



Privacy Policy for Clients

Our contact details

Name: The Bereavement Counselling Service

Address: Falcon House, Eagle Road, Langage Business Park,
Plymouth, PL7 5JY

Phone number: 01752 349769

E-mail: enquiries@bcsplymouth.com

About us

The Bereavement Counselling Service (hereafter referred to as BCS, us, we) is registered as a Data Controller with the Information Commissioner's Office (ICO). "Data Controller" is the term used to describe the person / organisation that collects and stores and has responsibility for people's personal data.

BCS is a registered charity (charity registration number 1120156) and a member of a professional organisation, The National Counselling and Psychotherapy Society (membership number NCS20-0038).

Our commitment to privacy

Your privacy is very important to us and you can be confident that your personal information will be kept safe and secure and will only be used for the purpose it was given to us. The Bereavement Counselling Service adheres to current data protection legislation, including the UK General Data Protection Regulation (the GDPR), the Data Protection Act 2018 and the Privacy and Electronic Communications (EC Directive) Regulations 2003 (as amended 2011).

This privacy notice tells you what we will do with your personal information from initial point of contact through to after your therapy has ended, including:

- Why we are able to process your information and what purpose we are processing it for;
- Whether you have to provide it to us;
- How long we store it for;
- Whether there are other recipients of your personal information;
- Whether we intend to transfer it to another country;
- Whether we do automated decision-making or profiling; and
- Your data protection rights

The GDPR states that we must have a lawful basis for processing your personal data. There are different lawful bases depending on the stage at which we are processing your data.

We have explained these below:

- If you are currently having therapy or if you are in contact with us to consider therapy, we will process your personal data where it is necessary for the performance of our therapeutic contractual agreement and through you giving us your consent to hold your details as our lawful basis for processing your information;
- If you have had therapy with us and it has now ended, we will use legitimate interest as our lawful basis for holding and using your personal information.

The GDPR also makes sure that we look after any sensitive personal information that you may disclose to us appropriately and in the course of our alliance together. This type of information is called “special category personal information”.

The lawful basis for BCS processing any special categories of personal information is that it is for provision of health treatment (in this case specialist psychotherapy) and necessary for a contract with a health professional (in this case a contract between you and your counsellor).

How BCS will use your information

Initial contact

When you contact BCS with an enquiry about our psychotherapy services, we will collect information to help us satisfy your enquiry. This will include your name and contact details and a brief outline of your query.

Alternatively your GP or other health professional may send us your details when making a referral to us.

Initial Assessment Appointments

At an initial assessment appointment, we ask about your current personal, social and health circumstances. We may also ask about your background and family history, as well as the issues that are affecting you now. We require this information so that we can decide whether

our service is able to meet your needs and to enable us to provide a therapeutic counselling service to you.

While you are accessing counselling

Rest assured that everything you discuss with BCS is confidential. That confidentiality will only be broken if you were to tell us that you planned to end your life or significantly harm yourself or another person, revealed information about a child currently at risk of harm or if we are required by law to share any information. We will always try to speak to you about this first, unless there are safeguarding issues that prevent this.

After counselling has ended

Once counselling has ended, your records will be kept for a period of six years from the end of our contract or contact with you (whichever is later). After this period, your records will be securely destroyed. If you want us to delete your information sooner than this, please inform us of your wishes.

Data security

BCS take the security of the data they hold about you very seriously and as such BCS takes every effort to make sure it is kept secure.

All information you provide to us is stored as securely as possible. All paper files and other records and documents containing personal information is kept in a secure environment, i.e. on a lockable room with controlled access, or in a locked drawer or filing cabinet. Personal data held on computers and computer systems is protected by the use of secure passwords which are changed regularly. If removable media is used for storing confidential personal or sensitive information, the device is encrypted or otherwise protected and is kept locked away securely when not being used. Where personal information is transmitted by email, BCS uses a secure email system (for further information see "Third parties" below).

For security reasons, counsellors do not retain text messages for more than one month after completing their work with you. If there is relevant information contained in a text message, the counsellor will transfer this to the client notes. Likewise, any email correspondence that is relevant to your collaboration with BCS will be transferred to your file and stored securely. Other email correspondence will be deleted after one month of completing your work with us if it is not important.

We do not transfer any personal information to another country and we do not undertake automated decision making or profiling.

Cookies

Cookies are small pieces of information sent by a web server to a web browser, which enable the server to collect information from the browser. At BCS, we use cookies to ensure that users can interact with our website successfully, to identify when users visit our website and to keep track of browsing patterns. The use of cookies does not give us access to personal computers or private information about our users.

Our website may include links to other websites run by other organisations such as suggested support services. BCS is not responsible for the privacy practices of other organisations and websites, so we recommend that you read their privacy policies carefully if you are providing them with any personal information.

Third party

BCS will sometimes share personal data with third parties, for example, where BCS have contracted with a supplier to carry out specific tasks. In such cases, BCS have carefully selected which partners we work with. We take great care to ensure that we have a contract with the third party that states what they are allowed to do with the data we share with them. BCS will ensure that they do not use your information in any way other than the task for which they have been contracted. BCS currently operates from the second floor at Falcon House Business Centre and uses some of the Business Centre's general administrative services. BCS contracts with the NHS (NHS mail service) for secure email facilities and website hosting company who assist us in operating our website.

Your data protection rights

We try to be as open as we can in terms of giving people access to their personal information. You have a right to ask BCS to delete your personal information, to limit how we use your personal information, or to stop processing your personal information.

You also have a right to ask for a copy of any information that BCS holds about you and to object to the use of your personal data in some circumstances. You can read more about your rights at <https://ico.org.uk/your-data-matters> If we do hold information about you, we will:

- Give you a description of it and where it came from;
- Tell you why we are holding it, tell you how long we will store your data and how we made this decision;
- Tell you who it could be disclosed to: and
- Let you have a copy of the information in an intelligible form.

You can also ask us at any time to correct any mistakes there may be in the personal information we hold about you. To make a request for any personal information BCS may hold about you, please put the request in writing addressing it to our main office address listed above.

How to complain

If you have any complaint about how the BCS handles your personal data, please do not hesitate to get in touch with us by writing or emailing to the contact details given above. BCS would welcome any suggestions for improving their data protection procedures.

If you want to make a formal complaint about the way BCS has processed our personal information, you can contact the ICO, the statutory body that oversees data protection law in the UK.

ICO website <https://ico.org.uk/make-a-complaint>. Helpline number 0303 123 1113

Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow,
Cheshire, SJ9 5AF