



# Information Governance Policy and Procedure

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## Section A

### Introduction

Data held by Paper Plane Counselling Ltd will be held lawfully and for the retention periods set out in section B of this policy document.

This document refers to:

- Written Documents
- Spreadsheets
- Hardcopy case notes and files
- Database entries
- Images
- Recordings
- Emails
- Text messages
- Supervision notes
- Visits to the organisation's website
- Social media communication

### Aim and Purpose

The purpose of this document is to ensure that Paper Plane Counselling Ltd has a framework that ensures the rights and freedom of individuals in relation to their personal data (Article 1) and adheres to best practice in the management of client information and business records.

Information Governance sets out the way in which information collated by an organisation is managed and ensures that any information collected;

- is the right information
- is in the right place
- at the right time
- with the right people
- for the right reasons

***This is a live document and may be updated at any time to reflect changes in law or growth of the business, and therefore should be revisited regularly to check for any updates.*** Paper Plane Counselling Ltd is fully committed to ensuring clients' privacy and data protection rights.

*For the purpose of this policy Amy Mills is the named Data Protection Officer/Controller and Head of Organisation. She can be contacted by email [amy@paperplanecounselling.com](mailto:amy@paperplanecounselling.com), by telephone 07305 197 493 or by post at Paper Plane Counselling Ltd, 16 Westbourne Avenue, Hull HU5 3HR.*

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### Information Governance Framework Principles for Paper Plane Counselling Ltd

- 1.** Assessment needs for Information Governance (IG) Training have been identified and fully met, with a 75 minute GDPR CPD Course provided by the Clinical Hypnotherapy School ([www.clinicalhypnotherapyschool.com](http://www.clinicalhypnotherapyschool.com)) completed. Refresher training is completed every two years.
- 2.** Any changes to the business processes and/or operations will be planned and will comply with the framework to ensure any risks to personal and sensitive information are minimised.
- 3.** Any data collected is solely for the purpose of providing a person-centred service to an individual client.
- 4.** The Caldicott Principles are used to provide guidance in best practice when handling personal data, alongside the ICO's Office Codes of Practice.  
(<https://www.igt.hscic.gov.uk/Caldicott2Principles.aspx>)
- 5.** All technology used to store or facilitate information and communication is maintained according to the Data Retention Policy for Paper Plane Counselling Ltd.
- 6.** All records are identifiable, locatable, retrievable, and intelligible according to regulations set out by GDPR.
- 7.** It is the responsibility of the Data Controller to ensure sufficient resources are in place to prioritise adhering to Data Protection Legislation in the business.
- 9.** Any electronic devices where personal or sensitive, confidential information is held will be password protected.
- 10.** Procedures have been put in place to ensure the General Data Protection Regulations are met. These can be found in Section C.

## Section B

### Privacy Notice: Use of information

In accordance with this data retention schedule there may be occasions when data is not destroyed due to ongoing investigation, litigation or enquiry. The data will be deleted upon confirmation that it is no longer required.

On some occasions anonymised personal data will be retained whereby a client has provided a testimonial for use on the organisation's website. When data is non-identifiable GDPR law is no longer applicable. [Non-identifiable means that if this data was left on a bus, no one, including the data subject would be able to identify that this data was relating to them.]

- Personal information is collated and stored in hardcopy in a locked filing cabinet behind a locked door.
- Any document containing personal data will state "Official-sensitive, private and confidential" clearly.
- All emails will contain a privacy statement.

Under the General Data Protection and Retention (2018) legislation, regarding how your personal data is processed, all individuals have;

- the right to be informed;
- the right of access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to data portability;
- the right to object; and
- the right not to be subject to automated decision-making including profiling.

Please note that Paper Plane Counselling Ltd does not use automated decision-making tools, including profiling.

***If any information held is noted to be incorrect an individual can request a correction be made to their own personal information. If you wish for your data to be provided to another service provider, you may also request this in writing.***

### Website visitors and users

When an individual visits [www.paperplane counselling.com](http://www.paperplane counselling.com) we use Google analytics who are considered a third party service, to collect information about what visitors do when they click on our website, e.g. which page they visit the most. Google analytics only collect non-identifiable data which means we or they cannot identify who is visiting. Paper Plane Counselling Ltd will always be transparent when it comes to collecting personal data and will be clear about how that data is processed. Google analytics privacy notice can be found here:

<https://policies.google.com/privacy/update?hl=en>

Wix is a third-party service that hosts Paper Plane Counselling Ltd's website. Wix uses anonymised data to collect visitor information such as how long an individual remains on a page of a website. Wix also hosts the Contact Us form on Paper Plane Counselling Ltd's website and a copy of any data sent via this form is stored by Wix. Wix Bookings hosts the online session booking function on Paper Plane Counselling Ltd's website and a copy of any data given when booking a session online will be

