# Daniela Weetman Counselling – Privacy Policy

**Last updated: November 2026**

## Introduction

Your privacy is very important to me. I take the protection of your personal information seriously and only collect, use and retain it where there is an appropriate reason to do so.

I comply with applicable UK data protection legislation, including the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and the Privacy and Electronic Communications Regulations 2003 (PECR), as amended.

This privacy notice explains how I collect, use, store and protect your personal information from your initial enquiry through to after counselling has ended. It also explains your rights and the arrangements for handling your information if I become unable to practise or die.

**Data controller:** Daniela Weetman, Daniela Weetman Counselling

**ICO registration reference:** ZB786426

**Telephone:** +44 7356 063001

**Email:** info@danielaweetmancounselling.com

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

I am a member of the British Association for Counselling and Psychotherapy (BACP) and work in accordance with its Ethical Framework and relevant professional guidance. This includes maintaining appropriate records, respecting confidentiality and complying with data-protection requirements.
Under the UK GDPR, I must have a lawful basis for processing your personal information. Because counselling may involve information about your physical or mental health, which is special category personal data, I must also meet an additional condition under Article 9 of the UK GDPR. The lawful basis and condition I rely on depend on why I am using the information.

### Article 6 basis – ordinary personal data

For initial enquiries, I rely on Article 6(1)(b) UK GDPR where processing is necessary to take steps at your request before entering into a counselling agreement.

When you engage me for counselling, I rely on Article 6(1)(b) UK GDPR – processing is necessary for the performance of the counselling agreement between us. This includes using your information to arrange appointments, provide counselling and maintain appropriate records connected with the service.
After counselling has ended, I may rely on Article 6(1)(f) UK GDPR – legitimate interests – where retaining relevant records is necessary for appropriate professional record-keeping or to establish, exercise or defend potential legal claims. Where I am legally required to retain financial or accounting information, I rely on Article 6(1)(c) UK GDPR – compliance with a legal obligation.

### Article 9 basis – special category data (health information)

For health-related information that I need to process to provide counselling, I rely on Article 9(2)(h) UK GDPR – processing is necessary for the provision of health or social care. The corresponding condition in UK law is Schedule 1, Part 1, paragraph 2 of the Data Protection Act 2018 (health or social care purposes).
Article 9(2)(h) is subject to the professional-secrecy safeguards in Article 9(3). Section 11 of the Data Protection Act 2018 explains that these safeguards include circumstances where a person owes a duty of confidentiality under an enactment or rule of law. My work is subject to professional confidentiality obligations, including the duty of confidence that can arise in the counselling relationship and my professional obligations as a BACP member under its Ethical Framework.
Where I need to retain special category information specifically to establish, exercise or defend legal claims, Article 9(2)(f) UK GDPR (legal claims) may provide the relevant condition, where its requirements are met.
I only process special category information where the relevant Article 9 condition and any associated requirements are met. If you would like further information about the lawful basis or condition that applies to a particular use of your information, please contact me. Further information is available from the Information Commissioner's Office (ICO): www.ico.org.uk.

# How I use your information

## Initial contact

When you contact me about counselling, I collect information necessary to respond to your enquiry and consider whether counselling with me may be appropriate.

This may include your name, address, telephone number, email address and, where relevant, your GP's details. Your information may also be shared with me by a GP, another professional, a parent or another trusted person making an enquiry on your behalf.

If you decide not to proceed with counselling, your personal information will be securely deleted within **six months** of the enquiry, unless there is a specific legal or other justified reason to retain it for longer. You may request deletion sooner, subject to any applicable retention requirements.

I may use email, SMS/text messages or WhatsApp for practical and administrative communication, such as responding to an enquiry, arranging or changing appointments, and

sending other practice-related messages. These channels are not fully secure, so please avoid sending sensitive personal or clinical information through them and, wherever possible, bring this information into our sessions instead.

## While you are accessing counselling

I treat what you share in counselling as confidential. There are exceptional circumstances in which I may need to share information, including where disclosure is required by law, where there are safeguarding concerns, or where I believe there is a serious risk of harm to you or someone else.

Where appropriate and safe to do so, I will discuss a potential disclosure with you first. This may not be possible where doing so would increase risk or interfere with a legal obligation.

I hold two main types of client records:

- **Administrative records**, such as your contact details, signed counselling agreement, session dates and payment records.
- **Clinical notes**, which are brief and focused on relevant themes, patterns and interventions rather than a detailed account of everything discussed. They provide a snapshot of the work at a particular point in time and are not intended to be a complete or objective account of our sessions.

For data-minimisation and security reasons, I do not routinely keep emails, SMS/text messages or WhatsApp messages for longer than six months. Where a message contains information relevant to the counselling work, a necessary summary may be transferred to your client record. I may retain a message for longer where there is a specific and justified reason to do so.

I attend regular professional supervision to support safe, ethical and reflective practice. I may discuss aspects of our work with my clinical supervisor, using your first name or client reference code and sharing only the information necessary for supervision. My supervisor is also bound by professional confidentiality. Any additional professional consultation or information sharing will be undertaken in accordance with my confidentiality and data-protection responsibilities.

