



# Privacy Notice

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## **Introduction - Privacy notice 2018**

We are required to provide you with the information in this Privacy Notice under applicable law which includes (but is not limited to):

General Data Protection Regulation (EU) 2016/679 from 25 May 2018 (the "GDPR"), and

The Privacy and Electronic Communications (EC Directive) Regulations 2003.

If you have any queries regarding this privacy policy or have difficulty in understating it, please contact us. Our contact details are at the bottom of this page.

### **About us and what we do.**

Time to Talk West Berkshire is an independent charity originally established in 1986.

Our aim as a charity is to promote the mental health and emotional wellbeing of young people aged 11-25 in West Berkshire.

We do this primarily through our free, at the point of delivery, counselling services at Broadway House and in local schools and GP surgeries.

Time to Talk is an accredited British Association of Counsellors and Psychotherapists (BACP) agency and abides by its ethical frame work ([www.bacp.co.uk](http://www.bacp.co.uk))

### **People who use Time to Talk services**

Time to Talk offers counselling services to young people aged between 11-25. We must hold the details of the people who have requested the service to provide it. However, we only use these details to provide the service the person has requested and for other closely related purposes.

When you call Time to Talk we collect information from you in response the service you wish to access. Calls are not recorded.

If you decide to have counselling at Time to Talk you will be asked several details which logged on a client information sheet, e.g. name post code, date of birth, contact numbers, email address, school attending, GP surgery, these allow you to attend an initial assessment. You will be allocated a client code which is used for statistical purposes.

You will be asked to complete a consent form which allows us to hold personal information about you. You will be asked to provide personal general information in order that we can decide if counselling is best for you and to allocate you an appropriate counsellor to meet your needs.

You have the right to access any information Time to Talk holds about you, ask for any changes to be made to information you feel is inaccurate, and to also erase any information held about you.

During your assessment we will collect information regarding the purpose for which you are requesting counselling.

At your first counselling session you will be asked to sign a contract with your allocated counsellor, this will hold your client number, first name only and the name and phone number of an emergency contact. Emergency contacts will only be approached with your express permission unless the situation of safeguarding arises.

Your counsellor will keep case notes which will be anonymised and marked only with your client code. The case notes will be securely held for 6 years once your counselling has finished.

You will be asked to complete CORE 10 or CORE YP forms during your counselling sessions. These forms measure issues, wellbeing, functioning and risk and allow your counsellor to measure your changes and record the outcome.

**a) Who will be able to view your personal information.**

- Consent Form – Clinical Lead, Office Manager, Assessor
- Client information sheet – Clinical Lead, Office Manager, Assessor, your counsellor
- Assessment form – Clinical Lead, Office Manager, Assessor, your counsellor.
- CORE 10 / CORE YP – Clinical Lead, Office Manager, Assessor, your counsellor
- Client notes -counsellor only
- Permission to record form – your counsellor, Clinical Lead

All the above form forms are held securely in a locked cabinet and are securely destroyed within 6 years of your therapy ending.

**b) How we use your information**

- To contact you via email, text, or telephone
- To provide you with counselling services
- To measure Time to Talk progress in providing services to you and to secure funding and local grants. These statistical measures are anonymised and only contain the client code.

We may contact you using Text magic (this sends texts to your phone) – to confirm appointments, you can find out more about how they handle data processing here: <https://www.textmagic.com/gdpr/> you can review their privacy policy here: <https://www.textmagic.com/privacy-policy/>

You should be aware that any emails we send or receive may not be secure.

We will monitor any emails sent to us, including file attachments, for viruses or malicious software.

We may contact you by Gmail - you can find out more about how they handle data processing here: / <https://blog.google/topics/google-cloud/google-cloud-our-commitment-general-data-protection-regulation-gdpr>

**c) Counselling Sessions**

Time to Talk have several volunteers undertaking further study. This may involve them having to record sessions or provide case studies to their place of study, for them to evidence they are ethical, within their theoretical model of counselling and to provide evidence of progress.

These anonymised case studies and tapes may be submitted to their college tutors for marking.

In all cases you will be asked to sign a consent form to allow the counsellor to use your anonymised details. You have the right to refuse to give this permission.

A copy of this consent form will be held by the Clinical Lead for a period of 6 years.

**d) Supervision Sessions**

The BACP ethical framework states that all counsellors require one and half hours of clinical supervision per month, to monitor your counsellors practice, ethics and standard of care. Your counsellor will present their anonymised cases to their clinical supervisor and may tell part of your story in relation to their working with you, but your name and details will never be disclosed.

**Client Confidentiality**

Time to Talk operates a policy of client confidentiality. This means that information held about you and what you say and do in your counselling session, will not be disclosed to another person or organisation outside this agency.

Should we refer you to another agency we will seek your permission first and ask you wherever possible to assist in completing the referral form.

However, there are some important exceptions to this policy:

Under the Children Act 1989, Time to Talk has a legal obligation to report to another person or organisation if clients under the age of 18 are at risk of:

- Harm from another person
- Serious self-harm
- Harming another person

Time to Talk has an obligation to disclose to a third party if you know of or are involved in serious illegal activities, particularly to do with terrorism.

## Your rights

You have rights as an individual which you can exercise in relation to the information we hold about you.

The GDPR provides the following rights for individuals:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling.

You can read more about these rights here – <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

## Fundraising or Direct Marketing.

If you are a regular attendee of our AGM or have supported us previously, you may also receive fundraising mails, which you can opt out of at any time by contacting us at [office@t2twb.org](mailto:office@t2twb.org) or write to:  
Office Manager  
Time to Talk  
Broadway House, 4-8 The Broadway, Newbury, Berkshire, RG14 1BA  
Tel: 01635 760331

We will only send you marketing information by email, SMS, or phone if you have given us specific consent. If you withdraw your consent and then subsequently opt in to receive marketing information again, then your most recent preference may supersede.

