



Our Privacy Notice for The Employee Counselling Service

The Employee Counselling Service is an emotional wellbeing service delivered by Northpoint Wellbeing, a registered charity.

In the context of delivering therapeutic support for users of this service, Northpoint Wellbeing will collect, store and use personal data about you. Your personal data will also be used to enable you to receive therapy.

Northpoint Wellbeing in its role as Data Controller has a registered address of Leeds Bridge House, Hunslet Road, Leeds, LS10 1JN, and is registered with the Information Commissioner's Office (ICO) registration: Z5357295

We take our duty to protect your personal data, and maintain confidentiality very seriously. We are committed to taking all reasonable measures to ensure the security of the personal data we are responsible for, whether this is computerised or in paper form.

At Board level we have a Senior Information Risk Owner (SIRO) who is accountable for the management of all the charity's information assets and a Caldicott Guardian who is responsible for the management of patient data and patient confidentiality. We have a Data Protection Officer who ensures the charity is accountable and in compliance with the General Data Protection Regulation (GDPR) and the forthcoming Data Protection Act 2018.

The Data Protection Officer is: Alison Cater (alison.cater@northpoint.org.uk)

What information do we collect about you?

We collect data about your health, and the treatment and support you receive from Northpoint Wellbeing.

The data we collect may come from you, or your employer It may include:

- Basic personal details about you, such as your name, address, date of birth, etc.
- Contacts we have had with you, such as appointments

How is your personal information used?

Your data is used to, to ensure that the therapist involved in your care has accurate and up to date information to assess your health and contact you and for us to receive payment for this work.

Your anonymised data may also be used to ensure the charity can meet people's needs in the future.

Our lawful basis for processing your information under Data Protection legislation is:

Legitimate interest: Article 6(1)(f) which gives a lawful basis for processing where:

"processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data"

The legitimate interest is being able to provide you with a service that meets your needs. Therefore, we hold contact information to be able to communicate with you and health information to best meet your therapeutic needs.

Some of the data we hold on you is classed as special category data. Special category data is personal data that needs more protection because it is sensitive. The lawful basis for processing this data is as follows:

The processing is necessary for the purposes of preventative or occupational medicine, the assessment of the working capacity of employees, medical diagnosis, the provision of health or social care or treatment or management of health or social care system (GDPR Article 9(2)h).

Storing your personal data

Records are stored electronically and retained for up to 3 years.

Who do we share personal information with?

We will not disclose your information to any other third parties unless:

- We have your permission
- We have to share it by law
- We have good reason to believe that failing to share the information will put you or someone else at risk of serious harm or abuse
- We hold information that is essential to prevent, detect, investigate or punish a serious crime

Please contact:

The Data Protection Officer, Northpoint Wellbeing, Leeds Bridge House, Hunslet Road, Leeds, LS10 1JN
0113 243 3400 if you have any questions about the processing of your data.

Your Rights

We will ensure your rights are respected. You have:

- The Right to be Informed – we tell you what we do with your information. We do this through notices like this, service information leaflets, notices on our websites and posters.
- The Right to Rectification – we will correct any personal information that is inaccurate or rectify any data that is incomplete.
- The Right to Object – you have the right to object to how we process your information. Your objection will be considered in relation to your particular situation; we will stop processing unless there is a legitimate reason for us to continue e.g. we will not be able to stop the processing of your data to provide you with support and this is needed to provide safe care.
- The Right to Restrict Processing – we will temporarily restrict processing your data, whilst we check the information, if you query the accuracy of it. We will also restrict processing (if you raise an objection to how we process your data) whilst we consider your objection.
- The Right of Access – you can ask for copies of information we hold about you. This is called a subject access request. If you would like to request a copy of your records, please contact the Data Protection Officer, Northpoint Wellbeing, Leeds Bridge House, Hunslet Road, Leeds, LS10 1JN.

- The right of Erasure Under Article 17 of the GDPR- you have the right to have personal data erased. This is also known as the 'right to be forgotten'. The right is not absolute and only applies in certain circumstances.

Complaints

You can also complain to the ICO (Information Commissioners Office) if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>