

## New Routes Ltd Privacy Statement

This privacy statement explains how New Routes Ltd collects, uses, shares, stores and protects your personal data. It is intended to meet the transparency requirements of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

### 1. Who We Are

New Routes Ltd Registered [Company Number 09656125](#)

Company Address: Clevely Barn Millers brow Forton Lancashire PR31DR

Email: [paulinehoward@newroutesltd.com](mailto:paulinehoward@newroutesltd.com)

Phone: 07903407305

### 2. What Information We Collect

We collect personal information to provide our services to you. The information we collect depends on how you interact with us and the services we provide.

#### 2.1 Information You Provide Directly:

- **Initial Contact:** When you first contact us, you may provide information such as your name, email address, phone number, and the nature of your enquiry. This may occur through forms, contracts, email, text messages, or social media (e.g., Facebook Messenger).
- **During Our Work Together:** In subsequent interactions, we may collect additional information, including:
  - Your address
  - GP details
  - Emergency contact information
  - Information about your personal situation relevant to the services you are receiving.
  - Session attendance records
  - Online identifiers (e.g., Microsoft Teams/Zoom ID)

#### 2.2 Special Category Data:

Because of the nature of counselling, supervision, training and related support services, some information we process may be special category data. This may include information about physical or mental health, wellbeing, safeguarding concerns, racial or ethnic origin, religious or philosophical beliefs, sex life or sexual orientation, where that information is relevant to the service being provided. We will only collect and use special category data where it is necessary, proportionate and supported by an Article 6 lawful basis and an Article 9 condition under the UK GDPR.

#### 2.3 Information We Collect from Third Parties:

- **Referrals:** We may receive your information from third parties, such as:
  - Organisations that employ you (e.g., schools, colleges, businesses)
- The information we receive from third parties will vary depending on the third party and the reason for the referral.

#### 2.4 Technical Information:

- When you use our website or online platforms, we may collect technical information, such as your IP address.

### 3. How We Use Your Information

We use your personal information for the following purposes:

- **To Provide Our Services:**
  - To make initial contact with you.
  - To maintain contact with you during our work together.
  - To deliver the services you have requested.
- **To Manage Our Relationship with You:**
  - For administrative purposes, such as invoicing and record-keeping.
- **To Communicate with you**
  - To provide you with information relating to any training opportunities that New Routes Ltd are to deliver after our work has finished
- **For Ethical and Legal Obligations:**
  - To conduct our work in an ethical manner (e.g., with supervision – this will be discussed with you during our initial meeting).
  - To address safeguarding issues (this will be discussed with you during our initial meeting).
  - To comply with legal obligations, such as responding to court orders or subpoenas.
- **In an Emergency:**
  - To contact emergency services in the event of an accident or incident.
- **Professional Will:**
  - In the event of my incapacity or death, your information may be accessed by the executor of my Professional Will, who is a qualified counsellor and bound by the same ethical standards. Access will only occur in exceptional circumstances.

#### 4. Legal Basis for Processing

We process your personal data based on the following legal bases:

- **Contract:** Where processing is necessary to take steps before entering into a contract with you or to provide the services agreed with you.
- **Legitimate Interests:** Where processing is necessary for our legitimate interests, such as service administration, record keeping, quality assurance, supervision, responding to enquiries and protecting our legal position, provided your interests and rights do not override those interests.

**Legal Obligation:** Where processing is necessary to comply with the law, such as tax, accounting, safeguarding, regulatory or court-related requirements.

**Vital Interests:** Where processing is necessary to protect someone's life or safety, for example in an emergency.

**Consent:** Where we rely on consent, we will ask for it clearly and you can withdraw it at any time. Withdrawal of consent does not affect processing that took place before consent was withdrawn.

**Special Category Data:** Where we process special category data, we will identify both an Article 6 lawful basis and an Article 9 condition. Depending on the circumstances, the Article 9 condition may include explicit consent, provision of health or social care, safeguarding, legal claims, or substantial public interest where permitted by the Data Protection Act 2018.

In practice, this means we usually rely on contract for delivering agreed services, legitimate interests for administration and service management, legal obligation for statutory or regulatory requirements, vital interests for emergencies, and explicit consent where we ask to use or share information for a specific optional purpose.

