



Privacy Notice

December 2025

Who are we?

The Women's Counselling and Therapy Service (WCTS) is a registered charity, under charity registration number 1145377, with a registered address of 43 Park Square North, Leeds, LS1 2NP. WCTS provides therapy, care, and additional support to women and girls in the Leeds area. WCTS is the 'data controller' of any data we collect about you.

This notice applies to all individuals whose data is processed by Women's Counselling and Therapy Service (WCTS).

If you apply to access services at WCTS we will need to process your personal data to deliver those services. This may at times include special category data.

This document summarises the key ways we do this and your rights in this. If we may collect personal data from you, we are responsible for ensuring that you have seen this notice before data is collected and processed.

All employees of WCTS are required to ensure that this notice is brought to your attention if we may be collecting your personal data, and to request your consent for the processing of personal data.

WCTS will process your personal information in accordance with all applicable laws, including the UK General Data Protection Regulations (UK GDPR) and the Data Protection Act 2018 (DPA 2018).

We are committed to protecting your privacy, whether as a client, member of staff, stakeholder, supporter, supplier or visitor to our premises or website. There are additional details in our GDPR Policy, if you would like a copy please ask at Reception.

What is personal data?

The term "personal data" means any information relating to you that identifies you, or through which you can be identified, directly or indirectly. In particular, by reference to an identifier such as a name, an identification number, location data, or an online identifier or to one or more factors specific to you physical, physiological, genetic, mental, economic, cultural or social identity.

The purpose of this Privacy Notice

The purpose of this Privacy Notice is to let you know how we process your personal data when you engage with our services. This Privacy Notice therefore explains what personal data we

collect from you and how we collect, use, store, and disclose it when you engage with us. This Privacy Notice also contains information about your rights under applicable data protection legislation.

We are committed to compliance with data protection laws. We believe that ensuring data protection compliance is the foundation of trustworthy business relationships.

It is important that you read this Privacy Notice together with any other Privacy Notice we provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Notice supplements the other notices and is not intended to override them. There are additional details in our GDPR Policy, if you would like a copy please ask at Reception.

How and why do we use your personal data?

We collect your personal data for the purpose of providing you with our services. We will collect data about you, both personal data (such as your name and contact details) and special category data, if applicable.

Special category data, which is data that needs more protection due to its sensitive nature. Additional obligations are placed on the Data Controller to process special category data lawfully, which comes under Article 9 of the UK GDPR.

We will collect and use your personal data for the following purposes:

- In order to assess your suitability to access services at WCTS (referral form).
- In order to contact you during your engagement with WCTS.
- To help the therapist/counsellor in their work with you.
- For monitoring and evaluating our services. We use different forms to check that the work we are doing with you is useful and effective. At the beginning of therapy /counselling, during and at the end of therapy/counselling you will be asked to complete forms to allow WCTS to monitor and evaluate the work done.
- As part of reports to our funders and other stakeholders about the work we are doing. This includes general information such as details of the types of problems we are working with, and may include brief, anonymous descriptions of how our work has helped.
- As part of our ongoing evaluation of services by ex-service users.
- To make enquiries to clients, such as asking if you would like to become involved as a board member.

We are committed to making sure that all personal information collected and processed is for the stated purpose(s) and will not be an invasion of your privacy. We will only use your personal data for the purpose we collected it and in accordance with the law. We will not use your personal data for any other purpose without your prior consent. The only exception to this is if it is required or permitted by law, such as where it is necessary for the prevention, investigation, detection or prosecution of criminal offences or the enforcement of civil law matters.

We may share this information with other organisations, for example:

- Inspire North: We may share some of your personal data with our partner, Inspire North. This is not routine, however functions such as Subject Access Request handling are an operation undertaken by Inspire North. Additionally, Inspire North may access the WCTS database to produce reports, however this does not include your client files/notes, and is only aggregated data gathering (anonymous).
- Local Authorities: We may share data with local authorities where there is a safeguarding concern.
- Third Party Service providers: We may share data with third party service providers who are contracted by us, to assist with providing our services.

When we share any data with third parties, we will ensure that they will hold your personal data securely and use it only in order to fulfill the service for which they are contracted. When there is no longer a service need, or the contract comes to an end, the third party will dispose of all personal data according to our procedures.

We will never be intrusive or invasive of your personal privacy, and we will not ask you to provide data that is irrelevant or unnecessary. We have strict measures and processes in place to ensure that the risk of unauthorised access or disclosure of your personal data is minimised as much as possible.

How do we collect your personal data?

