



Data Protection & Confidentiality Statement

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Next Review:

Your Privacy Matters

Your privacy is a fundamental part of our counselling relationship. MVCC are committed to protecting your personal data and processing it in a fair, transparent, and secure manner. This statement explains what data we collect about you, how we use and store it, and your rights pertaining to it.

As your counsellor, we, [Nicola Merrigan / Jaki North], are both Data Controllers for the personal information you provide. We are both registered with the Information Commissioner's Office (ICO), registration number [ICO Registration No 1/ICO Registration No 2].

What Information do MVCC Collect?

When you begin counselling, we collect the following information:

- **Personal Details:** Your name, date of birth, and contact details (email address, mobile number, and home address).
- **Emergency Contact:** The name and contact details of an emergency contact person (This will only be used in a genuine emergency).
- **GP Details:** Your doctor's name and surgery contact information.
- **Session Notes:**
 - As counselling involves discussing your health and personal life, we will also be processing **Special Category Data** (sensitive health information) as part of our sessions. Your agreement to counselling is your consent for us to process this data.
 - We keep brief, anonymised notes after each session. These are for professional use to help us keep track of our work together. They are kept separate from your personal details.

How do we Store your Information?

We take data security very seriously.

- **Digital Data:** Your personal contact details, emails, and any other digital correspondence are stored in a password-protected document on Microsoft SharePoint (cloud-based, encrypted storage). Our phones are secured with PINs.
- **Paper Records:** Any paper notes [e.g., our signed contract and any other forms] are scanned, password-protected and stored on SharePoint. The paper copy will be securely destroyed using a shredder.
- **Anonymisation:** To protect your identity, your session notes are anonymised (using a code) and stored separately from your personal contact details.

Why we Collect this Information

We collect and process your data for the following reasons::

- 1. To Fulfil Our Contract:** We need your personal details to manage appointments (e.g., send reminders) and contact you. This is necessary to provide the counselling service we have agreed to.
- 2. To Provide Therapy:**
 - We keep brief, factual notes for each therapy session under a client code. These notes include an attendance record.
 - We discuss our work with a **Clinical Supervisor** on a monthly basis. This is a standard requirement for registered counsellors to ensure ethical and professional practice. All discussions are anonymised (using your initials only).
- 3. To Protect Your Vital Interests:** We may use your information to contact your GP or emergency contact if we believe you are at serious risk of harm to yourself or others, and you are unable to provide consent.
- 4. With Your Explicit Consent:** For processing your sensitive health data (Special Category Data). Your signed counselling contract confirms your explicit consent for us to collect and use this information to provide therapy.

Contact Between us

- **Digital Data:** Your counsellor may hold your name and telephone number on their mobile phone for the purposes of contacting you (e.g. to arrange or change appointments). Your number will be deleted when counselling finishes and the counsellor's phone will be PIN protected.
- **Electronic Data:** If you have communicated by text or email, these records may be kept for the same duration as your counselling notes.

How Long do we Keep your Information?

We retain your personal information and session notes for three years after our work together has ended (in case you decide to return after a break) or unless we mutually agree to retain it for longer, where we believe that it is in your best interests to do so.

After this period, all paper records will be securely shredded, and all digital records will be permanently deleted.

Sharing your Information & Confidentiality

Everything you discuss in counselling is **strictly confidential**. We will not share your personal information with any third party, except in the following rare circumstances:

- **Clinical Supervision:** As mentioned previously, we will discuss an anonymised version of our work with our supervisors.
- **Serious Harm:** If we have a significant concern that you are at risk of causing serious harm to yourself or another person.
- **Legal Obligation:** If we are required by a court of law to disclose information (i.e. suspected drug trafficking, terrorism or money laundering)
- **Safeguarding:** If we believe a child or vulnerable adult is at risk of significant harm (in line with safeguarding laws).

We will always try to discuss any potential breach of confidentiality with you first, unless doing so would increase the risk of harm.

Your Data Protection Rights

You have several rights regarding the data MVCC hold about you:

- **Right to Access:** You have the right to request a copy of the information MVCC hold about you.
- **Right to Rectification:** You can ask MVCC to correct any information you believe is inaccurate.
- **Right to Erasure (Right to be Forgotten):** You can request that MVCC delete your data. (Please note: we may need to decline this request where we are still required to hold your data for insurance or legal purposes).
- **Right to Restrict Processing:** You can ask MVCC to limit how we use your data.
- **Right to Data Portability:** You can ask us to transfer your data to another service provider if you request this.
- **Right to Object:** You have the right to object to MVCC processing your data. If you are concerned about the way that your information is being held, please discuss this with your counsellor. If you are still unhappy please contact the Information Commissioners Office. Further information can be found at: <https://ico.org.uk/concerns/>.

To make a request regarding any of these rights, contact MVCC at mv-cc@outlook.com' MVCC will respond to your request within one month.

If MVCC becomes aware of a situation where your personal data may have been accidentally or maliciously obtained by a third party, you will be notified within three days.

Concerns or Complaints

If you have any concerns about how I have handled your data, please contact me first so we can try to resolve it.

If you are not satisfied with my response, you have the right to lodge a complaint with the **Information Commissioner's Office (ICO)**. You can find more information on their website: <https://ico.org.uk/concerns/>

Agreement

By signing the MVCC counselling contract, you are confirming that you have read and understood this Data Protection & Privacy Statement.

Code of Ethics

Both Jaki and Nicola adhere to the Association of Christian Counselling (ACC) Ethical Framework for Good Practice in Counselling. Copies are available from: www.acc-uk.org/wp-content/uploads/2023/08/ACC-Ethics-and-Practice.pdf.