



2Rivers Counselling Collective **Privacy Policy**

This Privacy Notice sets out details of the information that 2Rivers Counselling Collective and the therapists responsible for your therapy sessions may collect from you and how that information may be used. Please take your time to read this Privacy Notice carefully

This Privacy Notice:

- provides you with a detailed overview of how we will manage your data, from the point at which it is gathered and onwards.
- will give you all the details you need about how we use your information, and how we will comply with the law in doing so.
- will clarify that we do not use your information for marketing purposes or marketing materials.
- sets out your rights in respect of your personal information and how to exercise them. You can, for instance, seek access to your personal information, object to us using your information and request rectification of any information which you believe is inaccurate.

We are also open to improvement; if you have any feedback on this notice please contact us via; www.2riverscounselling.com

About us

In this Privacy Notice we use “**we**” or “**us**” or “**our**” or “**2Rivers Counselling Collective**” to refer to the 2Rivers Counselling Collective who is using your personal information, and the therapists who provide your therapy sessions. We will advise you in our direct communications with you of the specific therapist within the 2Rivers Counselling Collective who is making decisions about the use of your personal information.

Your personal data and therapists

As a potential or current client of 2Rivers Counselling Collective, your counselling or other related services will be provided by a therapist.



Those therapists make decisions about what information is collected about you and may maintain their own set of clinical records in relation to the service that they provide to you. They are a Data Controller in respect of your personal information which they hold within those records, meaning that they must comply with the data protection legislation and relevant guidance when handling your personal information. To the extent relevant to their practice, you can expect therapists (including their secretaries) to handle your information in line with this Privacy Notice. This includes using your personal information as set out in more detail below.

Therapists who work with 2Rivers Counselling Collective are expected to handle your personal data in accordance with the principles set out within this Privacy Notice. This means that whenever they use your personal data, they will only do so as set out in this Privacy Notice.

Therapists who work with 2Rivers Counselling Collective may process or store your personal information at a non-2Rivers Counselling Collective site.

If you have any concerns about the way your therapist has handled your personal information please contact us via our 2Rivers e mail address info@2riverscounselling.com

What personal information do we collect and use from our clients?

The personal information that we collect will depend on your relationship with us.

We may use “special categories of personal information” (otherwise known as “special categories of data”) about you, such as information relating to your physical and mental health.

If you provide personal information to us about other individuals (including medical or financial information) you should inform the individual about the contents of this Privacy Notice. We will process such information in accordance with this Privacy Notice.

In addition, you should note that in the event you amend data which we already hold about you (for instance, your address) then we will update our systems to reflect the amendments. Our systems will continue to store historical data.

Personal information

As a client of 2Rivers Counselling Collective the personal information we hold about you may include the following:

- Name
- Contact details, such as postal address, email address and telephone number (including mobile number)
- Financial information, such as credit card details used to pay us
- Occupation
- Emergency contact details, including next of kin
- Background referral details

Special Categories personal information

As a client of the 2Rivers Counselling Collective, we will hold information relating to your therapeutic treatment which is known as a special category of personal data under the law, meaning that it must be handled even more sensitively. The special categories of personal information we hold about you may include the following

- Details of your current or former physical or mental health. This **may** include information about any therapeutic care you have received (both from the 2Rivers Counselling Collective directly and other therapeutic care providers such as GPs, psychiatrists or hospitals (private and/or NHS)) or need, including about clinic and hospital visits and medicines administered. We provide further details below on the manner in which we handle such information.
- Details of services you have received from us
- Details of your nationality, race and/or ethnicity
- Details of your religion
- Data concerning your sex life and/or sexual orientation
- Family details
- Details of previous therapy
- Medication taken
- GP details
- Date of birth
- Short- and long-term goals

The confidentiality of your medical information is important to 2Rivers Counselling Collective. We make every effort to prevent unauthorised

access to and use of information relating to your current or former physical and mental health. In doing so, 2Rivers Counselling Collective complies with the EU General Data Protection Regulations (GDPR) which came into effect on the 25th May 2018 and whereby enforced by the Information Commission's Office (ICO) and all applicable professional bodies associated to the work we carry out namely the British Association Of Counsellors and Psychotherapists (BACP)

How do we collect your information?

