

Traveller Counselling Service
CHY 18635

1.2 Operating Procedures and Practice Guidelines for Counselling (Contracted and Volunteer Therapists)

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1 Purpose

The purpose of this operating procedures and practice guidelines document is to make clear the procedures and practice guidelines that all therapists, contracted to work for or working in a voluntary capacity for the Traveller Counselling Service, are required to abide by.

2 Scope

The scope of this operating procedures and practice guidelines document is to make clear to therapists (contracted and volunteer) the procedures and practice guidelines that they are required to abide by while seeing clients on behalf of the Traveller Counselling Service. This document applies only to therapists in their work with clients. Policies regarding general work practice will be addressed in a separate code of conduct policy document (TCS 1.4 Code of Conduct for Contracted and Volunteer Counsellors).

- 2.1 This procedures document is intended for contracted and volunteer therapists seeing clients on behalf of the Traveller Counselling Service.
- 2.2 The clients that are referred to in this document are Travellers that are aged 18+ that are attending our service, in any of our counselling locations, face to face, over the telephone or online for the purpose of getting counselling.

3 Objective(s)

The objective(s) of this procedures document are to ensure that all therapists contracted or volunteering on behalf of the TCS are fully aware of the policies and procedures that they are required to adhere to when dealing with clients.

3.1 What are Operational Procedures and Practice Guidelines?

Operational procedures and practice guidelines are the instructions or steps that describe how to complete a task or do a job.

3.2 The Need for Operational Procedures and Practice Guidelines

In order for the Traveller Counselling Service to provide the best possible service to the Traveller community, it is necessary that we adopt certain policies, procedures and practice guidelines that will ensure the safety, well-being and on-going development of our clients, staff and organisation.

This document, which is revised every three years, holds the most up-to-date versions of all of our operational procedures. If individual procedures are revised or updated in the interim three years, the update will be implemented immediately and circulated to relevant personnel.

In order to maintain our ethos, achieve our purpose, realise our vision, apply our principals and reach our strategic goals, the implementation of the operational procedures and practice guidelines and the policies that inform these, as outlined in this document is necessary. Agreed procedures and practice guidelines that have been ratified by the Board of Management ensure that all therapists (contracted and volunteer) are fully aware of how to carry out the various aspects of their roles as therapists. It ensures that we are consistent in how we deliver our service to clients in the various locations and through the various mediums and ensures that we are compliant in terms of governance and legal requirements.

4. Operational Procedures and Practice Guidelines

4.1 Who the service will be available to

The service is available to all members of the Traveller community and those who are in relationships with them who are over the age of 18 years. The service is also available to Traveller children or children of Traveller parents who attend with their families through our partner organisation, The Clanwilliam Institute.

4.2 Substance misuse

Counselling will be available to people trying to cope with substance misuse and while the service will see clients who are actively engaged in substance misuse, we direct them towards specific addiction supports to address their issues. Clients who arrive to appointments under the influence of alcohol or drugs will not be seen.

Clients who attend for counselling appointments under the influence of any substance, will not be seen and their appointment will be rescheduled for another time. Consistent arrival for appointments under the influence of a substance may result in the counselling being suspended until such a time as the client is in a position to address this.

4.3 When the service is available

Our services operates between the hours of 9.00 am and 5.30 pm Monday to Friday, with specific time slots available on different days in each location where we provide our service. Our service is also available in times of emergency.

4.4 Making appointments

There are a few different ways to make an appointment:

- Sending an e-mail - info@travellercounseling.ie
- Calling the office – 01 8685761/086 3061476
- Contact local group directly to make an appointment
- Via our website www.travellercounseling.ie

Once a client has completed their initial assessment, it is the responsibility of the therapist to arrange all follow-on appointments.

4.5 Where our service is available

Our service is currently available in seven different locations in Dublin and Wicklow. These locations are Clondalkin, Tallaght, Fingal, Phibsborough, City Centre, Dochas Women's Prison and Bray.

Since March 2020, we are also providing a telephone counselling and online counselling service. For more information on these, please go to the counselling page on our website.

There are other Local Traveller Organisations who also provide counselling to Travellers based in Galway, Navan and Offaly. For contact details of these, please see our website.

4.6 Initial Interview/Assessment

The aim of the initial interview/assessment is to decide whether or not the type of counselling we offer is appropriate to the client's needs, to gain an understanding of what the problem is from the client's perspective and to explore whether or not the client is in a position to benefit from the service being offered.

The initial assessment also provides an opportunity to gain an understanding of the clients background i.e. social and family life, to assess if the client is at risk of suicide or other risk and if so, what is the level of that risk, to determine what type of intervention might be needed and which therapist might be right for this client and to establish if the client is motivated to change. It also gives the client the opportunity to assess the therapist or the service and a chance to ask questions.

The data to be recorded during the initial assessment is recorded on CF1.1 Initial Assessment form (Appendix A) is as follows:-

- Therapist Name
- Client Reference
- Contact number
- Date
- Address (General Location Only, eg Tallaght, Birr)
- Marital Status
- Gender
- Age
- Whether they are using psychotropic medication or not
- Presenting Issues
- Medical/Health Problems
- Source of Referral
- Reason for Referral
- Location of Counselling

- Time for Counselling
- GP's Contact Details
- Emergency Contact Details

If it is felt that the client is suited to our services, an appointment to attend for their first session of counselling will be made and a copy of the clients contact details will be forwarded to the offices on Form CF1 (Appendix A).

At the end of the initial interview, clients will receive a document entitled, 'Information on Counselling' that provides all the information they need to know about the counselling process. This document is also available on our website, www.travellercounselling.ie.

4.7 Client Contracts

When the new client attends for their first session of counselling, there are three very important pieces of information that need to be relayed to the client before counselling commences:-

1. Confidentiality – Each client must be aware of the conditions where the therapist might have to share information with a third party:
 - a. Risk of harm to self
 - b. Risk of harm to another person
 - c. Disclosure regarding child abuse where children may be at risk

It is most important that therapists inform clients of the implications of disclosing names of individuals in relation to allegations of child abuse, either retrospective or present, so that the client will only divulge such information with a clear understanding of the possible implications and consequences.

2. Data Protection - The type of data that will be collected by us, what this data is used for and their right to access the data we hold on them (3.1 TCS Data Protection Policy).
3. Complaints - Procedure that the client can follow if they have a complaint or if they are not satisfied with the therapist or the service.

