

# COUNSELLING PRIVACY NOTICE

## Who are we?

We are a registered charity in England and Wales (charity number 900308, company number 2431825). We are committed to protecting your personal information and ensuring it is processed in a fair manner.

We are a data controller for the purpose of the Data Protection Act 1998 and the EU General Data Protection Regulations 2018. This means that we are responsible for the controlling and processing of your personal information.

## How we collect information about you

We collect information from you in the following ways:

When you communicate directly with us; this could be if you ask us about our services, refer yourself to one of our services or access one of our services.

You may interact with us through third parties: This could include if you have a referral from a professional (e.g. GP or social worker), if you have a referral from your local Single Point of Access or if you have a referral from other local gateway services.

## Information we collect

Information we collect includes information such as your date of birth, email address, telephone number and postal address.

We also process the following special categories of sensitive personal data:

- Information about your physical and mental health that may include medical records, details about your physical and mental functioning, diseases and disabilities, NHS Number
- Other sensitive data including ethnicity, sexual orientations, gender and information about criminal offences.

## How we use your data

We may process your data as necessary for the management of the service you are accessing, including:

- to provide the service that you have requested
- to keep a record of your relationship with us
- to share information with other professionals or organisations that are involved or responsible for your care.

As necessary to protect your vital interest or those of another person, including:

- where there are safeguarding concerns

As necessary to comply with our legal obligations:

- to respond to your request in connection with your rights under Data Protection Laws
- to comply with our legal and regulatory requirements (including NHS requirements) and related disclosures

- in connection with the prevention, detection and investigation of crime

## **Do we need consent to process your personal data?**

Sometimes we will only use your personal data when we have your consent or because we need to use it in order for you to access our services.

There are lawful purposes that allow us to process your personal data and these include:

- When we are processing your data for the provision of healthcare
- When Step by Step has a legitimate interest to process your personal data

## **Information Sharing**

The personal information we collect about you will be mainly used by Step by Step so we can support you. Your information will not be shared with other organisations so they can contact you for marketing purposes.

Step by Step may share your information with other trusted partners (including NHS organisations, GPs and Local Authorities) when delivering support to you.

We may disclose your information if required by law to comply with applicable laws, regulations, codes of practice or in response to a valid request from a competent authority.

## **Individual rights**

GDPR Law outlines your rights with your personal information:

1. The right to be informed

This means that you have the right to be informed about the collection and use of information about you.

2. The right of access

You can request to access your personal data. You can make this request verbally or in writing. At Step by Step we are required to respond to your request within one month. You have the right to obtain confirmation that your personal data is being processed, a copy of your personal data and other information including the purpose of processing and categories of personal data.

3. The right of rectification

This includes your right to have inaccurate personal data amended or completed. This request can be made verbally or in writing. Step by Step have one month to respond to your request.

4. The right to erasure

You have the right for your personal data to be deleted. This right only applies in certain circumstances, including; if your personal data is no longer required to meet the purpose it was originally collected, if consent is withdrawn, if there is no legitimate interest or legal requirement to process your data.

5. The right to restrict processing

You can ask us to restrict personal information we have about you. This means that you can ask us to use your data in certain ways or have it erased when you object to our use of it. You are only able to restrict the use of data in certain circumstances.

## 6. The right to data portability

Data portability allows you to obtain and use your data for your own purposes. This means you can ask us to provide your personal data to you or a third party in a secure, transferable and commonly used format.

## 7. The right to object

You can object to our processing of your data in certain circumstances. You can object if your data is being processed for a public interest, your legitimate interest or the interests of an official authority.

## Data Anonymisation

Your data may be converted into anonymised or aggregated data which cannot be used to identify you. This data will be used by us to meet our aims, improve our services and provide statistical research.

We are also required to provide information about who uses our services and out outcomes to NHS Digital. The information that we provide to NHS Digital does not contain your name and reports that are produced by NHS Digital do not include any details that can identify you.

## Children

We take extra care to protect the privacy of children and young people under that age of 18. We have created an easy read privacy notice specifically for children and young people.

If you are a parent or guardian and would like to exercise any of your child's data protection rights please contact us using the details provided.

## How long will we keep your personal information?

We only keep your information as is reasonable and necessary for the relevant activity. Generally we retain personal information about people accessing our service for 25 years.

After the retention period has expired we will be confidentially disposing of your personal information or permanently deleted.

## Changes to our privacy policy

We conduct regular reviews of our privacy policy and we will keep our updated policy in an easily accessible place.

## Contact us

If you have any questions, concerns or complains about our policy or if you would like to make a request in relation to your rights, you can contact us in the following ways:

By Email: [info@stepbystep.org.uk](mailto:info@stepbystep.org.uk)

By Telephone: 01252 346100

By Post:

DPO  
Step by Step  
36 Crimea Road

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