**DATA PROTECTION**

This policy is intended to clarify under the General Data Protection Regulation (GDPR) all aspects regarding the collection, protection, and retention of all data provided by you as client to me as Psychotherapist and Counsellor for individuals and couples/partnerships. I am regarded as both a Data Controller and Data Processor as I gather, store and process data in my work as Psychotherapist and Counsellor.

1. **Data Held**

At commencement of a contract, new clients will be asked for relevant personal data including name, address, contact phone number, contact email address, GP and emergency contact names and phone numbers, counselling history and any current medications. This data will be held by me in paper form in a locked filing cabinet.

Personal data also includes anonymised session notes that I will maintain separately to the above, in a locked filing cabinet. These brief notes are for the express purpose of reflecting on and developing the therapeutic process and to serve as a memory aid of the themes that are important and recurring.

This data will not be shared with any other party without explicit consent, unless there is a legal requirement or court order to do so (e.g. issues of child sexual abuse), or where there is immediate risk of substantial harm to a client or to others.

1. **Data Retention**

I will keep personal data for no longer than is necessary following the cessation of therapy. Data records will be retained in accordance with the guidelines of my professional association and in line with the requirements of my professional insurance provider. Any records will then be securely shredded. Data will be held for longer if there is an ongoing or pending court case or complaint. I do not write reports for the legal profession. However, following a solicitor’s request, I will confirm dates of sessions attended, upon receipt of the client’s written permission.

1. **Electronic Data Records**

Any emails or text messages received by me (either through my private email account or through a website are password protected. In the event of these communications being relevant to therapy, they will be printed off and stored with session notes, with any identifiable names, address, or contact details being redacted.

1. **Access to Personal Data**

Clients have the right to access their data records via a Subject Access Request (SAR). This access will be arranged within 30 days. Clients may request the updating or correction of data held. Clients may request the return, copy or deletion of their data. This is subject to legal requirements that I must hold data for a minimum of 7 years. Clients may also request that their data is sent to another data controller in suitable electronic format.

1. **Data Breaches**

I will notify any affected party of any serious breach of any of identifiable data. This would include incidents such as theft, loss, fire, or unauthorised access by another person. The Data Protection Commission will be notified of a serious breach of data.