* **Broadway Counselling Services**

**Privacy Policy**

1. Introduction

Broadway is committed to protecting and respecting individuals’ privacy. This policy explains how Broadway processes the personal data we receive from individuals and organisations. By engaging with Broadway, you agree to the terms of this policy.

Broadway provides services to adults, children and vulnerable adults. If you are under the age of 18 years, you should speak to a caregiver before sending us any personal data.

2. Legal status

Broadway Counselling Services is a Sole Trader. Following the BACP ethical framework and General Data Protections Regulations (2018).

3. Scope

This policy applies to all personal data processed by Broadway Counselling Services.

We make content available through social media channels. Counselling sessions and online meetings may be conducted using third-party systems, such as Microsoft Teams and Zoom. For a complete list of the systems we use, please contact us.

4. Principles

Broadway only processes the minimum amount of personal data necessary for service delivery, professional practice, and organisational management, in accordance with data protection legislation. Our Information Governance framework of policies explains how personal data is protected and how long it is kept before being destroyed.

5. Legal bases for processing personal data

All personal data processed by Broadway is collected under at least one of the Data Protection Act 2018’s lawful bases. We use the following lawful bases:

**Consent**
You have given informed consent for Broadway to process your personal data for a specific purpose.

Processing your personal data is necessary for Broadway to ensure safety and put safeguarding measures in place.
Processing your personal data is necessary for Broadway to protect someone’s life. For example, contacting emergency services in exceptional circumstances when staff consider there will be a risk of serious harm to self or another person.

6. Collecting personal data

You may choose to provide your personal data to Broadway via our websites; social media; email; referral and application forms; written correspondence; voice calls; online meetings; and face-to-face conversations.

You provide personal data when you:

• contact us about services
• apply to work or volunteer with us
• enquire about training
• order products and services

* participate in research or contact us for other reasons

Email is not considered a secure communication channel and we recommend you do not send us sensitive personal data by email, unless it has been encrypted.

7. Collecting sensitive personal data

Broadway may collect your name, address, email address, date of birth, phone number and other personal data you provide voluntarily. In certain circumstances, Broadway will be legally obligated to collect and process special category data, in order to protect vulnerable adults and children.

8. Using personal data

Broadway may process your personal data to:

* provide and/or link you with services
* notify you of service changes
* send you information about our services
* seek your views about our services and wider mental health topics
* process applications for paid and voluntary work
* perform contracts
* comply with legal requirements
* record unacceptable actions
* keep a record of our relationship with you

9. Storing personal data

Personal data is kept in secure personal files or IT systems. Disclosure information is held securely in lockable, non-portable containers, according to the Secure Handling, Use, in compliance with GDRP Policy.

10. Protecting personal data

Broadway adopts measures to protect personal data:

* staff, counsellors in training and counsellors receive data protection training
* data protection and records management policies are enforced
* special category data can only be accessed by nominated staff

In the unlikely event of a serious data breach, staff are expected to follow the Data Breach procedure.

11. Retaining personal data

Broadway keeps your personal data in accordance with our Information GDPR. In most cases, this is for no longer than is necessary for the purpose(s) it was collected. You can choose to withdraw your consent at any time, but Broadway may need to retain some personal data for legal, contractual or regulatory reasons.

12. Sharing personal data

Broadway will never sell personal data. All personal information given to us is kept within Broadway and not given to any third-party.

13. Access to personal data

Individuals have the right to request a copy of their personal data, this includes assessment forms and counsellor notes. If you would like a copy of some or all your personal data, please email us.

15. How to complain

If you are unsatisfied with how we have used your personal data, we want to hear from you. Please email Kate, within our administrative team at kate@broadwaycounsellingservices.com

If you remain unsatisfied with our response, you can also complain to the Information Commissioner’s Office (ICO) at:

Information Commissioner’s Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Website: [https://ico.org.uk](https://ico.org.uk/)
Telephone: 0303 123 1113