With your permission we may collect personal information from a number of different sources including, but not limited to:

- GPs
- Psychiatrists
- Other counselling and psychotherapy practices, both NHS and private
- Mental health providers
- Commissioners of therapeutic care services
- Therapists (including their secretaries)
- The client's employers

Directly from you

Information may be collected directly from you when:

- You enter into a Therapy Agreement with your individual therapist at 2Rivers Counselling Collective for the provision of therapeutic services
- You use those services
- You complete enquiry/contact forms on the 2Rivers Counselling Collective website
- You submit a query to us including through our website or by email or text
- You correspond with us by letter, email, telephone, including where you reference 2Rivers Counselling Collective in a public social media post

From other therapeutic care organisations

Our clients can sometimes receive therapeutic care from other organisations in addition to 2Rivers Counselling Collective, in order to provide you with the best treatment possible we may seek permission from you to collect personal information about you from other organisations. These may include:

- Medical records from your GP
- Medical records from another therapist (including their secretaries)
- Medical records from the NHS or any private therapeutic care organisation. Medical records may include information about your diagnosis, clinic and hospital visits and medicines administered.

From third parties

As detailed in the previous section, it is sometimes necessary to seek information from other therapeutic care organisations with your consent. We may collect information about you from third parties when:

- You are referred to us for the provision of services by a third party
- We liaise with your current or former employer, health professional or other treatment or benefit provider
- We liaise with your family
- We liaise with your insurance policy provider
- We deal with experts (including medical experts) and other service providers about services you have received or are receiving from us
- We deal with NHS health service bodies about services you have received or are receiving from us
- Website – when visitors visit www.2riverscounselling.com and leave details on the Contact Form, we collect the data shown on the form and also the visitor's IP address and browser user agent string to help spam detection.

Cookies

If you leave a comment on our website, you may opt-in to saving your name, email address and website in cookies. These are for your

convenience so that you do not have to fill in your details again when you leave another comment. These cookies will last for one year.

How will we communicate with you?

In order to communicate with you, we are likely to do this by telephone, SMS, email, and/or post. If we contact you using the telephone number(s) which you have provided (landline and/or mobile), and you are not available which results in the call being directed to a voicemail and/or answering service, we may leave a voice message on your voicemail and/or answering service as appropriate unless you have specifically asked us not to.

However:

- to ensure that we provide you with timely updates and reminders in relation to your therapeutic care (including basic administration information and appointment information (including reminders)), we may communicate with you by SMS and/or unencrypted email (where you have provided us with your email address) in each case where you have expressed a preference in the client registration form to be contacted by SMS and/or email.
- to provide you with your therapeutic information and/or invoicing information, we may communicate with you by email (which will be encrypted) where you have provided us with your email address and have expressed a preference in the client registration form to be contacted by email. The first time we send you any important encrypted email eg one that we are not also sending by post or which requires action to be taken, we will endeavour to contact you separately to ensure that you are able to access the encrypted email you are sent.
- If we have your mobile number or your email address, we may use this method of communication to contact you regarding client surveys which are for the purpose of improving our service or monitoring outcomes and are not a form of marketing.

Please note that although providing your mobile number and email address and stating a preference to be communicated with via a particular method will be taken as an affirmative confirmation that you are happy for us to contact you in that manner, we are not relying on

your consent to process your personal data in order to correspond with you about your treatment. As set out further below, processing your personal data for those purposes is justified on the basis that it is necessary to provide you with therapeutic care services.

What are the purposes for which your information is used?

We may ‘process’ your information for a number of different purposes, which is essentially the language used by the law to mean using your data. Each time we use your data we must have a legal justification to do so. The particular justification will depend on the purpose of the proposed use of your data. When the information that we process is classed as “special category of personal information”, we must have a specific additional legal justification in order to use it as proposed.

