

Privacy Policy 2018

Kate Manley, MA, UKCP Reg trading as Kate Manley Counselling and Psychotherapy and The Soul Work Project

Data Protection

You may be aware of changes to the legislation governing how we use and store individual personal information. I take your right to privacy very seriously and as such I adhere to the General Data Protection Regulations that come into effect on 25 May 2018. In order to be transparent about the use of data, this policy sets out in detail what data I collect, how I use it and your rights in relation to the data I hold. The information in this policy pertains principally to one-to-one work with me. Please see the separate section on page 2 concerning data relating to attendance at an event, talk, workshop, group or course.

My Information Commissioners Office (ICO) registration number is: Z1441256.

Terminology

- **Personal Data:** Any data relating to a living person or 'data subject' that can be used to directly or indirectly identify the person
- **Data Controller:** I (Kate) am deemed to be a Data Controller. This means I determine what personal data is collected how it is used.
- **Data Subject:** Anyone enquiring about or engaging my services and about whom data is collected.
- **Data Processing:** Any handling of data, ie holding, recording, sending, analysing, using and destroying it.

Your Rights under GDPR

Under GDPR you have rights as an individual, which you can exercise in relation to the information I hold about you. These rights are:

- to be *informed* as to what information I hold about you
- to *see* the information I hold about you (free of charge)
- to *rectify* any inaccurate or incomplete personal information
- to *withdraw consent* to me using your personal information.
- to request that I *delete* your personal information (I can decline if I need to retain it to comply with insurance or legal obligations)
- to *restrict* processing. This means that in certain circumstances you can request that particular information is not used.
- to *data portability*. This allows individuals to obtain and reuse their personal data for their own purposes across different services.
- to *object*. This gives individuals the right to object to the processing of their personal data in certain circumstances and always in relation to data used for marketing purposes.
- *not be subject to automated decision-making* including profiling

If you wish to discuss or make a request in relation to these rights, please contact me in the first instance. I am obliged to respond within a specific time period.

Lawful Basis

To collect and use data you share, I must be able to demonstrate to the ICO that I have a lawful basis to do this. I also need to tell you what this lawful basis is. I have

determined that the following categories may apply to the way I use data: Consent, Contract, Legal Obligation, Vital Interests and Legitimate Interests. For more information on what these mean, please see the [ICO website](#).

The data I collect

One-to-One Work (Counselling, Psychotherapy or Coaching)

If you make contact with me concerning one-to-one work in order to safely and efficiently offer my services to you, I may collect some or all of the following information either at our initial contact or first meeting:

Name and Contact Information

- Full Name
- Date of Birth
- Home address
- Telephone number(s) and whether you consent to receiving text or voice messages
- Email address(s)
- User names for live online contact such as Skype, Facetime or Zoom

I may also collect other personal information about you from initial contact onwards that is relevant to the safe and ethical delivery of my services. This is factual information you share about your personal circumstances, lifestyle, history and concerns as it pertains to our work together. This may include relevant data described as Special Category Data, which includes information such as ethnic origin, sexuality and religion.

Attendance at an event, talk, workshop, group or course

If you purchase a ticket to an event I am running via a ticket booking service (such as Eventbrite), I will only receive notification of your name, email address and method of payment (such as PayPal or Visa but no account details). I collect and use this information only insofar as it enables me to conduct the administration of the event and in order to communicate with you about the event for which you have purchased a ticket. I will not transfer this information to my mailing list or use it for any other purpose unless you give your explicit consent for this. At most events there will be a paper form on which you can leave your details for signing up to my mailing list. This data is collected in line with GDPR requirements.

Some events that form part of an ongoing group or course may necessitate the collection of additional personal information in order to assess whether someone is suitable to attend such a course. If this is the case, I will contact you to discuss this and information will be collected as outlined in the section about one-to-one work.

How information is recorded and stored

I use a combination of written and digital methods for recording information. Your Name and Contact Information are kept separately from any other personal data held about you.

Paper Documents

These are the written documents I may hold:

- Name and Contact Information Sheet (as listed above)
- Initial Session notes contacting Other Personal Information (as listed above)
- Signed Working Agreement
- Signed Privacy Policy (this document)

- Written correspondence to and from you, me or third parties (such as GP/employer/referrer) in line with the confidentiality clause in our Working Agreement, including print outs of emails (emails are then deleted)
- Session summary notes (a few sentences summarising the main issues discussed in each session)

These documents are stored in a locked cabinet. The only other person who has access to this cabinet is the executor of my therapeutic will. She is the person who will contact you in the event of my death or if I become incapacitated and unable to contact you myself about my ability to work.

