**Privacy Policy Template**

[I / We] understand how important your privacy is. [I / We] take care to maintain your confidentiality in accordance with current data protection laws (GDPR, 2018) and the ethical guidelines of [INSERT YOUR REGULATORY BODY]. These guidelines have been set up to protect your confidential material and ensure that your therapist always conducts themselves with professionalism and integrity.

In order to provide you with the best service possible, [I /we] will hold your personal contact details and records of your therapy sessions. Please find below important information about how this information will be held and used.

**Your personal information**

[INSERT DETAILS OF HOW YOU STORE CLIENT DETAILS]

e.g. [I / We] use the secure, encrypted and password protected practice management platform, Kiku (wearekiku.com) to collect and store your personal data. At the point of booking your initial consultation with [me/us], you will be asked for your personal contact information, for example your name, address, email address and telephone number and you may also choose to share details of the issues you are looking for help with.

Your contact information is stored securely in Kiku and can only be accessed by [me / the admin team and your therapist].

In order to be able to fulfil [our/my] duty of care to you, in your initial consultation or first treatment session, [I / your therapist] will ask you for contact information for your GP and elected Emergency Contact person. These details will be stored securely in Kiku and will only be accessible to [me / your therapist or our administrator].

This personal information will be held for the duration of your therapy after which it will be deleted from [my/our] Kiku database.

Please note that [I /we] will need to keep a record of your name and client reference number for seven years after the end of your therapy, so that we can respond effectively to any potential requests regarding your clinical notes and treatment.

[I / 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 [I am /we are] providing to you i.e. to arrange, cancel and rearrange appointments and collect payment for sessions.

**Online Bookings**

When you make an online booking or payment, Kiku will send a booking notification to your therapist via email and the Kiku messaging system.

Anonymised payment details are recorded in our Kiku financial income reports. These reports will only hold your first name, last name initial and unique client reference number. The HMRC requires that we retain this information for 5 years after the end of the financial year.

You can view Kiku’s [privacy policy here](https://www.wearekiku.com/privacy-notices)

[My / our] website uses cookies. You can find the details of our here [ADD LINK]

**Your payment details**

[INSRT DETAILS OF ANY PAYMENT INFORMATION THAT YOU HOLD]

e.g. All payments made through [my / our] website [ADD WEB URL] are made through the secure Stripe Connect server. [My / Our] website therefore does not hold your payment information. Where you have made payment for your session over the phone, [I / 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.

**Your therapy sessions**

[INSERT INFO ABOUT CONFIDENTIALITY]

e.g Everything that you discuss with [me / your therapist is confidential]. Confidentiality will only be broken if there is concern about your safety or the safety of someone else or [I am / we are] instructed to do so by a Court of Law. [I /We] will always endeavour to speak to you about this first.

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

[I discuss / Your therapist discusses] [my / their] clinical work with a supervisor. This is to ensure that [I am / 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.

[I keep /Your therapist will 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 Kiku system (wearekiku.com). These notes are for [my /your therapist’s] use only and help to keep a track of everything that is being discussed. In line with industry guidelines, these notes will be kept securely for up to seven 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, or a family member), 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 [us / you and your therapist]. Any other information can only be shared if you provide your written consent.

**Your communications with us**

[INSERT INFORMATION ABOUT THE SOFTWARE AND DEVICES YOU USE TO COMMUNICATE WITH CLIENTS]

e.g All of our email accounts use the secure GSuite server and are double password protected If you send an email to your therapist’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**

[INSERT INFORMATION ABOUT HOW CLIENT DATA WILL BE USED]

e.g. [I /We] will only use your email address and telephone number to contact you about your appointments. [I /Your therapist] 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. You can opt in or out of text updates using your free Kiku account.

**Your rights**

Any personal data retained by [me / our service or your therapist] 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 [I /we] hold about you (contact details, appointment logs etc.) at any time. If during therapy you would like to see your session notes, please [let me know / make this request to your therapist directly]. Should you require a copy of your notes after your therapy has come to an end you can make this request by emailing [INSERT EMAIL ADDRESS] or calling [INSERT PHONE NUMBER].

1. The right of rectification

At any point during your time using [my / our] service or during the seven 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 [me /your therapist] or by contacting [me / us] in writing.

1. The right to be forgotten

You can request that [I /we] delete and confidentially destroy the information that [I /we] hold about you and your sessions at any time. This request can be made by contacting me / our admin office at [INSERT EMAIL ADDRESS].

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

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

**Consent**

[INSERT INFORMATION ABOUT HOW YOU’LL TAKE CONSENT]

e.g When you book your first session with us via Kiku, 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 [me /our office] at [[INSERT](mailto:info@theclearing.org.uk) EMAIL ADDRESS]

**Breaches of data protection**

In the event of any breach of [my /our ]data protection policies, [I /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 [my /our] data protection practices, you can raise these directly with your [me / our admin team]. You can also notify the Information Commissioner’s Office. [I am / We are] registered with ICO under the reference number [INSERT YOUR ICO REF].