

# The Family Life Services Privacy Statement

The General Data Protection Regulation is “designed to protect European citizens and residents by safeguarding personal data that we provide to public authorities, companies, charities etc.” Under this regulation there are seven guiding principles which help us manage your personal data. Here is a brief summary of each principle with a simple explanation of each followed by a detailed privacy statement.

## **(a) Fair, Transparent and Lawful Processing:**

Transparency: We must tell you who is collecting and processing your data, why we’re processing it, who the data might be given to. We have to tell you about your rights to access your information and who you need to contact to do so.

Lawful: We must have a clear and lawful purpose to process your data.

**(b) Purpose Limitation:** We can only use your personal data for the purpose for which it was collected and not for any other purpose.

**(c) Minimisation of Processing:** We process only what is necessary.

**(d) Data Accuracy and Quality:** We have to make sure that the data we process is accurate and up to date e.g. we need to have a way of checking the data on a regular basis.

**(e) Retention and Storage Limitation:** We need to retain data only for as long as we need it and we have a retention schedule for each category of data. We have to be able to retrieve it quickly.

**(f) Security and Confidentiality:** We must have appropriate security measures to protect the data we hold.

**(g) Accountably and Liability:** We must have a plan and know who is responsible for what. We are required to have a privacy statement, have appropriate policies and procedures and a method of checking them on a regular basis.

**1. Who we are.** Family Life Services was first established in 1995 by the Catholic Archdiocese of Tuam in association with the Health Services Executive-West and the Dept. of Social & Family Affairs. In 2004 it was incorporated under the Company’s Act 1963 as a Limited Company, limited by guarantee, under the name of Cúram Clainne Ltd. t/a Family Life Services. The company registration number is 369163. We are a “not for profit” organisation. Since 2004 the company is a registered charity CHY 15845

**2. What we do.** Family Life Services provides support for families and individuals through counselling, education and training. We provide counselling, bereavement care and support groups and an education and training programme consisting of courses, workshops and talks



under the headings of Personal Development, Loss and Bereavement, Faith & Spirituality and Professional Training. We also offer Flourish – a social prescribing service, Mayo Suicide Bereavement Liaison service (MSBLS), Rainbows, Free Legal Advice. For more information about us please refer to our website: [www.thefamilycentre.com](http://www.thefamilycentre.com)

**3. How do we collect your personal data?** We ask and collect personal information from you when you contact the Family Centre for all our services. This information is necessary for us to carry out our work and inform or support you and to allow us to comply with our legal obligations.

When you make contact with the Family Centre to set up a counselling appointment we obtain the following personal data from you. We ask for your name, DOB, Address, Mobile /Telephone number, G.P., Name of Referrer. In order to set up an initial appointment with a counsellor we may also receive information about your employment & marital status. We may receive data about you from a person referring you to our service.

We collect more data from you in the course of meeting you at our initial consultation. All information received about you and from you will be used by us only in accordance with the purposes as outlined in this document. The counsellor will go through our “client counselling service agreement” with you which covers areas relating specifically to counselling e.g. confidentiality, records, files and will ask for your signed consent. A copy of this agreement can be made available to you by request.

Under G.D.P.R sensitive personal data is personal information relating to your ethnic origin, religious or political opinions, sexual orientation, physical or mental health, trade union membership or criminal convictions. We will only ask about some sensitive personal information when you are applying for employment or a volunteering position, this information is needed for the purpose of Garda Vetting.

When a query is about general services we will need a contact number and your first name, once the query is dealt with this information is shredded. Details of course attendance is deleted in twelve months.

If you’re inquiring about the Rainbows Programme we will ask for your contact details and the name and age of your children, their school, and class and teachers name. This is required so we can establish whether we can offer the programme to your child. This information is kept only for the next programme and it will be shredded unless you give your consent to hold this information for future programmes. The Rainbows Administrator and Coordinators are the only people who have access to this information.

**4. How do we store your data?**



We will only ask for and keep information that is necessary and make every effort to keep it accurate and as up to date as possible. If you attend more than one counsellor within our service in the interest of continuity of care they will have access to your file.

