



Next Steps

Counselling and Support Service

Digital Policy

Next Steps asks all its clients, support group attendees, supervisees, staff, and volunteers to read our digital policy when we start working together, as we recognise that technology and social media use can affect the therapeutic relationship. This digital policy aims to address and contain the most likely eventualities that may arise by way of digital exposure, also with reference to maintaining privacy and data protection. This document acknowledges the complex world of digital media and tries its best to address issues that may impact the therapeutic relationship.

Keeping Boundaries

The nature of an online presence can blur interpersonal boundaries, so it is important to be as clear as possible about how boundaries may be compromised. As a rule, Next Steps prefers to keep clinical work in the consultation space as much as possible. However, the nature of the digital world can sometimes stretch these boundaries, so we offer the best clarity we can below. The hope is to help avoid misunderstandings and to offer guidance on handling digital interactions between Next Steps and clients. It is based upon advice received, practitioner experience, and discussion with other counselling professionals. The Next Steps position on this policy is open to change. If there are any details about which you are unclear, please let us know by email on info@next-steps.org.

Data Protection

If you are a client or supervisee you will have been asked to sign a GDPR compliant data protection policy - a copy of which can be accessed on our website or requested separately.

Emails

It is important to highlight that emails may be vulnerable to viruses and human error. This includes logs of emails being stored by Internet Service Providers, so please take care when considering what personal information to include in your email correspondence with us. Many email providers do not encrypt messages, meaning there is a potential for them to be intercepted by hackers. Furthermore, emails can be vulnerable to unintended forwarding or replication. For this reason, we recommend that you are mindful of the information you include in emails to us, and which email address you choose to use. Often, it is best to rely on email for non-confidential communications like setting up appointment times. If the Next Steps office needs to include personal information in any email correspondence with you, it will do so via WriteUpp, an encrypted, secure client management system. However, we accept that you might not always wish to communicate via this method. If you are concerned about confidentiality in emails, please telephone us instead.

E-invoicing: For some services, Next Steps uses an online software application to process its invoices that are then sent out to your chosen e-mail address. If you prefer not to receive these invoices by email, please let us know and we can send you a printed copy instead.

Contact between sessions

To keep clinical material 'in the room', between-session contact can only be for changing/cancelling/rescheduling appointments, and for administrative purposes. As a counselling and support service we are unable to offer an emergency service at this stage.



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Please refer to our website for a list of agencies which might be able to offer emergency support.

(The phrase 'in the room' pertains to all therapeutic environments i.e., face-to-face in the therapy centre, outdoors, online, telephone, 1-to-1, or groups).

Telephone and Online Sessions:

While we endeavour to operate on a face-to-face basis as much as possible (in the therapy centre, or outdoors), our service also extends to telephone or online video conferencing. Any such sessions will be arranged in advance, and you will receive separate policy documents and therapeutic agreements before these sessions can commence. Where possible, we use the WriteUpp video conferencing system, which is fully encrypted. However, Zoom, Teams or 3CX may also be used. These platforms do have some level of security in place (such as password protection) however, our understanding is that they are not fully encrypted. If we choose to work together remotely, you will receive further instructions about how to join shortly before your scheduled session. When engaging via video conferencing, both parties will agree not to record sessions. It is also crucial that you are sure the environment from which you are conferencing with us is safe, secure, and private.

Availability and safety

Next Steps checks emails and phone messages during office hours (please see website for details) however, a practitioner may not be immediately available to respond (for example, they may be in-session with another client or facilitating a support group, or other event). We will respond as soon as we can. Unfortunately, we do not presently have the resources to be available outside our stated office hours. Out of consideration for your privacy and safety, we will only return a phone call if you leave a voicemail asking us to do so, with a number you would like us to call you on. If you are at immediate risk or feel suicidal, please call the emergency services or the Samaritans (116 123).

