



The InnerPath

Privacy Policy

Contact details

Name: Dawn Harding

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Web: www.the-innerpath.co.uk

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ICO reference no: ZB654130

Lawful Basis for processing – Contract

- As part of Dawn's commitment to BACP, she is required to keep accurate records that are adequate, relevant and limited to what is necessary for the type of service being provided, and comply with the applicable data protection requirements.
- As she is required to enter into contracts and agreements with her clients, "necessary for the performance of a contract" the GDPR is likely to be a lawful basis for processing client personal data.
- When therapeutic work begins with a client, a contract with the client is formed, using a "Counselling Agreement".
- The Counselling Agreement (contract) details Dawn's way of working; that she is regulated by BACP; the information she keeps is inline with the GDPR and for its duration; confidentiality and her terms of payment and cancellation policy, contact outside sessions, holidays/sickness, report writing/letter requests, record keeping and health & safety.
- The client needs to commit to the Counselling Agreement (contract) as part of the work. This is signed by the client electronically or on paper.

The type of personal information The InnerPath collects

- Contact is made via phone call, text message or email in relation to arranging/re-arranging sessions.
- A contact information form is completed between the client and The InnerPath. This includes: client's name, address, date of birth, email address and phone number, GP contact details, current medication/diagnoses, any previous counselling undertaken, emergency contact details, resources, presenting issues and hopes from counselling are taken.
- All session notes are hand written only.
- 3rd party session notes (via an Employee Assistance Programme referral) are stored electronically on the 3rd party's software.

How we get the personal information and why we have it

- When you contact us regarding an initial counselling enquiry via the counselling directories I am listed with, direct via my website (direct email or use of website's contact form) or by phone call or text. This is to ascertain availability and arrange sessions.



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- From a 3rd party (ie. Employee Assistance Programme) to whom you have given the information to and have been made aware, and gained your consent, to share with The InnerPath in order to arrange counselling sessions.
- Information collected in the Contact Form is, firstly to identify the client, should notes be requested in line with legal obligations and also for The InnerPath's records relevant to the client. These details are used for The InnerPath's use only, in order to demonstrate a duty of care for the client in the event of an emergency, as well as implementing payment procedures if necessary. These details are provided by the client with consent.
- The information collected is used by The InnerPath in order to provide psychotherapeutic counselling and energy healing.

How we use this information

- We use the information that you have given us in order to contact you to arrange, re-arrange or cancel appointments.
- In the event of an emergency during a therapeutic session, we will seek your permission to contact the next of kin. If necessary, and in line with our duty of care to the client, the counsellor has the right to also contact the client's GP or the emergency services.
- Occasionally, client work via a 3rd party referral may result in an application being made to request additional counselling sessions once the initial permitted sessions have been completed. This application will be completed by the counsellor and emailed direct to the 3rd party (ie. Employee Assistance Programme provider) for their processing.

How we store your personal information

As records for clients are kept, there is a filing system that falls within the GDPR definition and therefore the data protection legislation will apply to them.

All contact made by clients is via telephone and email; both of which are password protected and can only be received by Dawn Harding of The InnerPath. Further communications remain in this format.

Paper documentation

- Each client's information is kept alphabetically within a lever arch folder. This includes hand-written session notes.
- The file is kept in a lockable metal filing box for the duration of the work; only Dawn has access to the key.
- Once the work has been complete, the file is closed down and any personal notes taken by Dawn are destroyed securely via a shredder. The personal details obtained from the client in addition to summary notes of the session remain within the metal lockable file within Dawn's home. The information remains in here for a 7-year period in case the client wishes to return. This time period is set by Dawn's insurance company, Therapist Insurance.
- Seven years after the last contact with the client, the files are securely destroyed via shredder. The current files are reviewed each month to ensure therapeutic work is still taking place with each client, and if the circumstances have changed the file is closed down and moved to another section for work completed, within the metal locked filing box.



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Electronic Documentation

Electronic documentation comprises of emails, calendar invitations, texts and phone records.

- The laptop used is password protected and backed up onto a memory stick on a monthly basis. The memory stick is stored securely in the locked metal filing cabinet along with the lever arch file.
- The phone is locked with PIN number.
- Once 3 years has passed since the end of the work, telephone records, texts, emails and calendar invitations are deleted from the laptop and the phone.
- Any corresponding information backed up on the memory stick will also be deleted once the 7 years has exceeded.

Personal Data Processing and Exceptions

- Processing of personal data is processed by Dawn Harding. Dawn is aware that special categories of personal data that reveal racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, physical or mental health condition, any offence the data subject has actually or allegedly committed or any proceeding relating to the alleged offence and processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a person's sex life or sexual orientation shall be prohibited.
- Non such data is collected. The exception to the above is the collection of information regarding current medication and previous counselling history. These fall under the exceptions list for the purposes of preventive or occupational medicine for the assessment of the working capacity of the client, medical diagnosis, the provision of health or social care or treatment, or the management of health or social care systems and services, on the basis of union or member state law or pursuant to contract with a health professional and subject to the conditions and safeguards.
- To summarise: to assess the working capacity of the client and ensure that Dawn Harding practices within her limits of proficiency, data for current medication and previous mental health history is collected.

Requests for Information

Any requests for information/notes need to be responded to within a one-month period from the request being made and given directly to the source of the request. All requests should be directed to Dawn and dealt with by her.

Personal Data Breaches

In the event that a personal data breach is made; ICO will be notified immediately by Dawn and the individual affected will be informed within 72 hours of the breach.

All breaches to be documented and logged within the data protection file.

Mobile and home working; all devices are as above and are used for Dawn's sole purpose, therefore security to a corporate network is not applicable.



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Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

How to complain

If you have any concerns about my use of your personal information, you can make a complaint to me at The InnerPath (email: info@the-innerpath.co.uk)

You can also complain to the ICO if you are unhappy with how I have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>