

Alex Moseley,
BACP registered (MBACP) Psychotherapeutic Counsellor
Tel: 07834 066150
Email: hello@alexmoseleycounselling.co.uk

The Practice Rooms, 15-16 Castle Street, Exeter

Privacy policy

This policy outlines what data I will collect about you, how I will use it, how it will be stored and how long it will be kept for. It also outlines your rights regarding the data I collect.

As a registered member of the British Association of Counselling and Psychotherapy, I abide by their standards and ethical requirements which include the strict guidance on the requirements of confidentiality.

Please note that you are under no obligation to give your consent and if given, can withdraw it at any time by letting me know by sending an email to hello@alexmoseleycounselling.co.uk or asking me in person/on the phone (07834 066150).

Personal data I hold about you:

Identity Data

- Title, First Name, Last Name

Contact Data

- Mailing Address, Email addresses, Telephone numbers, Skype address (if appropriate).
- GP details for counselling clients where relevant.
- Telephone, email and skype details are held on my personal password protected computer and smartphone.

Session data

- I hold brief handwritten notes to provide cues and reminders of session detail.
- These notes are stored in a secure, locked, filing cabinet.
- These notes are retained for the period specified by my professional bodies and my professional indemnity insurers.
- As soon as the retaining period has lapsed, all notes are destroyed.

I use your personal data for the purpose of contacting you

- To arrange/rearrange any session
- To submit an invoice
- To submit a receipted invoice
- To provide any information that I might have agreed to supply you with
- To provide any updated information regarding my services

Disclosure

- I abide by the BACP Ethical Framework for the Counselling Professions which states that 'We will give careful consideration to how we manage situations when protecting clients or others from serious harm or when compliance with the law may require overriding a client's explicit wishes or breaching their confidentiality (Good Practice, section 9. Also see sections 25 and 54). Further information is at <https://www.bacp.co.uk/events-and-resources/ethics-and-standards/ethical-framework-for-the-counselling-professions/>.
- I will only grant access to or share your data with anybody else where I am required or entitled to do so by law under lawful data processing. There are times when I may still need to share your information with others, for example:
 - any stated purposes I tell you about when you supply me with information
 - as part of my duty to protect a child, a vulnerable adult, yourself or the public
 - for the prevention and detection of a crime
 - for the assessment of any tax or duty
 - if I am required to do so by any court or law

If I decided that I may need to share your information with someone else, I would normally seek to speak to you by phone or communicate with you via email before taking any action.

- My own supervisor does not have access to any identifying information relating to you, barring a first name.
- ICO: I am registered with the office of the information commissioner, in accordance with current legislation.

Breach of security

I have a duty to report any breach to data security to the Information Commissioner's Office (ICO) within 72 hours. If the breach is likely to adversely affect your rights and freedoms, I would seek to inform you without undue delay.

Right of erasure

Under the GDPR legislation, you have a 'right of erasure' to ask for records to be destroyed. If there were any potential conflict of opinion between us about retaining your records, I would consult the BACP (British Association for Counselling and Psychotherapy) and Balens, my insurance company, for advice. There are limited conditions when the 'right of erasure' does not apply – for example, to comply with a legal obligation. Please see <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-erasure/>.

Right to see the data held about you

You have a right to see any data that I hold about you at no charge. If you were to request access to your records, I would seek to talk to you about this in a counselling session first, when we could plan a time when you could read the notes with me. I would also seek to talk to my supervisor first to consider the potential implications for our counselling work together.