Social Media

Next Steps maintains Facebook, Twitter, and Instagram accounts as a way of promoting our services, which you are welcome to follow. However, the therapeutic relationship between you and your practitioner must remain as much as possible in the counselling or support space. Our practitioners are asked not to knowingly engage in discussion with clients on social media. Some of our practitioners, support staff or volunteers may have private social media accounts for personal reasons, or a LinkedIn account for connecting with colleagues and other associated professionals, or membership organisations. Our policy is to keep social media accounts as private as possible and we recommend that practitioners and clients **do not** become 'friends' on social media. There may occasionally be overlap across social networks that may come to light over the course of time. In such cases we recommend that practitioners and clients discuss the situation in-session.

Google

We do not Google clients, in the interests of your privacy and to avoid encountering information about you that does not come directly from you. You may have googled Next Steps, our practitioners, support staff or volunteers, as is your right. However, if in doing so, some questions are raised for you, we would ask that you contact us to discuss them.



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(The guidelines in this policy document are based on the Digital Policy kindly shared by [Aaron Balick](#)).



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Digital Policy Addendum: General Data Protection Regulation

You have a right to know what digital information we keep about you. In addition to the information collected on this form our practitioners may also keep notes about your sessions together. These notes are kept manually on pad and paper and are not kept alongside information that identifies you.

Practitioners may keep written notes which are stored as encrypted digital documents on WriteUp, or in a locked filing cabinet in the Next Steps office. The office is locked each night and the centre itself is secured by an alarm system and CCTV. Your notes are not shared with anyone other than anonymously within supervision or other professional confidential contexts. Under rare circumstances, notes can be subpoenaed in a court of law. Because of this, our policy is to keep notes to a minimum. Next Steps will keep your notes for the period to which we are obliged which can be anywhere from 3 to 7 years, after which they will be destroyed.

You have the right to request any information we keep about you. As these notes are hand-written and for your practitioner's own use only, we would advise that we discuss together your reasons for requesting them in therapy. After this conversation, should you request a written copy, Next Steps will require time to type them up and you can have them within one calendar month.

Your practitioner will also keep your contact information, email, phone number, address, and GP details in their digital contacts so they can contact you if necessary. These contacts may be vulnerable to hacking. If you prefer, we can refrain from keeping them digitally and instead keep them in a locked file. Please circle the relevant response in the client declaration and consent section below.

Emails may also be vulnerable to hacking or miss-sending by human error. If you would prefer not to communicate by email, please let us know. Otherwise, it is best to use email only for logistical purposes (changing session times, etc.). Some Next Steps practitioners use QuickBooks for invoicing which, by default emails out invoices every month. Should your email be compromised, these invoices would show that you are in therapy with Next Steps. If you would prefer that we do not send invoices via email but instead print you a copy on paper each month, please circle the relevant response in the client declaration and consent section below

You have the right to have the information we hold about you erased. If you would like Next Steps to delete your information, please let us know. However, as above, we may need to retain your notes for a required period, after which they will be deleted. In general, we will only hold the minimum of information we need about you to carry out our duties and will regularly audit and clear such data. Next Steps is registered with the Information Commissioners Office to hold such records.



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Client Declaration and Consent

Please tick relevant boxes:

- I have read and understood the information held within the Next Steps Digital Policy document and have been given an opportunity to ask questions for further clarification.
- I have been offered a printed copy of this policy document for my records.
- I understand that I have a right to withdraw consent by contacting the Next Steps Data Protection Officer (Suzi Garrod) on 01548 312256 or email info@next-steps.org, or in writing at: Next Steps, Age Concern Centre, Ilbert Road, Kingsbridge, Devon, TQ7 1DZ.
- I would prefer you **DO** keep my contact details in your digital address book.
- I would prefer you **DO NOT** keep my contact details in your digital address book.
- I would prefer my invoices via email
- I would prefer my invoices to be posted to me

By pressing the consent button at the bottom of this digital form and/or signing a paper version of this document, I understand that Next Steps will process my personal data in accordance with the General Data Protection Regulations (GDPR) and in relation to the purposes described in this document.

Consent is given via the electronic submission of this document by completing the form below and pressing on the "Consent" button.

Client Signature:

Client Name:

Date:
