

WCC Client Privacy Notice

Waterloo Community Counselling (WCC) places the highest importance on keeping client information safe and confidential. We are committed to protecting your personal information and to being transparent about what information we hold and how we use it.

In this notice 'WCC', 'we', 'us' or 'our' means:

- Waterloo Community Counselling, a charitable company limited by guarantee.
- Company no. 3034938.
- Charity no. 1045444
- Registered office: Barley Mow Clinic, Greet House, Frazier Street, London SE1 7BD

WCC ensures that when we collect and use personal information, it is done in accordance with applicable UK data protection legislation, including the General Data Protection Regulations (GDPR).

This notice explains when and why we collect personal information about you, how we use it, the conditions under which we may disclose it to others, how we keep it safe and secure and your rights and choices in relation to your information.

How do we collect information about you?

Information you give us directly: We collect information from you through Referral Forms you may fill in to request an assessment for our counselling services and other information you may email us when you start to receive our services. We also collect information when you complete PHQ9 or GAD7 self-assessment tools, voluntarily complete an evaluation questionnaire at the end of your counselling sessions, provide us with feedback or contact us about any matter by email or in a letter .

Information from our staff and counsellors: WCC staff will create a client file for you while you are accessing our services. This contains assessment notes, records of attendance, any correspondence between you and WCC, and any risk or safeguarding records. These are stored electronically in our database (Lamplight) which is password-protected, using 2-factor authentication. Lamplight is only accessible to authorized staff members. We do not keep detailed notes on the content of each counselling session. We only keep short, factual notes for each counselling session.

For fee paying clients, we store the name and email address of clients on Xero which is password protected, using 2-factor authentication and is only accessible by authorised staff members.

Information we receive from other sources: Your information may be received by us from third parties, including NHS Talking Therapies or another agency referring you to us; your GP or another professional such as a case worker, psychologist or social worker; other voluntary organisations or charities.

What type of information is collected and used about you?

The information we collect and use will include personal data and sensitive data (known as 'special category data' in data protection law). These records may include the following information relevant to you:

- your name and contact details (including address, email address and telephone number);
- your date of birth;
- the name and address of your GP
- Medical notes, or notes from another professional like a social worker, that are relevant to your counselling sessions
- Information from contact we have had with you, including assessment notes, records of attendance, any correspondence between you and WCC, and any risk or safeguarding records
- information about your solicitor or other representatives we may encounter in the delivery of services
- any other personal information shared with us, e.g. details of your children or family members.

Data protection laws recognise certain categories of sensitive personal information as 'special category' and

therefore requiring greater protection. We may collect the following types of special category data about clients:

- information about your mental health, disabilities, or special educational needs
- details and records of medical or psychiatric treatment and medications
- information about your race, religion, beliefs or political views
- information about an individual's sexual orientation, disability, pregnancy or gender reassignment
- criminal convictions that have been committed against an individual or which an individual has committed.

How and why is your information used?

We only collect and use information that is necessary for WCC to provide you with a professional and high-quality counselling service and appropriate support to meet your needs.

This includes using your data to collate anonymous statistical and demographic information about our services for monitoring purposes. This helps us understand how well we are delivering our services.

We also use your anonymised data to report to our funders about the services we have delivered. This allows us to continue offering our services for a low-fee or free of charge. This does not include any information which could identify an individual service user.

If you do not provide us with information that we ask for and that we require, or you do not consent to storage of your information in our database, we may not be able to provide services to you. If you are uncomfortable about disclosing certain information to us or if you have any concerns or queries about why we require certain information, we are happy to discuss this in further detail with you.

Sharing your information

We will never share your personal data with third parties unless you give us your explicit consent to share information, for example with your GP, solicitor or other organisations who we may refer you to for additional support and services. The only limit to this is in exceptional circumstances when there is a concern about risk of serious harm, safeguarding, or when we are legally required or authorised to disclose information.

