

SCHOOL COUNSELLING SERVICE PRIVACY NOTICE

FOR STUDENTS 13 - 18 YEARS OLD

Important information

With your agreement, arrangements have been made for me to provide you with counselling or support. I am employed by the Catholic Children's Society (Westminster) (**CCSW**), which is the organisation which the school has asked to provide counselling to its students through its ConnectEd service.

It is important that you are able to trust me and you can have honest conversations with me during our sessions about you, your relationships with others and your feelings. For this reason, the detail of what we discuss during our sessions is confidential and my file about you is handled securely. I will not share what you tell me with anyone outside CCSW except if further support is required, or if I believe there is a risk of significant harm to you or someone else, or where the law requires me to do so.

The law (General Data Protection Regulation and the Data Protection Act 2018) protects your information and gives you special rights, including the right to understand what we do with your information. This document explains to you what we (CCSW and I) do with your information.

If you have any questions about this document or your information, please let me know. Otherwise, you are welcome to contact Rosemary Keenan at CCSW on 020 8969 5305.

The information which we hold

We hold the following information about you

- **Identity and contact information** includes your name, date of birth, gender, form/year group, school, home address, telephone number, email address, as well as names and contact details of key family members or carers.
- **Professional contact information** includes details of other professionals, such as a GP or social worker, who looks after you or your family.
- **Counselling and support information** includes information shared by you or others (such as your school) for the purposes of providing you with counselling and support, including notes and documents I make for your file. This may include sensitive information about you.

The information which we hold comes from you, your family, your school and other professionals who may be assisting you or your family.

What we do with your information

We may use your information for the purposes below:

- Provide you with counselling or other support
- To organise the service we provide to your school
- Make sure that we comply with our professional and legal obligations (including being supervised)
- Take steps to ensure that you or anyone else is protected from harm or to protect your or another person's wellbeing if we believe you or others are at risk of significant harm
- Respond to complaints or legal proceedings

The lawful reasons for using your information

We will only use your information where it is lawful for us to do so. This is when it is necessary to provide you with counselling or support, to organise our service, to comply with a legal obligation and to keep records about the service we provide.

When we use sensitive information about you (such as information about your race, religious beliefs, health), it will be where it is necessary for the purposes of providing a confidential counselling or support service, protecting you or anyone else from harm, complying with our professional obligations to ensure that counsellors practise safely or to deal with legal proceedings.

We do not rely upon your consent in using or holding your information for the purposes above.

Who we share your personal information with

We will only share your personal information where it is necessary for the purposes above. We may need to share your information as follows:

- With another professional (such as your GP or social worker looking after you or your family) when we need to communicate with them for the purposes of your counselling or support. We would also discuss this with you beforehand where appropriate / possible.
- With your school in order to ensure that you are protected from harm and / or your wellbeing is protected.
- Our counsellors are members of a professional organisation (such as the Health and Care Professions Council), and therefore we may need to report potential breaches of ethical principles or codes of professional conduct.
- Where we are concerned that you or anyone else may be at risk of harm, we may need to report to the Designated Safeguarding Lead in the school, the Local Authority or police in accordance with our safeguarding procedures.
- We will disclose information if we are required to do so by law, such as a court order.

On occasion, we may need to seek the advice of professionals such as our lawyers about specific issues arise or IT consultants to assist in the management of our computer systems. for the purposes of managing our organisation.

We only share the minimum amount of information necessary for the purposes above.

Communicating with you outside of a meeting room

We may also use on-line services to provide you with counselling and support when it is not possible to arrange a meeting in person. For example, we may use Zoom / Skype for Business / RingCentral. We may also ask for your telephone number and email address and use them to communicate with you when necessary by telephone, email or instant messaging services for the purposes of providing you with our services.

Where we use on-line meeting services, you may be able to join the on-line meetings without creating an account. If you wish to create a user account, you may be required to provide your name and contact details for the purposes of setting up a user profile and using this service. As a user, the on-line service will keep information about you such as your account settings, contact details, user preferences, technical information, metadata and approximate location.

Any on-line meeting or messaging service may keep the contents of any on-line chat or messages, or voice mail messages. However, we will not enable the recording or transcription of the content of any meeting with you without your specific agreement.

Where we are not able to meet with you in person, we will take appropriate steps to ensure that any on-line meeting or other communication with you is secure and confidential. We will rely upon you to comply with the guidance we provide for this reason.

How long we keep your information

We hold your information for a period of seven years after the end of our last meeting or until your 21st birthday, whichever is later, unless there is a specific reason why it is necessary to keep your information for longer. This may be because we believe that there is a risk of harm to you or someone else or there is the possibility of legal proceedings.

How we protect personal information

We make sure that your information is stored securely. When we do need to share your information for any of the reasons above, this is done securely.

Transferring your personal information outside of the European Union

If we communicate with you by on-line meeting services (such as Zoom / Skype for Business / RingCentral) or on-line messaging services, your data may be stored by these services somewhere other than the European Union. As data protection standards are lower in some countries than within the European Union, we will ensure that protections are put in place to keep your personal information safe. For example, Zoom / Skype for Business / RingCentral are members of the US Privacy Shield programme.

Your information rights

You have the right to:

- **Request access to your personal information.** You can request a copy of your personal information that we hold and information about how we use your information.
- **Request correction of the personal information** that we hold about you.
- **Request deletion of your personal information** where there is no good reason for us continuing to use it.
- **Object to processing of personal information** where you feel the impact upon your rights outweighs our interests in using this information.
- **Request restriction of processing of your personal information.** You can ask me to stop using your information for specific reasons.

These rights belong to you. Your parents or those with parental authority are not able to exercise these rights on your behalf without your specific authority. Where you have provided your authority for us to share your confidential information with your parents, we may decide not to do so if this is not within your best interests. We would always seek to discuss this issue with you first before making a decision.

These rights are limited and subject to various legal exceptions. If you make any of the requests above, we would explain to you in our response if we relied upon any of these exceptions.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO) if you are concerned about the way in which we use your information. Full details can be found on the ICO's website www.ico.org.uk. If you have any concerns, we would be grateful for a chance to deal with these before you approach the ICO.

Changes to this privacy notice

We keep this privacy notice under regular review. This privacy notice was last updated on 21st April 2020.