

## Data Protection Policy

### General Data Protection Regulation

Reflect Hailsham is run by Hailsham Frontiers Charitable Trust and the Pregnancy Crisis Centre complies with the requirements of the General Data Protection Regulations (GDPR). Any personal data it processes will be obtained fairly and lawfully and not processed unless one of the conditions specified in Schedule 2 (and also in the case of sensitive data, one of the conditions in Schedule 3) are met. As a centre it will be clear about what data they are collecting and ensure they only collect data they need to process.

### Client Confidentiality

- In all aspects of the service, it will offer to provide a confidential service to all clients.
- Confidentiality is not between the individual and the trained Practitioner, but between the individual and the organisation. Any discussion of the client records within the organisation will be purposeful, sensitive, and respectful.
- No conversation about a client should take place outside of the organisation or with anyone who does not work as a volunteer.
- To provide the best possible help to clients, it may be necessary to share information with a supervisor or another member of the Practitioner Team.
- Information divulged by a client will be treated in the utmost confidence and will not be divulged to anyone outside the organisation except where extenuating circumstances exist (see below).
- No information about a client will be given to any third party even if the person is a member of the client's family.
- Information will only be passed onto another agency with the full informed consent of the client. The client has the right to withhold consent unless there are exceptional circumstances relating to the client's safety (see below).
- If the trained counsellor intends to obtain help from another agency or refer the client to another agency, this must be explained to the client and their permission given.

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- Clients under 16 are not required to have parental consent to use our services but trained Practitioners will always encourage these younger clients to discuss this issue with their parents or carer.

### Exceptions

- In certain circumstances, we reserve the right to break confidentiality should this be deemed necessary. These include:
  - Where there is reasonable cause to suspect that a child under the age of 18 is suffering, or at risk of suffering, significant harm.
  - Where the client has threatened, or is likely, to do serious harm to themselves or another individual.
  - Where the client gives information, which indicates a possible terrorist attack.
  - Where the centre has been instructed by the courts (including in limited circumstances by the police, acting on the authority of the courts) to reveal information. This will only be done if the courts or the Police ask in writing through their official channels.
- In all of these cases, if a decision is made to break confidentiality, it will be done only after consultation with the safeguarding lead for the Centre.
  - If confidentiality will have to be breached the Practitioner will make every effort to discuss it with the client unless this is deemed inadvisable. The client will be encouraged to contact the relevant authority involved themselves.
- If the client is unwilling to take action, then the decision to breach confidentiality will be made by the organisation, not the individual trained counsellor. The trained Practitioner must consult the centre manager and safeguarding lead.
- Trained Practitioners will keep careful notes of any incidents and all action taken should be recorded in the relevant place for a supervision record.

### Data Subject Access Requests

All data subject access requests for personal information made to Reflect Hailsham under GDPR will be dealt with by the Chair of Trustees for Hailsham Frontiers Charitable Trust, with responsibility for Data Protection.

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Reflect Hailsham will provide copies of the information it holds, by post, subject to the provisions of the General Data Protection Regulation.

#### Staff Awareness and Training

- All staff/volunteers will be made aware of the General Data Protection Regulations, and of their obligations under it. Any new staff/volunteers will receive this training as part of their induction process.
- All staff and volunteers will be asked to sign a policy agreement form when joining the organisation

#### Confidentiality re: Staff

- Staff and volunteer members also have the right to confidentiality.
- In order to protect trained Practitioners and staff members, their personal details should never be divulged to a member of the public.
- All staff training, and supervision records will be kept in a secure place.

#### Confidentiality of Client Records, Statistics, Publicity, Phone calls and Correspondence.

- All client records will be kept securely. It is the responsibility of those on duty to ensure that all written records are locked away at the end of each session. Electronic document will be stored in the SharePoint drive, only accessible by their practitioner, centre manager and administrator.
- To protect any future disputes, data will be kept indefinitely, in order to defend against any future legal claims, in the unlikely event of this occurring.
- Clients have the right to see their records. If such records exist the client is entitled to see them.
- Any statistical information shared for publicity purposes will not allow any clients to be identifiable.
- Anonymity will always be preserved if composite stories are created for publicity purposes.

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- No specific information about a client will be used publicly without their written consent. The same applies to any correspondence received that could be purposefully used in publicity.
- All letters and printed emails that disclose personal details of clients will be electronically stored on SharePoint.
- Regarding phone calls. If returning a landline phone call to a client, 141 should be dialled first to prevent other members of the client's household tracing the call. Texts to client's mobiles should be discreetly worded. Any client numbers left on the voicemail service should be removed as soon as possible and any notes made during the conversation revealing the client's details should be shredded or stored in a locked filing cabinet.
- An email regarding an appointment or personal client information will be deleted as soon as possible. If the correspondence is such that it is needed to be kept with their records, it will be electronically stored on SharePoint and then deleted from the email account.
- In order to comply with the requirements of GDPR that personal data be kept safe from unauthorised or unlawful access or processing and protected against accidental loss destruction or damage, all staff/volunteers will:
  - Be aware of and follow the security requirements applicable to the personal data upon which they work, to files and documentation, and which cover access to their work areas;
  - Ensure that personal data is disposed of in accordance with the Reflect Hailsham Centre Data Retention Policy.

#### Confidentiality of Supporters on the Mailing List

- All supporter's information that is stored on the computer will be kept up to date and will not be used outside the charity in anyway.
- This data will be stored in Sharepoint. Only the centre manager and admin will have access to this information. This information will not be shared with anyone else unless there is need to do so on grounds there is a significant risk to those involved.

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- Only what is needed will be kept about supporters, as soon as someone would like to be removed from our mailing list we shall do so promptly.

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