Electronic Data

Data may be collected via email, mobile phone or website. All my electronic devices and email accounts are password protected and my phone is accessible by password or fingerprint.

Email: From 25 May 2018, I will only be using the kate@thesoulworkproject.com email address. This is hosted by Zoho mail and is fully encrypted. Any emails coming to my livingforwards@hotmail.co.uk account after that date will be responded to from the alternate Zoho email address other than a brief response to notify you of this. Your email address and correspondence will automatically be stored in my email account if you have made contact with me in this way. If you are concerned about sharing personal information by email, you may prefer to use email only to communicate about practical arrangements. I will only send documents (such as draft working agreements or relevant articles or information) via email if given verbal consent to do so and no documents sent by email will contain identifying information about you.

Mobile phone: your telephone number(s) may be stored in my mobile contacts list alongside your first name only and/or client code. If we communicate by text (SMS), your number and the content of the texts may be stored across my devices and deleted within two months of the end of our work together. I will only communicate with you by text if you have explicitly given your consent to this. I will only leave voicemail messages if you have given your explicit consent to this.

Website: No personal data about you is stored via my website www.thesoulworkproject.com other than anonymised data which I use solely to monitor trends in traffic to my site. My website is hosted and published by Wordpress. It is protected by SSL encryption. I currently have no contact forms on my website other than to opt in to my mailing list. If you decide to opt in, you will see a notice about what you are signing up for and how you can unsubscribe. You will be asked to confirm that you wish to go ahead with joining the list. I use MailChimp to administer my mailing list.

Please also see my Cookie Policy.

How personal information is used

Information about you is collected and kept on a need-to-know basis to comply with my professional code of ethics, data protection legislation and other relevant legal obligations (as detailed in the confidentiality statement in my Working Agreement). Information is also used to assist with the practicalities of communication outside the sessions and to support my commitment to provide a professional, ethical and high quality service.

Disclosure of Information: I will never disclose information about your identity, personal information or our work together other than in the circumstances outlined in our Working Agreement. These circumstances include where there is a risk or

perceived risk of serious harm to you or another person, where there is a safeguarding issue regarding a child or children or where I have a legal obligation to do so (such as by order of a court). Should you request I share information about you with a third party, we will discuss in detail what information you want me to share, whether this is in your best interests and the potential implications of both sharing or not sharing it.

Supervision: as per the Working Agreement, I may discuss our work in supervision but will not disclose information that could identify you. Supervision is an ethical requirement for counselling and psychotherapy and considered good practice in coaching. My supervisor(s) are also bound by the data protection legislation, ethical guidelines and relevant legal obligations.

Sharing Information for Marketing: I will not share your name or contact details with anyone for marketing or promotional purposes. If you wish to join my Soul Work Project mailing list for information about projects, events and published writing, you can opt-in to this list via my website in line with GDPR requirements.

How long information is kept for

Any information kept electronically will be deleted within two months of our last contact. I keep written information for up to seven years after the end of our work together. This is common practice in line with guidance from my professional bodies. After that time, all paper records will be shredded.

Other Agencies/Organisations

As a result of contact with me, your data might be handled by external agencies such as when transferring payment, using email and online platforms such as Skype, FaceTime and Zoom. These companies are also required by law to handle your data in line with GDPR legislation.

If you contact me as a registered BUPA provider, I will only have access to personal information about you when you yourself have given me your name, date of birth, pre-authorisation code and member number. When I log onto the BUPA Providers website using this information, I will be able to see your address, the number of sessions authorised and presenting issue. No additional data is transferred to or from the BUPA website.

If you contact me by email via an online directory, your email will be treated in the same way as any other email.

Social Media

I have a private Facebook account and do not accept friend requests to this personal page from clients or former clients in order to maintain my privacy. However you are welcome to like my professional page at www.facebook.com/thesoulworkproject in which case you can be identified by anyone looking at the page.

I also have a public Instagram account and a LinkedIn page. You are welcome to like or follow me on these pages but I do not knowingly follow any current or former clients on these platforms. This maintains a certain degree of privacy for both of us and avoids the blurring of boundaries between personal and professional relationships.

How you can complain

If you are not happy with any aspect of how I collect or use your data or how I have responded to a request about it, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk/concerns, 0303 123 1113). If you do have any concerns, I would welcome you contacting me in the first instance so I can try to resolve the issue for you.