

Hampstead Counselling Service

Registered Office:
36, Menelik Road,
London,
NW2 3RH
24 May 2018

GDPR – Beneficiary Information Management and Retention Policy

Introduction

This notice sets out the way in which Hampstead Counselling Services (HCS) arranges for beneficiary, or client, information to be managed and retained, and the processes we follow to ensure that data is deleted when no longer needed.

Enquiries from potential clients are received either on a confidential telephone answering service or in a confidential e-mail account. Telephone messages can only be accessed by counsellors using a specific pin code. The email system used is Gmail, for which only counsellors have the password. The information provided by the potential clients is normally their name and telephone number, but may include other information such as e-mail addresses. The confidential telephone service and e-mail account can be accessed only by counsellors, never by HCS's Trustees or administrative staff.

The counsellors add potential clients to a waiting list database which at least three counsellors manage jointly and use to decide the allocation of potential clients to counsellors for follow up. The HCS Trustees and administrative staff have no access to this waiting list database. The database is held on a password protected digital file on a Google drive, which is itself also password protected.

If a potential client becomes a beneficiary of HCS by becoming a client of a counsellor, the client relationship is subject to the counsellor's professional standards, which include ensuring compliance with GDPR: see further below. Each time a new client is accepted, counsellors send to HCS's Treasurer, currently Patricia Nicholson, a new client form, using a coding system and including anonymised data for accounting record and statistical purposes.

Data Privacy

The Trustees require that the counsellors hold information on potential clients in strict confidentiality when managing the waiting list database which is password protected. .

The Trustees require the counsellors to confirm that they comply fully with GDPR principles in respect of potential client information received in the context of HCS.

If required by law or some exceptional circumstances, the Trustees may require the counsellors to provide the Trustees with access to some or all of the information on the waiting list database. In this event the Trustees will ensure that they themselves will comply fully with the requirements of GDPR in relation to the management of the relevant information.

Data Retention

The Trustees require that the counsellors delete potential client information from the waiting list database within 3 months of the case being allocated to a counsellor.

Client information obtained during the course of a counselling relationship

Once a potential client becomes a beneficiary of HCS by becoming a client of a counsellor, the retention of the beneficiary's information is subject to GDPR processes and policies governing the client relationship with the counsellor.

HCS requires counsellors to ensure that all personal information received by counsellors from or in relation to any client is kept confidential. However, in order to provide an effective service, the counsellor may discuss a client's case [*wherever possible, on a generalised and anonymised basis*] with others working for HCS, such as a clinical supervisor.

All client records will be retained by counsellors for 3 years after the counselling work has finished, and discarded thereafter.

Any client will have data protection rights to be informed about, to access, and to require rectification of, any personal data held by counsellors in respect of him or her, as well as the right to portability and to erasure of such data in certain circumstances.

Counsellor Confirmation

The Trustees issue this policy and any updates to all counsellors and obtain from each counsellor their agreement to the requirements of the policy.

The Trustees require written confirmation from counsellors of their compliance with the requirements of the policy.

Complaints

Any complaint which any client may wish to make about this notice, about any of the procedures in it, or about HCS's compliance with its role under such procedures should be made to HCS's Treasurer, currently Patricia Nicholson, who is HCS's data controller, and can be contacted at tricianicholsonhcs@gmail.com

There is also a right to raise concerns with the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

Policy History

Version Number	Date Created/reviewed	Author/Reviewer	Date approved by Board	Scheduled Review Date
6	24 May 2018	TN	24 May 2018	April 2019