

New Routes Ltd Privacy Statement

This privacy statement explains how New Routes Ltd collects, uses, and protects your personal data. It complies with the General Data Protection Regulation (GDPR) and Data Protection Act 2018.

1. Who We Are

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

Company Address: Townend Farm 1a Woodview Lane Stalmine Lancashire FY6 0LH

Email: 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 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)
 - Other service providers (e.g., Counselling Directory, Employee Assistance Programs)
- The information we receive from third parties will vary depending on the third party and the reason for the referral.

2.3 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:** Processing is necessary for the performance of a contract with you (e.g., to provide the agreed-upon services).
- **Legitimate Interests:** Processing is necessary for our legitimate interests (e.g., for administrative purposes, to ensure the quality of our services), provided that your interests and fundamental rights do not override those interests.
- **Legal Obligation:** Processing is necessary to comply with a legal obligation (e.g., to respond to a court order).
- **Consent:** In some cases, we may process your data based on your explicit consent. If we rely on consent, we will ask you for it clearly and you can withdraw it at any time.

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:** We may use other persons identified as an associate of the Supplier in the performance of our Services.
- **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:

- Contact information from invoice systems will be removed as soon as our work is finished.
- Electronic communications between us will be deleted as soon as our work is finished.
- All other records relating to our work, whether hard copy or electronic, will be retained for 7 years after the completion of our work, and then shredded or deleted in accordance with the BACP.

8. Your Rights

Under the GDPR, you have the following rights regarding your personal data:

- **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 lodge a complaint with the Information Commissioner's Office (ICO) if you believe that we have not complied with the GDPR.

9. International Data Transfers

We do not currently transfer personal data to countries outside the European Economic Area (EEA). If this changes in the future, we will update this privacy statement and implement appropriate safeguards to ensure the protection of your data.

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. We will notify you of any significant changes by [state how you will notify users, e.g., by email or by posting a notice on our website].

12. Contact Us

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

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Email: paulinehoward@newroutesltd.com

Phone: 07903407305

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/>