We will collect your personal data directly from you in the following ways:

Most of the personal information we process is provided directly by you. This occurs when you ask us to carry out work with you, communicate with us, or use any of our services. In these situations, you choose to share information such as your contact details, instructions, preferences, or any other data we need in order to assist you.

We may also collect data from other sources, such as in instances where you have been referred to our services.

Our legal bases for processing your data.

The UK GDPR requires that a controller must have a legal basis for processing personal data. In most instances, our legal basis for processing your personal information are:

- Your consent. We will obtain your consent directly from you, and you are able to withdraw your consent at any time. You can do this by contacting info@womenstherapyleeds.org.uk.
- We have a contractual obligation.
- We have a legal obligation.
- We have a vital interest.
- We need it to perform a public task.
- We have a legitimate interest.

In some cases, we may process special category data. This is afforded some extra protection due to its sensitive nature, and therefore, under UK GDPR we are required to provide a lawful basis for processing, and a secondary condition under Article 9. The conditions we may rely on are:

- Explicit consent
- Employment, social security and social protection (if authorised by law)
- Vital interests
- Not-for-profit bodies
- Made public by the data subject
- Legal claims or judicial acts
- Reasons of substantial public interest (with a basis in law)
- Health or social care (with a basis in law)
- Public health (with a basis in law)
- Archiving, research and statistics (with a basis in law).

Marketing

With your consent we may contact you via email and/or phone to promote or inform you about our services. If you have provided consent, we may also contact you to promote services provided by third parties. Where we are legally required to obtain your consent to provide you with marketing materials, we will only provide you with such marketing materials if you have provided consent for us to do so.

When we contact you for direct marketing purposes, we will comply with the requirements set out in the Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR).

To start or stop receiving marketing information from us, simply contact us at info@womenstherapyleeds.org.uk.

How long will we keep your personal data?

WCTS will process your data (i.e. collect, store and use) according to the requirements of data protection legislation at all times, and will endeavor to keep your personal data up-to-date and accurate. We will only keep your personal data for as long as is necessary to fulfil the purposes we collected it for, which may include satisfying any legal, accounting, or reporting requirements. The retention period depends on the type of personal data and the reason we are processing it.

In some situations, there are set legal requirements for the length of time that we keep personal data but normally we will use our discretion, making sure that personal data is not kept outside of our business needs. When calculating the appropriate retention period for your data, we consider the nature and sensitivity of the data, the purposes for which we are processing the data, and any applicable statutory retention periods. Using these criteria, we regularly review the personal data which we hold and the purposes for which it is held and processed.

When we determine that personal data can no longer be retained (or where we must comply with your request to us to delete your data in accordance with your right to do so) we ensure that this data is securely deleted or destroyed.

Security of your personal data

To protect your personal data, we put in place appropriate organisational and technical security measures. These measures include ensuring our internal IT systems are suitably secure and implementing procedures to deal with any suspected data breach.

In the unlikely event of a data breach, we will take steps to mitigate any loss or destruction of data and, if required, will notify you and any applicable authority of such a breach.

Although we use appropriate security measures once we have received your personal data, you will appreciate that the transmission of data over the internet (including by email) is never completely secure. We endeavour to protect personal data, but we cannot guarantee the security of data transmitted to or by us.

Transferring your personal data outside of the UK/EEA

To provide our services, we may need to share your personal data with third parties and suppliers outside the European Economic Area (the “EEA”). If we do this, we will ensure your personal data receives the same protection as if it were being processed inside the EEA. For example, our contracts with our suppliers stipulate the standards they must follow to process personal data.

We currently implement the following safeguards to protect your personal data:

- Encrypting data when in transit.
- Implementing standard contractual clauses (SCCs), as approved by the European Commission, or International Data Transfer Agreements.

Your Rights

You have rights under the data protection legislation and, subject to certain legal exemptions, we must comply when you inform us that you wish to exercise these rights. There is no charge, unless your requests are manifestly unfounded or excessive. In such circumstances, we may make a reasonable charge or decline to act on your request. Before we action your request, we may ask you for proof of your identity. Once in receipt of this, we will process the request without undue delay and within one calendar month. In certain circumstances, we may be able to apply an extension for up to a further two months. In such instances, you will be informed of any such extension, along with justification. In order to exercise your rights please contact info@womenstherapyleeds.org.uk.

You can contact us if you wish to complain about how we collect, store and use your personal data. It is our goal to provide the best possible remedy regarding your complaints.

However, if you are not satisfied with our answer, you can also contact the relevant competent supervisory authority. In the UK, the relevant supervisory authority is the ICO, contact details of which can be found below.

Your rights in connection with personal information are set out below:

Subject Access Request - You have a right to receive a copy of all the personal data we hold about you.