While some agencies provide information regarding the three above items to clients in writing and require signatures to ensure that clients understand fully their implications, we believe that this would be counterproductive to engagement and therefore verbally communicate the above points to each client at the initial assessment and re-visit these issues at the first session of counselling where a contract is agreed and signed to ensure the client fully understands their implications.

These issues are detailed on the Client Contract Form, CF1.2 (Appendix A) along with information on-

1. Attending and Cancelling Appointments
2. Finishing Counselling
3. Phone and Online Counselling

Data that is recorded on the Client Contract Form is as follows:-

- Therapist
- Client Reference
- Client Name
- Client Reference
- Clients Signature
- Date

In some instances, the client is unable to sign the contract (literacy issues, online counselling or telephone counselling and during this COVID-19 19 pandemic). In such instances, the therapist may sign on behalf of the client once they are satisfied that the client understands the information that is detailed on the client contract.

4.8 Referrals to Other Services

After an initial interview, if it is felt that the client needs help other than the support we can provide, the client will be referred to the appropriate organisation or agency and every assistance will be offered to the client to ensure that the client engages with the appropriate service.

4.9 Referrals to the TCS

There are two types of referrals to the Traveller Counselling Service

a. Self-referral

This is where the client makes direct contact with the service

b. Referrals by other agencies or professionals

This is where other family members or friends, agencies or professionals make contact on behalf of a client.

Effective counselling requires a high degree of motivation, which involves both keeping appointments and cooperating with the process of working to gain insight or to solve personal problems. The experience of some counselling agencies is that clients who are referred by third parties, such as relatives or professional workers are sometimes not as motivated as those who self-refer to the possibility of change through counselling.

The onus therefore should be placed on clients themselves to make appointments and to keep or cancel them and communicate back, if they wish, to anyone who encouraged them to refer themselves. What this means in practice, is that people who phone on behalf of someone, whether this is a relative or professional, could be asked to encourage that person

to make his or her own appointment and contact the service directly themselves provided they are in a position to do so.

Correspondingly for reasons of confidentiality, if a third party who has referred a client onto our service, contacts the service to see whether the client has made contact or not, we are not in a position to divulge this information, unless the client has agreed this in advance with the counsellor. If this agreement is not in place, we will encourage the third party to contact the client in question themselves. We will also check our files to ensure that the client has been contacted or an attempt to contact the client has been made. If the third party wishes further clarification, they can contact the Manager.

4.10 Fees

The service will be free to the clients.

If a client has been referred by an organisation, the organisation may be invoiced for the service, provided this arrangement is in place and the organisation is in a position to do so.

4.11 Missed Sessions Clients

Counselling needs to be conducted on a regular basis and if there are too many or very long breaks this can interfere with and undermine the therapeutic process. Where clients are missing sessions on an ongoing basis this issue will need to be addressed by the therapist and the client.

The space for a client will only be held for a limited number of sessions where the client has failed to turn up unless there is a good reason to do otherwise. Anytime a session is missed, the therapist will endeavour to contact the client to see if they wish to return the following week or to come to an alternative arrangement.

4.12 Cancellation Policy

As we operate with maximum flexibility, we don't adhere to a strict cancellation policy. We do request that clients contact us in advance if they are unable to attend but if there is no contact before a missed session, the therapist can contact the client at a later date to see if they would like to reschedule their appointment.

4.13 Client Records

There are a number of key issues which have to be considered with regard to keeping client records such as contents, access, confidentiality and security. These issues are all dealt with in greater detail in our Data Protection Policy document (3.1 TCS Data Protection Policy) but below is an outline of our operational procedures in relation to the keeping of client records.

The Traveller Counselling Services uses four separate forms to collect data on our clients. Copies of all these forms are available in Appendix A. They are as follows:-

- (a) CF1.1 : Initial Assessment Form – the data collected on this form includes general profile information on the client, age, status etc. This form also includes the presenting issues, source of referral and emergency contact details.

These forms are stored in a locked cabinet in the administrator's office which is locked when not in use. They do not contain the clients name or address (just general location) and are stored separately to all other data in relation to the clients, so that client information remains unidentifiable. These forms are posted into the office or are e-mailed to a password protected, secure e-mail address.

- (b) CF1.2 : Client Contracts – the data on this form is detailed in section 4.7 above.

This is the only place where the client name appears. This is for the purposes of confidentiality. The client reference also appears on this form, so that we have on record data that allows us to link the relevant client notes and data to the relevant client. Client Contract forms are stored in a separate, locked filing cabinet in a locked office and are only assessable to the Manager and Administrator.

- (c) CF1.3 : Client Notes Statistical– the data on this form includes the therapist name, client reference number, month, number of sessions this month, and number of sessions in total and whether sessions were 1:1, phone or online.

There are two types of notes that therapists collect in relation to clients. Firstly are the clinical notes. These are the notes that record the specific issues that arise in the session. These notes are to be forwarded to the office on a monthly basis. Secondly, there are process notes, which are the therapists own set of personal notes.

- (d) CF1.4 Client Record Closed Form – data includes therapists name, client reference, date of first and last session, total number of sessions, referrals to other agencies and outcomes.

Note : These above forms (a,c and d) that use client reference only, are stored in a locked filing cabinet in the administrator's office which is locked when not in use. They are stored separately to the Client Contract (CF1.2) where the client name appears. This is to ensure that client details remain anonymous. For further information see 3.1 TCS Data Protection Policy.

All therapists are required to submit their relevant forms once a month either via e-mail or by post. The keeping of client contact details, is the responsibility of each therapist.

The data that we collect through client notes, will be used to generate anonymised statistics that will help us to modify our service to meet the specific needs of our clients and supports our funding

applications. Clients need to be informed in a clear and accessible manner, how, why and when and for what their data will be used. This information should be given to all clients during the initial assessment (3.1 TCS Data Protection Policy).

According to legal requirements, client notes should be kept on file for 7 years from the time the client attends their last session. Once this period of time has passed, notes should be destroyed in a secure manner (3.1 TCS Data Protection Policy).

As per the 3.1 TCS Data Protection Policy, for the purposes of generating original archival material on the Traveller Community in terms of mental health, the Board agreed, that for the time being, the TCS would hold all data pertaining to clients in a secure and safe manner as this data was felt to be valuable to future research and development of services for the Traveller community in Ireland.