## How I store and protect your information

I take steps to protect your personal information and maintain your confidentiality. My clinical notes are stored electronically using a coded identifier rather than your name wherever practicable. Your name and contact details are stored separately from your clinical notes, with access restricted to authorised persons. Signed contracts and other relevant paper documents are stored securely in a locked filing cabinet.

Although I take care to keep identifying information separate from clinical notes, coded records may still constitute personal data. They are therefore handled in accordance with applicable data-protection law.

## How long I keep your information

I retain adult client records for five years after the end of our counselling relationship.

For clients under 18, I retain records until five years after their 18th birthday.

These periods apply to clinical and relevant client-administration records. Some information, such as financial and accounting records, may need to be retained for a different period to meet legal and tax requirements.

I review records at the end of their retention period and securely destroy them when they are no longer required, unless there is a specific legal, professional, insurance or other justified reason to retain them for longer.

## Clinical Will and continuity arrangements

If I become unable to practise or communicate, including through serious illness, incapacity or death, my appointed Clinical Will Executor will manage the necessary client-related arrangements in accordance with my Clinical Will.

This may include contacting current clients, explaining the situation, providing information about ending counselling or finding alternative support, and managing client records in accordance with my instructions and applicable data-protection requirements.

Where necessary to carry out these responsibilities, my Executor may be given access to relevant client information, including contact details and clinical records. Access will be limited to what is necessary for the purpose. My Executor is required to respect confidentiality and handle all information securely and in accordance with applicable data-protection requirements.

My Executor will follow the instructions in my Clinical Will concerning the secure management, retention and eventual destruction of records. Your information will not be used for any unrelated purpose.

## Your rights

You have rights in relation to the personal information I hold about you. Depending on the circumstances, these include the right to:

- Request access to your personal information.
- Request correction of inaccurate or incomplete information.
- Request erasure of your personal information.
- Request restriction of processing.
- Object to certain types of processing.
- Request the transfer of information in certain circumstances.

These rights are not absolute. For example, I may need to retain particular information where there is a legal obligation or another valid reason for doing so.

To exercise your rights, please contact me in writing at info@danielaweetmancounselling.com.

I will respond within the applicable legal time limit, normally one month. There is normally no charge for responding to a request, although the law allows a reasonable fee or refusal in limited circumstances, such as manifestly unfounded or excessive requests.

If you have concerns about how I handle your personal information, please contact me in the first instance. You also have the right to complain to the Information Commissioner's Office:

www.ico.org.uk/make-a-complaint

## Third-party service providers

I use third-party service providers and communication services to support the operation and administration of my counselling practice. These include:

- **Google: Business email, document storage and file management.**
- **Microsoft: Calendar, meeting arrangements (including online meeting invitations) and related administrative services.**
- **Webhealer: Website hosting and website enquiry forms.**
- **WhatsApp (Meta): Sending and receiving messages with clients, including appointment arrangements, changes to appointments and other practice-related communications. I may also use SMS/text messaging through my mobile phone service for similar administrative communications.**

These providers and services may process personal information on my behalf or as independent data controllers, depending on the service they provide. The mobile network provider may also process information needed to transmit SMS messages. I take reasonable steps to ensure that appropriate data-protection arrangements and security safeguards are in place.

## Data security

I take the security of your personal information seriously and use reasonable and appropriate measures to protect it against unauthorised access, loss, alteration or disclosure.

Client information is stored in locked paper files or secure digital systems, as appropriate.

Paper records are kept in a locked filing cabinet with restricted access. Digital records are held in systems with appropriate access controls and security safeguards.

Devices used to access client information, including my laptop and smartphone, are password-protected and kept reasonably up to date. I take reasonable steps to protect digital information through account security, device security, access controls and other safeguards appropriate to the information held.

No method of storing or transmitting information can be guaranteed to be completely secure, but I take appropriate steps to reduce the risks.

## Visitors to my website

When you visit my website, my website provider, Webhealer (www.webhealer.net), may collect standard internet log information and information about how visitors use the website. The information collected and how it is used may depend on the website's configuration and the services enabled.www.webhealer.net

Information that has been genuinely anonymised so that it can no longer identify an individual is not personal data. Information that can identify you, directly or indirectly, remains personal data and is handled in accordance with this privacy notice.

If you submit a form through my website, the information you provide may be collected and temporarily stored by the website host before being transmitted to me.

My website may use cookies and similar technologies. The types of cookies used, their purposes and how you can manage your preferences should be explained in the website's cookie information. Non-essential cookies should only be used where the required consent has been obtained.

## Telephone and online counselling

When providing counselling by telephone or online, I take reasonable steps to ensure that I am in a private and confidential space where I cannot be overheard or seen.

I use appropriate equipment and take steps to protect the confidentiality and security of our sessions.

I ask you to ensure that you are also in a private and safe space and, where possible, using secure equipment and a reliable internet connection. Although no technology can be guaranteed to be completely secure, I take these risks seriously and manage them as far as reasonably possible.