myself is solely processed in order to make contact and to provide counselling and psychotherapy to clients. The information you provide will only be used for the purposes stated when it was collected. Your email address and phone number will be used to discuss appointments, unless we have agreed that I will use your email to send information that is relevant to our counselling / psychotherapy sessions.

If an enquiry is made but you decide not to proceed to working with me, I will ensure that your data is deleted within one calendar month. If you would like me to delete this information sooner, please contact me by email: contact@katiemcgillcounselling.com.

For those who work with me, I will delete any email and phone correspondence / text messages and / or Whatsapp messages that are not necessary to keep every calendar month. I will save your phone number to my phone but will not identify you by your name. Once we have worked together in counselling or psychotherapy, I am required to retain your personal data for at least seven years, in line with BACP and insurance requirements. Data may be stored for a longer period than this, if deemed necessary.

I am required by my profession and ethical framework to attend regular group supervision where I will discuss my clinical work, in order to maintain high standards of practice. I send brief notes to my supervisor in advance via email (once discussed, these notes are deleted). Supervision remains confidential between the group and myself and I only ever use initials or first names to protect your privacy. My supervisor and supervision colleagues also abide by the BACP ethical framework.

If you have consented to your therapy session being recorded, I may play a short 3 – 5 minute excerpt to a small group of colleagues for supervision or training purposes. I will use a false name or your initials to ensure you cannot be identified. I may also listen to these recordings after our sessions to assist my professional development. I will listen to the recordings in a private and confidential space.

I share a limited amount of personal data with third parties in order to provide therapy services to you and to fulfill legal obligations in respect of tax and accounting purposes. For example, certain information may be shared with an accountant, tax adviser, legal adviser or administrative assistant. Where possible, I ensure that the information provided to these third parties do not include client names, so that your details remain private.

If you request for your details to be shared with a third party (for example, for health insurance purposes), I will only proceed to share your details after gaining written consent from you. I may also pass your details onto another therapist or organisation, if you wish to be referred. I will only make a referral when I have received consent from you via email.

If a third party arranges your appointments (for example your employer), your dates of attendance and non-attendance will be shared for the purpose of invoicing and payment. Details about what was discussed in the sessions will remain confidential.

Data may be shared with other agencies if there is a legal requirement, or if there is felt to be an immediate risk of substantial harm to clients or others. This may result in contacting the relevant emergency authorities, your emergency contact and / or your GP. If there is ever the situation where I am required to breach confidentiality or share information without consent, I will endeavor to discuss this with you first when it is safe and practical to do so.

How is your data stored?

All information is kept in one or more of the following: a locked filing cabinet, a password-protected computer or mobile phone and / or a password protected email account. Your counselling / psychotherapy session notes are kept in a separate place to your intake questionnaire and do not include any personal details that could be used to identify you. Instead, I use a unique client reference number to allow me to identify your session notes.

If you have given me consent to record our counselling / psychotherapy session, the recording will be taken using a voice recorder device. Following the session, the recording will be downloaded onto a password-protected computer and the original recording will be deleted from the voice recorder device. The downloaded recording will be kept until it has been used at a supervision or training session.

I will review the personal data that I hold on an annual basis to ensure the data is still relevant and accurate. Any information, which is no longer necessary, will be deleted. Any inaccurate information will be updated or corrected.

Holding data when therapy has ended

There are reasons why I am required to keep records after therapy has ended. In the case of financial transactions, information must be kept for as long as legally required for tax or accounting purposes.

Unless you have specifically agreed otherwise, or there is a legal reason for me to continue storing your information, I will keep your notes of our sessions and any relevant texts, Whatsapps, voicemails or emails for a minimum of seven years, in accordance with BACP and insurance guidelines. Seven years after therapy has ended, your personal

details and counselling / psychotherapy notes will be confidentially destroyed. In rare circumstances, I may be required to keep your records for longer than seven years. An example of this is if the data is being used to defend myself in a claim situation or to comply with insurance terms and conditions. All information will continue to be stored in a locked filing cabinet, a password-protected computer or mobile phone and / or a password protected email account.

Your access to your information

You may request a copy of the personal data I hold on you - this is called a Subject Access Request (SAR). There is no charge for this and I will respond within one calendar month. Please email contact@katiemcgillcounselling.com

Your data protection rights

I would like you to be fully aware of your data protection rights. You can make a request in writing or by email to ask me to delete your personal data, to limit how I use your personal data, or to stop processing your personal data. You may also ask for a copy of information that I hold about you and to object to the use of your personal data in some circumstances. I have one calendar month to respond to your requests. Please note that, in line with my insurance and BACP guidelines, I may be unable to delete details of my work with you until seven years has passed since our last session working together.

In the case of deleting personal information, any paper records will be shredded and any electronic data deleted (emails would be permanently deleted from the devices they are stored on). I will save the request for the deletion but not any other data.

You can read about your rights here: <https://ico.org.uk/your-data-matters/>

To make a request about any information I hold about you, please request this in writing and email: contact@katiemcgillcounselling.com.

What happens if there is a data breach?

Although I take measures to protect your data, information can be intercepted and breaches can occur. If there is a data breach, I will follow the regulations set out in Article 33 of the GDPR. This includes notifying the ICO of the nature and consequences of the breach within 72 hours, and any measures I have taken to address it, unless the personal data breach is unlikely to result in high risk to your rights and freedoms. I will also notify you without undue delay if the breach is likely to result in a high risk to your rights and freedoms.

Making a complaint

If you wish to complain about how I handle your data, in the first instance please contact me, Katie McGill (the data controller) by email: contact@katiemcgillcounselling.com. If your complaint is not resolved to your satisfaction, you can contact the Information Commissioners Office: <https://ico.org.uk/make-a-complaint/> or call 0303 123 1113.

Website information

This website may contain links to third party websites and third party websites may contain links to this site. I take great care to create links only to organisations I believe to be responsible. However, please be aware that if you follow a link to any other websites, these websites have their own privacy policies and I do not accept any responsibility or liability for their policies. Please check these policies before you submit any personal data to any third party websites.

Similar to most websites, my website uses Google Analytic (GA). This is a service that analyses the details of visitors to a website, which helps me to improve my online service to clients. This information does not identify anyone.

You can read Google Analytics privacy notice here:

<https://policies.google.com/privacy?hl=en-US>

Website cookies are text files placed on your computer to collect standard Internet log information and visitor behaviour information. When you visit the website, I may collect information from you automatically through cookies or similar technology. More information about cookies and their use on the Internet can be found here:

<https://www.aboutcookies.org.uk>

I use the company ‘Wix’ to build and host my website - find out about Wix and their data protection here:
<https://www.wix.com/about/privacy>

For online work, I use Zoom™ video-conferencing software. Its privacy statement can be found here:
<https://zoom.us/privacy>

Changes to this privacy notice

This privacy notice will be periodically reviewed and updated. Please check occasionally for any of these updates.