

## Privacy & Cookies Policy, Data Protection & Confidentiality.

At Relate Plymouth and South Devon, we are committed to keeping your personal information safe and being clear about how we collect your data, how we store it and what we do with it.

This privacy policy applies to the Relate Plymouth and South Devon website.

Relate Plymouth and South Devon services governed by this policy include our face-to-face, direct services with children, young people and their families, although individual data and confidentiality statements will also apply. Live Chat and Message a Counsellor services are provided through National Relate website and are not relevant to this privacy statement.

Relate Plymouth and South Devon is registered as a data controller with the number ZA043283. Full details of this listing can be seen on the [Information Commissioner's Office website](#). Our registered charity number is 237035 and our company number is 07972047 (registered in England and Wales).

This privacy notice, along with our [Data Protection and Confidentiality statements](#) and [cookies policy](#) lets you know how we collect, use and keep your personal information safe.

If you have any queries about our Privacy Notice, please get in touch with our data team:

**By email:** [relateplymouth@googlemail.com](mailto:relateplymouth@googlemail.com) or [sdevonrelate@btinternet.com](mailto:sdevonrelate@btinternet.com)

**By post:**

Data Protection, 3 Blenheim Road, North Hill, Plymouth PL4 8LJ

Data Protection, 4 East Street, Torquay, TQ2 5SD

## What information do we collect about you?

### Information you give to us directly

We will collect and store information that you give us when you do the following things on our website:

- Register for a workshop, course or training
- Make an enquiry
- Support our work through a donation
- Fundraise on our behalf
- Give us feedback or make a complaint
- Apply for a job or work with us
- Register as a volunteer

- Enter into a contract with us

### **Information you give to us indirectly**

- We store information about how you navigate our website, although this cannot be used to personally identify you.
- We may also collect and store your personal information if you interact with us on our Twitter social media channels. This will depend on your own privacy settings on these individual channels, so make sure you check these first.

Depending on what you do on our website, we may collect and store the following types of personal information: name, email address, date of birth, mobile or telephone number, relationship status, gender, sexual orientation, financial details, credit/debit card information, details about your education and career.

Certain types of personal information are recognised by data protection law as being more 'sensitive'. So things like sexual orientation, racial or ethnic origin, religious or political opinion, data concerning your health (mental or physical) or your sex life fall into this category.

Relate Plymouth and South Devon will only collect sensitive information like this where it informs the provision of the service to you, usually a contract for a counselling service. Whenever we do this, we will state clearly at the time, why this information is required. We may also gather sensitive personal information if you choose to share your experiences with us for a case study, but we will only do this with your explicit consent.

### **If you're a young person aged 13 or under**

You must get the permission of your parent/guardian before providing Relate Plymouth and South Devon with any personal information using the website.

### **How do we use your personal information?**

We will use your personal information to do the following:

- Respond to direct requests where you contact us with a query - we will use your personal information to respond.
- Provide you with information, products or services you've requested or that we feel might be of interest to you.
- Carry out general administrative tasks like dealing with complaints and feedback, essential record-keeping.
- Transact: we will use your personal information to take payments from you when processing orders and payments for goods and services.
- Process one-off or regular donations and to claim Gift Aid.
- Keep you safe: in the event that we reasonably think you (or someone else) is at risk of serious harm or abuse.

- Monitoring and evaluation: we use your personal information to inform and develop our service delivery.
- Improve your experience of our website, so that we may offer you a more user-friendly navigation of our website.
- Process applications to work at Relate Plymouth and South Devon: for example, if you fill in an application form or send us your CV or send us information speculatively in respect of possible contract opportunities.

## For how long will we keep your personal information?

At Relate Plymouth and South Devon, we are committed to retaining your personal information for no longer than necessary in relation to the purpose for which it was first collected. This is in line with guidance from the Information Commissioner's Office. Relate Plymouth and South Devon may hold some types of data for up to seven years.

