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**THOUGHTTS - Privacy Notice/Information**

**Overview**

This policy informs you of your rights and my obligations to you. Regarding your personal information being collected, stored and used from the initial point of contact until you end your contract will be with considerations of and working under, The Data, Protection Act, 2018 and will not share any of your data/information with any third parties unless consented by you to do so, unless it is strongly felt disclosing this to you might cause more distress/threat or risk in doing so.

‘Date Controller’ is the individual that collects, stores and has responsibility over maintaining, keeping safe and destroying people’s personal data. As a sole trader, I (Hayden Judah François) am the data controller for THOUGHTTS and registered **with the Information Commissioner's Office (ICO), reference: ZB421611.** I take privacy, data protection and confidentiality very seriously and adhere to policies and acts in consideration of this as well as ensuring I have taken precautions to safely store and access any data and to keep it protected, some of which is: General Data Protection Regulation (EU/2016/679) (the GDPR), Privacy and Electronic Communications (EC Directive) Regulations 2003.

**My lawful reasons and justifications for holding and using personal information**

The GDPR states that I must have a justifiable lawful reason/basis for processing your personal data. To clearly state, I collect and maintain/process personal information from you, provided by you, to enable me to assess the possibility of counselling with me as well as keeping a brief record of content of sessions providing me with some history/information to maintain a level of recorded insight to our ongoing sessions. This also allows me to fulfil my obligations to you as your professional counsellor should we agree to work together. Once the counselling contract has ended, I will keep records for 3 years in the case that they might be required for whatever reason.

**How I collect and use your personal information**

Information is/will be collected via my website, (www.thoughts.co.uk, over the telephone, via video call and/or in person by you. On some occasions, I may receive information from your GP or another health professional or trusted third party when they are making either a referral, or enquiry on your behalf. When you make an inquiry with me for counselling, some information will be collected for me to respond to your request. This will include your name or names, email address, telephone number, this will be to have a brief discussion about the type of therapy you may want or the type of counsellor, allowing an opportunity to mutually decide whether to proceed to carry out an assessment and then start counselling. You can request to have an initial assessment with me instead of requiring a brief discussion. If it is felt I am not the right counsellor for you, I will offer to refer you to an alternative counsellor or service if you wish, at that point I will allow you to decide if you wish for me to handover the information from the assessment, or if you wish for me to destroy it within 30 days. If I am unable to respond to your initial enquiry or you do not wish to proceed with me, I will ensure all data is deleted within 30 days.

I share financial information with the HMRC and banks to provide proof of earnings if required to. I keep financial data for the length of time required by law from the HMRC, after which is securely destroyed.

I am fully insured which includes cover for “Professional Indemnity and Public Liability” as one of the examples which is a requirement as a practicing counsellor, this covers me and clients with adequate protection. This is for the purposes of preventing and reducing risks of serious harm and threat towards yourself or others and to protect me in the event of a claim being made against me. This will be information with brief content of our sessions such as themes, dates and times which are anonymised, any written, face to face content created during sessions will be destroyed if you do not wish to keep this yourself.

My website has a valid SSL certificate. This is proved by the closed padlock which shows in the address bar on your browser, this provides and means there is a secure and safe for your computer/device and my website. My website is hosted by ‘Wix’, please see their Data Processing agreement if you have approached me through my website.

**Your rights**

You have a right to ask me what information I hold about you, you can request for me to delete your personal information or ask that I correct any personal data which you believe to be inaccurate. If you do not wish for me to hold data about yourself, I would have to consider terminating your contract if you have already started therapy, or to not proceed with counselling as it is a way I am comfortable and feel is ethically appropriate and required to carry out effective work.

**Complaints**

If you have any concerns in regards to the security and protection of your personal data and the way it is being maintained and handled by me, please get in contact with me on: [judahfrancois2021@gmail.com](mailto:judahfrancois2021@gmail.com), I will discuss this with you further and hopefully resolve and minimise/reduce any concerns or issues. If you are not satisfied and wish to escalate the matter further, please contact the ‘Information Commissioner’s Office’ on 0303 123 1123, or visit their website for more information <https://ico.org.uk/make-a-complaint/>. You can also contact the BACP; the regulatory organisation is responsible for addressing public complaints against matters relating to the counselling profession.