

1. Information we collect

In order to provide our services and for the other purposes set out in use of information below, we collect and process personal data from the users of our service. We may collect the following information:

- Personal information (e.g. your name; email address; mailing address; phone numbers; date of birth)
- Sensitive personal data
- Attendance information (such as attended, absences and absence reasons)
- Safeguarding incidents

From time to time and as permitted by applicable law(s), we may collect personal data about you and update any existing personal data we currently hold from other third-party sources

2. How we collect information

We collect information from:

- Self-referral discussions and / or completion of enquiry forms by clients
- Referrals from referring and other involved organisations where this is relevant

We may also collect information from:

- Telephone conversations
- Emails
- Written and verbal communications
- Attendance records

3. How we use information

Your Personal Data may be used in the following ways:

- To provide our services to you
- To respond to your requests and inquiries
- To improve our services
- To let you know that we are conducting a survey of clients' experiences of our service provision to enable us to improve our services so that you can participate if you wish to do so
- To comply with applicable law(s) (for example, to comply with a search warrant or court order) or to carry out professional ethics/conduct investigations,
- To enable us to maintain our own accounts and records and to support and manage our employees

4. Consent and lawful processing of data

Our legitimate interests which include processing such personal data for the purposes of:

- Providing and enhancing the provision of our services
- Administration and programme delivery
- Dealing with medical needs [any information you provide we must have had explicit consent to use]
- All other cases that are necessary for our legitimate interests which are to run a counselling and psychotherapy service

5. How long will we keep your information?

Psychological therapy records will be securely disposed of after the close of the service provided unless safeguarding or child protection issues are present.

6. Sharing and disclosure to third parties

We may disclose your personal data to third parties from time-to-time under the following circumstances:

- You request or authorise the disclosure of your personal details to a third party
- The information is disclosed as permitted by applicable law(s) and / or in order to comply with applicable law(s) (e.g. to comply with a search warrant or court order)
- The information is provided to service providers who perform functions on our behalf (if this is the case your written permission will first be required)
- Hosting providers for the secure storage and transmission of your data (this applies only to our email system)
- Legal and compliance consultants such as external counsel or external auditors
- Technology providers who assist in the development and management of our web properties (this applies only to improving our email system)

7. Subject access / user rights

As a user, you are subject to the following rights:

- To be informed of the use of your personal data
- To access and / or to require the correction or erasure of your personal data
- To block and / or object to the processing of your personal data
- To not be subject to any decision based solely on automated processing of your personal data
- In limited circumstances you may have the right to receive personal data in a format which may be transmitted to another entity

8. Complaints

If you have a complaint in relation to the processing of your data carried out under this Privacy Policy you have the right to lodge a complaint with the Information Commissioner Office.

You may seek to exercise any of these rights by updating your information online (where possible) or by sending a written request to Christine De Ionno, Director, CA Counselling Associates (Trading as Cassel Associates), International House, 64 Nile Street, London N1 7SR or by emailing christine@casselassociates.org

9. Information security

We are working to protect your personal information that we hold, its confidentiality, integrity and availability.

- We review our information collection, storage and processing practices, including physical security measures, to guard against unauthorised access to systems
- We restrict access to personal information to Cassel Associates workers subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations
- We have Security Information Policy in place which defines the measures we take to protect your personal information
- We use a combination of technology and procedures to ensure our systems are protected, monitored and are recoverable
- We use third party service providers only where we are satisfied they provide adequate security for your personal data

10. Compliance and cooperation with regulatory authorities

We regularly review our compliance with our Privacy Policy.

If we receive formal written complaints, we will contact the person who made the complaint to follow up.

We will work with the ICO to resolve any complaints regarding the transfer of personal data that we cannot resolve with our users directly.

11. Changes to the Privacy Policy

Our Privacy Policy may change from time to time.

We will not reduce your rights under this Privacy Policy without your explicit consent.

HOW TO CONTACT US

Address	CA Counselling Associates Ltd, International House, 64 Nile Street, London N1 7SR
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Email	Generic counselling service:	christine@casselassociates.org
	School and outreach projects:	projectmanager@casselassociates.org

KEY DATES

Review date	01 May 2022
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