4.14 Confidentiality

The limits of confidentiality will be explained to the client in the initial session and will be outlined on the Client Contract form, which will be signed by the client where possible.

Confidentiality is considered to be fundamental to counselling, because by its very nature, counselling is an intimate relationship which often involves the client divulging information about their current and past situation, as well as their opinions and inner most feelings. This can only take place in a relationship based on trust. This is particularly true for the Traveller community, where there is a smaller population and a great fear of other people knowing their business.

However, circumstances issues may arise that need to be brought to the attention of a third party.

Such instances include:-

- (a) where there is a serious risk to the client themselves
- (b) where there is a serious risk to a third party
- (c) where there is risk to a child (Please see 2.1 TCS Child Safeguarding Policy Document)

Any decision to disclose information should be guided by certain principles. Any disclosures should be in the client's best interest and disclosures should only be on a need to know basis. The clients consent will always be sought in such instances.

The principle of respect for client autonomy provides a basis for emphasizing the importance of client consent in decisions about confidentiality.

The identity of the clients who avail of the service will be kept confidential by the therapist who is working with the client and the person who does the initial assessment unless there are circumstances where this is unavoidable (see above).

The onus is on management, staff, volunteers, workers and Board members, to ensure the confidentiality of our clients is maintained. For further detail please see our policy document on staff code of conduct (1.4 TCS Code of Conduct for Contracted and Volunteer Counsellors).

4.15 Counselling Supervision

In the Traveller Counselling Service, we provide two types of supervision to our therapists.

Individual supervision is the responsibility of each therapist. It is a requirement for all therapists to ensure that they are attending supervision privately. During this supervision, they can discuss issues pertaining to clients they see on behalf of the Traveller Counselling Service and also issues pertaining to clients they see on behalf of other organisations or clients they see privately.

Individual supervision is also provided to the therapists working for the TCS by the Manager or our external supervisor when. This is also a space where personal support for the therapist is given.

The second type of supervision is team supervision, which is specific to the work that therapists carry out with our clients. An important element in terms of team supervision is the development of cultural competency which forms an inclusive part of our team supervision where cultural issues are identified and explored.

Team supervision takes place once every quarter. Team supervision provides a space where general issues that are emerging in the work are discussed. This is a space where specifically cultural issues are discussed and appropriate responses considered. This is similarly a space where personal support for the therapists is given. Team supervision takes place both in person in the offices of the Traveller Counselling Service and online. **It is a requirement that all counsellors attend team supervision. Dates will be provided for the year at the start of each year.**

4.16 Clients Complaints Policy

Clients are informed at the initial assessment and are reminded again at their first session of counselling that if they are not satisfied with either the therapist they are working with or with the service they receive that a complaints policy is in place that will guide them as to how to make a complaint.

They are also advised that Client Complaint Forms (CF1.5) are available to be printed from our website or can be posted directly to the client if requested by phone or e-mail. In some locations, Complaint Forms are available to be taken freely at the leaflet stand. The 'Information on Counselling' document on our website, also includes a copy of the Complaints Form in the appendix.

Completed forms can be either posted into the office or e-mailed into travcounselling@hotmail.com and are dealt with according to our Client Complaints Policy (1.6). A record of the complaint will be noted in the Complaints Register and will be brought to the next Board of Management Meeting. A formal process is in place for dealing with client complaints and is detailed in TCS 1.6 Clients Complaints Policy which is available on our website.

Therapists should be aware of the following:-

- 1.6 TCS Client Complaints Policy
- IAHIP and IACP Complaints Policies

4.17 Note Taking Requirements

The Traveller Counselling Service requires that client notes are:-

- factual
- objective
- clear
- relevant
- brief
- pseudonymised (ie using only the client's reference, not their name)

It is preferable to type notes. Hand-written notes must be in black pen, legible and written on paper suited to redaction work.

There are three types of notes:-

1. Process Notes – these refer to the personal opinion or personal reflections that a counsellor might make regarding the client. They are used as an aid to counsellors in trying to understand their clients perspective or situation. Process notes are the responsibility of the counsellor. They are the counsellors private property.
2. Client Notes – these are notes that are taken after each session, summarising what was discussed in the session. Client notes should be about a paragraph in length and should include all relevant or new issues that arose during the session. Client notes can be requested through the Subject Access Request procedure. It is important to note, that if a third party is named in client notes, they can make a Subject Access Request for those notes.

The counsellor must familiarise themselves with the transparency and accountability requirements under data protection laws and remain cognisant of the fact that the client has a legal right to request a copy of any personal data relating to her/him. Counselling notes should be written so that they could be handed over to the client at any time (subject to the TCS removing third parties' data or other exceptions as may arise under Article 15 GDPR and the Data Protection Acts 1988 – 2018).

3. Client Statistical Notes – these are the notes that are sent into the office monthly that become part of the statistical report. These notes should highlight the issues that are impacting the client. These notes give us an indication of trends and of areas where more support might be needed.

These notes should reflect all issues that are impacting a client, according to the client themselves. For example, if the client mentions unemployment as an issue, it can be noted, but if the client is unemployed but does not raise this as an issue or a concern, it should not be included. If you are unsure, you can clarify with the client whether it is an issue or not. For example, it might become apparent that the client has literacy issues when filling out the contract, but this does not necessarily mean that literacy is an issue for the client as it might not cause them any stress or concern.

We encourage counsellors to include all issues as they arise in their statistical notes as these allow us to plan our service to meet growing needs, but it is equally important that these issues are the ones that clients bring into the session, rather than issues that the counsellor perceives to be impacting the client. If in doubt, either clarify with the client or don't include as an issue on your statistical notes.

When a therapist leaves the service, they are requested to forward copies of their notes to the office. Notes for each client should be in a sealed envelope, with the client's reference number, the date of the last session, and an indication as to whether the notes are to be 'destroyed' or 'held' after the regulatory 7 year period. If there have been any issues regarding child abuse or other issues that might result in litigation at a later stage, these notes must be held. If in doubt, please discuss with the Manager.

4.18 Requests for Notes and Reports

Requests

There are two types of requests that the TCS deals with in terms of client notes: Firstly, there are requests directly from clients for copies of their notes and secondly there are requests from third parties, such as solicitors who are acting on behalf of clients. In both instances, the use of form DF1.1 Data Subject Access Request Form is favourable, though not a necessity.