Generally, we will rely on the following legal justifications, or ‘grounds’:

- Taking steps at your request so that you can enter into a contract with a therapist at 2Rivers Counselling Collective and receive therapeutic services from us.
- For the purposes of providing, you with therapy pursuant to a contract between you and your therapist at 2Rivers Counselling Collective. We will rely on this for activities such as supporting your treatment or care and other benefits, supporting your doctor, nurse, carer or other therapeutic care professional and providing other services to you.
- We have an appropriate business need to process your personal information and such business need does not cause harm to you. We will rely on this for activities such as quality assurance, maintaining our business records, developing and improving our products and services and monitoring outcomes.
- We have a legal or regulatory obligation to use such personal information.
- We need to use such personal information to establish, exercise or defend our legal rights.
- You have provided your consent to our use of your personal information.

Note that failure to provide your information further to a contractual requirement with us or a therapist may mean that we are unable to set

you up as a client or facilitate the provision of services on the 2Rivers Counselling Collective's systems.

We provide further detail on these grounds in the sections below.

Appropriate business needs

One legal ground for processing personal data is where we do this in pursuit of legitimate interests and those interests are not overridden by your privacy rights. Where we refer to use for our appropriate business needs, we are relying on this legal ground.

Special categories of personal information include information about your:

- Health
- Sex life
- Sexual orientation
- Ethnicity
- Political opinions
- Religious or philosophical beliefs
- Genetic or biometric information

The right to object to other uses of your personal data

You have a range of rights in respect of your personal data, as set out in detail in the section entitled "Your rights". This includes the right to object to 2Rivers Counselling Collective using your personal information in a particular way (such as sharing that information with third parties), and we must stop using it in that way unless specific exceptions apply. This includes, for example, if it is necessary to defend a legal claim brought against us, or it is otherwise necessary for the purposes of your ongoing treatment.

You will find details of our legal grounds for each of our processing purposes below. We have set out individually those purposes for which we will use your personal information, and under each one we set out the legal justifications, or grounds, which allow us to do so. You will note that we have set out a legal ground, as well as an 'additional' legal ground for special categories of personal information. This is because we have to demonstrate additional legal grounds where we are using information which relates to a



person's therapeutic care, as we will be the majority of the times we use your personal information.

Purpose 1: To set you up as a client on 2Rivers Counselling Collective's systems

Legal ground: Taking the necessary steps so that you can enter into a contract with us for the delivery of therapeutic care.

Additional legal ground for special categories of personal information: The use is necessary for reasons of substantial public interest.

Purpose 2: To provide you with therapeutic treatment and related services

The reason you come to us is to provide you with therapeutic treatment, and so we have to use your personal information for that.

Legal grounds:

- Providing you with therapeutic treatment and related services
- Fulfilling our contract with you for the delivery of therapeutic treatment

Additional legal grounds for special categories of personal information:

- We need to use the data in order to provide therapeutic treatment services to you
- The use is necessary to protect your vital interests where you are physically or legally incapable of giving consent

Purpose 3: For account settlement purposes

We will use your personal information in order to ensure that your account and billing is fully accurate and up-to-date

Legal grounds:

- Our providing you therapeutic treatment and other related services
- Fulfilling our contract with you for the delivery of therapeutic treatment
- Our having an appropriate business need to use your information which does not overly prejudice you

Additional legal grounds for special categories of personal information:

- We need to use the data in order to provide therapeutic services to you
- The use is necessary in order for us to establish, exercise or defend our legal rights

Purpose 4: Communicating with you and resolving any queries or complaints that you might have.

From time to time, clients may raise queries, or even complaints, with 2Rivers Counselling Collective and we take those communications very seriously. It is important that we resolve such matters fully and properly, and so we will need to use your personal information in order to do so.

Legal grounds:

- Our providing you with therapeutic treatment and other related services
- Our having an appropriate business need to use your information which does not overly prejudice you

Additional legal grounds for special categories of personal information:

- The use is necessary for the provision of therapeutic services or treatment pursuant to a contract with a health professional
- The use is necessary in order for us to establish, exercise or defend our legal rights

Purpose 5: Communicating with any other individual that you ask us to update about your treatment and updating other therapeutic care professionals about your treatment.

