



A Community Interest Company

Privacy Notice & Cookies Policy

Bedford Community Counselling complies with the General Data Protection Regulation (GDPR) and is registered as a 'Data Controller' with the Information Commissioner's Office (Reg. No. ZA376155).

The Data Protection Officer (DPO) for BCC is Jo Moloney. She can be contacted at:

Bedford Community Counselling, 4 Goldington Road, Bedford, MK40 3NF

Tel: 01234 362 730 and 07712 306 085

Email: info@bedfordcommunitycounselling.org

Website: www.bedfordcommunitycounselling.org

We ensure that your personal data is processed fairly and lawfully, is accurate, is kept secure and is retained for no longer than is necessary.

We want everyone who comes to us for support to feel confident and comfortable with how any personal information you share with us will be looked after or used. This Privacy Policy sets out how we collect, use and store your personal information (this means any information that identifies or could identify you).

At Bedford Community Counselling (BCC) we are committed to protecting your personal information and making every effort to ensure that your personal information is processed in a fair, open and transparent manner.

We are a "data controller" for the purposes of the Data Protection Act 1998 and (from 25 May 2018) the EU General Data Protection Regulation 2016/679 ("Data Protection Law"). This means that we are responsible for, and control the processing of, your personal information.

For further information about our privacy practices, please contact our Data Protection Officer by:

- Writing to us at Bedford Community Counselling, 4 Goldington Road, Bedford, MK40 3NF
- Calling us on 01234 768 787 and 07712 306 085
- Emailing us via info@bedfordcommunitycounselling.org

Consent to hold your data

We are committed to ensuring that we protect your privacy and will seek your explicit written consent to hold personal data about you, specifically and only for the purposes of providing counselling to you. We may also analyse data you provide us with for the purposes of providing the best possible service to you.

If you make contact via our website or by phone you will be asked to provide certain information by which you can be identified, including your name and contact details (such as your phone number or email address).

The information you provide is held securely and will only be used in accordance with data protection principles, our data protection and other policies and our ethical principles (contained in the British Association for Counsellors and Psychotherapists Ethical Framework for the Counselling Professions: July 2016).



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You have the right of access to information we hold about you and to amend or ask for deletion of information that may not be accurate or correct. Please contact us if you wish to view the data we hold about you.

BCC will not hold your data for longer than is deemed necessary for the purposes of counselling and following best practice and legal guidance. If you wish to know how long we hold data or notes for please contact us.

By visiting our website, you are agreeing to the contents of this Privacy Notice.

How we collect information about you

Everything we do, we do to ensure that we can help people experiencing a mental health problem get both support and respect. We want to make sure you receive the communications that are most relevant to you, whether this is through visiting our website or receiving emails, post or phone calls. We want to make sure you receive the best attention when you book on an event or make a donation.

We collect information from you in the following ways:

- When you interact with us directly: This could be if you ask us about our activities, register with us for training or an event, make a donation to us, ask a question about mental health, apply for a job or volunteering opportunity or otherwise provide us with your personal information. This includes when you phone us, visit our website, or get in touch through the post, or in person.
- When you visit our website: We gather general, anonymised information which might include which pages are visited most often. We also use "cookies" to help our site run effectively. There are more details below – see 'Cookies'.

Information we collect and why we use it

We will use the information you provide when you first contact us to identify whether we are the right service for you, and to arrange an initial assessment. When you first contact us, we will ask for your name and contact information (such as your phone number and email address) in order to start the process of establishing if BCC can provide you with therapy or EMDR.

Personal Information

Personal information we collect includes details such as your name, date of birth, email address, postal address and telephone numbers as well as information you provide in any communications between us. You will have given us this information during your initial assessment, whilst making a donation or registering for an event, applying for a job or volunteering placement with us or any of the other ways to interact with us.

During the initial assessment, we will re-confirm your name and contact information, alongside your:

- Date of birth.
- Home address.
- The name and address of your doctor.
- Any medication you may be taking.



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- Information about your employment status and income, which will help us to identify what your counselling fees will be.
- Other information relevant to you engaging in counselling with us.
- A brief description of what is bringing you for counselling now and information about any disabilities you may have.
- During the assessment you will be given a copy of the counselling contract to take away and read. If you proceed with counselling, you will sign the contract during your first session.
- We may ask you to complete an outcome measure, which is a tool designed to help monitor your well-being at the start, during and end of therapy. You have the right not to participate in this.

