

Reach Privacy Policy

(for date of latest update see point 14)

This policy is a requirement for all organisations who use or process personal data of European union citizens. It is a requirement under the general data protection regulation (GDPR).

Introduction.

Reach appreciates that your privacy is important to you and that you care about how your personal data is collected stored and used. Reach respects and values the privacy of everyone who uses our services, website or has a supporter relationship with us. We will only collect and use personal data in ways that are described here and in a manner that is consistent with Reach's obligations and your rights under the law.

1. Information about us.

1.1 Reach Merseyside is a registered charity and a limited company (often referred to as Reach or Reach counselling). Our registered address is 85A Allerton Road, Liverpool, Merseyside, L18 2DA.

1.2 The Data Protection Officer for Reach Merseyside is Andy Bond, and can be contacted on 0151 737 2121 or by email at reach@reachuk.co.uk or at the above postal address.

2. What information do we collect?

Depending on whether your request is to access counselling, to become a supporter or to register interest in an event or service, Reach may collect some or all of the following data, always with your express permission:

2.1 Name.

2.2 Address.

2.3 Phone numbers.

2.4 Email.

2.5 Reason for requesting counselling.

2.6 Payment details when you offer financial support, in order to process a standing order.

2.7 Correspondence, when you communicate with us by post, email or telephone on a matter of interest or concern.

2.8 Counselling case notes with your express consent.

3. How does Reach use personal information?

3.1 All personal data is processed and stored securely, for no longer than is necessary for the reasons for which it was first collected. Reach will comply with the obligations under the Data Protection Act 1998 or GDPR and safeguard your rights accordingly at all times. For further details see section 6 How we store and secure personal data.

3.2 Reach's use of your data will always have a lawful basis, either because it is necessary to serve you as you have requested, because you have consented to the use of your data or because it is in Reach's legitimate interests. Specifically, Reach may use your data for the following purposes:

3.2.1 To offer and maintain an effective counselling relationship.

3.2.2 Replying to emails, letters and phone calls.

3.2.3 Facilitating your financial support of Reach as a supporter (Partner or Friend).

3.2.4 To register your interest or involvement in an event or training that Reach may hold or host.

3.2.5 Giving updated information to supporters who have requested it.

3.3 Reach will not send you unsolicited marketing or spam and will take all reasonable steps to ensure that Reach fully protects your rights.

3.4 You have the right to withdraw your consent to Reach using your personal data at any time and to request that Reach deletes it. This does not apply to counselling case notes which are kept for three years (seven years for children and young people) post counselling, as identified in section 7 (7.2). This is as advised by the Association of Christian Counsellors.

3.5 Reach does not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. See section 7 for more detailed information.

4 What legal basis do we have for processing your personal data?

4.1 The usual legal basis for Reach processing data is one of consent or of contract. This is where you have given consent in: written, verbal or electronic form for information to be used for a specific purpose. This will usually be to receive counselling, begin a supportive relationship or to attend an event.

4.2 Some data may be processed on a basis of legitimate interest. Either where further information has been requested for marketing purposes or in a way that will have minimal impact on privacy and it is expected that the information will be welcomed by the subject.

4.2.1 Legitimate interest is also the basis for using employee data such as is relevant to effective payroll management.

5 When do we share data?

5.1 We do not normally share your data with any third party unless you specifically request it in order to assist you. This would require additional specific consent from you.

5.2 There could arise very rare cases where Reach would have a legal obligation or it would be seen as a vital interest for us to share your data. This would only be done in order to comply with the law or to protect an individual's life.

6 How do we store and secure personal data?

6.1 The data we collect from you will be stored in the U.K. only. We will take all reasonable steps to ensure your data is treated securely and in accordance with this policy.

6.2 Reach has put in place appropriate security measures to prevent your data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We limit access to those employees or agents of Reach who have a need to know in order to serve you. All such persons are subject to a duty and commitment of confidentiality.

6.3 All digital information is stored on a server that is password protected.

6.4 All Reach staff are trained in managing confidentiality and we seek to maintain an appropriate balance between your information being secure yet accessible to Reach staff in order to serve you as requested.

6.5 Notes used to assist client's counselling, known as counselling case notes, are assigned a code number, are anonymised and stored separately from the contact information we have been given for you.

7 How long do we keep your personal data for?

7.1 Reach does not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or retention will be determined on the following basis) in order to carry out your request or as long as is required under legal or counselling expectations.

7.2 We will keep counselling information for three years after the counselling has concluded. This is to provide reasonable evidence should there be any complaint, investigation or claim. All counselling case notes and contact information will then be shredded or deleted.

7.2.1 Counselling information and case notes from working with children and young people will be kept for seven years as is advised for this type of work.

7.3 Information from supporters (Partners or Friends) will be kept for six years after the relationship ends as will information from an event or training unless you request we keep some of your information to inform you of future events.

7.4 When the appropriate time has elapsed information stored electronically will be deleted and paper information will be shredded.

8 Your rights in relation to personal data.

8.1 as a data subject, you have the following rights under the GDPR, which this policy and Reach's use of personal data have been designed to uphold:

8.1.1 the right to be informed about Reach's collection and use of personal data;

8.1.2 the rights of access to the personal data Reach holds about you see section 12;

8.1.3 the right to rectification if any personal data reach holds about you is inaccurate or incomplete (please contact Reach);

8.1.4 the right to be forgotten, i.e. the right to ask Reach to delete any personal data we hold about you, Reach only holds your data for a limited time, as explained in section 7 but if you would like Reach to delete it sooner, please contact us;

8.1.5 the right to restrict (i.e. prevent) the processing of your personal data;

8.1.6 the right to data portability (obtaining a copy of your personal data to reuse with another service or organisation);

8.1.7 the right to object to Reach using your personal data for particular purposes;

8.1.8 rights with respect to automated decision making and profiling;

8.2 If you have any cause for complaint about Reach's use of your personal data, please contact reach using the details provided in section 11 and we will do our best to solve it for you. If Reach is unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office, with whom Reach is registered.

8.3 For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

9 Use and definition of cookies.

9.1 Reach has used cookies, especially chocolate-chip ones, in the typical and pleasurable way for many years. However, we now have to have a different relationship with cookies as part of our website. These cookies are used to improve your use of our

website. They are apparently a legality and our use of them is defined in this very detailed automatic cookie privacy policy which can be found here <https://automatic.com/cookies/>

9.2 A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree the file is added and the cookie helps analyse web traffic and let you know when you visit a particular site. Cookies are intended to allow web applications to respond to you as an individual.

Our understanding is that overall, cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie does not give us access to your computer or any other information about you. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser to decline cookies if you prefer. In some circumstances this will prevent you from taking full advantage of the website. For full information on about cookies and how to manage them please go to <http://www.allaboutcookies.org/>

10 Use of automated decision-making and profiling.

10.1 Reach does not presently make any known use of this technology.

11 How to contact us?

Should you have any questions about this Privacy Policy please contact Reach by email at reach@reachuk.co.uk by telephone on 0151 737 2121 or by post at Reach, 85A Allerton Road, Liverpool, Merseyside, L18 2DA.

12 How can you access your data?

12.1 You have the right to ask for a copy of any of your personal data that is held by Reach. Under the GDPR, no fee is payable and Reach will provide any and all information in response to your request free of charge. Please note this does include counselling case notes, but does not include counsellor's process notes, which are occasionally made, as they are used for the counsellor's own development and awareness raising in order to improve their work with all clients.

13 Linking to other websites/third party content.

13.1 Reach is not responsible for how any linked website or third party manages your data.

14 Changes

14.1 This Privacy policy was last updated 10 May 2019