

Introduction

Common understands that the information you entrust to us is important. We are committed to protecting and respecting your privacy. We aim to be transparent about the information we collect and process. This privacy notice sets out what information we collect and what we do with that information, so that you can make informed choices regarding personal information.

About us

Common is a Community Interest Company based in Lisburn, Northern Ireland. We provide evidence based psychotherapy and counselling, wellbeing courses, clinical supervision, training and consultation.

Common Wellbeing and Mental Health CIC is a Community Interest Community registered and approved by Companies House under number **NI656576**

Common Wellbeing and Mental Health CIC is registered with the Information Commissioners Office (ICO) under number **ZA727774**

Common Wellbeing and Mental Health is also referred to in this policy as “Common”, “we”, “us” or “our”.

Our registered office address is Office 9, Railway Studios, 3A, The Sidings, Antrim Road. Lisburn. BT28 3AJ.

For further information about this policy or any aspect of our data protection please contact

Email: hello@lisburncommon.com

Write: address as above

We will continue to update this policy regularly to ensure it complies with latest legislation and best practice. This privacy policy was last updated in January 2021.

What information do we collect?

We collect personal information needed to provide clients with a safe and professional service and in order to work within our ethical framework and safeguarding policies. We will only ever collect information we need. Information we collect includes:

Personal Information: This is information which could be used to identify who you are.

Sensitive information: We also collect some information which is sensitive. This can include information regarding race, ethnic origin, health (both mental and physical), sexual orientation, family background and reason for referral. Sensitive data is collected when needed to ensure you receive a safe and professional service.

We collect this information when you make a referral to our service and it could include:

- Your name and contact details (including address, email address and phone number)
- Date of Birth
- GP contact details
- General demographic details
- Emergency contact details
- Private medical insurer details (if applicable)
- Client history
- Third party or referrer information
- Psychometric questionnaires
- Session notes

If the client is a child or young person aged 16 or under the parent will complete the referral form and provide the personal information required to provide a safe and professional service. A parental contract and consent form will be signed by the parent (or person with parental responsibility) which also includes parental consent for the retaining and storing of their child or young person's data as set out in this policy.

Reason for retaining personal information and legal basis

Common retains information where there is legitimate interest to do so in order to deliver our services or where the client has given consent.

Administration information details (name, address, date of birth and contact details) are kept for legitimate interest.

GP contact details are kept for public interest in the event that the client is deemed to be at risk of harm and legitimate interest should communication with GP be necessary.

Client history is kept with consent from the client, this is explained verbally at start of assessment appointment and written consent is taken before therapy sessions commence.

Client session notes and third party information is kept with consent of client.

Storing your personal information

We make every effort to ensure your data is held securely and to safeguard against loss, selling, misuse or alteration of your personal information. All information stored on our database system is in keeping with GDPR regulations, password protected and stored securely on the cloud. Database security is managed by Blue Zinc IT. Further information regarding their policies is available on their website. Any paper files are stored securely in a locked cabinet within a secured office with password access. Management of technological devices are handled carefully and all devices are encrypted to uphold protection of your information.

If a person refers to Common and does not proceed to become a client in the service we will delete and shred their details.

Common keeps client records for 5 years, in keeping with professional insurance requirements and professional guidelines. After this time records are deleted and shredded. Where Common have knowledge of a safeguarding issue or legal action they reserve the right to hold the record until that reason no longer exists.

Sharing of information

Any reports to funders, for research or external decision makers will be given in a factual manner giving only summary details and ensuring client confidentiality.

You may request us to write a report or letter for a third party. Your name, contact details, date of birth and relevant medical details will be used on reports or letters and a copy of the letter or report will be shared with you.

In the circumstances of risk of significant harm to a client or another person, disclosure of a serious offence or a court order requesting client notes, Common may disclose personal information. The decision to break confidentiality will only be taken following consultation with a Clinical Lead and in keeping with Common's policies and procedures. Consent will be sought from the client or the client informed if possible.

Website

Currently Common's website is a holding page and therefore we do not use any cookies or google analytics. The only information you give when visiting our website is if you choose to email us your contact details to make a referral. These details are used to contact you to discuss our referral process.

Your data protection rights

Under UK legislation you have a number of rights about how your data is processed. You can read more about your rights on the Information Commissioner's Office website <https://ico.org.uk/>.

You have the right to:

- **Be informed:** We will provide every client with information regarding our privacy policy
- **Have access:** You can request access to the data we hold about you. This is known as a subject access request form.
- **Right to object:** Any client who wishes to object to how Common has used their data can object in writing to Clinical Lead, Common Wellbeing and Mental Health CIC, Office 9, Railway Studios, 3A, The Sidings, Antrim Road, Lisburn. BT28 3AJ or by email to hello@lisburncommon.com
- **Right to rectification:** The client has the right to have any inaccurate information amended. The client should notify Common in writing to the Clinical Lead or by email to Clinical Lead at hello@lisburncommon.com
- **Right to restrict processing:** The client has a right to restrict processing. The request can be made by emailing the Clinical Lead at hello@lisburncommon.com. If it is not possible to restrict processing due to best practice guidelines or safeguarding, therapy may have to end.
- **Right to withdraw consent:** The client has the right to withdraw consent however to do so would mean Common would be unable to continue to provide the service effectively.
- **Right to be forgotten:** The client may ask records to be deleted by contacting the Clinical Lead as above. Common Wellbeing and Mental Health CIC reserve the right to reject the request when there is reason to retain client records in order to fulfil professional insurance requirements or were there may be legal action or client welfare may be affected.
- **Right to make a complaint:** If a client as a complaint regarding their information they can do so by emailing Clinical Lead of Common at hello@lisburncommon.com. They may also make a

complaint to the Information Commissioner's Office, for more information see the ICO website <https://ico.org.uk/>.