



# Connections

## Privacy Policy:

### Confidentiality & Data Protection

We understand how important your privacy is. We take care to maintain your confidentiality in accordance with current data protection laws (GDPR, 2018) and the ethical guidelines of the Confederation of Scottish Counselling Agencies ([COSCA](#)). These guidelines have been set up to protect your confidential material and ensure that your counsellor always conducts themselves with professionalism and integrity. In order to provide you with the best service possible, we will hold your personal contact details and records of your counselling sessions.

#### Your personal information

We use a secure online secure digital storage, encrypted and password protected practice management platform to collect and store your personal data. At the point of booking your initial consultation with us, you will be asked for personal contact information, for example your name, address, email address, telephone number and you may also choose to share details of why you are looking for help with us. Your contact information is stored securely at Connections and can only be accessed by the admin team and your counsellor. In order to be able to fulfil our duty of care to you, in your initial consultation or first treatment session, your counsellor will ask you for contact information for your GP and elected Emergency Contact person. These details will be stored securely at Connections and will only be accessible to your counsellor or our administrator. This personal information will be held for the duration of your therapy after which it will be deleted from our Connections database.

We will need to keep a record of your name and client reference number for three years after the end of your counselling, so that we can respond effectively to any potential requests regarding your clinical notes. We will never pass on your contact details to any third party organisations for the purposes of sales, marketing or research and will never use your personal data for any purposes other than the administration of the counselling

service we are providing to you i.e. to arrange, cancel and rearrange appointments and collect payment for sessions.

### **Online Payments**

Anonymised payment details are recorded in our Connections financial income reports. These reports will only hold your first name, last name initial and unique client reference number. HMRC requires that we retain this information for 5 years after the end of the financial year. Our website uses cookies. You can find the details [here](#).

### **Your payment details**

All payments made through our website [www.connections counselling.co.uk](http://www.connections counselling.co.uk) are made through the secure Stripe Connect server. Our website therefore does not hold your payment information. Where you have made payment for your session over the phone, our admin team will never keep a record of your card details. Your information is inputted directly into the card payment portal and no written record will be taken.

### **Confidentiality - mandatory and discretionary disclosure**

Everything that you discuss with your counsellor is confidential. Confidentiality will only be broken by discretionary disclosure if there is concern about your safety or the safety of someone else. We will always endeavour to speak to you about this first. Confidentiality will only be broken by mandatory disclosure (a legal requirement) if we are instructed to do so by a Court of Law, there are concerns around money laundering, serious criminal drug activity and terrorism, where we may not be permitted to inform you in advance.

During remote working your counsellor will ensure that they are conducting online and telephone sessions in a quiet, private and confidential setting. We have selected video calling platforms that offer end to end encryption to ensure maximum privacy. Please note however that we cannot be held responsible for any breaches that occur due to failures in this technology.

Your counsellor discusses their clinical work with a supervisor. This is to ensure that they are offering you the best service possible. These conversations are bound by confidentiality and you will only be referred to by your first name.

Your therapist may also keep notes of each session. These are anonymised and are stored in a locked filing cabinet or within a password protected file within the secure Connections system. These notes are for your therapist's use only and help to keep a track of everything that is being discussed. These notes will be kept securely for up to three years after your therapy comes to an end. After this time, they will be confidentially destroyed.

If your sessions are paid for or arranged via a third party, (e.g. your employer, a friend, a family member, or funding), other than payment requests, invoices or receipts, your counselling information will not be shared. Details about what is discussed in your sessions will remain confidential between you and your counsellor. Any other information can only be shared if you provide your written consent.

### **Your communications with us**

All of our email accounts use the secure Roundcube Webmail server and are password protected. If you send an email to your counsellor's email address, only they will have access to it. All phones, tablets and laptops used to respond to your emails are encrypted, fully protected with anti-virus software and password protected.

### **Data Usage**

We will only use your email address and telephone number to contact you about your appointments. Your counsellor may also contact you directly via email in order to share information with you that is pertinent to your therapeutic process. Your phone number may also be used to issue appointment reminders via text message.

### **Your rights**

Any personal data retained by our service or your counsellor is kept in accordance with the GDPR, 2018.

Under these guidelines you have the following rights

1. The right to request access to your data

You can request to view the information that we hold about you (contact details, appointment logs etc.) at any time. If during therapy you would like to see your session notes, please make this request to your counsellor directly. Should you require a copy of

your notes after your therapy has come to an end you can make this request by emailing [ian@connections counselling.co.uk](mailto:ian@connections counselling.co.uk) or calling 07599220895

## 2. The right of rectification

At any point during your time using our service or during the three years thereafter, while we retain your records, you have the right to request amendments to your contact details or session notes. This right can be exercised either by speaking directly to your counsellor or by contacting us in writing.

## 3. The right to be forgotten

You can request that we delete and confidentially destroy the information that we hold about you and your sessions at any time. This request can be made by contacting our admin office at [ian@connections counselling.co.uk](mailto:ian@connections counselling.co.uk)

Instances where we would not be able to comply with your request are as follows:

1. a) It is necessary for us to retain these records in order to continue providing an effective service
2. b) We are compelled to retain these records by a Court of Law
3. c) We require these records in order to establish, exercise or defend legal claims

## **Consent**

When you book your first session with us at Connections, you will be asked to provide a digital signature and tick a checkbox to confirm that you consent to the storage and processing of your personal data for the purposes of providing therapeutic services. You are entitled to withdraw this consent at any time and can do so by emailing our office at [ian@connections counselling.co.uk](mailto:ian@connections counselling.co.uk)

## **Breaches of data protection**

In the event of any breach of our ]data protection policies, we will notify you and the Information Commissioner's Office (ICO) within 72 hours and will seek to rectify this immediately.

## **Raising concerns**

Should you have any concerns about our data protection practices, you can raise these directly with your our admin team. You can also notify the Information Commissioner's Office. We are registered with ICO under the reference number ZB802884.

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