In addition, other therapeutic care professionals or organisations may need to know about your treatment in order for them to provide you with safe and effective care, and so we may need to share your personal information with them. Further details on the third parties who may need access to your information is set out in purpose 8 below.

Legal grounds:

- Our providing you with therapeutic care and other related services
- We have a legitimate interest in ensuring that other therapeutic care professionals who are routinely involved in your care have a full picture of your treatment

Additional legal ground for special categories of personal information:

- We need to use the data in order to provide therapeutic services to you
- The use is necessary for reasons of substantial public interest under UK law
- The use is necessary in order for us to establish, exercise or defend our legal rights

Purpose 6: Complying with our legal or regulatory obligations, and defending or exercising our legal rights

As a provider of therapeutic services, we are subject to a wide range of legal and regulatory responsibilities which it is not possible to list fully here. We may be required by law or by regulators to provide personal information, and in which case we will have a legal responsibility to do so. From time to time, 2Rivers Counselling Collective and its therapists may be the subject of legal actions or complaints. In order to fully investigate and respond to those actions, it is necessary to access your personal information (although only to the extent that it is necessary and relevant to the subject-matter).

Legal grounds:

- The use is necessary in order for us to comply with our legal obligations

Additional legal ground for special categories of personal information:

- We need to use the data in order for others to provide informed therapeutic care services to you

- The use is necessary for reasons of the provision of health or social care or treatment or the management of health or social care systems
- The use is necessary for establishing, exercising or defending legal claim

Purpose 7: Managing our business operations such as maintaining accounting records, analysis of financial results, internal audit requirements, receiving professional advice (eg tax or legal advice)

In order to do this, we will not need to use your special categories of personal information and so we have not identified the additional ground to use your information for this purpose.

Legal grounds:

- Our having an appropriate business need to use your information which does not overly prejudice you

Purpose 8: Provide marketing information to you (including information about other products and services offered by selected third party partners) in accordance with preferences you have expressed in discussion with your therapist

As a business, we need to carry out marketing but we are mindful of your rights and expectations in that regard. As a result, we will only provide you with marketing which is relevant to our business and only where you have specifically confirmed your consent to do so.

Legal grounds:

- Our having an appropriate business need to use your information which does not overly prejudice you
- You have provided your consent

Who do we share your information with?

From time to time, we may share your personal information within our group of therapists or with third parties.

Disclosures within the 2Rivers Counselling Collective group of therapists

We may share your personal information with other therapists in the 2Rivers Counselling Collective. This might be because we need to share information relating to your treatment within the Practice.

Disclosures to third parties:

We may disclose your information to the third parties listed below for the purposes described in this Privacy Notice. This might include:

- A doctor, psychiatrist, nurse, carer or any other therapeutic care professional involved in your treatment
- Other members of support staff involved in the delivery of your care, like receptionists and secretaries
- Anyone that you ask us to communicate with or provide as an emergency contact, for example your next of kin or carer
- NHS organisations
- Other private sector therapeutic care providers
- Your GP
- Your therapist (including their secretaries)
- Third parties who assist in the administration of your therapeutic care, such as insurance companies
- Government bodies, including the Ministry of Defence, the Home Office and HMRC
- Our professional bodies such as BACP, UKCP, NCS, NHS, GHR.
- The police and other third parties where reasonably necessary for the prevention or detection of crime
- Our insurers
- Our third party services providers such as IT suppliers, accountants, lawyers, document management providers and tax advisers
- Selected third parties in connection with any sale, transfer or disposal of our business

We may communicate with these third parties in a variety of ways including, but not limited to, email, post, and telephone.



Under no circumstances will your personal information be used for marketing purposes or marketing materials.

How long do we keep information for?

We will only keep your personal information for as long as reasonably necessary to fulfil the relevant purposes set out in this Privacy Notice and in order to comply with our legal and regulatory obligations. If you would like further information regarding the periods for which your personal information will be stored, please contact us via our 2Rivers email address info@2riverscounselling.com

Your Rights

Under data protection law you have certain rights in relation to the personal information that we hold about you. These include rights to know what information we hold about you and how it is used. You may exercise these rights at any time by contacting us using the details set out above. There will not usually be a charge for handling a request to exercise your rights. If we cannot comply with your request to exercise your rights, we will usually tell you why.

