



GDPR Client Declaration

How will BrainHubCPW store and process your Personal Information:

Storage Methods:

Paper: Hard Copies

Client Contract

GDPR Client Declaration (this document)

Assessment Record

Session Notes

Your Client ID code

All active client files are stored within a locked filing cabinet at your counsellors' home.

Once all paperwork is completed and your therapy with BrainHubCPW has ended your counsellor will archive and store in a locked filing cabinet at your counsellor's home. This paperwork will be kept in archives for a period of 3 years, following the client contract being ended. This is to ensure that we have a full history of our work with you, should you return to counselling with BrainHubCPW in the future. All hard copies will be shredded at the end of this time period.

Client files will be carried from location to location, due to the nature of the counselling service that BrainHubCPW offer, paperwork will always be kept in a lockable bag by your counsellor when away from their homes.

Computer:

Your client referral form will be stored on password protected email system, accessed by password protected laptops by your counsellor. On receipt of a completed online client referral form, your details will be placed onto a password protected spreadsheet with limited access.

All clients are allocated a client ID, so you are not identifiable by any individual, other than for the purposes of counselling and processing of clients' information.

Counselling appointments are booked via your Counsellor in person, via telephone or email. Your client ID will be used when inputted into the BrainHubCPW shared calendar, so you are only identifiable for the purpose of counselling and processing client information.

When using our instant messenger or email service your name will appear as you have it set. When storing data in phones or in our systems or in correspondence we will use your Client ID.

Your email address and correspondence will be stored in the email account (admin@brainhubcpw.com) by nature of you contacting BrainHubCPW. Electronic correspondence will be held for the duration of your counselling with our service but deleted on completion of your therapy.

Smartphone:

Your counsellor will store your contact information in their phone using your first name and Client ID code; eg Phil001. This allows them to contact you and know who is contacting them without your personal data being revealed.

If using our instant messaging, webcam or facetime services then your ID you have set on the particular app will be used.

When contacting the client via text message your counsellor will use “Hi” without a name or Client ID code. This is solely for confidentiality and GDPR regulation purposes only.

Text messages will be retained for the duration of your counselling with BrainHubCPW and will be deleted on completion of your client contract.

All therapists have password protected or fingerprint recognition (Encrypted) enabled smart phones.

BrainHubCPW Process and Sharing of your Personal Information.

Supervision:

All therapists working for BrainHubCPW seek a minimum of monthly Supervision with another therapist, who is a Qualified Counsellor and Supervisor. The Supervision process is for the therapists practice and professional processes.

In order to protect your privacy, the Supervisor will not know you personally, nor professionally. The Therapist and Supervisor may refer to you by your first name and client ID, and may refer to your information verbally, when it's helpful to their practice and professional processes.

Personal Data:

Personal Data will not be processed or shared, other than the purposes laid out in this form, or unless;

Lawful reasons:

A necessity to fulfil a legal duty – court order.

A necessity to protect the client's vital interests – Harm to self (Covered under confidentiality Breaches).

Personal Sensitive Data:

Personal Sensitive Data will not be shared or processed, other than for the purposes laid out in this form, or unless;

A necessity to protect someone's vital interests, but crucially the addition of:

The client cannot consent.

The client unreasonably with holds consent.

Consent cannot reasonably be obtained.

Erasing your Information:

When the Counselling contract has ended, we will erase electronic copies of your correspondence, within one month. This includes clearing any instant message or email counselling chat logs.

We will hold onto your client file for a period of 3 years, after the Counselling contract has ended. This is so that we have a reference of our work with the client in situations such as you returning to counselling in the future. After 3 years have passed, we will shred the written information.

Your Rights:

You have the following rights;

To be informed what information we hold (i.e. this document).

To see the information, we hold about you (free of charge – must complete an SAR form and give 30 days' notice to BrainHubCPW).

To rectify any inaccurate, or incomplete personal information.

To withdraw consent, for BrainHubCPW, to use your personal information. (though we can decline, whilst the information is needed for us to practice lawfully and competently).

To request your personal information to be erased by BrainHubCPW (though we can decline, whilst the information is needed for us to practice lawfully and competently).

If you are not happy with the way your data is used, you can complain to ICO @ www.ico.org.uk.
BrainHubCPW registered ICO Ref: **xxxxxxxxxx**

NB: A printed copy of this Client Declaration, will be discussed with you, during our first assessment meeting or during your first Counselling session. If we agree to continue working together, we will both sign the printed copy of this statement, to indicate we are in agreement.

The printed copy of this signed form will be placed into your client file. We will also give you a copy of this agreement to take away with you.

Consent:

If you do not consent to BrainHubCPW using your data in the way detailed in this document, we unfortunately will not be able to work with you.

Do you consent to BrainHubCPW using your data as detailed in this document?

Please state: Yes or No

Client Name:

Client Signature:

Date:

Therapist: (Therapist is signing to agree that they discussed all of the information with you, within this form and you have given consent).

Therapist Signature:

Date: