

Introduction

Your privacy is very important to me and you can be confident that your personal information will be kept safe and secure and will only be used for the purpose it was given to me. I adhere to current UK data protection legislation, including the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

This privacy notice tells you what I will do with your personal information from the initial point of contact through to after your counselling has ended.

I am registered with the Information Commissioner's Office (ICO) [Registration reference: ZB786426].

My phone number is: +44 7356 063001

My email address is: danielaweetmancounselling@gmail.com

My lawful basis for holding and using your personal information

I am a member of the British Association for Counselling and Psychotherapy (BACP), which commits me to work within professional and ethical standards, including keeping accurate records that are adequate, relevant and limited to what is necessary, and which comply with data protection requirements (BACP Ethical Framework, 2018). Further information about data protection can be found at www.ico.org.uk.

In its broadest sense, a record refers to any information that will be processed or stored about a person who can be identified directly or indirectly from that information.

UK GDPR requires that I have a lawful basis for processing your personal data. Depending on the stage of our contact, these are as follows:

- **If you are currently having counselling, or are in contact with me to consider counselling,** I process your personal data where it is necessary for the performance of our contract.
- **If you have previously had counselling with me and it has now ended,** I use legitimate interests as my lawful basis for retaining your personal information.
- Some of the information you share may be classed as **special category personal data** (for example, information about mental health). The lawful basis for processing this data is that it is necessary for the provision of health treatment (counselling) and carried out by a health professional under contract with you.

How I use your information

Initial contact

When you contact me with an enquiry about my counselling services, I collect information to help me respond appropriately. This may include your name, address, telephone number, email address and the name of your GP. Alternatively, your details may be shared with me by a GP, another professional, or (in the case of young people) a parent or trusted individual making an enquiry on your behalf.

If you decide not to proceed with counselling, your personal data will be securely deleted within **six months**. You may request deletion sooner if you wish.

Email is not a fully secure form of communication. By contacting me via email, you acknowledge and accept this risk. I ask that no sensitive personal information is shared by email or text message and that such information is brought into sessions instead.

While you are accessing counselling

Everything you discuss with me is confidential. Confidentiality will only be broken in exceptional circumstances, including where required by law (for example in relation to terrorism, money laundering, drug trafficking, safeguarding concerns, or a court order), or where there is an immediate risk of serious harm to yourself or others. Wherever possible, I will try to discuss this with you first unless safeguarding concerns prevent this.

I hold two types of records:

- **Administrative records**, such as your contact details, signed contracts, session dates and payment records.
- **Clinical notes**, which are brief and factual, focusing on themes, patterns and interventions rather than detailed content. These notes are a snapshot of the work at a particular point in time rather than a complete or objective account.

For security reasons, I do not retain emails or text messages for longer than six months. If relevant information is shared by text or email, it may be summarised and transferred into your clinical notes so it can be stored securely.

As part of my professional practice, I attend clinical supervision. In supervision, I may discuss themes or processes arising from our work, but no identifying information is shared. Any supervision process notes are anonymised, kept separately as a reflective journal, and do not form part of your client record (Reeves & Bond, 2021).

After counselling has ended

After counselling has ended, your records are retained for **five years** from the end of our contact. After this period, all records are securely destroyed.

In the event that I am incapacitated or unable to continue my practice, your contact details may be accessed by a trustee named in my clinical will, solely for the purpose of informing you of the situation.

Your rights

I aim to be open and transparent about how I use personal data. You have the right to:

- Request access to the personal data I hold about you
- Request correction of inaccurate or incomplete data
- Request restriction of processing in certain circumstances
- Object to the processing of your personal data in some circumstances
- Request deletion of your personal data

Some rights, such as deletion, may be limited where I am required to retain records for legal, ethical or insurance reasons.

To request access to your personal data, please submit your request in writing to danielawetmancounselling@gmail.com. Information will be provided within one month, free of charge. Requests are considered on a case-by-case basis.

Data Protection Complaints

If you have concerns about how I have collected, stored, used or shared your personal information, you may raise a complaint in accordance with my Data Protection Complaints Procedure, available on my website.

Complaints can be submitted by email to:

danielaweetmancounselling@gmail.com

I will acknowledge receipt of your complaint within 7 working days and aim to provide a full response within one calendar month.

If you remain dissatisfied following my response, you have the right to complain to the Information Commissioner's Office (ICO) via www.ico.org.uk/make-a-complaint.

Third-party recipients of personal data

I sometimes use carefully selected third-party service providers to support the running of my counselling practice. These organisations only process personal information on my behalf where necessary and are required to protect the confidentiality and security of that information.

Examples of service providers I may use include:

- WebHealer – website hosting, website forms and website administration.
- Google Workspace (including Gmail) – secure email communication and practice administration.
- Microsoft – document creation, storage and practice administration.
- FreeAgent – accounting and invoicing services.
- Mettle – business banking and payment administration.
- Professional advisers, accountants or regulators where legally required.

I only share personal information where necessary for the operation of my practice, compliance with legal obligations, or where you have given consent.

All third-party providers are expected to process personal information securely and in accordance with applicable data protection legislation.

Some of these providers may process data outside the United Kingdom. Where this occurs, appropriate safeguards are in place to ensure that personal information remains protected in accordance with UK data protection legislation.

Data security

I take the security of your personal data very seriously. Client information is stored either in **locked paper files** or within **secure digital systems**.

Paper records are kept in a locked filing cabinet with restricted access. Digital records are stored using secure digital systems that are designed to comply with applicable UK data protection legislation.

Digital information is protected by passwords, encryption, and additional security measures. Devices used to access data (laptop and smartphone) are password protected and use up-to-date security software.

Visitors to my website

When someone visits my website, I use a third-party service (www.webhealer.net) to collect standard internet log information and details of visitor behaviour patterns. This information is processed in a way that does not identify individuals and is used to understand how the website is used and to improve its functionality.

If you submit a form via my website, the information is temporarily stored by the web host before being securely transmitted to me.

The website uses **strictly necessary**, **analytical**, and **functionality** cookies to support basic operation and improve user experience.

Telephone or online counselling

When working online or by telephone, I ensure that I am in a private, confidential space where I cannot be overheard or seen. I use secure equipment and take reasonable steps to protect confidentiality.

I ask clients to ensure they are also in a private and safe space and using appropriate, secure equipment. While no technology can be guaranteed to be completely secure, these risks are taken seriously and managed carefully.