

## Privacy Policy. Updated 2026

I understand how important your privacy is. I take care to maintain your confidentiality in line with current data protection legislation, including the General Data Protection Regulation (EU/2016/679) (the GDPR), the Data Protection Act 2018, and the Privacy and Electronic Communications (EC Directive) Regulations 2003. I also adhere to the ethical guidelines of the British Association of Counsellors and Psychotherapists (BACP). These guidelines have been set up to protect your confidential material and ensure that your therapist always conducts themselves with professionalism and integrity.

To provide you with the best service possible, I will hold your personal contact details and records of your therapy sessions. Please find below important information about how this information will be held and used.

### **My lawful basis for holding and using your personal information**

The GDPR states that I must have a lawful basis for processing your personal data. There are different lawful bases depending on the stage at which I am processing your data. If you have had therapy with me and it has now ended, I will use legitimate interest as my lawful basis for holding and using your personal information. If you are currently having therapy or if you are in contact with me to consider therapy, I will process your personal data where it is necessary for the performance of our contract. The GDPR also makes sure that I look after any sensitive personal information that you may disclose to me appropriately. This type of information is called 'special category personal information'. The lawful basis for me processing any special categories of personal information is that it is for provision of health treatment (in this case therapy sessions) and necessary for a contract with a health professional (in this case, a contract between me and you).

### **How I use your information**

I will never use your personal data for any purposes other than the administration of the therapy service that I am providing to you i.e. to arrange, cancel and rearrange appointments, or to share resources that support our therapeutic work. I will only retain your personal information for as long as is necessary. This is in line with guidance from the Information Commissioner's Office.

### **Initial contact:**

When you contact me to book your first appointment I will collect some brief information to help me to process your enquiry. This will include your name so that I can book the appointment into my diary and also a contact method, for example an email address or phone number. This information is requested so that you could be informed if I was unable to attend an appointment due to unforeseen circumstances. If you do not want to be contacted under any circumstances you do not need to provide a

contact method. Alternatively, an organisation such as your employer may send me your details when making a referral or a relative may give me your details when making an enquiry on your behalf. If an enquiry is made and you decide not to proceed I will ensure that all of your personal data is deleted within one month. If you would like me to delete this information sooner please let me know.

**While you are accessing therapy:**

Your email address or phone number will be used to provide you with written confirmation of your appointment times if you have given consent for this. Your email address and telephone number will only be used to contact you regarding appointment times unless we have agreed that I will also use your email address to email you information that is relevant to your therapy sessions.

At the beginning of your first appointment, I will ask you to complete a personal details form containing your name, address, date of birth, contact information and also contact information for your GP. The form is stored in a secure and encrypted online tool (Google Drive) that can only be accessed by me. Please be aware that I will not routinely contact your GP to inform your GP of your attendance, as your attendance is confidential. To fulfil my duty of care towards you while also maintaining your confidentiality, I will only contact your GP if it is necessary, and should these circumstances arise, I would discuss this with you wherever possible before contacting your GP.

Rest assured that what is said in our sessions will be kept confidential. I am an Accredited Member of the NCPS, and I abide by their professional code of ethics. Confidentiality will only be broken if there are legal or ethical obligations to disclose, for example, if you disclose abuse/neglect of a child or vulnerable adult, or say something else that implies serious harm to yourself or others, or if a court of law requires me to disclose information.

In the event that confidentiality must be broken, I will always try to speak to you about this first, unless there are safeguarding issues that prevent this.

Counsellors are required to have regular supervision support so I may discuss our work with my supervisor. This would be done without identifying you and my supervisor is a counsellor who also abides by the NCPS's code of ethics regarding confidentiality.

I keep brief notes of our therapy sessions for the purpose of assisting our work together. The notes help me to keep track of the issues that we are working on and they are for my use only. The notes do not include any personal details that could be used to identify you and they are stored securely in a locked filing cabinet that only I have access to. Your therapy notes are stored separately to your personal details form.

**After therapy has ended:**

There are reasons why counsellors are required to keep records after therapy has ended. For example, in the case of financial transactions personal information must be retained for as long as legally required in respect of tax or accounting purposes. Retaining your therapy notes ensures that I can continue to offer you an efficient service if you make contact after therapy has ended. Your therapy notes do not include any personal details that could be used to identify you and continue to be stored securely in an encrypted area online (Google Drive) that only I have access to for five years after therapy has ended. This time frame adheres to current industry guidelines. Five years after therapy has ended, your therapy notes will be confidentially destroyed.

