

PRIVACY POLICY

ALEX COX: alexcoxcounselling@gmail.com or 07766 087 486



This Privacy Policy explains how I, Alex Cox of Alex Cox Counselling, use and protect any information that you give to me.

I regularly update this policy to comply with the Data Protection Act 2018 (DPA), which includes the General Data Protection Legislation, GDPR. This update took place on 9.4.21.

I am the Data Controller and Processor for Alex Cox Counselling and my reference number with the Information Commissioner's Office (ICO) is A8926132.

Data protection

My lawful basis for processing your information is set out in Article 6 of the GDPR.

I keep confidential records about clients for your beneficial therapy and I keep your details so I can

- Provide you with information you have requested or changes to my practice.
- Invite you to appointments and schedule client hours.
- Send you invoices and receipts and keep financial records.



All records are kept securely and are only seen by me except where I may have a legal obligation to share, eg terrorism, money laundering or radicalisation. These records are subject to the DPA.

Some of the information I may collect is classified as sensitive personal data and I can only use such data where I have your explicit consent. This data may include: racial or ethnic origin, political opinions, religious beliefs, trade union membership, physical or mental health, sexual life, criminal proceedings and offences. Your personal and sensitive personal data will only be used in order to provide the service to you and for managing and quality assuring the service.

I ask clients to complete a Personal Details form: email and phone numbers, home and GP addresses. After every meeting I write brief notes. I lock this information in a filing cabinet at my home.

Clients' personal data on my laptop and mobile phone are password- and pattern-protected.

I keep data from clients' first contact and for 5 years after our last session. I then delete data electronically and in a shredder.

Data Breaches

I will notify the ICO of a breach where it is likely to result in a risk to the rights and freedoms of individuals – if, for example, it could result in discrimination, damage to reputation, financial loss, loss of



confidentiality or any other significant economic or social disadvantage. Where a breach is likely to result in a high risk to the rights and freedoms of individuals, I will also have to notify those concerned directly in most cases.

Confidentiality

I offer private and confidential help to my clients. I will not normally give your name or any information from or about you to anyone unless:

- it is for supervision or I am indisposed, as required by the BACP.
- I believe someone, especially a child, is at risk of serious harm.
- very rarely, I am required to by law.

I would discuss any proposed disclosure with you unless I believed this could increase the level of risk to you or to someone else.

Domestic Violence

Violence and abuse is an issue for many people who come to me for help with their relationship. I know from my experience that in this situation, working with couples or family members together may not be safe. If this is so, I will help each person to get individual specialist support from another agency.



Websites I use

For information on technology used and data captured, please contact the following websites I use:

www.wix.com for my website, www.alexcox.org.uk.

www.bacp.co.uk/search/Therapists on which I advertise.

Personal Data Access Request

I recognise that on rare occasions my clients may wish to exercise their rights under the DPA and ask to see their personal information held by me.

Often during counselling, information is provided by more than one individual. In these cases I will only release information if consent has been given by all of the individuals involved.

If at any time you wish to exercise your right under the Act you should put your request in writing to me and provide evidence of your identity such as a copy of your passport or driver's licence and proof of your address. When I receive your written request and evidence of identity, I will respond within 30 calendar days.

My response to a valid subject access request will normally be in the form of a schedule, listing and describing the personal data I hold on you. You can then specify which data you wish to see.



Supervision

As per BACP ethics, I discuss cases with my supervisor regularly, not disclosing clients' identity.

Mobile Phones

I ask you to please turn off your phones or to let me know if this is not possible.

Unauthorised Electronic Recording

In order for you to work safely and effectively with me, it is important that the privacy of the work is respected. Please do not attempt to record your counselling session. If it is found that recordings have been made covertly, counselling services for the individual responsible will be discontinued immediately.

Authorised Electronic Recording

Occasionally I might be required to record a counselling session. In these circumstances you will be asked to give your written consent for this to happen. The consent will specify all the ways in which the recording will be used (for example training, supervision or research) and will specify how and when the recording will be destroyed.



Reports and Client Records

Occasionally I may be asked by clients or by external agencies such as Social Services or the NHS to write reports on the progress made in counselling. I am not normally in a position to do this because of my duty of confidentiality to clients and because I am not trained in the specialist areas of diagnosis or social work assessment. However, I can in some circumstances, and on receipt of written consent from the client(s) who attended counselling, provide brief information about the dates and number of sessions attended.

Client records are not suitable as evidence in legal proceedings and I reserve the right to resist legal requests to produce the records in court. I do this in order to protect my duty of confidentiality to all my clients and to preserve my reputation as the provider of confidential counselling.

Codes of Ethics

Relationship counselling is covered by the British Association for Counselling & Psychotherapy's *Ethical Framework for Good Practice.*

As for all counsellors, I am in ongoing professional clinical supervision for my work. This helps me to offer you maximum support.



Cancellation Policy

If you intend to cancel, please give me at least 24 hours' notice to avoid cancellation charges.

Feedback and Complaints About How I Handle Your Data

If you have any feedback, or you are not satisfied with your experience, please tell me. I welcome feedback and if you make a complaint, I will always take it seriously as it allows me to improve the service I offer.

If you think there is a problem with the way I handle your data please tell me so we can discuss it and see how we can resolve it. If we can't, you can go to the Information Commissioner's Office (ICO) *https://ico.org.uk/concerns/handling/* or 0303 123 1113. My reference number with the ICO is A8926132.

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