

Counselling Data Protection Policy and Privacy Statement

Any personal data provided by you through any means (e.g. verbal, written, text, or in electronic form via email) will be held and processed in accordance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR), for the purposes for which you have given your information; namely, to provide the services you have requested from me and to meet my legal obligations.

Introduction

As a private practitioner, I am committed to protecting your privacy. When you request to use my service, you will be asked to consent to my processing of your data under the terms of this policy. Please read the following carefully to understand how I collect, store, and use your personal data.

Lawful Basis for Processing

The lawful bases on which I process your personal data are:

- **Contract** – to provide the counselling service you have requested.
- **Legal obligation** – to meet requirements such as record keeping, HMRC, or safeguarding laws.
- **Vital interests** – where information must be shared to protect you or another from serious harm.
- **Special Category Data** – I process health-related information as “special category data.” This is done under Article 9(2)(h) of the UK GDPR: *“for the purposes of the provision of health or social care.”* Explicit consent will be sought for processing this information.

What information do I collect?

Counselling Enquiries - Normally people contact me via email, text, WhatsApp or telephone in the first instance. This involves providing me with your name, telephone number(s), and email address. During the initial telephone assessment, I may request your home address, GP details, availability, therapeutic issues, and other relevant information.

If you contact me through other organisations (e.g. BACP, Psychology Today, Institute of Psychedelic Therapy, Counselling Directory), please refer to their privacy policies in addition to mine.

Forms - At your Initial Consultation you will be asked to sign a Client Agreement Contract, setting out the terms of my service, and to give consent for me to store and use your data. Those seeking supervision will sign a Supervision Contract.

Initial Consultation - At this stage I may collect information about your personal, social, medical, and mental health circumstances, background, and family history. This enables me to assess whether counselling is appropriate and to provide safe and effective support.

Website - When you make an enquiry via my website, I collect the information you provide in the contact form. This data is stored securely on a password-protected computer.

PA / Medical Secretary

To ensure the smooth running of my practice, I employ a PA/medical secretary to assist with administrative tasks such as inbox management, invoicing, and record-keeping. All emails are screened in accordance with GDPR requirements, and only information necessary for the safe and effective management of the service is accessed. Urgent communications or those raising safety concerns will be flagged directly to me. Disclosure of personal information in email correspondence remains your choice, and all communications will be handled in strict confidence. My PA/medical secretary is an experienced professional who has worked within healthcare settings and is fully aware of the confidentiality requirements of my counselling practice.

What do I use your information for?

I use information held about you in the following ways:

- To provide the counselling service requested by you.
- To offer suitable counselling appointments.
- To notify you about changes to appointments and other service updates.
- To administer my service, including appointments and invoices.
- To seek feedback on your experience of counselling.
- To monitor and improve my service.
- Within clinical supervision (your identity will remain protected).

What information do I share?

I will not share your information with third parties, except in the following circumstances:

- **Consent** – where you request or agree I contact another professional.
- **Serious Harm** – where I believe it may prevent serious harm to you or another.
- **Compliance with Law** – where required by law or professional regulations.
- **Event of Critical Illness or Death** – In the event of my death, my nominated Clinical Executor has been instructed to access your name, email and contact telephone number/s and share these with my Clinical Supervisor. My Clinical Supervisor has then been instructed to contact you to communicate basic information about what has happened.

How do I keep your information safe?

- Paper records are stored in a locked filing cabinet.
- Electronic records are stored on password-protected devices and GDPR-compliant cloud platforms (e.g. Microsoft 365).
- Personal data is stored separately from session notes.
- Contact details are destroyed two weeks after completion of therapy. Mandatory documentation (e.g. clinical notes, invoices, supervision records) are destroyed seven years after therapy ends, in line with clinical guidance.

Data Breach Procedure

If a personal data breach occurs that risks your rights or freedoms, I will notify the Information Commissioner's Office (ICO) within 72 hours and inform you without delay if there is a high risk of harm.

International Data Transfers

Some third-party providers (e.g. Microsoft) may process data outside the UK/EU. In such cases, data transfer safeguards are applied to protect your information.

Your Rights

You have the right to:

- Access the personal data I hold about you.
- Request correction of inaccurate data.
- Request erasure of your data (“right to be forgotten”).
- Request restriction of processing.
- Request transfer of your data to another provider (data portability).
- Object to processing under certain circumstances.
- Withdraw consent at any time (though counselling may need to end if this prevents service delivery).
- Lodge a complaint with the Information Commissioner’s Office (ICO).

Changes to this Policy

I may update this policy from time to time. Any substantial changes will be communicated directly to you.

Last Updated 30th September 2025.