Client's requests for access to notes

Clients who wish to access their clinical notes can do so through the procedures outlined in the 3.1 TCS Data Protection Policy and 3.7 Data Subject Access Request Policy. We require that such requests are made in writing on G. The TCS Manager can provide a subject request form should the client wish to use it. On receipt of such a request from a client, the Manager must be informed. It is often the case that the client is requesting notes for a third party, such as their solicitor.

Requests from third parties

Where a request is received from a third party, the Manager must be notified immediately to ensure it is dealt with appropriately. While it is the policy of the TCS not to give reports to third parties, the Manager shall guide the counsellor with regard to other legal considerations (eg. mandatory reporting, subpoena etc) and the TCS's legitimate interests. For example, when requests are received from a solicitor, the DPP or other official bodies, it is necessary to evaluate such requests.

In the event that you are contacted directly by a third party i.e. the Gardaí, Solicitor or Barrister requesting a copy of the client's notes, please follow the following steps:

- Inform the Manager immediately.
- Ask for a written request which specifies the purpose for the request
- Notify the client that you have received the request (but only if that is appropriate). Obtain the advice of the Manager immediately to ascertain if it is appropriate to notify the client.

- Get the client’s written permission to comply with the request (only if appropriate). For example, obtaining permission may not be appropriate in certain situations (eg. mandatory reporting, Court Orders/subpoenas, or where doing so could put a child in danger, or other particular situations). In certain situations, if permission is being obtained, it may be advisable to meet the client in person before writing the report. The Manager shall decide the appropriate procedures in light of the facts of the particular case and the nature of the particular request.
- Evaluate the request. Take into account guidelines provided by your Professional Body and supervisor.
- Indicate that you may need time to redact your notes and prepare the report. (Generally, the legal profession will pay a fee for your report).

Please ensure that in dealing with the issue of requests for notes you are following the directions of the Manager of the TCS, all legal requirements of GDPR/Data Protection Acts 1988 – 2018, and the 3.2 TCS Privacy Notice for Clients and Learners.

It is the policy of the TCS not to provide an expert witness for court unless subpoenaed. Generally, it is the policy of the TCS not to issue court reports.

4.19 Child Protection and Mandatory Reporting

Procedures for dealing with Mandatory Reporting

Steps must be taken in the event of an allegation or reasonable suspicion of Child Abuse, or where a child or vulnerable adult is at risk of harm. The following publications will guide the practice:

- Traveller Counselling Service Child Safeguarding Policy 2021
- Children First Act 2015
- Traveller Counselling Service Privacy Notice.
- Children First’: National Guidance for the Protection and Welfare of Children: Dept. Of Children and Youth Affairs, 2017 and subsequent Child Protection Acts.
- Criminal Justice (Withholding of Information on Offences against Children and Vulnerable Persons) Act 2012
- Code of Ethics and Practice: Irish Association for Counselling and Psychotherapy.
- Code of Ethics and Practice for Psychotherapists: Irish Association of Humanistic and Integrative Psychotherapy.
- Code of Ethics and Practice of other Professional Bodies as applicable.

All therapists, working for and on behalf of the TCS are mandated persons and must inform the Designated Liaison Person (Manager) of any allegation or reasonable suspicion of child abuse or risk of harm to a child or vulnerable adult whether this be through neglect or through physical, emotional or sexual abuse. The report can be made on the appropriate attached forms CF9 (Appendix A) which must be completed to the best of the therapist’s knowledge. This joint report must be dated and

signed by the person making the report and the DLP. When adults make retrospective disclosures of abuse which took place during their childhood, it is essential that consideration is given to the current risk to any child who may be in contact with the alleged abuser. If any risk is deemed to exist, the therapist must report the allegation to the designated person without delay and complete the reporting form for TUSLA. (Appendix A). If no risk is felt to exist, the mandated person is still required to bring the case to the attention of the DLP as it may be that there is insufficient information available to determine whether or not a risk does exist.

4.20 Guidelines for dealing with threat of Suicide

Please consult Privacy Notice 4.1 (a) and (b) for guidance in the GDPR implications of making contact with doctors or other health professionals.

This issue has been included because suicide has become such a problem for the Traveller community over the last number of years. Thinking about suicide is not uncommon or pathological and talking about suicide does not increase the likelihood of a client taking action. Rather, it enables the client to express and feel heard for the desperation they are experiencing. The therapist's first duty of care is to create a safe space in which the client can explore what suicide may mean for them while sensitively assessing the level of intent.

Ultimately the responsibility for deciding whether or not to break confidentiality rests with the therapist who must use their judgement according to all the circumstances of the case. It requires maintaining a delicate balance between on the one hand over-reacting and risking the fidelity of the therapeutic relationship and on the other hand denying the seriousness or extent of the client's intent and sense of meaningless or hopelessness.

It is important that therapists are informed and are fully aware of the policy and practice of the Traveller Counselling in relation to suicidal clients and also the policy and practice of the local organisation if they are seeing clients on their behalf.

All acts of self-harm, including all suicidal threats must be taken seriously when a person makes initial contact with the service. Every effort will be made to offer the earliest possible appointment with such clients. As the TCS does not offer a drop-in service, a caller may be offered the contact number for the Samaritans or emergency services. However, TCS does not provide a crisis intervention service.

Where a client has begun therapy and where the risk of suicide has been assessed as high or imminent the therapist and/or Manager/Centre Manager (if working remotely on behalf of a local group) in collaboration with the client will contact the client's family, if appropriate, and medical provider, either GP or Psychiatrist, to inform them of the risk and to agree a joint action plan. If no suitable third party is identified the Centre staff will make contact with the emergency services to elicit their help.

While every effort will be made to involve the client in all 3rd party contacts, it is the policy of the TCS to forgo the usual provision for confidentiality when a client is deemed to be at high risk of suicide and where the client is unwilling or unable to engage in a "safe plan".

Where the client is hospitalised as a result of suicidal ideation or attempt, the clinical opinion of his/her GP or Psychiatrist will be sought in making the determination as to their suitability for returning to counselling.

