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BACKGROUND

Under the GDPR and Data Protection Act 2018 (DPA) and associated legislation, No5 (The Charity) are required to explain to service users:

- What information we hold
- Why we hold information.
- How we use that information
- If we will share that information with anyone else

SCOPE

This notice applies to everyone who uses No5 (The Charity) services.

PURPOSE

The purpose of this Privacy Notice is to explain how No5 processes personal data, to outline the steps we take to ensure that personal data is protected and to describe the individuals' rights in relation to the data we process.

What is Personal Data?

Personal data is any data that can be used to identify a living individual, on its own or in combination with other available information. References to names, identification numbers and location data are all personal data. Processing means anything we do with the data and includes collecting, storing, and sharing.

THE POLICY

1. The Counselling Service

No5 offers counselling services to young people (11-17) and young adults (18-25) referred to as "clients". We must hold the details of the people who have requested the service to provide it. However, we only use these details to provide the service the person has requested and for other closely related purposes.

Clients can access counselling at No5 either by telephone (calls are not recorded) or by filling in an online referral form. At the point of referral No5 collects client information relevant to the service the client wishes to access. They will be asked several details which will be logged, such as name, post

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code, date-of -birth, email address etc. They will also be asked to provide general information so that No5 can allocate the most appropriate service and counsellor to meet their needs. If the referral is made by a carer or external agency, then their data will be recorded alongside that of the client.

Emergency contacts will only be approached with the client's express permission or unless the situation of safeguarding arises.

In their initial counselling session, clients will be asked to complete a consent form which allows No5 to hold personal data. They will also be allocated a pseudonymised client code by Lamplight and all counselling session data will only be held against this unique client code.

During counselling, clients will be asked to answer key questions including outcome measures, and 6th and final session feedback information. These questions are designed to measure client wellbeing and monitor risk to allow counsellors to measure changes and record outcomes. All of which will be held against this pseudonymised client code. In their initial counselling session, clients will be asked to verbally consent to allow No5 to hold this outcome measure data.

The purpose of the feedback questions are to anonymously inform the agency of its overall performance. There is one bank of questions for completion during the 6th session or halfway point, and another set for completion during the final session.

Filling in all of this data is optional, and the information is held electronically under a pseudonymised client number which is double password protected.

Counsellors may also keep session notes which are pseudonymised and marked only with the client code. Session notes are for the counsellor's information only and are not held by No5 Young People.

We ask all clients to fill in a GDPR consent form which in the case of under 13s must be completed by the parent or caregiver.

Information is likely to be held in various forms, including electronically as well as in paper-based records. All information, forms, creative materials, and case notes are held securely and are destroyed after 7 years of therapy ending.

Clients have the right to access any information No5 holds about them and to ask for it to be changed or erased. Clients can withdraw their consent at any time by reading our Right to Withdraw Consent Procedure 92017-I. You can ask for this form by contacting No5 on 0118 901 5668.

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How No5 Uses Client Information

- To contact clients via email, text, or telephone
- To provide clients with counselling services
- To measure No5 progress in providing services and to secure funding and local grants. These statistical measures are anonymised.

Volunteers

No5 has several volunteers, who are Counsellors in Training. This may involve them having to record sessions or provide case studies to their training organisation. For written work, all details are changed/removed, clients are not identifiable. Consent needs to be obtained for recording etc but not for use in written work that is fully anonymised and unidentifiable.

Supervision Sessions

The BACP Ethical Framework states that all counsellors require one and a half hours of clinical supervision per month, to monitor counsellors' practice, ethics and standard of care. Counsellors may verbally present their anonymised cases to their clinical supervisor for a second opinion, but full name and any identifiable details will not be disclosed.

Client Confidentiality

No5 operates a policy of client confidentiality. This means that client information, along with what is said and done in counselling sessions, will not be disclosed to another person or organisation outside of the agency.

Should a client be referred to another agency the counsellor would seek the clients' express permission before doing so.

However, there are some important exceptions to this policy.