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stored by Wix Bookings. Wix's privacy notice can be found here for further information:

<https://www.wix.com/about/privacy>

### Electronic financial data

Paper Plane Counselling Ltd uses a third-party provider, Stripe, to manage and take payment for sessions booked online through Paper Plane Counselling Ltd's website. Stripe will record an individual's contact and bank details when taking a payment. Stripe's privacy notice can be found here: <https://stripe.com/privacy-center/legal>

Paper Plane Counselling Ltd uses a third-party provider, SumUp, to take payments made by debit or credit card at the time of the therapeutic session. SumUp will record an individual's contact and bank details when taking a payment. SumUp's privacy notice can be found here:

<https://sumup.co.uk/privacy/>

Paper Plane Counselling Ltd uses a third-party provider, PayPal, to take online payments (on the request of clients who specifically wish to use this platform). PayPal will record an individual's contact and bank details when taking a payment. PayPal's privacy notice can be found here:

<https://www.paypal.com/uk/webapps/mpp/ua/privacy-full>

Paper Plane Counselling Ltd uses a third-party provider, Quickbooks, to manage our accounting electronically. Quickbooks will record an individual's name, payment amount and date of payment for each transaction made electronically (i.e. for all payments made via Stripe, SumUp or by making an online BACS payment). Quickbooks' privacy notice can be found here:

<https://quickbooks.intuit.com/uk/privacy-policy/>

Paper Plane Counselling Ltd uses an independent accountant who is considered a third-party provider, Botterill & Co, to prepare our annual accounts and tax returns. Botterill & Co views all data inputted by Paper Plane Counselling Ltd on to Quickbooks. This includes each individual's name, payment amount and payment date for all transactions made electronically (i.e. for all payments made via Stripe, SumUp or by making an online BACS payment). Botterill & Co's privacy policy can be found here: <https://www.botterillco.co.uk/privacy-policy>

Paper Plane Counselling Ltd banks with Yorkshire Bank. Yorkshire Bank records the account name, payment date and amount of all transactions made electronically (i.e. for all payments made via Stripe, SumUp or by making an online BACS payment). Yorkshire Bank's privacy policy can be found here: <https://secure.ybonline.co.uk/site-information/legal-privacy/> Yorkshire Bank has recently merged with Virgin Money. Virgin Money's privacy policy can be found here:

<https://uk.virginmoney.com/security/>

### Communication

Paper Plane counselling Ltd uses Frama RMail to communicate with clients via email ensuring that all emails sent containing sensitive information are encrypted and allowing clients the option to reply via encrypted email. Frama RMail is a third-party provider. Its privacy policy can be found here:

<https://www.frama-rmail.com/en/privacy-policy/>

Paper Plane Counselling Ltd uses WhatsApp to communicate with clients for the purposes of arranging client sessions, if the client initiates using this medium of communication. WhatsApp is a third-party provider. Its privacy policy can be found here: <https://www.whatsapp.com/legal/>

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Paper Plane Counselling Ltd uses Zoom to communicate and conduct therapeutic sessions with clients by prior agreement. Zoom's privacy policy can be found here: <https://zoom.us/privacy>

Paper Plane Counselling Ltd uses VSee to communicate and conduct therapeutic sessions with clients by prior agreement. VSee's privacy policy can be found here: <https://vsee.com/privacy/>

Paper Plane Counselling Ltd uses Doxy.Me to communicate and conduct therapeutic sessions with clients by prior agreement. Doxy.Me's privacy policy can be found here: <https://doxy.me/privacy-policy>

Paper Plane Counselling Ltd uses Signal to communicate and conduct therapeutic sessions with clients by prior agreement. Signal's privacy policy can be found here: <https://signal.org/legal/>

### Retention Schedule

Information Asset	Information Owner Asset	Retention	Trigger for Disposal
Email (including sent items and read receipts)	Head of organisation	Up to three calendar months from the date of the last therapeutic session and/or up to three calendar months from receipt of payment for the final therapeutic session (whichever is later).	End of retention period
Data received via the "Contact Us" form on Paper Plane Counselling Ltd's website	Head of Organisation	Up to three calendar months from receipt of data. A copy of the data will be saved as part of the client records (below) for individuals who go on to engage in therapeutic sessions.	End of retention period
Contact details and text messages held on mobile devices	Head of organisation	Up to three calendar months from the date of the last therapeutic session and/or up to three calendar months from receipt of payment for the final therapeutic session (whichever is later). All entries to be deleted prior to decommissioning of mobile device or reissue of device.	End of retention period
WhatsApp messages held on mobile devices	Head of organisation	Up to three calendar months from the date of the last therapeutic session and/or up to three calendar months from receipt of payment for the final therapeutic session (whichever is later).	End of retention period