Where a client completes suicide, the response will be to endeavour to provide support to all those in the TCS impacted by this event. To this end:

- The Manager will contact the therapist and staff concerned within 24 hours to offer support and assistance.
- The counsellor involved will be supported in taking a break from the work, if they so wish, for whatever time is deemed appropriate by all parties.
- The therapist is encouraged to discuss his/her experience in supervision.

4.21 Procedures for all staff dealing with Threat of Suicide

Step 1: Caller contacts seeking help. Client is referred to the Manager or phone number is taken and call will be returned as soon as possible. If the caller indicates that the situation is urgent or that he/she is feeling suicidal and if the Manager or another therapist is not available, the person taking the call explains that there is no emergency service in the TCS and encourages the client to ring his/her GP or Samaritans or Pieta House. If the client is actually on the premises and if the staff recognises that the caller is unable to return home, then they will call an ambulance or family member.

Step 2: If the client is prepared to wait for an appointment the Manager or therapist will discuss the issues with them on the phone and will offer the next free appointment with them in their locality..

Step 3: The therapist implements a safe plan or safety agreement with the client. If a therapist judges a client is suicidal, the therapist will strongly encourage the client to contact his/her GP immediately. The therapist may need to speak directly with the GP. The responsibility for the client is then taken by the GP. Such incidents to be noted on the Incident Report Form CF6. (Appendix A).

Step 5: In a situation where the client refuses to seek medical care and is judged to be at serious risk, the therapist will need to seek medical assistance, even against the wishes of the client, by contacting the client's GP. another local GP or, failing that, call an ambulance or An Garda Siochana. The client should, if possible, remain with a member of staff in these circumstances.

The therapist should inform staff to instigate appropriate action. Each staff member should be familiar with the location of first aid equipment and should be trained in Safe Talk, STORM or another suicide support intervention.

Step 6: An initial verbal report should be made to the Manager of the Centre and should be followed up by a written report of the action taken.

For therapists working remotely in Local Groups, it is important that the policies and procedures that are appropriate to the local group are adhered to.

4.22 Violence

The Traveller Counselling Service is committed to preventing and stopping violence in all its forms, whether this is domestic, family, inter family or individual violence. In order to implement this the service needs to ensure that there is safety in the process for people who engage with the service, without fear or threat.

The Traveller Counselling Service works closely with the Traveller Mediation Services in order to support the work of reducing violence within the community.

4.23 Safety of the Therapist

It is the responsibility of the therapist to ensure that they are not alone in a building at any time with a client. If there is no second person available to remain in a building with you while you see clients, it is your responsibility to cancel the session.

If you are having difficulties ensuring that you are not alone seeing clients, please contact the manager of the service where you are seeing the clients or the Manager in the TCS.

Therapists should consider where they sit in the room where they see clients, so that they can make an easy exit if they should feel unsafe at any point.

4.24 Dealing with Threatening or Aggressive Behaviour

If at any stage during a session with a client, the client becomes abusive or you begin to feel unsafe, excuse yourself for a minute from the room and inform another person of the situation and return to the session only if you feel it is safe to do so.

If a client threatens violence or behaves violently or threateningly towards you, exit the room, inform another person and return with them requesting that the client leaves the premises and advise that you will be informing An Garda Siochana if they do not. If they refuse to leave, contact An Garda Siochana.

A Client Incident CF6 form must be completed and forwarded to the Manager of the TCS and the Manager in the Local Centre (if counselling is being carried out on their behalf) in the case of any such incidents where a client is felt to be behaving in a way that is not in keeping with the respect and safety of the therapist.

Following discussions with Management and the therapist, a decision will be made to either:-

- Give the client a verbal warning and resume counselling
- Suspend counselling for a given period, and review once period is up
- Refer the client to another therapist within the service
- Refer the client to another service
- Report the incident to An Garda Siochana

A record of the incident will be noted in the Incident Register and brought to the next Board of Management meeting for discussion.

4.25 Therapeutic Space

It is the responsibility of the therapist to ensure that the space where they see clients is safe, clean, tidy, sufficiently lit and heated and a space where you won't be disturbed. This will ensure a comfortable and relaxed space conducive to the therapeutic process.

If you have any issues in relation to the space where you see clients, please refer to the Manager of the service where you are seeing clients or the Manager in the TCS.

No materials that could be used for self-harm should be available in the room. Clients should not be brought to the staff kitchen except in exceptional circumstances.

4.26 Health & Safety

It is the responsibility of the therapist to adhere to the rules and regulations in relation to health and safety in the location where they see clients. Any concerns they may have in relation to health and safety must be raised with the Manager in the local service or the Manager in the TCS. (2.6 Health and Safety Policy).

Therapists must leave the building accompanying the client as soon as the fire alarm sounds and await instructions from fire marshal.

4.27 Cancelling Appointments with Clients

If a therapist is unable to make an appointment for any reason, they will endeavour to ensure that the client has as much notice as possible that their appointment is cancelled. They will contact the client in due course to arrange another appointment.

4.28 Invoicing for Counselling Hours

There are two types of invoicing requirements. The counselling session should comprise of 45 – 50 mins of counselling, with 15 – 10 minute break between clients, in which notes from the session can be taken.

Working in an Area

Counsellors are required to book a block of hours when they are providing a service in a local area. It is the responsibility of the Manager in the Local Group to ensure that all available slots in the block are filled. This is to be done with the support of the counsellor and the Manager of the TCS.

It is the responsibility of the counsellor to liaise with the Manager of the local group to let them know if there are free slots in the block. This can be done by email or phone. If the slots remain free for a period of four weeks or more, the counsellor should contact the Manager in the TCS. If a counsellor is working with more than one local group, an invoice for each local group must be submitted.

Working with Self-Referred Clients

Counsellors that are seeing clients individually, that have been referred or self-referred through the website, are required to invoice for individual hours only. These client hours should be invoiced on a separate invoice.

All invoices should be in before the 3rd of each month to ensure early payment. Invoices that arrive in after this date might be delayed in terms of processing.

4.29 Grounds for Review of Client Engagement

In certain instances, it may be deemed necessary to suspend the provision of counselling to a client. The grounds for such a suspension include:-

- (i) Threatening or violent behaviour towards the counsellor or any volunteer, member of staff or management
- (ii) Making malicious complaints about a counsellor or any member of staff or volunteer

Following an incident, the therapist will meet with the Manager and an Incident Form will be completed in relation to the matter. A decision will be noted on this form if and when to review the suspension.

