



## Central Counselling & Training Service

### Managing Personal Information

*[effective from 16<sup>th</sup> June 2020 and supersedes all previous versions]*

#### Information about you.

In order for us to fulfil our professional responsibilities and to run the service, we will need to record personal information about you. This information includes your name, address, contact details, date of birth and your GP details.

Your contact details will be used to contact you. Other personal data, such as your date of birth, will only be used to verify your identity if there is a need to contact your GP or if we receive a request for access to personal data from yourself, your representative or legitimate legal instrument - such as a court order.

During the initial consultation, we will take notes of any relevant medical information and aspects of your personal, social and family history that you choose to share with us. These notes will be recorded under a unique anonymised code and stored in a locked filing cabinet. Information shared electronically will be sent and stored via encrypted email (Hushmail) and you will be prompted to set up your own online account and passphrase. Our computers are password protected and running ESET firewall/virus protection.

Personal information and counselling notes will be held securely for a period of three years after the end of the counselling relationship and then deleted and/or shredded. The only exception to this would be if it is agreed with you to retain them for longer, or if your counsellor believed that it was in their best professional interests to do so.

In the event of your counsellors unplanned absence (whether due to injury, illness, death or any other reason) your contact details alone will be shared with your counsellors' supervisor, or other named agent, in order for them to provide you with appropriate information regarding the circumstances. You will be offered a session as interim support and to assess your counselling needs. If you want to continue working with us, another counsellor will be offered as soon as one becomes available. If not, then we will make every effort to assist you in a referral to a suitable alternative source of support.

In the event of death, the arrangements set out in your counsellors professional or therapeutic will, will be carried out. The appointed executor from CCTS will have access to the notes kept by your counsellor, which will remain confidential and managed in accordance with our Data Protection policy.

## Information about counselling sessions

Professional bodies recommend that your counsellor keep brief written notes of your sessions together. We will only refer to you by code to preserve your anonymity and to keep notes secure. These notes will be a brief factual record of the session but may include any agreements made on the way the therapy is conducted, work required between sessions etc.

Anonymised notes may be shared with a supervisor, professional counselling body or similar, for the purposes of maintaining professional standards and aiding your counsellors' own professional development.

## Confidentiality

Anything you tell your counsellor will remain confidential and secure unless:

- You choose to share what you discussed with someone else.
- You, or your representative, asks us to release your notes, and where the release of the notes is not judged by your counsellor as likely to cause significant harm to you or another person.
- Your location isn't private during telephone or online counselling. We cannot guarantee confidentiality from your location and the responsibility for this rests with you.
- There is an ethical duty for them to break confidentiality, for example to avoid serious harm to yourself or another person, including the safeguarding of children or vulnerable adults.
- A complaint has been made about them to a professional body and session notes are used to address any grievances within CCTS. Wherever possible, you would be informed of this.
- There is a need for guidance from their supervisor, in which case you would remain anonymous and issues would only be discussed in a general context.
- There is a specific legal requirement, where to hold back information would lead to prosecution.
- The UK Police force or other international government authorities ask for access to an email account or synchronous messaging account where there is suspicion of illegal activities.

For online/phone counselling sessions:

- Do all that you can to find a private and undisturbed place where you feel confident that you cannot be overheard and able to engage fully with the session.
- Both parties agree not to make any kind of recording of sessions unless explicit permission has been given by you.
- You are responsible for the security of your devices, including antivirus/firewall and password protection and your Hushmail account (if applicable).

### Records of contact

The CCTS landline answerphone is password protected and located in a locked office. Messages left on the answerphone can only be accessed by CCTS staff and will be deleted once played.

Your counsellor will hold your name and telephone number on their mobile phone until the counselling relationship ends, after which the contact will be deleted. The phone company may retain summary records (date and duration) of calls made to or from your number.

Emails (including Zoom invitations if counselling online) and text exchanges will be via encrypted servers and records will be kept for three years after counselling has ended, in line with our policy.

### Your Rights

You have the right to ask to see any information held by your counsellor about you. To do this please ask your counsellor, or submit a request to the Service Manager via email ([info@ccts-southampton.org](mailto:info@ccts-southampton.org)). We will endeavour to provide you with the information requested within four weeks.

You also have the right to ask for records to be amended if you believe them to be inaccurate. If you wish to ask for an amendment or if you raise objection to any data we keep, such objection will be stored with the original records or notes.

If your counsellor becomes aware of a situation where your personal information may have accidentally or maliciously been obtained by a third party, you will be notified within three days.

If you are concerned about the way that your information is being held, please discuss this with your counsellor or with the CCTS Service Manager. If you are still unhappy you have the right to complain to the Information Commissioners Office.

Further details are available in our Privacy Notice, which is available from our website: [www.ccts-southampton.org/privacy](http://www.ccts-southampton.org/privacy)