We hold a client's personal data on our secure encrypted on-line computer system. Client's files are kept in hard copy, are only available to the counsellor, their Supervisor and or the Clinical Director. Hard copy files contain session notes and are used to inform the work. In some cases client's notes are typed and stored on the counsellor's encrypted computer and listed under a reference number. Individual counsellors record the client's names in their diaries, a copy of their diaries are also held at reception so as to manage appointments. We hold the hard copy closed file securely for five years and access to these is by the Clinical Director or Director of Services. After the five years they're shredded and a log is kept of when files are shredded. We have a Client Access and File Retention Policy.

All employees and volunteers personal information is stored securely in hard copy and is only accessed by the individual or the Director of Services. All staff including volunteers, administration, and housekeeping sign a confidentiality agreement in relation to personal information of clients of the Family Centre and are bound by our Confidentiality Policy.

Client records are managed in such a way that they are only accessed by non-counselling staff while carrying out duties necessary for the running of the service. Such duties include the setting up of appointments, receiving and responding to calls, emails and inquiries, booking a course/workshop, taking payment for counselling/ courses. Admin staff are responsible for arranging client appointments.

## **5. What do we do with your data?**

There are many ways of processing all the data we collect, these are some examples:

- Process a job / volunteering application.
- Process a once off donation.
- Seek your comments/ feedback on our services
- Send our Spring/Summer or Autumn/Winter Programmes
- Send an email with activities and workshops of interest to you.
- Notify you of changes to the service
- Provide information.

Anonymized data is used for statistical reports for example our **annual report**, these do not include any data that identifies you or any individual. This data relates to clients demographics and presenting issues, referrer etc. We also contribute a statistical report which forms part of the national annual statistics generated by the Association of Agency-Based Counsellors & Psychotherapists in Ireland. (AACPI)

## **6. Do we share your data?**



The information you provide is confidential, however there are circumstances in which it may be necessary to share aspects of your data with third parties as outlined below. It is our practice to inform clients and ask for explicit consent other than when there is a serious concern for your safety.

1. It might arise if we receive a referral letter on your behalf e.g. we will acknowledge the referral, it may be beneficial to you if we speak to the referrer.
2. If we were referring you to another service it may be helpful to disclose some information so they could provide the most relevant service for your needs.
3. Disclosure required or Permitted under law: Please refer to the Client Counselling Agreement where it highlights the limits of confidentiality. The Family Centre has a Confidentiality Policy.
4. We can only disclose to solicitors subject to your written consent or request.

Supervision is a required part of the professional work within the Family Centre and content of counselling work may be discussed within our contracts and the normal bounds of confidentiality.

### **7. How long do we keep your data?**

In keeping with data protection principles we will only hold data for as long as is necessary. We retain data for the periods necessary to comply with legal obligations e.g. tax compliance, accounts, employees and volunteers. For people availing of counselling services we retain files for five years following completion. This period of time has in practice been sufficient to accommodate continuity for returning clients. It also allows a significant period of time for accountability should any issues arise post therapy, and finally it has proven to be manageable for the efficient access and secure storing spacing within the Centre.

### **8. Accessing your counselling notes.**

We have a separate policy titled **Clients Access File Retention Policy** which outlines how you can access your files. If you wish to see your file please discuss with your counsellor in the first instance or the Clinical Director or Director of Services.

### **9. What choices do you have?**

Under the data protection regulations you have the right to know what data we hold and to ask in writing to see your records and to amend your records if you have any concerns with any information.

You have a choice about whether or not you want to receive information from us. If you do not want to receive communication from us about our services please email us on [info@thefamilycentre.com](mailto:info@thefamilycentre.com)



The accuracy of your data is important to us. If you change your email address or if any of your data is inaccurate or out of date, please email [info@thefamilycentre.com](mailto:info@thefamilycentre.com) or you can phone us on 094 9025900. You can write to: The Director, Family Centre, Chapel Street, Castlebar, Co. Mayo. F23PH39

