

Re-Connect Privacy Notice

Re-Connect is a rapid access counselling service that ensures people get the support they need, when they need it. Our counsellors help customers through whatever is affecting their mental health, like depression, anxiety, stress, or addiction.

Re-Connect also delivers Cognitive Behavioural Therapy (CBT) group sessions to provide you with a self-care toolkit to minimise escalation of mental ill health, improve well-being and reduce the impact of isolation.

The services may be delivered face-to-face, over the phone, or using video/audio conferencing facilities.

Who we are

The Wise Group is the data controller. This means that we are responsible for determining the purposes and means of this personal data processing. We do this in accordance with [Regulation \(EU\) 2016/679](#) (General Data Protection Regulation – GDPR) and [Data Protection Act 2018](#) (DPA18).

Personal data

Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect and process the following information:

- Name and contact details including email address, postal address and telephone number
- Date of birth and age
- Gender
- Other equal opportunities monitoring information including special category data - disability, sexual orientation, religion and ethnicity
- Referral information
- Information regarding counselling appointments
- Information about your mental health and wellbeing
- Counselling notes from any counselling sessions undertaken.

Wherever possible we de-personalise our records so you are not directly identifiable.

For example, we may assign a reference number or use coded case notes as an added security measure.

Purpose of personal data processing

We use personal information to deliver the Re-connect service to you, including records of your participation and attendance. We may also use it to:

- communicate with you and provide details of our services
- arrange, cancel or reschedule appointments or otherwise manage our relationship with you
- request your participation in surveys, case studies, and other evaluation and service improvement activities
- monitor the performance and impact of our services
- monitor diversity and equal opportunities
- publicise the service
- report the performance of the service internally and to relevant third parties
- share with other Wise Group services that can provide additional support to help you meet your goals or improve your personal circumstances
- flag risks

The lawful grounds for the processing

The lawful grounds for processing your data are:

- *Consent* – if you agree to the specific data processing activities described above you will be asked to provide your consent in writing. Your consent is freely given, but we may not be able to deliver the service to you without it. You have the right to withdraw your consent at any time. The withdrawal of your consent will not affect the lawfulness of processing based on consent before its withdrawal. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.
- *Legitimate Interests* – We may rely on the Legitimate Interests of the Wise Group (or those of a third party) to use your personal data to inform you of additional support services available to you through the Wise

Group to enhance the support provided to you. Legitimate Interest means our interest in conducting and managing our activities and projects to enable us to give you the best service and experience. We consider and examine any potential impact on you and your rights before we process your personal data for our legitimate interests to ensure that those interests do not override your interests and fundamental rights. 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.

How do we collect this data?

If you are referring yourself to the Re-Connect service then we will collect information directly from you. If you have been referred to the service from another source, we may collect basic information such as your name and contact details from the referring organisation.

How long do we keep your data?

The information collected will be kept for the duration required for any legal and audit purposes and in line with our record retention policy. Unless otherwise required we will retain counselling records for 3 years following your last engagement with the service. Following this period, we will completely and irreversibly erase your personal data, unless we are required by law to do otherwise.

Sharing your personal data

We will only share your personal data with third parties where required by law, for safeguarding purposes, to administer our relationship with you or where we have another relevant, carefully assessed legitimate interest in doing so.

Personal information held by the Wise Group may be shared with government organisations and departments to enable them to exercise their statutory duties as required by law.

We will not disclose your personal information to third parties unless there is a lawful reason for doing so. We will not share your personal information for marketing purposes unless you consent to this processing.

We may use reputable third parties to process your information to help us deliver the service to you. We will ensure all data pro-

cessors have agreements in place to ensure they only process your data on our instruction and in accordance with this privacy notice and the UK's data protection laws. The third parties your information may be shared with include:

- Organisations that provide funding to deliver the service for monitoring and audit purposes
- Organisations who provide other services that enable us to deliver the service to you such as those who provide survey and audio/video conferencing software
- Other contracted data processors such as external evaluators

In exceptional circumstances (such as where your counsellor believes that someone may come to harm) we may have to share information with the relevant authorities or an emergency contact you have provided.

From time to time we may provide you with links to other websites. These websites are not under our control and as a result, we will not be liable to you for any issues arising in connection with their use of your personal data, the website content or the services offered to you. You should exercise caution and look at the privacy statement applicable to the website in question.

Additional Information

For more information about the Wise Group's commitment to data protection, your rights under data protection law, our fees policy or how to contact our Data Protection Officer please read our Privacy Notice Supporting Information document, available on our website:

<https://www.thewisegroup.co.uk/privacy/>

About this privacy notice

We keep our privacy notices under regular review. This notice was last updated 29 May 2020.

This notice does not form part of any contract of employment or another contract to provide services. We may update this notice at any time but if we do so, we will provide you with an updated copy of this notice as soon as reasonably possible.

We want to hear from you and keep your data safe, accurate and complete. Please keep us informed about any changes regarding your personal data during your relationship with us.