

Need help reading this Privacy Statement?

We know privacy information can feel long or complicated. If you would like this notice explained, or if you need it in a different format (for example, large print or an accessible version), please contact us at info@helpcounsellingcentre.com, or via telephone at +44 20 3834 9514. We will be happy to help.

PRIVACY STATEMENT

HELP COUNSELLING CENTRE (“Help Counselling”, “we”, “our” or “us”) is a UK based charity that provides low-cost, open-ended counselling services in person and online, and hosts counselling placements for trainee counsellors (the “Services”).

This privacy statement (“Privacy Statement”) sets out the basis on which any Personal Data (as defined below) we collect from you (“you”, “your”) or that you provide to us, will be processed by us. This Privacy Statement applies to service users (“Clients”), trainee and qualified counsellors (“Counsellors”), clinical service providers including supervisors and assessors (“Clinical Service Providers”), volunteers, non-clinical service providers (“Business Partners”) and website visitors.

By “Personal Data”, we mean any information which, either alone or in combination with other data, enables you to be directly or indirectly identified, for example, your name, email address, username, contact details or any unique identifier such as an IP address, device ID or other online identifier.

Please read the following carefully to understand what Personal Data we collect, how that Personal Data is used and the ways it can be shared by us.

We may amend this Privacy Statement from time to time to keep it up to date with legal requirements and the way we operate our charity. Please regularly check these pages for the latest version.

1. About us (as the data controller)

HELP COUNSELLING is the controller of your Personal Data. We are a registered charity in the UK (registered charity number: 1140721; registered company number: 07407329). Our registered office address is: 5th Floor, 167–169 Great Portland Street, London, W1W 5PF and we can be contacted via email at info@helpcounsellingcentre.com, or via telephone at +44 20 3834 9514.

If you have any questions about this Privacy Statement, including any requests to exercise your legal rights (Section 7), please contact us using the information set out in the contact details in the paragraph above.

2. Legal Basis

The law requires us to have a legal basis for collecting and using your Personal Data. We rely on one or more of the following legal bases:

- **Performance of a contract:** to provide our counselling services or manage placement/volunteering/employment/ relationships.
- **Legitimate interests:** to run and improve our charity (for example, allocating clients to Counsellors, managing placements, keeping records, and engaging with supporters), balanced against your rights. We might have legitimate interest to process Personal Data in other contexts. We ensure that we balance any potential impact on you and your rights before we process your Personal Data on that basis. You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us. Please also consult the section “Your rights” below.

- **Legal obligation:** We may use your Personal Data where it is necessary for compliance with a legal obligation that we are subject to. For example, tax/charity law requirements (including HMRC and Gift Aid), safeguarding, and employment law. We will identify the relevant legal obligation when we rely on this legal basis.
- **Consent:** We do not rely on consent as a legal basis for processing your Personal Data other than in relation to our use of cookies (please see our Cookies Notice for more details which can be found [here](#)); when we send third party direct marketing communications to you via email; and, when providing you with personalised content, ads, and promotions tailored to your interests and preferences. From time to time, We may share your Personal Data with third parties with your consent.
- **Vital interests:** in rare cases, to protect someone's life or safety (e.g., safeguarding - please see our Safeguarding Policy).

Where we need information from you to offer our services or meet any of our legal or regulatory requirements, failure to provide such information will mean that you may not get access to our services.

It is important that the Personal Data we collect from you is accurate and current. Please keep us informed if your Personal Data changes during your relationship with us. You can do so by contacting us. We will endeavor to effect those changes within a reasonable timeframe.

3. Our Processing of Your Personal Data

In the tables below we have provided a description of the different purposes for which we process Personal Data.

3.1 Clients

If you are a Client, we process your Personal Data for the following purposes.

Purpose	Personal Data		Legal Basis
	From You	From Others and Your Devices	
Register you and provide counselling (including allocating counsellor, managing appointments, keeping counselling notes)	Name, date of birth, contact details, GP details, relevant medical history, disabilities or adjustments, cultural background and intersectional information (if relevant to preferences), referral source, financial information for fee setting, forms (enquiry, contract, health questionnaires), counselling session notes, billing/payment history	Correspondence from/referrals by health professionals (where relevant)	Performance of a Contract; Legitimate interests (service operation); Legal obligation (e.g., safeguarding records); Special category (health) under Art. 9(2)(h)
Communications about your care and appointments	Contact details, preferences	Email metadata via Outlook/Medesk/TextMagic	Performance of a Contract;

Purpose	Personal Data		Legal Basis
	From You	From Others and Your Devices	
			Legitimate interests
Handling queries, complaints or incidents	Details you provide in emails or calls	Information from your counsellor or GP if needed	Legitimate interests; Legal obligation (where applicable)
Finance and fee administration	Name, contact, billing and bank information and payment history	Financial information and payment confirmations in Medesk, JotForm and Xero	Legal obligation; Legitimate interests

Retention: Client general records and counselling notes – 6 years after counselling ends; safeguarding and data breach records – may be retained beyond this 6 years, however we review our need to keep such records regularly.

3.2 **Counsellors and other Service Providers**

If you are a Counsellor or a service provider we will process your Personal Data for the following purposes.

Purpose	Personal Information		Legal Basis
	From You	From Others and Your Devices	
Manage applications, placements and practice	Name, contact, ID/DBS records, memberships, training history/certificates, areas of specialism, insurance, languages, cultural background and intersectional information (if relevant for client preferences), availability, allocated supervisor, billing history, complaints, safeguarding, and data breach records	DBS provider confirmations (APCS), information from your training provider (e.g. fitness to practice confirmation), references from tutors and others	Performance of a Contract; Legitimate interests; Legal obligation (e.g., safeguarding)
Clinical allocation and scheduling	Contact and availability, experience, specialism, cultural/religious background, (if relevant for client preferences), language	Internal operational data (client allocations)	Legitimate interests
Pay/expenses and finance	Financial information, bank details and	Xero transactions	Legal obligation;

Purpose	Personal Information		Legal Basis
	From You	From Others and Your Devices	
	Contact/billing history		Legitimate interests
Policy acknowledgements and agreements	Signed agreements	JotForm/DocuSign records	Legitimate interests

Retention Counsellor records – 6 years after counselling ends; safeguarding and data breach records – may be retained beyond this 6 years, however we review our need to keep such records regularly.

3.3 **Employees and trustees**

If you are an employee or trustee we will process your Personal Data for the following purposes.

Purpose	Personal Data		Legal Basis
	From You	From Others and Your Devices	
HR administration	Name, contact, right-to-work/ID, medical/adjustment information (if relevant), next of kin, payroll (including bank details/tax details, appraisals, CV, training records, photo	Payroll provider data supplied by us, references	Performance of a Contract; Legal obligation; Legitimate interests
Governance (trustees)	Contact details, CV/qualifications, board appointment dates, photo (if relevant), financial information (for the purposes of expense claims, if applicable)	Recommendations and/or references (if relevant)	Legal obligation; Legitimate interests
Leave and learning	Leave records, training completions	BrightHR, training platform	Legitimate interests
Policy acknowledgements and agreements	Signed agreements	JotForm/DocuSign records	Legitimate interests

Retention: Staff records – 6 years after the end of the last tax year of employment; governance register entries (appointments/resignations) – may be retained beyond this 6 years, however we review our need to keep such records regularly; finance/payroll – 6 years after the end of the last tax year of employment.

3.4 **Volunteers**

If you are a volunteer, we process your Personal Data for the following purposes:

Purpose	Personal Data		Legal Basis
	From You	From Others and Your Devices	
Volunteer administration	Name, contact, CV, health/adjustment info	References	Contract/Legitimate interests

Purpose	Personal Data		Legal Basis
	From You	From Others and Your Devices	
	(if relevant), emergency contact, photos (if relevant)		
Policy acknowledgements and agreements	Signed agreements	JotForm/DocuSign records	Legitimate interests

Retention: 6 years after volunteering ends.