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Information Asset	Information Owner Asset	Retention	Trigger for Disposal
Recordings	Head of organisation	7 years or earlier if consent is withdrawn	End of retention period
Images taken	Head of organisation	7 years or earlier if consent is withdrawn	End of retention period
Promotional materials	Head of organisation	Until superseded – Consent to be rechecked prior to reissue	End of retention period
Policies	Head of organisation	Until new policy has been put into place	End of retention period
Client records including session notes, initial assessment notes and client contact form	Head of organisation	In accordance with BACP regulation and insurance company requirements, 7 years after final treatment session has ended. Child records are held until the month after the client's 25 <sup>th</sup> birthday, or 26 <sup>th</sup> birthday if aged 17 when therapy ends.	End of retention period
Safeguarding records	Head of organisation	In accordance with the current organisation's insurance policy, 7 years after final treatment session has ended, unless superseded by new insurance policy. Safeguarding records relating to child clients will be held until the month after the client's 25 <sup>th</sup> birthday, or 26 <sup>th</sup> birthday if aged 17 when therapy ends.	End of retention period
Waiting lists	Head of organisation	Annual review period every January, old waiting list destroyed and new waiting list developed with any remaining live data transferred to new live document.	End of retention period
Worker supervision records	Head of organisation and worker's supervisor	To be retained when worker is in service and until 7 years afterwards.	End of retention period

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Information Asset	Information Owner Asset	Retention	Trigger for Disposal
Worker Continuing Professional Development records	Head of organisation and worker's supervisor	To be retained when worker is in service and until 7 years afterwards.	End of retention period
Service evaluation records	Head of organisation	Transfer to anonymised data within 6 months of collection.	End of retention period
Tax returns	Head of organisation	6 years from the end of the financial period to which they pertain to.	End of retention period
Incident/Accident reports	Head of organisation	40 years from date report was closed	End of retention period
Insurance policies	Head of organisation	40 years from date policy ended.	End of retention period
Complaints	Head of organisation	3 years from complaint being resolved	End of retention period
Right to Erasure Request	Head of organisation	7 years from request being submitted and completed.	End of retention period
Subject Access Request	Head of organisation	7 years alongside session notes, or plus 2 years from case closure if request is made after 5 years of storing data.	End of retention period

Hard copy data will be destroyed via a cross shredding machine owned by the organisation, electronic data will be permanently deleted.



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### Data Processing

#### What is the lawful basis for processing data at Paper Plane Counselling Ltd?

- **In relation to communicating with our clients:** The individual has given clear **consent** for their data to be processed for the specific purpose/s detailed in the consent form stored in their personal file.
  - Processing is necessary in order to protect the **vital interests** of the data subject or of another natural person.
  - Processing is necessary for your **legitimate interests** as specified in Article 9 of the GDPR;
1. Processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation shall be prohibited.
2. Paragraph 1 shall not apply if one of the following applies:
- (h) processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional and subject to the conditions and safeguards referred to in paragraph 3;
3. Personal data referred to in paragraph 1 may be processed for the purposes referred to in point (h) of paragraph 2 when those data are processed by or under the responsibility of a professional subject to the obligation of professional secrecy under Union or Member State law or rules established by national competent bodies or by another person also subject to an obligation of secrecy under Union or Member State law or rules established by national competent bodies.

***This means that Paper Plane Counselling Ltd does not require consent to hold your data to provide a service but does require your consent to contact you for specific purposes. Participating in the service by attending more than one appointment implies that you agree with the Terms and Conditions provided to you at the commencement of service delivery.***

#### Description of processing

The following is a broad description of the way this organisation/data controller processes personal information. Clients wishing to understand how their own personal information is processed may choose to read the Accessible Privacy Policy document, which compliments the policies detailed here.

#### Reasons/purposes for processing information

Paper Plane Counselling Ltd processes personal information to enable the provision of Counselling and Psychotherapy, and the Supervision thereof, to advertise services and to maintain accounts and records.

#### Type/classes of information processed

Paper Plane Counselling Ltd processes information relevant to the above reasons/purposes. This information may include:

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- personal details
- family, lifestyle and social circumstances
- goods and services
- financial details
- employment and education details

Paper Plane Counselling Ltd also processes sensitive classes of information that may include:

- physical or mental health details
- racial or ethnic origin
- religious or other beliefs of a similar nature
- offences and alleged offences

Paper Plane Counselling Ltd processes personal information about:

- clients
- suppliers
- business contacts
- professional advisers
- supervisors

## Section C

### Data Breach

All personal and sensitive data held by Paper Plane Counselling Ltd is held securely. Electronic data is stored on a password protected and encrypted external hard drive which is stored in a locked filing cabinet behind a locked door when not in use. A back-up of all electronic data is made on a monthly basis and is stored in a separate password protected and encrypted external hard drive which is stored in a separate locked filing cabinet behind a separate locked door when not in use. The computers used to access this data are also password protected. Hardcopy data is held securely in a locked filing cabinet behind a locked door.