## Closed-circuit Television (CCTV)

Any CCTV used in our offices is not operated by us, so we are not the controller. It will be under the control of the relevant building landlord.

## Time to Talk Web Site - <http://t2twb.org/>

We may use your personal information to help provide you with access to our website, personalise your experience, and improve and develop it further.

We have a valid Secure Socket Layer (SSL) certificate running on all the financial information input pages on the site. We do everything we reasonably can to make sure that your information is held securely on our systems.

Cookies are small text files stored on your computer by a website. We use login and session cookies on the site to operate the necessary systems for accepting donations.

You can learn more about cookies in general, and how to set your Internet browser so that cookies are not downloaded, at <http://www.allaboutcookies.org>.

If you continue to use the site without setting your browser so that it does not download cookies, we will assume you agree that we may download them.

a) Security and performance

Time to Talk uses a third-party service to help maintain the Time to Talk website. To deliver this service it processes the IP addresses of visitors to the Time to Talk website but does not store them.

b) Analytics

When you visit <http://t2twb.org>, we use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out such things as the number of visitors to the various parts of the site. This information is only processed in a way that does not identify anyone.

c) Links to other websites

This privacy notice does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

## Complaints or Queries

Time to Talk tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

If you want to make a complaint about the way we have processed your personal information, you can contact us at [office@t2twb.org](mailto:office@t2twb.org).

### People who make a complaint to us

When we receive a complaint from a person we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint.

We will only use the personal information we collect to process the complaint and to check on the level of service we provide.

We usually must disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant doesn't want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for three years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

Similarly, where enquiries are submitted to us we will only use the information supplied to us to deal with the enquiry and any subsequent issues and to check on the level of service we provide.

## Access to personal information

Individuals can find out if we hold any personal information by making a 'subject access request' under the GDPR 2018. If we do hold information about you, we will:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form.

To make a request to the Time to Talk for any personal information we may hold you need to put the request in writing addressing it to the address provided below.

If we do hold information about you, you can ask us to correct any mistakes by, once again, contacting us at the address below.

## Job applicants, Current and former employees / volunteers

We have a legitimate interest in processing personal information during the recruitment process and for keeping records of the process.

Time to Talk is the data controller for the information you provide during the process unless otherwise stated. If you have any queries about the process or how we handle your information, please contact us at [www.office@t2twb.org](mailto:www.office@t2twb.org)

### a) What will we do with the information you provide to us?

All the information you provide during the process will only be used for progressing your application, or to fulfil legal or regulatory requirements if necessary.

We will not share any of the information you provide during the recruitment process with any third parties for marketing purposes. The information you provide will be held securely by us whether the information is in electronic or physical format.

We will use the contact details you provide to us to contact you to progress your application. We will use the other information you provide to assess your suitability for the role you have applied for.

### b) What information do we ask for, and why?

We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary.

The information we ask for is used to assess your suitability for employment. You are under no obligation to provide the information requested but this may affect your application.

### c) Application stage

We ask you for your personal details including name and contact details. We will also ask you about your previous experience, education, referees and for answers to questions relevant to the role you have applied for. Our Trustees, Clinical Lead and Managers will have access to all this information and will shortlist applications for interview.

We might ask you to attend an interview, we might take interview notes. This information is held by Time to Talk. If you are unsuccessful at any stage of the process, the information you have provided until that point will be retained for 6 months from the closure of the campaign.

If we make a conditional offer of employment we will ask you for information so that we can carry out pre-employment checks. You must successfully complete pre-employment checks to progress to a final offer. We are required to confirm the identity of our staff, their right to work in the United Kingdom and seek assurance as to their trustworthiness, integrity and reliability.

### **You will therefore be required to provide:**

- Proof of your identity – you will be asked to attend our office with original documents, we will take copies.
- Proof of your qualifications – you will be asked to attend our office with original documents, we will take copies.
- You will be asked to complete a criminal records declaration to declare any unspent convictions.
- We will provide your email address to the Government Recruitment Service who will contact you to complete an application for an Enhanced Criminal Record check via the Disclosure and Barring Service, or Access NI, which will verify your declaration of unspent convictions.
- We will contact your referees, using the details you provide in your application, directly to obtain references

If we make a final offer, we will also ask you for the following:

- Bank details – to process salary / expense payments
- Emergency contact details – so we know who to contact in case you have an emergency at work.

#### **d) How long is the information retained for?**

If you are successful, the information you provide during the application process will be retained by us as part of your employee file for the duration of your employment plus 6 years following the end of your employment. This includes your criminal records declaration, fitness to work, records of any security checks and references.

Information generated throughout the assessment process, for example interview notes, is retained by us for one year. Equal opportunities information is also retained for one year.

#### **e) How we make decisions about recruitment?**

Final recruitment decisions are made by the Trustees and Clinical Lead. All the information gathered during the application process is considered.

#### **f) Information held during the course of employment.**

We will also hold yearly reviews, appraisals and supervision notes for the duration of your employment plus 6 years following the end of your employment.

### **Changes to this privacy notice**

We keep our privacy notice under regular review. This privacy notice was last updated on 11<sup>th</sup> June 2018

### **How to contact us**

If you want to request information about our privacy policy, you can email us [office@t2twb.org](mailto:office@t2twb.org) or write to:

Office Manager  
Time to Talk  
Broadway House, 4-8 The Broadway, Newbury, Berkshire, RG14 1BA

Tel: 01635 760331

Registered charity number 1155235