4.30 Counselling Appraisal Procedures

Once per year, at the end of the year, the counselling process will be reviewed by the team during a Team Supervision Session, and an agreed aspect/(s) of the counselling will be focused on, such as referral pathways, initial assessments, targeting specific cohorts etc. Each therapist will then be asked to complete a review of this process to see how the service can be improved. This feedback will be compiled into a report that will give recommendations on how to improve the service and this will be presented to the Board of Management.

At times, such as part of or following our Strategic Planning process, the Board of Management might request a review of particular aspects of the service or a review of the service in its entirety. Again, feedback will be sought from each therapist and a report compiled that will be reviewed by the Board of Management.

4.31 Counsellor Reviews

As part of ongoing Team Supervision, counsellors have an opportunity to discuss difficulties or issues they are experiencing as part of their work for the TCS though, should the need arise, the Manager is always available to meet with or discuss particular issues with counsellors on an individual basis.

Each counsellor contracted to work with the TCS also has their external supervision where issues can also be addressed on an individual basis.

4.32 Training

Training will be offered to counsellors at various times throughout the year. Some of these sessions may be obligatory and some may not. You will be advised in advance as to the upcoming training. Some sessions will be in-house and others will be external.

5. Requirements and Responsibilities

5.1 Requirements for Therapists

All therapists must be members or associate members of a Professional Body.

All therapists must present the following completed forms before beginning to work in the TCS:

- Therapist Registration form CF8 (Appendix A)
- Current Insurance Certificate
- Professional membership certificate
- Tusla e learning certificate
- Letter from current supervisor
- Signed acceptance of the TCS 1.2 Operating Procedures and Practice Guidelines and other relevant policies as listed on CF8 in Appendix A).

It is the therapist's responsibility to submit current insurance certificate and certificate of professional membership annually as they are renewed. Each therapist will be given a contract when they start working with the service. This contract will be operational until such time as they leave the service.

Each counsellor must attend team supervision and training sessions as required.

5.2 Management Responsibility

The management of the Traveller Counselling Service is responsible for

- the selection of therapists
- the allocation of clients to therapists
- the provision of a room
- putting administration procedures and policies in place
- ensuring procedures are followed by all involved
- the provision of opportunities for professional development and training
- the provision of individual supervision twice per year
- the provision of team supervision every quarter

5.3 Responsibilities of Therapists

Therapists will:

- take responsibility for the creation and security of anonymised client notes
- notify the Manager of the TCS of a therapeutic issue that may be of concern to the therapist or that may have consequences for the Service. (The therapist should get the client's permission where applicable)
- inform the Centre's DLP in the event of an incident or suspicion or in the event that you are made aware of a concern about a child or vulnerable adult that meets or exceeds the thresholds of harm that requires mandatory reporting. It is the Services policy that the

mandated person and the DLP submit a joint report to Tusla, Child and Family Agency. (Please see 2.1 Child Safeguarding Policy and Privacy Notice)

- the receipt from TUSLA must be given to the DLP for legal hold
- attend continuous professional development as arranged by the Manager of the TCS
- make referrals where necessary. If in doubt discuss with the Manager of the TCS
- attend individual supervision
- seek individual supervision within TCS if and when required
- attend team supervision every quarter
- maintain good practice and high standards. This implies that:
 - therapists practise under, and comply with the standards and ethics of their respective professional bodies
 - therapists keep themselves up-to-date with requirements of the law and fulfil the legal requirements in every respect, particularly with reference to current Data Protection Acts 1988 - 2018, Criminal Justice (Withholding of Information on Offences against Children and Vulnerable Persons) Act 2012, Children First Act 2015, Children First Guidelines 2017 (DYCA), and the Centre's policies;
 - therapists maintain confidentiality, which means that material disclosed by a client during a session will only be used in line with counselling contract agreement and [Privacy Notice](#);
 - therapists maintain confidential pseudonymised files on clients and store them safely therapists observe professional boundaries and regulations;
 - implement the complaints and grievance procedures in line with the [TCS Complaints Policy](#).

6. Outcome(s)

6.1 Outcomes for Therapists

It is anticipated that by adhering to these policies and procedures, that therapists, both contracted and voluntary, who are providing a service on behalf of the Traveller Counselling Service, will have a clear understanding of what is expected of them in terms of how they carry out their work. Policies and procedures ensure that a certain level and standard of service is delivered consistently.

6.2 Outcomes for Clients

It is correspondingly anticipated that adherence to these policies and procedures, will ensure that all clients attending the Traveller Counselling Service will be

receiving the highest standard of service that we can offer and will be dealt with in a consistent and fair manner.

6.3 Outcomes for the Organisation

It is anticipated that through adherence to these policies and procedures, that we will be adhering to the legal and governance requirements as set out by the relevant governing bodies.

- Children First Act 2015
- Children First: National guidance for the protection and Welfare of Children: Dept. of Children and Youth Affairs, 2017 and subsequent Child Protection Acts.
- GDPR Data Protection Commission [www.gdprandyou.ie]
- Code of Ethics and Practice: Irish Association for Counselling and Psychotherapy
- Code of Ethics and Practice for Psychotherapists: Irish Association of Humanistic and Integrative psychotherapy.
- Code of Ethics Family Therapist Association of Ireland
- TCS 1.4 Code of Conduct for Contracted and Volunteer Counsellors

7. Policy Development/Governance Group

7.1 Membership of the Policy/Governance Group.

Membership of the policy/governance group that has responsibility for this policy will be made up of members of the Board of Management, the Manager of the Counselling Service and the Administrator of the Counselling Service.

7.2 Conflict of Interest/Conflict of Loyalty

Expressions of conflict of interest and conflict of loyalty will be assessed and noted in the minutes each time this group meets to discuss policy.

8. Supporting Evidence

8.1 List relevant legislation an regulations

- Children First Act 2015
- Children First: National guidance for the protection and Welfare of Children: Dept. of Children and Youth Affairs, 2017 and subsequent Child Protection Acts.
- GDPR Data Protection Commission [www.gdprandyou.ie]
- Code of Ethics and Practice: Irish Association for Counselling and Psychotherapy
- Code of Ethics and Practice for Psychotherapists: Irish Association of Humanistic and Integrative psychotherapy.
- Code of Ethics Family Therapist Association of Ireland

8.2 List of policies that are being replaced by this policy

This policy is replacing the section, entitled Practice Guidelines, that was part of the TCS1 Counselling Code of Ethics, Policies, Procedures and Practice document.