For example, in the case of financial transactions like donations and purchases, we will keep your personal information for as long as legally required in respect of tax or accounting purposes, which could be anything up to six years after a transaction has taken place.

## Do you share my information with anyone else?

We will only use your personal information for the purposes for which it was obtained in the first place. We won't share it with any third parties and you won't receive any communications from other organisations.

However, there is one very explicit way in which your data might be shared:

Where we are legally bound to disclose your personal information, for example, to further criminal investigation or to keep you safe if we believe you (or someone else) is at risk of serious harm or abuse.

## Keeping your personal information safe

We have both digital and operational safeguards to make sure your data is secure at Relate Plymouth and South Devon. Access to information is reviewed on a regular basis and limited to those people who actually need to access it, and are assigned the permission to do so.

Relate Plymouth and South Devon is PCI (Payment Card Industry) compliant and uses PCI compliant providers to collect this data on our behalf; we don't store this data on our own systems.

There are, however, inherent risks to passing information over public networks and Relate Plymouth and South Devon cannot 100% guarantee the security of data handled in this way.

Relate's web servers are located in England and Ireland and we use Office 365 to support our email administration, servers are in Europe.

## Your rights and managing your own data

You have the right to request access to the personal information that Relate Plymouth and South Devon stores and processes about you. You can ask for corrections to be made to the information we hold or for your personal information to be deleted. You can also ask us to restrict the processing of your personal information or to object to the processing of it altogether.

We will not charge you for either considering or complying with a request unless it is deemed to be excessive in nature. We will ask you for proof of identity and upon this being successfully verified, you are entitled to obtain the following information about your personal information:

- The purposes of the collection, processing, use and storage of your personal data.
- The source(s) of the personal information, if it was not obtained from you.
- The categories of personal data stored about you.
- The recipients (or categories of recipients) to whom your personal data has been or may be transmitted, along with the location of those recipients.
- The envisaged period of storage for your personal data or the rationale for determining the storage period.
- The use of any automated decision-making and/or profiling

If you'd like to make a request relating to any of the rights above, please send a request by emailing: [relateplymouth@googlemail.com](mailto:relateplymouth@googlemail.com) or [sdevonrelate@btinternet.com](mailto:sdevonrelate@btinternet.com)

Or if you prefer, you can make the request in writing to:

Data Protection, 3 Blenheim Road, North Hill, Plymouth PL4 8LJ

Data Protection, 4 East Street, Torquay TQ2 5SD

## How to make a complaint

If you have any questions about this privacy policy or the way in which Relate Plymouth and South Devon handles your personal information, or if you wish to make a complaint, please follow our [complaints procedure](#).

If you're unhappy with our response, you may then raise your concern directly with the Information Commissioner's Office: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Alternatively you can [visit the ICO website](#).

## Changes to our privacy policy

Our Privacy Notice may change from time to time, so please check this page occasionally to see if we have included any updates or changes, and that you are happy with them.

*(Last updated: 31 May 2018)*

## Cookies policy

Cookies are little text files downloaded by and stored on your device (phone, laptop, tablet, etc.) when you visit a website. Cookies are used to help the website owner (in this case, Relate) to provide you with a smooth experience while you browse.

Relate uses cookies to:

- Make our website work
- Collect anonymous data to gain insight into how visitors use our website
- Help us show advertisements about our services to those people who might be interested in them
- Allow you to share content with social networks like Twitter and Facebook.

Relate does not use cookies to collect any information that could personally identify you. Neither do we use cookies to pass on any personally identifiable information to third parties.

## Data protection

The information about confidentiality in no way contravenes your rights under the General Data Protection Regulation May 2018 to access personal data that Relate Plymouth and South Devon holds on you. Relate Plymouth and South Devon keeps confidential records and statistics about its clients. All records are kept securely and are only seen by authorised Relate personnel. These records are subject to the General Data Protection Regulation May 2018. Some of the information we may collect is classified as sensitive personal data and we can only use such data where we have your explicit consent. This data may include racial or ethnic origin, political opinions, religious beliefs, trade union membership, physical or mental health, sexual life, criminal proceedings and offences. Your personal and sensitive personal data will only be used in order to provide the service to you and for managing and quality assuring the service. Records may be kept for up to a period of 7 years and are then destroyed.