There are some special rules about how these rights apply to health information as set out in legislation including the Data Protection Act (current and future), the General Data Protection Regulation as well as any secondary legislation which regulates the use of personal information.

If you make a large number of requests or it is clear that it is not reasonable for us to comply with a request, then we do not have to respond. Alternatively, we can make a charge for responding.

Your rights include:

The right to access your personal information;

You are usually entitled to a copy of the personal information we hold about you and details about how we use it.

Your information will usually be provided to you in writing, unless otherwise requested. If you have made the request electronically (e.g. by email) the information will be provided to you by electronic means where possible.

Please note that in some cases we may not be able to fully comply with your request, for example if your request involves the personal data of another person and it would not be fair to that person to provide it to you.

You are entitled to the following under data protection law.

Under Article 15(1) of the GDPR we must usually confirm whether we have personal information about you. If we do hold personal information about you we usually need to explain to you:

- The purposes for which we use your personal information
- The types of personal information we hold about you
- Who your personal information has been or will be shared with, including in particular organisations based outside the EEA.
- If your personal information leaves the EU, how we make sure that it is protected.
- Where possible, the length of time we expect to hold your personal information. If that is not possible, the criteria we use to determine how long we hold your information for.
- If the personal data we hold about you was not provided by you, details of the source of the information.
- Whether we make any decisions about you solely by computer and if so, details of how those decision are made and the impact they may have on you.
- Your right to ask us to amend or delete your personal information.
- Your right to ask us to restrict how your personal information is used or to object to our use of your personal information.
- Your right to complain to the Information Commissioner's Office.

We also need to provide you with a copy of your personal data.

The right to rectification

We take reasonable steps to ensure that the information we hold about you is accurate and complete. However, if you do not believe this is the case, you can ask us to update or amend it.

The right to erasure (also known as the right to be forgotten)

In some circumstances, you have the right to request that we delete the personal information we hold about you. However, there are exceptions to this right and in certain circumstances we can refuse to delete the information in question. In particular, and for example, we do not have to comply with your request if it is necessary to keep your information in order to perform tasks which are in the public interest, including public health, or for the purposes of establishing, exercise or defending legal claims.

The right to restriction of processing

In some circumstances, we must “pause” our use of your personal data if you ask us to. We do not have to comply with all requests to restrict our use of your personal information. In particular, for example, we do not have to comply with your request if it is necessary to keep your information in order to perform tasks which are in the public interest, including public health, or for the purposes of establishing, exercise or defending legal claims.

The right to data portability

In some circumstances, we must transfer personal information that you have provided to us to you or (if this is technically feasible) another individual/ organisation of your choice. The information must be transferred in an electronic format.

The right to withdraw consent

In some cases, we need your consent in order for our use of your personal information to comply with data protection legislation.



We have explained in the section entitled “What are the purposes for which your information is used?” where we rely on your consent in this way. Where we do this, you have the right to withdraw your consent to further use of your personal information. You can do this by contacting us via the 2Rivers Counselling email address info@2riverscounselling.com

The right to complain to the Information Commissioner’s Office

You can complain to the Information Commissioner’s Office if you are unhappy with the way that we have dealt with a request from you to exercise any of these rights, or if you think we have not complied with our legal obligations.

More information can be found on the Information Commissioner’s Office website: <https://ico.org.uk/>

Making a complaint will not affect any other legal rights or remedies that you have.

Updates to this Privacy Notice

We may update this Privacy Notice from time to time to ensure that it remains accurate. In the event that these changes result in any material difference to the manner in which we process your personal data then an updated copy of the Policy will be listed on the 2Rivers Counselling Collective website. The most up-to-date version can always be found at: www.2riverscounselling.com.

In the event that there are any material changes to the manner in which your personal information is to be used then we will provide you with an updated copy of this Privacy Notice.

This Privacy Notice was last updated on 01/10/2024.