8.3 List related policies and documents

Policies that are referred to or are relevant to this policy are as follows:-

- a. 2.1 TCS Child Safeguarding Policy Document
- b. 3.1 TCS Data Protection Policy Document
- c. 1.4 TCS Code of Conduct for Contracted and Volunteer Counsellors
- d. 1.6 TCS Client Complaints Policy
- e. 3.2 TCS Privacy Notice for Clients and Learners
- f. 2.6 TCS Health and Safety Policy

8.4 List of Relevant Governing Bodies

- Tusla
- Dept of Children and Youth Affairs
- Revenue Commissioners
- GDPR Data Protection Commission [www.gdprandyou.ie]
- Irish Association of Humanistic and Integrative Psychotherapy (IAHIP)
- Irish Association for Counselling and Psychotherapy (ICAP)
- Family Therapy Association of Ireland (FTAI)
- Association for Agency-based Counselling and Psychotherapy in Ireland (AACPI)

9. Glossary of Terms

No terms were felt to warrant inclusion in the Glossary of Terms.

10. Approval and Review

This policy document was circulated to governance sub group for comment and feedback following which, the final version was submitted to the Board of Management through the Governance Sub Group for ratification. This policy was signed-off by the Board of Management at the date inserted below and is due for review three years from this date.

Chairperson : _____ Date : _____
Chris McDonagh

Review Due : _____

11. Appendix A

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Traveller Counselling Service

Initial Assessment Form – CF1.1

Personal Details

Therapist : _____ Client Ref : _____

Contact No : _____ Date : _____

Address : _____

Marital Status : _____ Gender : _____ Age : _____

Using psychotropic/anti-depressant/sleeping tablets or similar prescription meds : _____

Presenting Issues

Medical/Health Problems

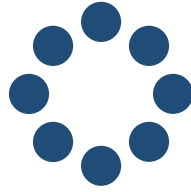
Other Details

Source of Referral : _____ Reason for Referral : _____

Location for Counselling : _____ Time for Counselling : _____

GP's Contact Details : _____

In case of emergency, contact details for your next of kin: _____



Traveller Counselling Service

Client Contract – CF1.2

This contract is between the Traveller Counselling Service and the client. It will operate for the duration of time that the client attends counselling. There are a number of items, detailed below, that need to be discussed and agreed when the client and counsellor first meet.

1. Confidentiality

While each counsellor working for the Traveller Counselling Service is bound to maintain confidentiality in all work carried out during counselling, there are three circumstances where the counsellor is obliged to share information with a third party:-

- (a) If a client is intending on harming themselves
- (b) If a client is intending to or is harming another person
- (c) If a client discloses the name of someone who is abusing children or from whom children may be at risk of abuse.

In the above circumstances, the counsellor will discuss in advance with the client any communications they are obliged to make.

2. Data Protection

In order to attend counselling with our service, we need to keep a record of some information about our clients, for example, their name, their contact number etc. This data will not be shared with any third party, with the exception of when the counsellor is obliged to share information or if a client requests that their information be shared, for example, with their GP. Anonymised data will be used for the generation of quarterly statistical reports.

Clients have a right to see their information and/or amend their data at any time. All details relating to client counselling sessions will be anonymised, meaning a client cannot be identified from their notes.

3. Complaints

If you are not satisfied with any aspect of the service, you can make a complaint by using our complaints form. A copy of this form is attached to the Counselling Information Sheet. Our Complaints Policy is available on our website at www.travellercounselling.ie

4. Attending and Cancelling Appointments

Clients are expected to attend their appointments on a weekly basis unless an alternative agreement is made. If a client is unable to attend, they are expected to contact their counsellor in advance. Where the client misses a number of sessions (usually 3 weeks) and fails to make contact with the therapist, they risk losing their place. However, every effort will be made to communicate this to the client in advance

5. Termination of Counselling

The client can end counselling at any stage during the process, however, we recommend discussing this with the counsellor before deciding to finish up.

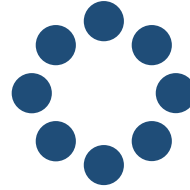
6. Signature on form

In some instances, such as where there may be literacy issues or cases of phone and online counselling, the counsellor can sign and confirm that the contract has been discussed, understood and agreed with the client.

Therapist : _____ Date : _____

Client Name : _____ Client Ref : _____

Signed : _____ Signed : _____
Client Therapist



Traveller Counselling Service

Client Statistical Notes – CF1.3

Therapist : _____; Ref : _____; Month : _____; Sessions: ___ out of ____; Sessions in Total : ___ out of ____; 1:1 _____; Phone _____; Online _____:

Please highlight or circle the issues that arose for your client this month under the following headings. Add any new headings to the ends of lists as required:-

<u>Clients Childhood:</u>	<u>Relationship</u>	<u>Family:</u>	<u>Children:</u>	<u>Violence</u>	<u>Bereavement</u>	<u>Addiction</u>	<u>Mental Health</u>	<u>Health Problems</u>	<u>Contrb Factors</u>
In Care	Conflict	Missing member	In Care	Perpetrator DV	Car Crash	General	Medication	Physical pain	Unemployed
Neglect	Infidelity	Member In Prison	Separated From	Experiencing in	General	Alcohol Self	Suicide Ideation	General	Debt
Physical Abuse	Victim of DV	Separated From	Sexual Abuse of	Violent Behaviour	Multiple	Drugs Self	Attempted Suicide	Injuries Car Crash	Identity Issues
Bullying	Marital Rape	Enmeshed	Parenting Issues	Anger Issues	Suicide	Gambling Self	Psychiatric Care	Family Member	Sexual Identity
Sexual Abuse	Fertility Issues	Sick Fam Member	With Ext Family	In Fear of	Multiple Suicide	Prescription Self	Self-Harm		In Prison
	Miscarriage	Threat of Suicide		Inter Family	Spousal Suicide	Family Alcohol	Eating Disorder		Court Case
	Sexual Abuse	Internal Conflict		Internal Family	Murder	Family Drugs	Depression		UnP pregnancy
	Emotional Abuse	Fam Member Raped		Being Intimidated	Accidental	Family Gambling	Stress		Raped
	Separated	Fam Member Raped		Sexual Violence	Violent	Family Prescription	PTSS		Housing
		Stress within		Family Murdered		In Recovery	Work Stress		Homeless
		Mental Health				Relapsed	Anxiety		Literacy Issues
							Guilt		Isolation
							Fear		No Support
							Shame		
							Breakdown		