During therapy

- Your therapist will keep brief session notes, and your identity will be protected. These notes will not be shared with anyone unless we are legally required to do so or you specifically request we share them with another third party, in which case we reserve the right to refuse to share the information.
- Personal data that identifies you and counselling notes are held securely.
- Notes are the property of BCC, and you have the right to view them should you wish, providing that doing so will not, in the professional opinion of the Directors, cause harm to you or anyone else. If a third party requests access to your notes, BCC will inform you of this.
- Only your therapist and BCC Directors are authorised to access your notes.

What we do with the information we collect

We collect this information to understand your clinical and other needs from counselling and provide you with a better service, and in particular for the following reasons:

- To keep a record of your relationship with us.
- To assist with clinical assessment, allocation to an appropriate counsellor and for professional supervision of how we work.
- To process your payments or donations and verify any financial transactions.
- To provide the counselling, training or placement services that you have requested and to update you with important administrative messages about them.
- Where you volunteer with us, to administer the volunteering arrangement.
- We will also use your personal data to meet any legal obligations placed upon us. For instance, when you exercise your rights to see what data we hold under data protection law or in order to meet any legal compliance placed on us; or occasions where we may be obliged to disclose information related to safeguarding children, young people and adults at risk.

If you do not provide this information, we will not be able to provide the services you have requested, process your donation or sign you up for a particular event you have requested.

We may also use your personal information to contact you to invite you to participate in surveys or research.



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Sensitive Personal Information

Data Protection Law recognises that some categories of personal information are more sensitive. Sensitive Personal Information can include information about a person's health, race, ethnic origin, political opinions, sex life, sexual orientation or religious beliefs. If you contact us via telephone, email or post, you may choose to provide details of a sensitive nature.

We will only use this information:

- For the purposes of dealing with your enquiry, training, and quality monitoring or evaluating the services we provide.
- We will not pass on your details to anyone else without your express permission except in exceptional circumstances. Examples of this might include anyone reporting serious self-harm or posing a threat to others or children, contacting us and sharing serious issues such as physical abuse or exploitation.

If you provide us with any Sensitive Personal Information by telephone, email or by other means, we will treat that information with extra care and confidentiality and always in accordance with this Privacy Policy. You can decide if you want to remain anonymous or if you are happy to share your personal details with staff members. We will not share your details with the media or other parties.

Legal basis for using your information

In some cases, we will only use your personal information where we have your consent or because we need to use it in order to fulfil a contract with you.

However, there are other lawful reasons that allow us to process your personal information and one of those is called 'legitimate interests'. This means that the reason that we are processing information is because there is a legitimate interest for BCC to process your information to help us to achieve our vision of ensuring that everyone experiencing a Mental Health problem gets both support and respect.

Whenever we process your Personal Information under the 'legitimate interest' lawful basis we make sure that we take into account your rights and interests and will not process your personal information if we feel that there is an imbalance.

Some examples of where we have a legitimate interest to process your Personal information are where we contact you about our work, use your anonymised personal information for data analysis, conduct research to better understand who our supporters are, improving our services, for our legal purposes (for example, dealing with complaints and claims), or for complying with statutory requirements.

The data that we collect from you is not transferred outside the European Economic Area ("EEA").

We process this information under Articles 6 and 9 of the GDPR, specifically:

Lawfulness of processing conditions

6(1)(a) Consent of the data subject.

6(1)(b) Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract.



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- 6(1)(c) Processing is necessary for compliance with a legal obligation.
6(1)(d) Processing is necessary to protect the vital interests of a data subject or another person.

Conditions for special categories of data

- 9(2)(a) Explicit consent of the data subject, unless reliance on consent is prohibited by EU or Member State law.
9(2)(b) Processing is necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement.
9(2)(c) Processing is necessary to protect the vital interests of a data subject or another individual where the data subject is physically or legally incapable of giving consent.
9(2)(f) Processing is necessary for the establishment, exercise or defence of legal claims or where courts are acting in their judicial capacity.
9(2)(h) Processing is necessary for the purposes of preventative or occupational medicine, for assessing the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or management of health or social care systems and services on the basis of Union or Member State law or a contract with a health professional.

Marketing

We do not undertake direct marketing with individuals. Instead, we may advertise in publicly accessible locations and formats.

Sharing your Information

The personal information we collect about you will only be used by our staff (and volunteers) at BCC so that they can support you.

