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**Privacy Statement and Data Protection**

With effect from 25 May 2018 the GDPR replaces the 1998 Data Protection Act to ensure your personal and sensitive confidential data is kept private, held securely and is processed in the way that you have agreed to. It protects your rights as a consumer of a service or product that might involve your identifiable data e.g. your name and address or whether you have a specific condition. It also covers any session records, text messages or emails we exchange.

The purpose of this document is to ensure that InnerSight Counselling has a framework that ensures the rights and freedom of individuals in relation to their personal data and adheres to best practice in the management of client information and business records.

This is a live document and may be updated at any time to reflect changes in law or growth of the business.

**Data collection**

Once an initial therapy appointment is made InnerSight Counselling collects the following personal details through a client registration form.

* Your name, age and contact details are collected for the purpose of being able to contact you during our work together.
* Your emergency contact and GP details are collected in case of a medical emergency and/or serious risk of harm to yourself or others.
* Your medical details are collected as I need to be aware of any relevant medical conditions or medications that may affect you during our work together.

These details will not be shared except in the following circumstances:

1. Where your written consent is given to share your personal information.
2. Where I am compelled to break confidentiality by a court of law.
3. Where information disclosed during the session is of such concern that confidentiality cannot reasonably be expected to be maintained in the case of serious crime, or if I have reason to believe that there is a serious risk of substantial harm to yourself or others, in which case I reserve the right to contact the appropriate authorities. I would keep you informed prior to disclosure unless I consider that the urgency of the situation requires immediate action to safeguard the physical safety of yourself or others.
4. I have appointed a clinical executor who would have access to your name and contact details to enable them to contact you in an emergency or if for any reason I am no longer able to work with you. In the event of my death they would be responsible for deleting your records and notes.

* Information about where you heard about InnerSight Counselling is collected for the sole purpose of informing my decisions about advertising InnerSight Counselling’s services. This information is stored in the form of an information table on a laptop, it is not shared with anyone else and it is not linked to any of your personal details.
* A counselling contract is signed at the first therapy session.

I will not sell on or use your personal details for any unethical reasons.

In addition to the client registration form, as a member of the British Association for Counsellors and Psychotherapists (BACP) I am required to keep short notes of the sessions we have together.

**Data storage**

Your client registration form, your contract and the singed Privacy Policy is kept in a locked filing cabinet at the practice’s premises. I transfer your name and a unique client code to my password protected lap top. The document where I transfer your name and the code is also password protected. This document is not saved in any cloud servers. It is also backed up on a USB drive that is kept in a locked cabinet at the practices premises.

Your phone number may be kept in my business mobile phone which is code protected to enable communication through calls and SMS. Contact through SMS is used only for practical arrangements about the sessions. Only the initials of your name are saved in the phone number. On my business phone I do not use any apps that require access to my contacts to prevent unauthorised access to your contact number.

I use Gmail to communicate with clients about practical arrangements about the sessions, homework or to provide information resources. Email communication is not used to discuss session details or personal issues. If a potential client in the process of enquiring about therapy chooses to provide information through email about their personal issues, the email will be deleted from the email account a month after the date sent. For a client in therapy any email communication in which they engage in personal issues will be deleted from the business email account and a printed copy will be kept with their session notes, but all identifying information will be deleted from the printed copy. The email business account is password protected and also has a second layer of protection with 2-Step Verification, which sends a single-use code to me to access my account. So even if somebody manages to steal the password account, it is not enough to get into InnerSight’s email account and gain access to our email communication. I recommend to clients to add a 2-Step Verification to their email account to maximise the protection of their privacy.

None of your personal information is stored on my website, other than to momentarily collect and send it to my Gmail account for the purposes of our initial contact.

Counselling notes**:** I keep password protected short notes that are stored on a laptop which is password protected too. Your notes are saved with your unique client number and not under your name. There is no personal information on the notes that links them to you. These notes are backed up on a USB drive (separate to the USB where your personal details are saved) that is kept in a locked cabinet at the practice’s premises.

**Length of storage and disposal of information**

Within a month of counselling ending I will print your notes and keep them in a locked file separately from where your personal details are kept. I will back up your password protected notes on a separate USB, but I will delete the copy from the laptop.

Your session notes, your name and your unique number will be kept for a period of 6 years after counselling has ended in line with my insurance requirements in case it may become necessary to share your data in the case of legal action following a complaint or a legal duty by court order. After this period this information will be shredded and deleted from the USB drives.

Your contact, GP and medical details will be erased 1 month after counselling has ended.

Your phone number, along with any SMS will also be deleted within 1 month after counselling has ended.

Your emails will be deleted from my email account within 1 month after counselling has ended.

**Right to access and control your personal data**

You have the following rights:

* To be informed what information I hold.
* To see the information I hold about you (free of charge for the initial request).
* To rectify any inaccurate or incomplete personal information.
* To request that the information I hold about you is transferred to a third party.
* To withdraw consent to me using your personal information.
* To request your personal information be erased. However, I retain the right to refuse your request as data may need to be retained for lawful purposes in line with my insurance requirements in case it may become necessary to share your data in the case of legal action following a complaint or a legal duty by court order.

If you have any concerns about how I handle your data, you can contact me directly. In the event that I cannot resolve your complaint to your satisfaction, you can contact the Information Commissioner’s Office (ICO) on 0303 123 1113.

**Consent**

If you do not consent to me using your data in this way it is unlikely that I am able to work with you.

Do you consent to me using your data in this way?

Please write yes or no \_\_\_\_\_\_\_\_\_\_\_\_\_

Client’s Name:………………………………………………………………………………

Signature:……………………………………………………………………………………

Date:…………………………………………………………………………………………

Counsellor’s Name:…Roula Barlika………………………………………………………

Signature:……………………………………………………………………………………

Date:………………………………………………………………………………………….