

THE SHERBORNE PRACTICE PRIVACY NOTICE

Reviewed: April 2025

To be reviewed: April 2026

Introduction

Your privacy is very important to The Sherborne Practice and our therapists'. You can be confident that your personal information will be kept safe and secure and will only be used for the purpose it was given to us. We adhere to current data protection legislation, including the General Data Protection Regulation (EU/2016/679) (the GDPR), the Data Protection Act 2018 and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

This privacy notice tells you what we will do with your personal information from initial point of contact through to after your therapy has ended, including:

- Why we are able to process your information and what purpose we have processing
 it for
- Whether you have to provide it to us
- How long we store it for
- Whether there are other recipients of your personal information
- Whether we intend to transfer it to another country,
- Whether we do automated decision-making or profiling, and
- Your data protection rights.

We are happy to chat through any questions you might have about The Sherborne Practice data protection policy and you can contact us via email or over the phone.

'Data controller' is the term used to describe the person/ organisation that collects and stores and has responsibility for people's personal data. In this instance, all of the therapists

at The Sherborne Practice are independently registered with the ICO as a 'data controller' for the information they hold. For initial enquiries that come through The Sherborne Practice the data protection officer is Rebecca Miles who is registered with the Information Commissioner's Office Registration ref: ZB560445

The postal address is: The Old Glove Factory, Bristol Road, Sherborne DT9 4HP. Phone number is: 07751080529. Email address is: contact@thesherbornepractice.co.uk.

For Individual client notes and contact details held by your therapist, your individual therapist is registered with the ICO as a separate legal entity and therefore adheres to keep your personal information safe and secure and will only use it for the purpose it was given to them. To adhere to current data protection legislation, including the General Data Protection Regulation (EU/2016/679) (the GDPR), the Data Protection Act 2018 and the Privacy and Electronic Communications (EC Directive) Regulations 2003. Your personal therapist can provide their individual ICO number for you, on request.

Our lawful basis for holding and using your personal information

The GDPR states that we must have a lawful basis for processing your personal data. There are different lawful bases depending on the stage at which we are processing your data. These are explained below:

If you have had therapy with the Sherborne Practice and it has now ended, we will use legitimate interest as our lawful basis for holding and using your personal information.

If you are currently having therapy or if you are in contact with The Sherborne Practice to consider therapy, we will process your personal data where it is necessary for the performance of our contract.

The GDPR also makes sure that we look after any sensitive personal information that you may disclose to us appropriately. This type of information is called 'special category personal information'. The lawful basis for us processing any special categories of personal information is consent initially. We will then retain any counselling/ psychotherapy records in case of the need to reference them in the future (the official legal basis is to defend against potential legal claims).

How we use your information

Initial contact.

When you contact The Sherborne Practice with an enquiry about our counselling and psychotherapy services, we will collect information to help us satisfy your enquiry. This will



include name, email, phone number and reason for enquiry. Alternatively, your GP or other health professional may send us your details when making a referral or a parent or trusted individual may give us your details when making an enquiry on your behalf.

If you decide not to proceed, we will ensure all your personal data is deleted within 2 weeks of notification that you wish not to proceed with our services. If you would like us to delete this information sooner, just let us know.

While you are accessing counselling.

Rest assured that everything you discuss with The Sherborne Practice and our therapists' is confidential. That confidentiality will only be broken if:

- You give permission for information to be shared with another person.
- The therapist considers there is a risk of significant harm, either to you or others
- The therapist retains the right to break confidentiality without prior consultation or agreement with you should the therapist consider that the urgency of the situation requires them to act immediately to safeguard the physical safety of yourself or others.
- Where you disclose information about drug trafficking, money laundering or terrorism, the therapist has a legal duty to report this information.
- Where the therapist is required by law to release information to the courts.
- The therapist has an ethical responsibility to take supervision and will discuss their client caseload at supervision, they will not share details that may identify you.
- When you give permission for anonymous information to be used in a case study or course work for the purpose of a therapist's counsellor training
- When you agree to counselling/psychotherapy sessions being taped anonymously for supervision purposes or to support counsellor/psychotherapy training.

We will always try to speak to you about this first, unless there are safeguarding issues that prevent this.

The Sherborne Practice will keep a record of your personal details to help the counselling services run smoothly. These details are kept securely using the following methods:

- Paper records- stored in a locked filing cabinet, in a locked room.
- Electronic records- stored in a password protected document, on a password protected device.

These personal details are not shared with any third party.

Your therapist will keep written notes of each session, these are kept in a secure manner which the individual therapist can detail to you on request.



For security reasons we do not retain text messages for more than 1 month after you have completed your therapy sessions with us. If there is relevant information contained in a text message we will add this information to your clinical notes and delete the message within 1 month after you have completed your therapy sessions. Likewise, any email correspondence will be deleted after 1 month after you have completed your therapy sessions with us if it is not important. If necessary, we will add relevant information to your clinical notes and delete the emails 1 month after you have completed your therapy sessions with us.

