

# **Bridge the Gap Facilitators Privacy Policy**

## **In accordance with the Data Protection Act 2018**

### **1. What data do we collect?**

Personal identification information prior to or at the initial assessment:

- Name, address, telephone, email

Special category data which may be disclosed through the course of sessions with your facilitator:

- Political opinions, religious or philosophical beliefs, trade union membership, health, transgender status, sexuality, ethnicity

### **2. How do we collect your data?**

All personal data collected by Bridge the Gap Facilitators is provided by you directly, when you:

- Call us using your phone number
- Submit an online callback request form
- Provide your identification information at the initial assessment
- Disclose special category data through the course of sessions with your facilitator

### **3. How do we use your data?**

Bridge the Gap Facilitators uses your personal information in 6 ways:

- Personal identification information to make or keep in contact with you through the course of sessions with your facilitator
- Personal identification information to send you a feedback form upon completion of your sessions with a facilitator
- Personal identification information to notify the appropriate authority where we have reason to believe or you disclose a risk of serious harm to yourself or others, as we are legally obliged to do so
- When you are receiving counselling under the jurisdiction of the BACP, your personal identification information may be used to notify the appropriate authority where we are legally required or authorised to disclose your information
- Special category data to support your facilitation sessions
- Special category data in communications with you outside of your sessions where necessary to confirm your details or by your request

Bridge The Gap Facilitators will only pass your data to a 3rd party where a facilitator acts on your behalf. This will require additional explicit consent and will not be done without your knowledge. You should request an Authority To Act form from your facilitator which can only be signed by you or someone with a relevant POA.

This does not include informing the appropriate authority where we have reason to believe or you have disclosed a risk of serious harm to yourself or others.

### **4. How do we store your data?**

Bridge the Gap Facilitators uses a paperless storage system:

- Your information will be stored with your facilitator whilst you are working with them
- All data is stored on password protected devices; where non Bridge the Gap Facilitators can access the device, data is stored in password protected files
- When we receive paper with your information on it this will be converted to a digital format and the paper either destroyed or returned
- When your sessions finish, your facilitator will pass your information to a data controller for long term storage and destroy their copy
- Your information will be stored for 6 months after your final session or for 5 years where your sessions fall under the jurisdiction of Holistic Insurance for counselling

## 5. What are your data protection rights?

### **The right to be informed**

- You have the right to the information within this policy.

### **The following rights are subject to the following:**

You can make requests to enact the following rights verbally or in writing and we have 1 month to respond unless the request is complex or copious, where we have a further 2 months. We may only charge an admin fee where the request is 'manifestly unfounded or excessive' or where multiple copies are requested. We may only refuse the request where it is 'manifestly unfounded or excessive' or where data processing is necessary to comply with a legal obligation. We may request ID or proof of authority to act on behalf in some circumstances.

### **The right of access**

- You have the right to access your personal data in an understandable format.

### **The right to rectification**

- You have the right to request that we correct, complete, or replace any of your personal information.

### **The right to erasure**

- You have the right to be forgotten and have all your personal data erased.

### **The right to restrict processing**

- You have the right to request the restriction or suppression of your personal data so that it may only be held, not processed.

### **The right to data portability**

- You have the right to request that we transfer your personal data to you or an appropriate 3rd party in an accessible digital format.

### **The right to object**

- You have the right to object to the processing of some or all of your data for all, some, or one purpose.

## 6. Who is responsible for your data?

All Bridge the Gap Facilitators directors are joint data controllers and can respond to requests or complaints. For the purposes of the ICO Rowan Hedley is the lead controller.

You can make a request or complaint to your own facilitator at their contact details or the company at:

[bridgethegapfacilitators@gmail.com](mailto:bridgethegapfacilitators@gmail.com)

07803 327454

27 St Leonards Road, Weymouth, Dorset, DT4 8LE

## **7. How to contact the appropriate authority**

Bridge the Gap Facilitators is answerable to the Information Commissioners Office. If you are not satisfied with how we have handled your request or complaint and it has not been possible to establish a resolution you can reach the ICO here:

Live chat and webforms - [www.ico.org.uk/global/contact-us](http://www.ico.org.uk/global/contact-us)

Helpline - 0303 123 1113

## **8. Updates to this privacy policy**

This privacy policy is updated annually. The last update was September 2022.