Lawful processing

Data protection law requires us to rely on one or more lawful grounds to process your personal information. We primarily rely on your *specific consent* to use your data as outlined above. In some circumstances we may collect and use personal information where this is necessary in our *legitimate interest* as a charity, including:

- sending out relevant updates and additional service offerings to our clients, e.g. information about our therapeutic support groups.
- conducting research to better understand the impact of our services and improve our services for the benefit of our clients.

Specific consent: You have a choice about whether or not you wish to receive marketing communications from us such as updates about our work, events and services which may be relevant to you, or communications about ways in which you can show your support for WCC through fundraising. If you want to receive direct marketing communications from us, then you can select your choices by ticking the relevant boxes on the form below. We will only send you marketing communications by post, email, text and telephone if you have given your *specific consent*.

In limited circumstances, we may ask for your consent to use your information (for example, your feedback or the story of your experience with us) in WCC's promotional materials or on our website. In these circumstances, we will always ask for your explicit consent beforehand, and we will tell you how you can withdraw your consent if you change your mind (which you can do at any time).

Other lawful grounds that may be relevant for processing your personal information are:

Legal obligation: when necessary so that we can comply with a legal or regulatory obligation to which we are subject, for example where we are ordered by a court or regulatory authority like the Charity Commission, or we are required to report a crime.

Vital interests: when it is necessary to protect life or health (for example in the case of medical emergency suffered by an individual) or a safeguarding issue which requires us to share your information with the emergency services.

Our lawful grounds for processing Special Category data

When we use special category (sensitive) personal information, we require an additional legal basis to do so under data protection law. Our basis for using such information is normally to provide our counselling and support services for adults experiencing mental health difficulties and psychological distress. Sometimes we may use another route available to us at law (for example, if we need to process it for purposes of vital interests or, in some cases, if it is in the public interest for us to do so).

Where is your information kept and long is it kept for?

We store all client data electronically. We keep our client records secure and updated by storing them on our Client Relationship Management (CRM) system Lamplight, which is stored on our secure servers within the European Economic Area (EEA). Lamplight is password protected, using 2-factor authentication, and access is restricted to authorized staff members only.

Assessment forms sent to us by email are completed with a client number only and without a name, and then uploaded to Lamplight.

We keep your personal information for five years after your counselling sessions end. After this we dispose of your data securely.

Keeping your information safe and up-to-date

We take steps to ensure that appropriate technical and organisational controls are in place to protect your information, such as Firewalls, anti-virus protection and encryption.

We take reasonable steps to ensure your information is accurate and up to date. We really appreciate it if you let us know when your contact details change.

Your Rights

Under UK data protection law, you have the right to:

- Request a copy of the personal information we hold about you (Subject Access Request) and to have any inaccuracies corrected. Please note, there may be an exemption to this if disclosure of information would be likely to cause serious harm to the physical or mental health or condition of the client.
- Request the deletion or removal of your personal data where processing is no longer required or justified
- Withdraw your consent at anytime
- Request us to restrict the processing of your personal information
- Object to our processing of your personal information

If you want to exercise any of the above rights, please contact us. We may be required to ask for further information and/or evidence of identity. We will endeavour to respond fully to all requests within one month of receipt of your request, however if we are unable to do so we will contact you with reasons for the delay.

You may opt out of our marketing communications at any time by clicking the unsubscribe link at the end of our marketing emails, or by contacting us to tell us that you no longer wish to hear from us.

How to complain

If you have any questions or wish to complain about our data privacy practices, please contact our Data Protection Lead Marisa Matos or our CEO Miriam Philip using the contact details below. We hope we can resolve any query or concern you raise about our use of your information. You also have the right to lodge a complaint with the ICO who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.

How to contact us

You can contact us by emailing info@waterloocc.co.uk or by writing to Waterloo Community Counselling, Barley Mow Clinic, Greet House, Frazier Street, London SE1 7BD. Alternatively, you can telephone 020 7928 3462.