Traveller Counselling Service

Client Record Closed – CF1.4

Therapist : _____

Client Ref : _____

Date First Session : _____

Date Last Session : _____

Total Number of Sessions : _____

Referrals

Outcomes

Signed : _____

Date : _____



Traveller Counselling Service

Client Complaint Form – CF1.5

Name : _____ Date : _____

(this is optional and can be left blank)

Contact Number : _____

Name of Therapist : _____

Location of Counselling : _____

Nature of Complaint : _____

Please use additional pages as necessary)

What would you like to see happen in response to this complaint? (Eg an apology) : _____

For Official use only:

Date Received : _____ No : _____

Date Responded to : _____ Signed : _____

Outcome : _____



Traveller Counselling Service

Client Incident Form – CF1.6

Therapist : _____ Client Ref : _____

Date of Incident : _____ Location : _____

Name of Witness : _____ Contact Number Witness : _____

Nature of Incident : _____

Action Taken :

For Official use only:

Date Received : _____ No : _____

Date Responded to : _____ Signed : _____

Outcome :



Traveller Counselling Service

Therapist Registration Form – CF1.7

Name : _____ Date : _____

Contact Number : _____ Mobile Number : _____

Address : _____

Next of Kin : _____ Contact Number : _____

Address : _____

Insurance Company : _____

Professional Body : _____

For Official Use Only

Signed Acceptance Form In Place : _____ Copy of Insurance in Place : _____

Copy of Cert of Membership : _____ Signed Contract on File : _____

Induction Pack Sent : _____



Traveller Counselling Service

Therapist Signed Acceptance Form - CF1.8

Name : _____ Contact No : _____

I confirm that I have read and understand the following documents included in my induction pack :-

- a. 2.1 TCS Child Safeguarding Policy Document
- b. 3.1 TCS Data Protection Policy Document
- c. 1.4 TCS Code of Conduct for Contracted and Volunteer Counsellors
- d. 1.6 TCS Counselling Complaints Policy
- e. TCS Privacy Notice
- f. 2.6 TCS Health and Safety Policy

Signed : _____ Date : _____

9. Tusla Child Welfare Report Form – please use link below

<https://www.tusla.ie/children-first/publications-and-forms/#SRP>

10. Tusla Retrospective Abuse Form - please use link below

<https://www.svp.ie/getattachment/ff1827a1-f16e-4f13-8c25-6764bc829db3/Retrospective-Abuse-Report-Form.aspx>



Traveller Counselling Service

DF1.1 Data Subject Access Request Form

To enable us to process your application for data access we are providing a form which you may choose to use. However, should you choose not to fill in this form we ask you to give as many details as possible in your written request.

The Data Protection Act 1988 – 2003 (DPA) and the EU General Data Protection Regulation (GDPR), effective on 25 May 2018 governs the entitlement to personal information.

Information about processing of personal data, the retention periods which apply and any rights to rectification, erasure, or restriction of processing that may exist is available also.

A response will be made within one month of receipt of the following:

- Receipt of a written request; or
- Receipt of any further information you may be asked to provide to enable compliance with the request made

The information supplied in this form will be used only for the purposes of identifying the personal data requested.

There is no obligation to complete this form to make a request, but doing so may make it easier to process your request quickly.

Please Read all Sections of this Form

Section 1 - Details of the person requesting information

Full Name: _____

Address: _____

Contact Telephone Number: _____

Email Address: _____

Data subject

Please tick the appropriate box and read the instructions which follow it:-

YES: I am the data subject. I enclose proof of my identity.

(please go to section 2 and 4) _____

NO: I am acting on behalf of the data subject. I have enclosed the data subject's written authority and proof of the data subject's identity and my own identity.

(please go to section 2, 3 and 4) _____

Section 2 - Proof of Identity

To ensure data is released to the right person, proof of your identity and address is required.

A photocopy or scanned image of the following must be submitted along with, or following your data request:

1. Proof of Identity (Passport, photo driving licence, public services card or birth certificate) and
2. Proof of Address (Utility bill no more than 3 months old)

In the case of doubt, the right to refuse is reserved

Section 3 - Details of the data subject (if different from section 1)

Full Name: _____

Address: _____

Contact Telephone Number: _____

Email Address: _____

Section 4 - Information sought

Please provide any relevant details which may help identify the information required, e.g attendance at a course or counselling, providing required dates where possible.

Please note that if the information requested reveals details directly or indirectly about another person the consent of that person must be received before information may be released. In certain circumstances, where disclosure might adversely affect the rights and freedoms of others, the information may not be disclosed and full reasons for that decision will be given.

We reserve the right, in accordance with Article 12 of the GDPR to charge a fee or refuse the request if it is considered to be “manifestly unfounded or excessive”. However, every effort will be made to provide a satisfactory form of access or summary of information if suitable.

Section 5 - Disclosure of CCTV Footage

The Traveller Counselling Service does not record any CCTV footage. The Parish of the Travelling People, St Peters Parish is the controller of the CCTV footage at the entrance to the building where our offices are located and where counselling sometimes takes place, in Phibsborough, Dublin 7.

Section 6 - Declaration

Please note that any attempt to mislead may result in prosecution.

I confirm that I have read and understood the terms of this subject access form and certify that the information given in this application to The Traveller Counselling Service is true. I understand that it is necessary for the Traveller Counselling Service to confirm my / the data subject’s identity and it may be necessary to obtain more detailed information in order to locate the correct personal data.

Signed : _____ **Date :** _____

Documents which must accompany this application are:-

- **Evidence of identity (see section 2)**
- **Evidence of the data subject’s identity if different from above (see Section 3)**
- **Authorisation from the data subject to act on her/his their behalf (if applicable)**

Please return the completed form to:

The Manager
Traveller Counselling Service
Phibsborough
Dublin 7

Email: info@travellercounselling.ie
Telephone: 00353 1 868 5761