We will never sell or share your personal information with organisations so that they can contact you for any marketing activities. Nor do we sell any information about your web browsing activity.

We do not share your personal information with anyone else unless in pursuit of counselling on your behalf and only then if we have your permission to do so. In exceptional circumstances we may be required by law and our ethical responsibilities to break our confidentiality with you. We may disclose your information if required to do so by law (for example, to comply with applicable laws, regulations and codes of practice or in response to a valid request from a competent authority).

Keeping your information safe

We take looking after your information very seriously. We've implemented appropriate physical, technical and organisational measures to protect the personal information we have under our control, both on and off-line, from improper access, use, alteration, destruction and loss.

All information you provide to us is stored securely and information held on computer is held on our secure servers. Any payment transactions via your bank will only be identified by an anonymised client reference number and no other information will be required or shared.



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Unfortunately, the transmission of information using the internet is not completely secure. Although we do our best to protect your personal information sent to us this way, we cannot guarantee the security of data transmitted to our site.

Our website may contain links to other sites. While we try to link only to sites that share our high standards and respect for privacy, we are not responsible for the content or the privacy practices employed by other sites. Please be aware that advertisers or Web sites that have links on our site may collect personally identifiable information about you. This privacy statement does not cover the information practices of those websites or advertisers.

How long we hold your information for

We only keep it as long as is reasonable and necessary for the relevant activity, which may be to fulfil statutory obligations.

Your rights

You have various rights in respect of the personal information we hold about you – these are set out in more detail below. If you wish to exercise any of these rights or make a complaint, you can do so by contacting us by:

- Writing to us at Bedford Community Counselling, 4 Goldington Road, Bedford, MK40 3NF
- Calling us on 01234 768 787 and 07712 306 085
- Emailing us via info@bedfordcommunitycounselling.org

You can also make a complaint to the data protection supervisory authority, the Information Commissioner's Office, <https://ico.org.uk>.

Access to your personal information: You have the right to request access to a copy of the personal information that we hold about you, along with information on what personal information we use, why we use it, who we

share it with, how long we keep it for and whether it has been used for any automated decision making. You can make a request for access free of charge. Please make all requests for access in writing, and provide us with evidence of your identity.

Right to object: You can object to our processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on these grounds. Please contact us as noted above, providing details of your objection.

Consent: If you have given us your consent to use personal information, you can withdraw your consent at any time.



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Rectification: You can ask us to change or complete any inaccurate or incomplete personal information held about you.

Erasure: You can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.

Portability: You can ask us to provide you or a third party with some of the personal information that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.

Restriction: You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.

No automated-decision making: Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. You have the right not to be subject to automated decisions that will create legal effects or have a similar significant impact on you, unless you have given us your consent, it is necessary for a contract between you and us or is otherwise permitted by law. You also have certain rights to challenge decisions made about you. We do not currently carry out any automated decision-making.

Please note, some of these rights only apply in certain circumstances and we may not be able to fulfil every request.

Cookies

'Cookie' is a name for a small file, usually of letters and numbers, which is downloaded onto your device, like your computer, mobile phone or tablet when you visit a website. They let websites recognise your device, so that the sites can work more effectively, and also gather information about how you use the site. A cookie, by itself, can't be used to identify you. Our website uses cookies.

The cookies we use are analytical cookies. They allow us to record technical data (such as IP addresses) so that we can recognise and count the number of visitors to our site and to see how visitors move around the site when they are using it. This helps us to improve the way our website works, for example by ensuring that users find what they are looking for easily. All of the data that we collect from the use of cookies is aggregated and anonymous, meaning that we do not keep records of individual names, addresses etc.

To find out more about cookies including how to manage your cookie settings, please visit www.allaboutcookies.org. This link is provided for convenience only and BCC does not have any control over its content. We therefore make no warranties or representations as to the accuracy or completeness of any of the information appearing on that site nor as to the suitability or quality of any of their products or services.

Monitoring

Your communications with BCC (including by telephone or email) may be monitored and/or recorded for training, quality control and compliance purposes to ensure that we continuously improve our customer service standards.



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To find out more about this policy and how we look after your personal information, contact us by:

- Writing to us at Bedford Community Counselling, 4 Goldington Road, Bedford, MK40 3NF
- Calling us on 01234 768 787 and 07712 306 085
- Emailing us via info@bedfordcommunitycounselling.org