



Privacy Statement

Who are we?

Cogwheel Counselling provides affordable counselling in Cambridgeshire to individual clients of all ages, children, young people and adults.

Cogwheel Counselling is the controller for the personal information we process, unless we state otherwise. You can contact us about data privacy by email, post or phone at:

Head of Services, Cogwheel Counselling, 66 Devonshire Road, Cambridge, CB1 2BL or at admin@cwheel.org.uk or on 01223 464385

Registered charity number: 1157141

This Privacy Statement explains how and why we use your personal data, to ensure you remain informed and in control of your information.

What type of personal information do we collect?

We collect, process and store three main types of personal information:

- Client records in order to provide a professional counselling service to clients in line with their overall contract with Cogwheel.
- Recruitment and HR records about our employees, contracted practitioners and volunteers to fulfil our recordkeeping obligations as employers and contractors.
- Supporter records relating to our fundraising activities to thank them, keep them informed and comply with financial obligations.

How do we obtain your personal data?

Most of the personal data we process is provided to us directly by you when you:

- Use our counselling services
- Apply for a job
- Apply for a volunteering role
- Request information about our activities and services
- Make a donation to us
- Fundraise on our behalf
- Register for an event
- Sign up for our newsletter
- Get in touch with us via phone, our website or other method
- Enter into a contract with us

The type of information we collect will vary according to how you are engaging with us, and we always ensure we only collect the information necessary to fulfil this engagement.

Sometimes we collect your personal information indirectly from third-party fundraising organisations, such as JustGiving, when you use their services to make a donation to us. These third parties only share



your information with us with your consent. You should check their privacy notices when you provide your information to understand fully how they will process your data.

You may also provide personal information to us when you visit Cogwheel's pages on social media or when you visit our website. Our website uses cookies which make it work as you would expect, improve the security of the site and allow pages to be shared by social networks. For more information about cookies, please read our Cookies Notice.

How we handle client records

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 and their counselling sessions. We need to hold this data in order to provide a professional counselling service to you, and the legal basis for processing this data is *contract*. All records and their contents are owned by Cogwheel Counselling. 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).

Cogwheel uses third parties for some of our processes. Links to their privacy policies are below:

[Medesk](#) - to manage appointment bookings and process client data

[Stripe](#) - to process client payments

[infobip](#) - to send text messages

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.

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 occasionally 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.

How we handle HR and recruitment records

We use personal data that you provide to, for example,

- process an application for employment, a volunteer role or a placement: we may process your data to ascertain suitability and for the performance of contract (or prior to entering into a contract)
- maintain an employment relationship.

The above list is supplied for illustration and is not exhaustive. Appropriate data will be shared with our third-party pension provider, external auditors for our accounts, and HM Revenue and Customs.

How we handle supporter data

We use personal information to fundraise, run events, process donations and stay in touch with our supporters to thank them and keep them updated on what we have achieved with their support.

We will process data provided by you if you register to take part in one of our fundraising events. That type of data collected will depend on the event and the legal basis for processing this data is our legitimate interest. As part of the process of registering to take part in an event we may invite you to subscribe to our newsletter. Any data provided for this purpose is processed as outlined in the next paragraph.

We may process information that you provide to us for the purpose of subscribing to our newsletter. The data we process includes your name and email address. The legal basis for processing this data is consent, which is provided through a double opt-in. We will use this data to send you a quarterly newsletter to inform you of our latest updates and future events.

We use a third-party provider (MailChimp) to manage this data and to deliver our marketing emails. We gather statistics around email opens and clicks using industry standard technologies to help us monitor and improve our communications. For more information see MailChimp's privacy notice. We do not share this data with any other third parties.

To process your payments (including donations) to Cogwheel, some information may be passed to payment processors. Please refer to their privacy statements.

We will never sell your data to third parties, and you will not receive offers or communications from other companies or organisations as a result of giving your details to us.

Visitors to our website

We may process data about your usage of our website. This data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of



visits. The legal basis for processing this data is our legitimate interest. We use this data for monitoring and improving our website.

We use a third-party service, Google Analytics, to collect this data. Please see the Google Analytics security and privacy principles for more information. We do not share this data with any other third parties. This data is processed at an aggregate level and no attempt is made to identify any personal data. Any individual data held by Google Analytics will be retained for 26 months from the date of the last interaction.

How long will we keep your information?

We will keep your personal information in respect of any financial transaction for as long as the law requires us to for tax or accounting purposes (which may be for up to seven years).

We will retain any personal information for no longer than necessary for the purposes for which it was collected, taking into account guidance issued by the Information Commissioner's Office (ICO).

For client information: all records including profiling and contact details, clinical notes, and correspondence, are kept securely for a period of six years as required by our Professional Indemnity Insurers and are then destroyed.

Can I see the data Cogwheel holds about me?

Under GDPR, you have the following rights:

- Your right of access

You have the right to ask us for copies of your personal information. This right always applies. There are some exemptions, which means you may not always receive all the information we process.

- Your right to rectification

You have the right to ask us to correct information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies.

- Your right to erasure

You have the right to ask us to erase your personal information in certain circumstances.

- Your right to restriction of processing

You have the right to ask us to restrict the processing of your information in certain circumstances. These circumstances are: if you are contesting the accuracy of the data we hold about you and we are verifying this; if your data has been unlawfully processed and you request a restriction in processing instead of erasure of the data; if we no longer need the data but you request us to keep it in order to establish, exercise or defend a legal claim; or if you are objecting to us processing your data under Article 21(1) and we are considering whether our legitimate grounds override yours.

- Your right to object to processing

You have the right to object to processing if we are able to process your information in certain circumstances. These circumstances include where we process data processed for direct marketing, or where we use 'legitimate interest' as our basis for data processing. Data processing carried out under the basis of contract is not included.



- Your right to data portability

This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another or give it to you.

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 Services. 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 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 Services 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.

You can read more about your rights here: <https://ico.org.uk/your-data-matters/>

Updates to this statement

We will update this Privacy Statement from time to time so you may wish to check it each time you submit personal information to Cogwheel. This policy was last updated on 24 August 2023.