After counselling has ended.

Once counselling has ended your records will be kept for:

Adults - 5 years from the end of our contact with each other and are then securely destroyed.

Children - 7 years after their 18th birthday, and are then securely destroyed.

If you want us to delete your information sooner than this, please contact us.

Third party recipients of personal data

I sometimes share personal data with third parties, for example, where I have contracted with a supplier to carry out specific tasks. In such cases I have carefully selected which partners I work with. I take great care to ensure that I have a contract with the third party that states what they are allowed to do with the data I share with them. I ensure that they do not use your information in any way other than the task for which they have been contracted.

Below is a list of the third parties that The Sherborne Practice works with:

Simply Book

To view how our booking system SimplyBook.me uses your information as a data processor please follow the link below. The information we share with them is: name, telephone number and email address.

https://simplybook.me/en/policy accessed April 2025.

WebHealer

To view how our website host uses your information as a data processor please follow the link below. The information gathered by them are: name, email address, telephone number and a brief description of why you are looking for counselling.

https://www.webhealer.net/privacy-policy/ accessed April 2025



Monzo

We use a MONZO business bank account to process payments, please follow the link below to view their privacy notice. We send you a payment link, and you choose to share your information with them. Should you feel that you would like to pay via a different method please email: contact@thesherbornepractice.co.uk

https://monzo.com/legal/business-account-privacy-notice accessed April 2025.

JanDust Business Sage Ltd

We use the virtual assistant services JanDust Business Sage Ltd to help us with administrative tasks of running the Sherborne Practice. WE DO NOT directly share any personal data with them. They are registered with the ICO. For more information, please view their website

www.jandustbusinesssage.co.uk accessed April 2025.

Your rights

The Sherborne Practice and its' therapists' tries to be as open as they can be in terms of giving people access to their personal information. You have a right to ask us to delete your personal information, to limit how we use your personal information, or to stop processing your personal information. You also have a right to ask for a copy of any information that we hold about you and to object to the use of your personal data in some circumstances. You can read more about your rights at ico.org.uk/your-data-matters.

If we do hold information about you we will:

- give you a description of it and where it came from;
- tell you why we are holding it, tell you how long we will store your data and how we made this decision;
- tell you who it could be disclosed to;
- let you have a copy of the information in an intelligible form.

You can also ask us at any time to correct any mistakes there may be in the personal information we hold about you.

To make a request for any personal information we may hold about you, please put the request in writing to contact@thesherbornepractice.co.uk.

If you have any complaint about how we handle your personal data, please do not hesitate to get in touch with us by writing to the contact details given above. We would welcome any suggestions for improving our data protection procedures.



If you want to make a formal complaint about the way we have processed your personal information you can contact the ICO which is the statutory body that oversees data protection law in the UK. For more information go to ico.org.uk/make-a-complaint.

Data security

The Sherborne Practice and our therapists' take the security of the data we hold about you very seriously and as such we take every effort to make sure it is kept secure.

We keep your personal data secure by:

- Paper records- stored in a locked filing cabinet, in a locked room.
- Electronic records- stored in a password protected document, on a password protected device.

Your individual therapist will tell you how they are storing your information (from the two methods mentioned above) before you start working with them.

Visitors to The Sherborne Practice website

When someone visits the website, we use a third party service, WebHealer to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such 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. We do not make, and do not allow WebHealer to make, any attempt to find out the identities of those visiting my website.

We use legitimate interests as the lawful basis for holding and using your personal information in this way when you visit the website.

We use WebHealer so that we can continually improve the service to you, you can read WebHealer's privacy notice here https://www.webhealer.net/privacy-policy/.

Like most websites we use cookies to help the site work more efficiently. See Appendix 1 for the cookie policy of WebHealer who we use to host our website and manage our use of cookies on our website.

No user-specific data is collected by us or any third party. If you fill in a form on our website, that data will be temporarily stored on the web host before being sent to me.



Appendix 1

WebHealer Cookie Policy 2025

Use of cookies

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

This website does not require cookies in order to function properly. The information below explains the cookies we use and why.

| Cookie | Used For |
|--|--|
| Cookie Bar (cb-enabled) | This is used to remember whether you have clicked the button to acknowledge our use of cookies. Without this, the bar would always show. |
| Social Media Sharing Facebook, Twitter, YouTube, Google, AddThis | We include Facebook and Twitter plugins on this website to help you share content that may be of interest to your social network. We also use AddThis, which is a service allowing social media sharing with a range of alternatives to Facebook and Twitter. Some pages may also include Google or YouTube features which need cookies in order to work, improve service and prevent fraud. |
| | Note that Social Media companies usually design cookies in a way that enable them to track your activity across multiple websites and this may be a reason you choose to disable cookies. Please see individual social media platform websites to view their full cookie policies. |

Taking Control of Your Cookies

You have the ability to accept or decline cookies by modifying the settings in your browser, however you may not be able to use all the interactive features of our site if cookies are disabled. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.aboutcookies.org.

