

## DATA PROTECTION PROCEDURES AND GUIDELINES

### 1. Sue Lambert Trust is committed to complying with principles of the General Data Protection Regulations 2018 as follows:

- Personal data shall be processed fairly and lawfully and, in particular, shall not be processed at all unless it is required to allow SLT to pursue its legitimate interests, or in the case of sensitive personal data, data that needs to be processed to protect the interests of volunteers or staff (for example information about a history of violence).
- In the case of Personal data it shall be asked for and used only for one or more specified and lawful purposes. Data collected will not be used for any other purpose at a later date.
- All information held will be relevant, adequate and not excessive in relation to the purpose or purposes for which is being requested and held.
- All information will be kept up to date.
- Information collected will not be kept longer than is necessary for the purpose for which it has been collected. In the case of client files, these shall be kept for no longer than 12 months following the date the client ended their counselling.
- Personal data shall be used and shared taking into account the rights of the person that it relates to.
- All reasonable steps will be taken to protect information held – to stop unauthorised access to hard copy/computer information and minimising the risk of accidental loss or destruction.
- Personal data will not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

### 2. Information collection and processing

#### 2.1 Information will be collected and recorded in the following circumstances:

- When completing initial assessments
- When administering the waiting list
- When recording attendance and take-up rates
- To monitor the profile of SLT clients

#### 2.2 When collecting and recording individual client information care will be taken to:

- Ensure that there is a private and secure environment in which questions can be asked in confidence
- To ensure that only relevant questions are asked

- To record information in an appropriate manner – using appropriate and concise language
- To ensure that the information recorded is relevant to the matters being addressed

2.3 When collecting monitoring information (for example to establish the client profile) care will be taken to:

- Explain the reasons for collecting the information
- Explain that information will be recorded and held anonymously
- Explain that the information will not be used for any purpose other than monitoring and that it will not be shared with third parties in any circumstances

### **3.0 Information Sharing**

3.1 SLT will share information with relevant agencies in the following circumstances in line with SLT's Safeguarding Policy and Procedures:

- Where there is information relating to potential risk or harm to a child or vulnerable adult
- To manage and prevent risk of harm to clients – this will be with the consent of clients in all circumstances
- At the request of the client

3.2 Consent to share information will be sought from the client in all circumstances unless there is an urgent need to refer the matter because of the seriousness of the situation. This is to be assessed on a case by case basis as outlined with the Safeguarding Policy and guidelines/procedures.

3.3 In the event of any queries regarding the sharing of information staff/volunteers should contact the Clinical Lead, Operations Manager or Chief Executive as appropriate.

3.4 Details of information shared with other agencies will be stored securely

3.5 All information is to be shared on a 'need to know' basis. This means that:

- Information given will be accurate and based on facts
- Information will be relevant to the situation being managed
- Information will only be shared with the relevant agency and with an authorised person
- Any hard copy or email information will be marked to show that it is sensitive information that must be handled confidentially and is only to be seen by the authorised person

3.5 When sharing information the responsible person will discuss the matter with the receiving agency and clarify:

- Feedback that they can expect
- Timescales for getting any feedback
- Feedback to be reported to the client and who will be responsible for doing this