

July 2022

MSCC PRIVACY POLICY

The Mid Sussex Counselling Centre (Referred to as MSCC) takes the confidentiality or privacy of any personal information very seriously and this underpins our service. At their initial assessment at the Centre, clients will be asked to sign a form which allows them to indicate agreement with the way that their information will be used and stored as described below:

This Privacy Policy provides information about the way in which the Mid Sussex Counselling Centre is using any information that we hold about Clients. (in line with Data Protection law – GDPR). This also refers to the personal information of personnel where applicable.

This includes the following:

1. What information we hold and why
2. Where and how we hold the information
3. What it will be used for
4. Who it will be shared with
5. How long we will keep it for
6. Your Rights as a client

1.What information do you we hold and why?

MSCC will hold the minimum amount of data – and only that which is necessary to provide a counselling service to clients. This includes:

- Personal contact details so we may contact clients to offer a counselling service
- Details of GP or other relevant health providers that we may contact with client's consent in order to enhance our counselling service.
- A report from the initial assessment which is used in the process of allocating clients to a suitable counsellor
- A short first session and last session report.
- Details of any correspondence between the Centre and clients, and in rare circumstances with other Agencies.

2.Where and how is it kept?

All information is anonymised as far as possible in records kept by MSCC.

Paper copies are kept in locked filing cabinet in a locked room when not in use. They do not leave the Centre. Electronic Copies are password protected.

Some information is held on one computer at the MSCC. This is accessed by limited staff and is password protected. This is also in a locked room.

Any electronic copy of client information that is shared within the Centre is password protected, anonymised and deleted on receipt.

3. What it will be used for.

The information that we hold will only be used within the Centre for the purpose of maintaining contact with clients/personnel and the provision and enhancement of our counselling service.

4. Who it will be shared with.

Assessment Reports are shared with supervisors at MSCC in order to allocate clients to a suitable counsellor. The allocated counsellor will receive a client assessment report.

A counsellor in training may share completely anonymised material with their college supervisor to develop and enhance their counselling work. This may include the writing of a case study with the client's consent.

It is the Policy of the Centre not to disclose any information to any Third Party outside of the Centre, unless subpoenaed by a Court of Law.

The exceptions to this (as outlined in the Client Consent Form) are as follows:

If MSCC feels that the client is at risk of:

- Serious deterioration to their mental health
- Self-Harm
- Harm to Others or
- Requirements of Law

In these cases, the clients' GP or Psychiatrist or other necessary Agency may be contacted with the clients' consent as far as possible.

5. How long will we keep it for?

MSCC will keep information for 6 years after a client's last counselling session as advised by our Insurers. After this point it will be deleted or destroyed. This applies to both electronic and paper records.

6. Your Rights as a Client

Clients have rights in respect to their personal information and these are enhanced by the GDPR. These include:

a) The Right to Erasure

Clients can withdraw their consent to MSCC keeping and/or using any information they have provided to us.

This may be in circumstances where the information is no longer needed to provide a counselling service to a client, or where a client may object to the use of the information and there is no overriding legitimate reason for continuing to use it.

There may be a requirement to erase information to comply with a legal obligation.

If a client wishes to request their information to be erased, then they must in the first instance contact the Head of Counselling Service.

b) The Right to Transfer Information (Data Portability)

Clients may request to transfer information electronically (e.g. a report) for reuse for their own purposes across different services. This means that information can be transferred from one I.T environment to another.

If a request is received, then MSCC will provide this information in an electronic format that is safe and secure.

c) The Right to Access

This allows clients to access the information that is being held about them.

Clients can request to see or obtain a copy of any information we have and request details about what it has been used for.

MSCC will provide this within a month of your request (special circumstances do apply – see below*). A request must be made in writing to the Head of Counselling Service.

A client who considers there to be an inaccuracy in the recorded information may ask for it to be corrected. This will need to be in agreement with the counsellor and their Supervisor. A record of any disagreement will be kept in the notes.

*MSCC will consider carefully their duty of care to any client requesting to see their information, and will usually arrange for the counsellor and/or a member of senior staff to be present at this time. MSCC will be mindful of any clients' response to seeing their records. There may be certain circumstances where access will not be provided (e.g. if the Clinical Team is concerned that access would cause serious harm to the physical or mental health of the client.)

For any further information please contact us on info@midsussexcounsellingcentre.org.uk