GDPR AND DATA PROTECTION

Privacy Notice and GDPR

The General Data Protection Regulation (GDPR) is legislation which came into effect on 25th May 2018. Under this law you have a right to know what information we collect, how we use it and the circumstances in which it may be shared. The personal information you provide to **shine counselling** will be used for legitimate business interests, that is, to provide you with a professional counselling service.

As of 1st January 2022, we have moved all of our record keeping across to a secure, cloud-based app called WriteUpp. We no longer keep paper records for new clients. As of 3rd November 2026, client contact details are also stored in an app called ClinicalWill (see note on Clinical Executor below). This is also cloud-based and secure.

Your Personal Data

Information kept includes:

- Your signed counselling agreement (scanned and uploaded to WriteUpp)
- Brief record of each counselling session (which may contain sensitive personal data – see below)
- A personal information sheet

Sensitive Personal Data ("Special Category Data")

Information collected may be sensitive personal data including ethnic origin, religious beliefs and physical and mental health. Such data is only used to provide a counselling service in accordance with legal obligations.

Why We Need It

Name, date of birth, occupation	Basic information about yourself that helps us to get to know you.
Address, email address, telephone number	Email/phone no. for contacting you about your sessions, and in the event of death or incapacity of your counsellor. Address is used where we see a risk that needs a police safety check request.
Emergency contact	In case anything happens to you within our session, for instance if you become suddenly ill and we needed to contact someone.
GP details	If we felt you were at risk then we may need to contact your GP. Where possible, and if appropriate, we will discuss this with you first.
Session notes	Standard professional procedure requires summary notes to be made of each session which refreshes your counsellor's memory of what was discussed in sessions.
Sensitive Personal Data ("Special Category Data")	This helps us make an initial assessment of your circumstances including any history of depression and anxiety.

Session Notes – Data we have a legal obligation to keep

We are required by our insurance company to keep session notes for a period of 5 years after the end of therapy, after which they are destroyed by deleting the records from WriteUpp.

What are your rights?

You have a right to request to see or have amended any personal information we may keep about you. You also have the right to request that we delete information that we hold about you. You also have the right to object to the processing and use of your personal data.

What information we share

We will not share any information about you with other organisations or people, except in the following situations:

- **Consent** – We may share your information with other professionals whom you have requested or agreed we should contact.
- **Serious harm** – We may share your information with the relevant authorities if we have reason to believe that this may prevent serious harm being caused to you or another person.
- **Clinical Executor** – In the event of their death, or if for any reason your counsellor becomes incapacitated and unable to work, your information will be passed onto their Clinical Executor so they can contact you and make suitable arrangements.
- **Compliance with the law** – for instance if we are required by a court of law.

How your data is stored

Personal details and session notes are encrypted within WriteUpp and require password access. Information passed to a Clinical Executor is encrypted within ClinicalWill.app and requires password access. Your telephone number may be kept in our mobile phones using your unique code rather than your name or any other identifying details.

More details about WriteUpp and ClinicalWIll security features can be found here:

- https://knowledge.writeupp.com/en/privacy-data-security
- https://clinicalwill.app/security

How long we keep it for

For legal reasons we keep session notes for 5 years after the end of therapy which is the time frame our insurance company requires. After this they are destroyed, by deleting the records from WriteUpp.

The following will be deleted within 3 months of our work finishing:

- Personal information form
- Your phone number from our mobile phones
- Emails regarding appointment arrangements

Data Protection Accountability

If you wish to complain about how your data is handled, in the first instance contact the Data Controller at **shine counselling**.

Tel: 07899 985190

Email: gdpr@shine-counselling.co.uk

If your complaint is not resolved to your satisfaction you can contact the Information Commissioner's Office at https://ico.org.uk/make-a-complaint/data-protection-complaints/ or call 0303 123 1113.