

Hounslow Youth Counselling Service Data Protection & Privacy Policy

1 January 2026 v

HYCS regards the privacy of our users and staff as highly important. Any personal data which you provide to us through any means (verbal, written, in electronic form, or by your use of our website) will be held and processed respectfully and in accordance with **The Data Protection Act 1998**, and the **revised version of The Data Protection Act 2018** which implements the **General Data Protection Regulation(GDPR)** 2018. The GDPR specifically outlines the responsibility and strict data protection principles for looking after personal information.

HYCS asks for, and holds our users'/staff data for the purposes for which you have given consent, to provide the services you have requested from us, and to meet the legitimate interests of the charity.

Introduction

Hounslow Youth Counselling Service, is committed to protecting your privacy. Please read the following to learn more about our privacy policy and our information collection and use practices:

This policy only applies to data collected by HYCS staff and volunteers, and via our own forms and website. Third party agents (e.g. in schools, prison) and websites which are linked to ours, are not covered by this policy. If you have any queries concerning your personal information or any questions on our use of the information, please contact the HYCS Data Controller, Head of Service Patricia David at 78 St John's Road, Isleworth, Middlesex TW& 6RU.

When you request counselling with the HYCS; become an employee or volunteer with the HYCS; or otherwise provide your personal details to us, you will be asked to consent to our processing of your data under the terms of this policy.

What information do we collect?

- **Counselling Requests** – Registering with us or being referred to our counselling service can be done via email, on paper, telephone or in person. Our request process can involve providing us with your name, address, telephone numbers and email address and other personal details such as: gender, ethnicity, sexuality. We will also request information on your availability, therapeutic issues, and other details which we deem relevant to processing your request.
- **Introduction Counselling Appointments** – At an initial appointment or via a referral form in school or HM Feltham YOI, we ask about your current personal, social, and medical circumstances. We may also ask about your background and family history, as well as the issues which are affecting you now. We require this information so that we can decide about our offer of counselling to you, to assign you to a relevant counsellor, and to manage the service we provide to you.
- **Staff** – Counsellors, Administrative staff, Supervisors, Trustees and other staff paid or unpaid may apply to work at HYCS by form, letter, telephone or email. They will be interviewed and

depending on the position, go through a recruitment and selection programme. We will ask you to complete: an application form and cover letter about your background, qualifications, experience, and professional memberships, name, address, telephone numbers, email address, and details for referees and people we may need to contact for you in emergencies.

We will ask for details (DBS) to ensure you do not have a criminal record. This information is only processed for the purpose of considering your application for volunteer or paid position, making any offer of employment, administering an agreement of accountability or contract of employment.

- **Donors** – The information you give us when making a donation may include your name, postal address, email address, phone number, amount donated, Gift Aid status, and messages.
- **Website** – We use Rubbaglove to host our website. They collect anonymous data relating to user behaviour and ‘web traffic’ statistics. The collection and use of this data by Rubbaglove is subject to their own Privacy Policies. Rubbaglove hosts our website domain, in which data protection is subject to their privacy policy.
- **Other** - Google Analytics collects statistics on traffic to our website. Please see more info on Google Analytics help centre and data privacy and security policy.
- **Emails**- Microsoft Exchange 365 host our email system
- **Other Forms** – The information you give us on other forms such as HYCS evaluation forms (feedback forms) and Clinical Outcome Evaluation Forms are coded and anonymous and locked in cabinets.

What do we use your information for?

- To provide clients with the professional counselling service requested from us.
- To enable us to offer appropriate opportunities and support to our counsellors, administrative staff and other volunteers.
- To offer suitable counselling appointments, and to allocate clients to our counsellors
- To evaluate the counselling process and difference made.
- To notify you about changes to your appointments and other changes to our services.
- To seek feedback from you on your experience of counselling with us.
- To improve our service to ensure that it is provided in the most effective manner for you and for us.
- To administer our service, including the arrangement of appointments, the handling of donations, and for financial control, data analysis, research, statistical and survey purposes.
- To complete reports to ensure accountability of the service and as a legal requirement.
- To keep in touch with those who consent to this, for the purposes of organisational, service and professional development.
- To fulfil our administrative, legal and contractual obligations.