In the case of a data breach Paper Plane Counselling Ltd shall comply with the regulations set out under Article 33 of the GDPR stated below;

**1.** In the case of a personal data breach, the data controller shall without undue delay and, where feasible, not later than 72 hours after having become aware of it, notify the personal data breach to the ICO, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of the individual. Where the notification to the ICO is not made within 72 hours, it shall be accompanied by reasons for the delay.

**2.** The notification referred to in paragraph 1 shall at least:

**(a)** describe the nature of the personal data breach including where possible, the approximate number of data subjects concerned and the categories (e.g. sessions notes, phone numbers) and approximate number of personal data records concerned;

**(b)** communicate the name and contact details of the data controller where more information can be obtained;

**(c)** describe the likely consequences of the personal data breach;

**(d)** describe the measures taken or proposed to be taken by the controller to address the personal data breach, including, where appropriate, measures to mitigate its possible adverse effects.

**4.** Where, and in so far as, it is not possible to provide the information at the same time, the information may be provided in phases without undue further delay.

**5.** The controller shall document any personal data breaches, comprising the facts relating to the personal data breach, its effects and the remedial action taken. That documentation shall enable the supervisory authority to verify compliance with this Article.

**6.** In the event that a data breach will likely cause a risk to the rights and freedoms of client data, the data controller must communicate the nature of the breach in clear, concise and plain language, to the client/s involved, without delay.

**7.** If a breach occurs but the data controller has gone to appropriate lengths to protect the data held on the client (e.g. password encryption of electronic files), or if the data controller has taken subsequent action to prevent the risk (e.g. immediately blocking a mobile device) then notifying the client will not be required.

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### Subject Access Request

A Subject Access Requests (SAR) permits individuals to request a copy of their personal information.

A SAR must be acted upon within one month, at the most within two months, any longer and reasonable reason must be provided. There are no fees unless there is a disproportionate fee to the organisation for sending out the information. Application for SAR should be held alongside session records, unless application was made after eight years of the end of treatment. In which case the SAR will be held for a further two years after closure of SAR.

A SAR request will include information we hold about you. Paper Plane Counselling Ltd will:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form.

SAR requests should be put in writing to Paper Plane Counselling Ltd. If the data controller doubts the identity of the person making the request then they will first take reasonable steps to ensure your identity before releasing any records. A response may be provided informally over the telephone with your agreement, or formally by letter or email. ***If any information held is noted to be incorrect an individual can request a correction be made to their own personal information. If you wish for your data to be provided to another service provider, you may also request this in writing.*** We may have a legal basis to continue to hold your data and will notify you of this if that is the case. Any requests should be made in writing to Paper Plane Counselling Ltd.

### Right to Erasure

Any person may put in a request for their personal data to be removed (the 'right to be forgotten' or the 'right to erasure'). In this instance hard copy data will be shredded using a cross shredding machine owned by the organisation and any electronic data will be permanently deleted. The client will be notified of the completion. The request for deletion of data and the confirmation of completion will be held securely until eight years after the request was made. In some instances, Paper Plane Counselling Ltd's supervisory body or insurance company may require us to lawfully hold your files until the end of our retention period. If this arises, we will notify you at our earliest opportunity.

### Complaints

Paper Plane Counselling Ltd hopes to meet the highest quality standards when processing personal and sensitive data. Complaints can help identify areas for improvement and therefore Paper Plane Counselling Ltd would welcome you raising any concerns you have.

These Information Governance Policy documents were created to be as transparent and understandable as possible. It will not be completely exhaustive of all aspects of data collection. If you would like further information about a specific process, please contact Paper Plane Counselling Ltd.

If you feel you would like to make a complaint about how your personal and sensitive data is handled by Paper Plane Counselling Ltd you can contact Paper Plane Counselling Ltd directly. In the event that Paper Plane Counselling Ltd cannot resolve your complaint to your satisfaction you can contact the Information Commissioners Office on 0303 123 1113.

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### Safeguarding your privacy

In the event of the data controller becoming incapacitated due to an unforeseen emergency (e.g. sudden illness or death) then the data controller's supervisor will contact current clients to explain the situation and discuss alternative support. They will archive any client files in accordance with General Data Protection Regulations.

This may mean shredding any hardcopy documents, and having any electronic documents saved on a hard drive professionally wiped or destroyed by a GDPR compliant technician.