#### 5. Data Sharing

We will only share your personal information in the following circumstances:

- **With your consent:** We may share your information with third parties if you have given us your explicit consent to do so.
- **With service providers and professional support:** We may share limited information with trusted associates, supervisors, professional will executors, secure IT or cloud service providers, accounting or bookkeeping support, insurers, professional advisers, or referral organisations where this is necessary to provide services, manage the relationship, meet legal or professional obligations, or protect safety. We require appropriate confidentiality and data protection safeguards where applicable.
- **For legal reasons:** We may disclose your information if required by law, such as to comply with a court order or subpoena.
- **In an emergency:** We may share your information with emergency services if necessary to protect your vital interests or the vital interests of another person.
- **Professional Will:** With the executor of my Professional Will, who is a qualified counsellor and bound by the same ethical standards, in the event of my incapacity or death.

**We will not share your information with third parties for marketing purposes.**

## 6. Data Security

We take the security of your personal information seriously. We have implemented appropriate technical and organisational measures to protect your data from unauthorised access, use, or disclosure. These measures include:

- Secure storage of hard copy records.
- Protection of electronic documents.
- Limiting access to your information to those who need it to provide our services.
- Use of secure electronic systems.

## 7. Data Retention

We will retain your personal information for as long as necessary to fulfil the purposes for which it was collected, including any legal, accounting, or reporting requirements. Specifically:

- Financial and invoicing records will be retained for the period required for accounting and tax purposes.
- Routine electronic communications will be deleted when they are no longer needed, unless they form part of the service record, relate to a complaint, safeguarding matter, legal requirement or another legitimate reason for longer retention.
- Counselling, supervision, safeguarding and related service records, whether hard copy or electronic, will normally be retained for 7 years after the completion of our work, and then securely shredded or deleted in accordance with professional guidance and legal requirements. Some records may be kept for a different period where required by law, professional obligations, insurance, safeguarding, complaints handling or legal claims.

## 8. Your Rights

Under the UK GDPR, you have the following rights regarding your personal data. Some rights may apply only in certain circumstances and may be limited where we have legal, safeguarding, professional or confidentiality obligations.

- **Right to Access:** You have the right to request a copy of the personal information we hold about you.

- **Right to Rectification:** You have the right to ask us to correct any inaccurate or incomplete information about you.
- **Right to Erasure ("Right to be Forgotten"):** You have the right to ask us to delete your personal information in certain circumstances.
- **Right to Restriction of Processing:** You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- **Right to Data Portability:** You have the right to receive your personal information in a structured, commonly used, and machine-readable format and to transmit that data to another controller.
- **Right to Object:** You have the right to object to the processing of your personal information in certain circumstances, including processing based on our legitimate interests.
- **Right to Withdraw Consent:** If we are processing your data based on your consent, you have the right to withdraw that consent at any time.
  - **Right to Complain:** You have the right to complain to us about how we handle your personal data. If you remain dissatisfied, you can complain to the Information Commissioner's Office (ICO).

## 9. International Data Transfers

We do not intentionally transfer personal data outside the UK unless this is necessary for the services we provide or for the secure operation of our systems. If personal data is transferred to a recipient outside the UK, including through cloud, email, video conferencing or other technology providers, we will take appropriate steps to ensure the transfer is lawful under the UK GDPR, such as using an adequacy decision, approved contractual safeguards, or another permitted transfer mechanism.

## 10. Automated Decision-Making and Profiling

We do not use your personal information for automated decision-making or profiling.

## 11. Changes to This Privacy Statement

We may update this privacy statement from time to time. If we make significant changes, we will take reasonable steps to bring them to your attention, for example by email, during our work together, or by making the updated statement available through our usual communication channels.

## 12. Contact Us

If you have any questions about this privacy statement or our data practices, please contact us at:

New Routes Ltd Registered [Company Number 09656125](#)

Company Address: Cleveley Barn Millers borw Forton Lancashire PR31DR

Email: [paulinehoward@newroutesltd.com](mailto:paulinehoward@newroutesltd.com)

Phone: 07903407305

If you wish to exercise your data protection rights or raise a complaint about how we handle your personal data, please contact us using the details above. We will acknowledge your concern and respond as soon as reasonably possible, usually within one month unless the matter is complex.

## Information Commissioner's Office (ICO)

The ICO is the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals.

ICO Registration Number: ZA385373

You can find more information on the ICO website: <https://ico.org.uk/>