What information do we share?

We will not share any information about you with other organisations or people, except in the following situations:

- Consent – HYCS may share your information with professional carers or others whom you have requested or agreed we should contact. In accordance with HYCS policy and procedures on: Safeguarding; Confidentiality; Information sharing.

- Serious harm – HYCS may share your information with the relevant authorities if we have reason to believe that this may prevent serious harm being caused to you or another person.
- Compliance with law – HYCS may share your information where we are required to by law or by the regulations and other rules to which we are subject, e.g. terrorism, drug money laundering; or via court order for disclosure.
- It is necessary to provide your employee details to our payroll management company.
- As part of the backups of encrypted data processed and held by professional IT security companies.

How do we keep your information safe?

All information you provide to us is stored as securely as possible. All paper forms and correspondence are kept in locked filing cabinets, in which the keys are locked in an alarmed room on our locked premises.

All electronic records are stored on our own on-site computer server, all access to which requires password-protected authentication. The server itself is locked in a separate room within our premises. The HYCS IT consultants and data base companies are Capital IT Services London Ltd. They maintain the safety and security of all of HYCS data and each company has their own Privacy Policy.

Unfortunately, the transmission of information via the internet is never completely secure. Although we will do our best to protect your information using industry-standard protocols and encryption, we cannot guarantee the security of your data transmitted to us via email, including forms completed on our website which are transmitted by email; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Personal information, appointments and other documentation are destroyed 6 years after the end of counselling. Our Introductory appointment log and Wait List Log are destroyed 6 years after the first appointment.

Emails, telephone messages and text messages are kept no longer than 12 months.

Personnel records/application forms are deleted 6 years after the end of staff contract.

Personal data about unsuccessful candidates who have applied for jobs or volunteer positions at HYCS will be stored for 1 year after the recruitment process is completed, at which point it will be disposed of securely.

Paper and hard copies of data are physically shredded in a paper cross-shredder or an external data destruction company to destroy them. Electronic data including emails, text messages and any electronic copies of referral forms stored on the computer server (please note every document with client personal data are password-protected) are deleted from the system.

Non identifiable information used for statistical purposes and reports is retained as part of the HYCS documentation. This is coded and anonymised.

Payroll information is securely kept by Topsource Worldwide under finance laws.

Your rights:

To access a copy and explanation of your personal data that HYCS currently holds

To request correction or erasure, in certain circumstances

To request limiting or ceasing data processing, where applicable

You may withdraw your consent for us to hold and process your data at any time. You can withdraw your consent by putting your request in writing to the HYCS Data Controller, Head of Service Patricia David at 78 St John's Road, Isleworth, Middlesex TW7 6RU.

If you wish to see the data that HYCS has stored about you, you can request this in writing to HYCS Data Controller, HYCS Service Manager – Maria David at 78 St John's Road, Isleworth, Middlesex TW7 6RU. Once we have acknowledged that we have received this request, we will share your information with you within one month.

In order for you to retain your data we would:

1. Invite you into our service personally to retrieve your data and sign to receive it. Or;
2. Send your data to you via email, ensuring all documents are password protected. We would ask you to acknowledge in writing that you have received this. Or;
3. Send your data via postal service recorded special delivery.
You can decide which option is most suitable/secure for you.

If you believe your data has been processed in a way that is not compliant with the GDPR, you have the right to complain to the Information Commissioners Office (ICO) by visiting their [website](#) or by calling 0303 123 1113.

Who is responsible for data protection at Hounslow Youth Counselling?

Named Contact: HYCS Service Manager, Maria David.

Hounslow Youth Counselling is a registered organisation and member of the Information Commissioner's Office (ICO).

Changes to this policy

We may edit and update this policy from time to time. If we make any substantial changes, we will notify you by posting a prominent announcement on our website.

Next Review 2027

z:\hycs docs & policy & procedures\policies & procedures\privacy policy and data protection\hycs privacy policy.rtf