Rectification - If any of the personal data we hold about you is incomplete or inaccurate; you have a right to have it corrected.

Erasure - This is also known as the “right to be forgotten”. You have a right to ask us to delete your personal data where there is no good reason for us continuing to process it. However, certain criteria apply and if we have a legitimate reason to continue processing your personal data, we will not be legally required to delete it.

Objection - You have a right to object where we are relying on legitimate interests as our legal basis for processing your personal data but, in certain circumstances we may be able to continue with the processing. For example, if we have compelling legitimate grounds which override your interests, rights and freedoms or your personal information is needed for the establishment, exercise or defence of legal claims. However, you have an absolute right to object to us processing your personal data for direct marketing purposes.

Restriction - You have a right to ask us to restrict the processing of your personal data in certain circumstances. For example, you may require us to suspend processing information about you whilst checks are made to ensure it is accurate.

Portability - You have the right to ask us to transfer any personal data you have provided to us to another party, subject to certain criteria being satisfied. We will provide this personal data in a structured, commonly used and machine-readable format.

Right to withdraw consent - If you have given us your consent for the processing of your personal data, you can withdraw this at any time. Please note, the withdrawal has no effect on the legality of the data processing carried out in the past on the basis of your consent. To exercise your right to withdraw consent contact us at info@womenstherapyleeds.org.uk.

Right to complain - If you are unhappy with the way in which your personal information has been or is being processed, you have the right to make a complaint about it to the Information Commissioner's Office (ICO). They can be contacted at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
www.ico.org.uk

Your obligations

If any of your personal data changes whilst you are a user of our services, it is important that you update the information within your account to ensure that the data we hold about you is accurate and up to date.

How to contact us

If you wish to contact us in order to exercise any of your rights referred to above, or if you have any questions, concerns or worries about how your personal data is being collected and processed by us, please contact us in writing, by phone or by email:

WCTS Head of Service
Women's Counselling and Therapy Service
43 Park Square North
Leeds LS1 2NP

Telephone: 0113 2455725
Email: info@womenstherapyleeds.org.uk

The Data Protection Principles

We will comply with the UK GDPR and the DPA 2018. Article 5 of the UK GDPR contains the data protection principles, which require that personal data shall be:

- Processed lawfully, fairly and in a transparent way.
- Collected for specified, explicit and legitimate purposes and not used in any way that is incompatible with those purposes.
- Adequate, relevant and limited to what is necessary.
- Accurate and, where necessary, kept up to date.
- Kept for no longer than is necessary for the purposes we have told you about.
- Kept securely.

We operate according to the principles of the UK GDPR, and PECR, regardless of the location of the data subject.

Changes to this Privacy Notice

We reserve the right to update this Privacy Notice from time to time. Updates to this Privacy Notice will be published on our website. To ensure you are aware of when we make changes to this Privacy Notice, we will amend the revision date at the top of this page. Changes apply as soon as they are published on our website. We therefore recommend that you visit this page regularly to find out about any updates that may have been made.

Job applicants, volunteers, current and former staff

We will only use any information you provide during the recruitment process for the purpose of progressing your application, or to fulfil legal or regulatory requirements if necessary.

We will not share any information you provide during the process with any third parties for marketing purposes or store it outside of the European Economic Area. The information you provide will be held securely by us, whether the information is in electronic or physical format.

What information will we ask you for?

- Contact details you provide to contact you to progress your application.
- Information you provide to assess your suitability for the job you have applied for.
- If we make an offer of employment, we will ask for information so that we can carry out pre-employment checks. Including proof of your identify and proof of your qualifications. We will ask to see the original documents.
- We will contact your referees directly, using the details you provide on the application form.
- Following pre-employment checks we will ask for bank details in order to process salary payments.
- Emergency contact details, so we know who to contact if you have an emergency at work.

We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary.

During your employment we may need to share your information with third party processors who provide elements of our HR, employment and payroll service. This information may be:

- Employment law advice.
- Occupational health advice.
- Payroll and pensions processing.
- Employee benefits.

We have contracts in place with all third-party processors. This means they will hold your information securely. They will not share your personal information with any organisation other than WCTS. They will only use your information as instructed by WCTS.

The information you provide will be retained as part of your employee file for the duration of your employment and for six years afterwards.

If you're unsuccessful the information you give us, and any information we create during the process, is retained securely for six months and then disposed of securely.

If you are employed by WCTS, please refer to your internal Employee Privacy Notice for further information.

Our website

Our website may contain links to other websites which may be of use to you. This privacy notice only applies to our website. When you follow links to other websites you should read their own privacy notices.