

Churches' Ministerial Counselling Service

Privacy Notice – Clients

Purpose of this Statement

The Churches' Ministerial Counselling Service (referred to as 'the Service', we, us or our) are committed to protecting and respecting your privacy. We think it is extremely important to keep any personal information we hold secure and confidential.

Laws apply to our use of anyone's personal information and everyone has rights regarding how their personal information is handled.

We have published this statement to tell you:

- What information we may collect about you;
- How we store your personal information;
- What we use your personal information for; and
- Who (if anyone) we pass it on to and for what purposes.

What information we collect

When you contact us to ask for counselling, the Area Coordinator will note your name and enough contact details to be able to get back in touch with you, together with the denomination¹ from which you derive your eligibility (which may be that of, for example, your spouse or parent rather than your own if you are not approaching us as a minister or employee). This information is essential to our being able to refer you to a counsellor, and **will be processed on the ground of our legitimate interest of making referrals and continuing administration of the Service**. We will also on the same ground record any requests you make which will help to make the most appropriate referral. This information will be destroyed three years after you have completed your counselling – this is the maximum period most bodies who accredit our counsellors will allow in the unlikely event of your making a complaint.

How we store your personal information

As soon as possible any handwritten notes will be transferred to electronic format, the paper will be shredded and the electronic file will only be stored on a secure remote server ("cloud") complying with Data Protection requirements, password protected. No file will remain on a local computer. The document on the cloud will only be accessible to the Area Coordinator and a designated alternate who will have access details to be used strictly only in the case of the Area Coordinator's incapacity or decease.

What we use your personal information for

We use your personal information to communicate with you in connection with your counselling and to make the referral to the counsellor. When the Area Coordinator receives requests for payment from the counsellor, they will refer to your personal information to ensure that the payment will be recorded against the correct denomination's liability, but documents sent to the central administration (Service Coordinator) will use only a reference number and it will not be possible to link this to your personal identity – only the Area Coordinator and the Counsellor are ever able to match name and number.

Who (if anyone) we pass it on to and for what purposes

Other than if we are compelled to do so by court order or other legal requirement, we will only pass your name and denomination to the counsellor to whom we are referring you, once we have received **your explicit consent**. You must make the initial contact once the Area Coordinator has given you the counsellor's contact details, but our passing on of your name will mean they are expecting to hear from you, and we tell them the denomination so they know which financial

¹ By denomination we mean also a Diocese or other regional church body, or a Christian organisation which offers our services to its staff.

arrangements apply and which body should be named on the claim for fees. (The counsellor will be bound by professional codes of conduct to maintain your confidentiality, which they should explain to you at the first session.)

Data Controller

For the purposes of Data Protection law, the Data Controller is the **Churches' Ministerial Counselling Service Steering Group**.

Your rights

You have the right to ask us not to process your personal information. However you will need to understand that we may be unable to provide counselling for you if we are unable to record and process the information you have provided.

There are a number of other rights you have:

- The right to access your personal data and to obtain certain information about it
- The right to rectify the data if it is inaccurate
- In some circumstances, such as when the data is no longer required or if the use of the data has no legal justification, the right to have the data erased
- In limited circumstances, the right to object to our handling of the data
- In limited circumstances, the right to restrict the handling of our data

You can exercise your rights or obtain more information about them by contacting the Service Coordinator (email sc.cmincs@gmail.com or phone 01235 517705).

(Note that under normal circumstances the Service Coordinator does not know the identity of clients – within the administration of the Service only the Area Coordinator holds this information. Although in an initial contact under this clause you may be able to maintain this anonymity by using your CMCS reference number, it may in due course become necessary for you to give your name.)

If you remain concerned about the way your information is being handled you have the right to complain to the Information Commissioners Office (ICO) about the way in which we collect and handle your personal data. Complaints to the ICO can be made on the website <https://ico.org.uk/>.