3.5 *Donors and Supporters*

If you are a donor or supporter, we process your Personal Data for the following purposes:

Purpose	Personal Data		Legal Basis
	From You	From Others and Your Devices	
Process donations and manage Gift Aid	Name, contact, donation details, contact preferences	Donation platforms (e.g., JustGiving, Give As You Live, GiveTap); HMRC submissions	Legal obligation (tax/Gift Aid); Legitimate interests
Supporter relations	Contact details, correspondence	Outlook records	Legitimate interests

Retention: 6 years after the end of the financial year of the last donation.

3.6 *Website Visitors / Enquiries*

For website visitors and for to handle any enquiries made to us, we process your Personal Data for the following purposes:

Purpose	Personal Data		Legal Basis
	From You	From Others and Your Devices	
Handle enquiries and referrals	Name, contact, nature of enquiry	Phone message forwarding via serviced office provider; email routing	Legal obligation (tax/Gift Aid); Legitimate interests
Website cookies and forms	Enquiry/contact/place ment forms	Cookie/tools data as implemented	Consent (cookies); Legitimate interests (essential cookies)

Website: www.helpcounselling.com. A cookie banner is in place on the site. Forms include enquiry, contact and placements applications.

3.7 **Business Partners**

For Business Partners, we process your Personal Data for the following purposes:

Purpose	Personal Data		Legal Basis
	From You	From Others and Your Devices	
Enter and manage relationships	Business contact details, service details, invoicing	N/A	Legitimate interests; Legal obligation (where applicable)

Retention: Typically 6 years from the end of the financial year of last engagement;

4. **Sharing Personal Data with third parties**

As necessary, we share your Personal Data with:

- a). **Business Partners (processors)** who supply our platforms and tools (see Appendix).
- b). **Public bodies and authorities** where required (e.g., HMRC for payroll/Gift Aid).
- c). **Professional advisers** (e.g., HR and legal advisers, independent examiner).

We also disclose your Personal Data to third parties if we are under a duty to disclose or share your Personal Data to comply with any legal obligation, court or police request, or to enforce or apply our terms of use and other agreements, or to protect the rights, property, or safety of Help Counselling, our Clients, or others. This includes exchanging information with other organisations for the purposes of protection.

You can find more information on the actual parties we are sharing your data in the Appendix below. The list is updated regularly.

5. **International transfers**

Your Personal Data will be stored in the United Kingdom (UK) and may be transferred worldwide.

We are taking all steps reasonably necessary to ensure that your Personal Data is treated securely and in accordance with this Privacy Statement. The Personal Data you provide to us is stored on our secure servers. Where we transfer our data outside of the UK, we ensure that adequate safeguards are in place. When no adequacy decisions exist in relation to the country of the data exporter, we are relying on the International Data Transfer Agreement adopted by the Commissioner under the Data Protection Act 2018 and evaluate the risks raised by the transfers. Please contact us if you want further information on the specific mechanism used by us when transferring your Personal Data out of the UK.

6. **Security**

We are committed to protecting your privacy. Internally, only people with a business need to know Personal Data, or whose duties reasonably require access to it, are granted access to users' Personal Data. Such individuals will only process your Personal Data on our instructions and are subject to a duty of confidentiality. We audit our personal compliance regularly.

Help Counselling systems and data are reviewed periodically to ensure that you are getting a quality service and that leading security features are in place. We have put in place procedures to deal with any actual or suspected data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

We take all reasonable endeavors to protect and safeguard Personal Data. Unfortunately, the transmission of information via the Internet is not completely secure. While we do our utmost to protect your Personal Data, we cannot guarantee the security of your data transmitted to us over email or through the Site. Once we have received your Personal Data, we will use strict procedures and security features to try to prevent unauthorised access, but there are protective measures you should take, as well. Do not share your Personal Data with others unless you clearly understand the purpose of their request for it and you know with whom you are dealing. Do not keep sensitive Personal Data in your e-mail inbox or on Webmail. If you are asked to assign passwords to connect you to your Personal Data, you should use a secure password and always use a two-factor authentication (2FA), where available. You should change your password regularly.

