



## Cogwheel Counselling Privacy Policy

### Is my counselling at Cogwheel confidential?

Counselling is a private and confidential form of help. We will not normally give your name or any information about you to anyone outside the organisation. However, there are exceptional cases where Cogwheel might ethically or legally have to give information to relevant authorities. For example, if we had reason to believe that someone, especially a child, is at serious risk of harm or to prevent a miscarriage of justice. We will discuss any proposed disclosure with you unless we believe that to do so could increase the level of risk to you or to someone else, or unless we are required by law to act without consultation. (See the Service Agreement for more detail.)

### What information does Cogwheel hold about me?

Cogwheel keeps confidential records and statistics about its clients. We need to hold this data in order to provide a professional counselling service to you in line with your overall contract with Cogwheel. All records and their contents, including counsellors' process notes, are owned by the Cogwheel Trust. They are kept securely and are only seen by authorised Cogwheel personnel. These records are subject to the General Data Protection Regulation May 2018 (GDPR).

Some of the information we may collect is classified as special category data. This data may include racial or ethnic origin, political opinions, religious beliefs, physical or mental health, and sexual life. Your sensitive personal data will only be used in order to provide the service to you and for managing and quality assuring the service.

Cogwheel gathers demographic statistics anonymously in order to maintain our commitment to equality and inclusivity, and to help us raise funds. You do not have to provide any or all these details, and they will not affect your counselling in any way. This information is held on a database separate from any identifying details such as names or addresses.

### How long will you hold my information for?

Paper records are kept securely for a period of six years as required by our Professional Indemnity Insurers and are then destroyed. Data held electronically, including emails, email addresses, and contact details stored on the booking system, are deleted within six months of your final session.

### Can I see the data Cogwheel holds about me?

Cogwheel recognises that, on occasion, our clients may wish to exercise their rights under the GDPR and make a Data Subject Access Request in respect of their



personal information held by Cogwheel. If you wish to make a subject access request, please contact the Head of Counselling. Your request will be responded to within one month. You will not be charged a fee on request of access to your data.

## **What if other services want access to my counselling records?**

Occasionally Cogwheel is asked by our clients or by external agencies such as Social Services or the NHS to write reports on the progress made in counselling. We are not normally able to do this because of our duty of confidentiality to our clients, and because Cogwheel counsellors are not trained in the specialist areas of diagnosis or social work assessment. However we can in some circumstances, and on receipt of written consent from the client who attended counselling, provide brief information about the dates and number of sessions attended.

In addition, we are also asked by clients, their solicitors, the police, and the courts for access to counselling records. These are not suitable as evidence in legal proceedings and Cogwheel reserves the right to resist legal requests to produce records in court. We do this in order to protect Cogwheel's duty of confidentiality to all its clients and to preserve Cogwheel's reputation as the provider of confidential counselling.

## **What if I am concerned about the way Cogwheel is using my personal information?**

Should you have any concerns about the way Cogwheel is handling your data, please contact the Head of Counselling in the first instance. If you do not feel that your concerns have been resolved following this, you have a right to contact the Information Commissioner's Office (ICO). Cogwheel Counselling's ICO registration number is 0004574314.