Your personal details form is confidentially destroyed on ending your therapy sessions. Please note that I need to keep a record of your name, date of birth and your client reference number for five years after therapy ends. Your client reference number corresponds with a client reference number on your therapy notes and therefore enables me to identify your therapy notes if necessary.

### **Third party recipients of personal data**

I share a limited amount of personal data with third parties in order to provide therapy services to you and to fulfil legal obligations in respect of tax and accounting purposes. For example, my accountant is permitted access to my invoices. Where I have contracted with a supplier to carry out tasks I have carefully selected which organisations I work with. I state that they do not use your information in any way other than the task for which they have been contracted. I will never pass on your contact details to any third party organisations for the purposes of sales, marketing or research.

If your appointments are paid for or arranged via a third party, for example, your employer the only information shared with the third party is your dates of attendance and non-attendance for invoicing and payment purposes. Details about what is discussed in your appointments will remain confidential and can only be shared if you give me your written consent to do so.

### **Data security**

I take the security of the data that I hold about you very seriously. My email account is password protected and mobile phones and laptops used to respond to your emails are password protected and have anti-virus software. Any email correspondence will be deleted within one month if it is not necessary to keep it.

### **Website visitors**

By accessing the website, you are consenting to the information collection and use practices described in this privacy notice. Should you choose to contact me using the contact form on the website none of the data that you supply will be stored by the website or passed to any third party data processors. Instead the data will be collated into an email and sent to me over the Simple Mail Transfer Protocol (SMTP). SMTP

servers are protected by TLS (sometimes known as SSL) meaning that the email content is encrypted before being sent across the internet. The email content is then decrypted by local computers and devices.

The website uses cookies and Google Analytics. Almost all websites use cookies which are small files that get put on your computer by websites as you surf them. These cookies can store lots of information which can have privacy implications. Google Analytics is a service provided by Google that gathers anonymous data on how people are using websites and then provides visitor statistics, details of page views etc. This service is used by many website owners as the data helps website owners to improve their websites.

Some page elements are embedded from trusted third parties in order to provide you with Interactive Maps. This makes the website more helpful to you as a site visitor however most of these come with their own cookies. This applies to Google Maps. I do not control these cookies so I cannot guarantee what they do. In many cases the cookies are used to generate identical information to Google Analytics and indeed use Google Analytics, so opting-out of Google Analytics will also opt you out of these cookies too. You can opt out of Google Analytics and other Google services here – <http://tools.google.com/dlpage/gaoptout> and <https://www.google.com/dashboard/>.

### **Your rights**

Under GDPR, 2018 guidelines you have the following rights: The right to request access to the personal information that I store and process about you. You can ask for corrections to be made to the information held or for your personal information to be deleted. You can also ask me to restrict the processing of your personal information or to object to the processing of it altogether in some circumstances. You can read more about your rights at [ico.org.uk/your-data-matters](http://ico.org.uk/your-data-matters). If you would like to make a request relating to any of the rights above, please send a request in writing by emailing [claireinnewbury@gmail.com](mailto:claireinnewbury@gmail.com). Please be aware that in certain situations counsellors may be unable to comply with the above requests. For example, if compelled to retain the records by a court of law. Please also be aware that there may be a charge for complying with a request if it is deemed to be excessive in nature.

### **Queries**

‘Data controller’ is the term used to describe the person or organisation that collects and stores and has responsibility for people’s personal data. In this instance, the data controller is Claire Black and I am registered with the Information Commissioner’s Office. If you have any questions about this privacy policy or the way in which I handle your personal information you can contact me via email at [claireinnewbury@gmail.com](mailto:claireinnewbury@gmail.com).

**Complaints**

If you have a complaint about how I handle your personal data please do not hesitate to get in touch by email at [claireinnewbury@gmail.com](mailto:claireinnewbury@gmail.com). If you want to make a formal complaint about the way I have processed your personal information you can contact the ICO which is the statutory body that oversees data protection law in the UK. For more information go to [ico.org.uk/make-a-complaint](https://ico.org.uk/make-a-complaint).

**Changes to privacy notice**

This privacy notice may be updated from time to time, so please check occasionally for any updates.