We have put in place procedures to deal with any suspected Personal Data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7. Your rights

You have a number of rights in relation to how we process your Personal Data under data protection laws. These are:

- a). Request access to your Personal Data (commonly known as a "subject access request"). This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.
- b). Request correction of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- c). Request erasure of your Personal Data in certain circumstances. This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your Personal Data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- d). Object to processing of your Personal Data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- e). Request the transfer of your Personal Data to you or to a third party. We will provide to you, or a third party you have chosen, your Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- f). Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
 - If you want us to establish the data's accuracy;
 - Where our use of the data is unlawful but you do not want us to erase it;
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

When we rely on your consent to process Personal Data (cookies, marketing communication) you have the right to withdraw your consent at any time. For cookies, this is done by setting up the cookie's preferences (please check our [Cookies Notice](#) for more details) or by updating your preferences. We will do our best to honor your request promptly.

No fee usually required

You will not have to pay a fee to access your Personal Data or to exercise any of your other rights. We may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

8. Retention of your Personal Data

We have data retention and deletion policies designed to retain Personal Data for no longer than necessary for the purposes set out herein or as otherwise required to meet legal or service needs. Because of those requirements, we might not be able to honor erasure requests.

To determine the appropriate retention period for Personal Data, we consider the amount, nature and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

9. Contact & Complaints

If you wish to exercise your rights in relation to how we process your Personal Data under data protection laws or if you have any questions or concerns about this Privacy Statement or our privacy practices, please contact us using the details provided at the beginning of this Privacy Statement.

You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

10. Changes to this Privacy Statement

We may from time to time, make changes to this Privacy Statement. We suggest you check back regularly to check to see if there have been any changes to this Privacy Statement.

Version Control

Version	Date approved	Date next review
V1	30 April 2026	April 2027

Appendix – List of Business Partners, non-clinical service providers and other third parties (processors or separate controllers)

The following key tools and providers are used to deliver our services and run our charity.

Party / Jurisdiction	Purpose	Categories of Personal Information Shared
Medesk (UK)	Clinical management: client records, bookings, counselling notes (primary clinical system)	Contact information, DOB, counselling notes
Microsoft 365 – Outlook, SharePoint, OneDrive, Teams (UK)	Email and document storage; internal drives for client/counsellor/HR/finance	Contact information, DOB, service history, ID documentation
JotForm (UK)	Online forms (enquiry, contracts, health questionnaires, placement applications)	Contact information, DOB, health information, bank details, payments information
Xero (UK and possibly elsewhere)	Accounts: billing, payments, Gift Aid records	Contact information, bank details, payments information, salary information including tax and pension records, gift aid declarations
Stripe (Ireland and possibly elsewhere)	Payments processing	Contact information, payments information
TextMagic (Europe)	SMS messaging (operated alongside Medesk)	Contact information, appointment and payment information
Trello (location not known)	Workflow management (allocations, onboarding, leavers/joiners)	Contact information, allocations details, service history
DocuSign (UK and possibly US)	Electronic signatures (contracts and agreements)	Contact details
BrightHR (UK/EU)	Annual leave and HR records	Contact details, HR records
High Speed Training (UK)	Training records	Contact details, training records
APCS (DBS provider)	Criminal records checks	Contact details, DOB, ID documents, criminal records
Peninsula (UK)	HR advice	Contact details, HR records
MIS (UK)	IT support	Contact details
Cecil & Co (UK)	Bookkeeping	Contact details, payment information, bank details, salary information including tax and pension records
tba	Independent examination	Contact details, payment information, bank details, gift aid records, salary information including tax and pension records
JustGiving / Give As You Live / GiveTap (UK and possibly elsewhere)	Donations and Gift Aid	Contact information, donations information, gift aid information

Party / Jurisdiction	Purpose	Categories of Personal Information Shared
Serviced office phone provider (UK)	Receives inbound calls and forwards messages/emails to employees	Contact information
HMRC (UK)	Tax/Gift Aid/payroll reporting	Salary information including tax and pension details, gift aid records
Dixon Wilson Accountants (UK)	Payroll	Salary information including tax and pension details,
Nest Corporation (UK and possibly elsewhere)	Workplace Pension Scheme	Contact information, salary and pension details
AJ Bell (UK)	Workplace Pension Scheme	Contact information, salary and pension details