Under the Children Act 1989 No5 has a legal obligation to report to another person or organisation if clients under the age of 18 are at risk of:

- Harm from another person
- Serious self-harm
- Harming another person

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In addition, No5 has an obligation to disclose to a third party if a client (of any age) knows of, or is involved in, serious illegal activities, particularly to do with terrorism.

Consent

When we ask for your consent, we will always explain clearly what we are asking for and how we will use it.

Consent must be freely given, specific and informed and clients must be a genuine choice about offering said consent. Consent can also be withdrawn at any time by contacting info@no5.org.uk.

2. Fundraising or Direct Marketing

If you are a regular attendee of our AGM or have supported us previously, you may receive fundraising or other marketing mailings. We will only send you marketing information by email, SMS, or phone if you have given us specific consent. You can opt out of this communication at any time by contacting us at info@no5.org.uk.

3. No5 Website

We may use your personal information to help provide you with access to our website, personalise your experience, and improve and develop it further.

We have a valid Secure Socket Layer (SSL) certificate on all the financial information input pages on the site. We do everything we reasonably can to make sure your information is held securely on our systems.

Cookies are small text files stored on your computer by a website. We use login and session cookies on the site to operate the necessary systems for accepting donations.

No5 uses a third-party service to help maintain our website. To deliver this service it processes the IP addresses of visitors to the No5 website but does not store them.

No5 uses a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out such things as the number of visitors to various parts of the site. This information is only processed in a way that does not identify anyone.

This privacy policy does not cover the links within this site linking to other websites.

4. Complaints or Queries

No5 aims to achieve the highest standards when collecting and using personal information and take any complaints we receive about this very seriously. If you would like to make a complaint

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about the way we have processed your personal information you can contact us at info@no5.org.uk. We also welcome suggestions to improve our procedures.

To find out more about our complaints procedures please see the No5 website.

5. Job Applicants, Current and Former Employees / Volunteers

No5 has a legitimate interest in processing information during the recruitment process and for keeping records of the process. No5 is therefore the data controller for the information you provide during the process. If there are any queries about how we manage this information, please contact info@no5.org.uk

What happens to the information you provide us with?

All the information provided during the recruitment process will only be used for progressing the application, to assess suitability for the role applied for, or to fulfil legal or regulatory requirements if necessary.

No5 will not share any of the information provided during the recruitment process with any third parties for marketing purposes. The information provided will be held securely and will not be kept for longer than necessary.

What information do we ask for?

We do not collect more information than we need to fulfil our stated aims in assessing your suitability for employment. You are under no obligation to provide the information requested but this may affect your application.

Application stage

We will ask for personal details such as name and contact details but also further information relevant to the role such as previous experience, education, qualifications, and referees. Only individuals relevant to the interview process will have access to this information.

If invited to an interview, we might make interview notes and if unsuccessful these notes will be held by No5 until 6 months after the closure of the interview process.

If we make a conditional offer of employment, we will ask you for information so that we can conduct employment checks. You must complete these final checks to progress to final offer. This information includes (but not limited to) proof of identity / qualifications, criminal records declaration, referees etc.

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Following a final offer, we may also ask for bank and emergency contact details

How long is the information retained for?

For 7 years following the end of your employment.

Information generated throughout the assessment process and equal opportunities details are retained for one year only.

During Employment

We will also hold yearly reviews, appraisals and possibly supervision notes for the duration of employment which will be held for 7 years following the end of said employment.

6. Access To Personal Information

Individuals can find out if we hold any personal information by making a 'subject access request' under the GDPR 2018. To find out more please request our GDPR policy at info@no5.org.uk.

RESPONSIBILITY

All those persons referred to within the scope of this policy are required to adhere to its terms and conditions. individuals failing to meet the obligations set out in this document may result in the Charity following a disciplinary procedure through to termination of employment.

This Policy may be reviewed annually or more frequently, if appropriate, to take into account changes to legislation that may occur.

RESERVED RIGHTS

The Charity reserves the right to amend this policy at its absolute discretion.