Relate Plymouth and South Devon recognises that on occasion, our clients may wish to exercise their rights under the General Data Protection Regulation (May 2018) and make a subject access request in respect of their personal information held by Relate Plymouth and South Devon. Often during counselling, information is provided by more than one individual. In these cases, Relate Plymouth and South Devon will only release information if consent has been given by all of the individuals involved.

## Confidentiality

Relate counselling is a private and confidential form of help. We hold information about each of our clients and the counselling they receive in confidence. This means that we will not normally give your name or any information about you to anyone outside the organisation. However, there are exceptional cases where Relate 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.

If you come with a partner or your family, the counsellor may suggest seeing each of you individually. It is important for you to know that what is said in those individual sessions will be confidential and not shared with your partner or family.

### Domestic violence

Violence and abuse is an issue for many people who come to Relate Plymouth and South Devon for help with their relationship. We know from our experience that in this situation, working with couples or family members together may not be safe. If this is so, the counsellor will help each person to get individual specialist support from Relate or another agency.

### Mobile phones

Please switch off your mobile phone during your counselling sessions as it can create an unhelpful distraction and interruption.

### Unauthorised electronic recording

In order for you to work safely and effectively with a counsellor, it is important that the privacy of the work is respected. Please do not attempt to record your counselling session using any device or app. If it is found that recordings have been made covertly, counselling services for the individual responsible will be discontinued immediately and Relate Plymouth and South Devon reserves the right to seek legal advice regarding possible further action.

### Authorised electronic recording

Occasionally a counsellor, for example, one who is undertaking a training course, will be required to tape or electronically record a counselling session. Some counsellors regularly use audio or video recording in their work and in these circumstances, you will be asked to give your written consent for this to happen. The consent will specify all the ways in which the recording will be used (for example training, supervision or research) and will specify how and when the recording will be destroyed.

### Reports and client records

Occasionally Relate Plymouth and South Devon 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 in a position to do this because of our duty of confidentiality to our clients and because Relate 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(s) who attended counselling, provide brief information about the dates and number of sessions attended

and depending on the nature of the contract with the third party provide a brief summary of the outcomes (for example with CAMHS).

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

### Codes of ethics and practice

All Relate counsellors and supervisors are required to comply with the code of ethics and practice that is appropriate to the work they undertake.

- Relationship counselling is covered by the British Association for Counselling & Psychotherapy's Ethical Framework for Good Practice.
- Sex therapy is covered by the College of Sexual and Relationship Therapy's Code of Ethics & Principles of Good Practice.
- Family counselling is covered by the Association for Family Therapy's Code of Ethics & Practice.

In addition, Relate Plymouth and South Devon personnel must comply with Relate's practice policies and guidance which both complement the external codes and set specific organisational standards for ethical working. Please ask your counsellor if you would like to know more about this.

Relate is a national trainer of relationship counsellors. All our practitioners in training have been assessed as competent to work with their clients on a wide range of issues. As with all our counsellors, they are in ongoing professional clinical supervision for the work they undertake. This assists them to offer you maximum help and support. If you would prefer not to be seen by a practitioner in training, please let the centre know.

### Cancellation policy

If you intend to cancel, at least 48 hours' notice should be given to avoid cancellation charges. Please contact us for further information.

### Feed back and complaints

If you have any feedback about the service you received at Relate Plymouth or South Devon or you are not satisfied with your experience, please tell the Centre Manager, the counsellor or another member of staff. It is possible the Centre Manager can resolve your complaint, but if you wish to take things further, Relate Plymouth and South Devon has a **Complaints Procedure** which the Centre Manager can give you details about. Relate Plymouth and South Devon welcomes feedback and if you make a complaint, we will always take it seriously as it allows us to improve the service we offer to our clients.

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