PRIVACY NOTICE & DATA PROTECTION POLICY
Practice Name: Reflections Trauma Counselling

This privacy notice explains how I collect, use, store, and protect your personal information from your initial point of contact through to after your therapy has ended.

1. Core Data Protection Commitments
I am happy to discuss any questions you might have about my data protection policy. You can contact me via:

Email: reflections.trauma.therapy@gmail.co.uk

Data Controller: 'Data controller' is the term used to describe the person or organisation that collects, stores, and has responsibility for people's personal data. In this practice, the data controller is me.
• ICO Registration Number: [Insert your registration number here]

2. Lawful Basis for Processing Data
The UK GDPR requires that I have a valid lawful basis to process your personal data. This changes depending on the stage of our work together:

• Active & Prospective Clients: If you are currently in therapy or are in contact with me to consider therapy, I process your personal data because it is necessary for the performance of our contract.
• Post-Therapy: If your therapy has ended, I rely on legitimate interest as the lawful basis for holding your personal information.
• Sensitive Data (Special Category): The law requires extra care for sensitive health data, known as 'special category personal information'. My initial lawful basis for processing this is your explicit consent. Following this, I retain counselling records to ensure I can reference them in the future if required (the legal basis for this retention is to defend against potential legal claims).

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3. How Data is Handled at Each Stage

Initial Contact
When you enquire about my counselling services, I collect information to help satisfy your enquiry (such as your name, phone number, or email address). Alternatively, a health professional (like your GP) may send me a referral, or a trusted individual may enquire on your behalf. If you choose not to proceed with therapy, all of your personal data will be completely deleted within 3 months, unless you request that I delete it sooner.

During Therapy
Everything you discuss with me is strictly confidential. This confidentiality will only be broken if you are at serious risk of harm to yourself or others. Furthermore, statutory legal obligations require counsellors to report ongoing sexual assault, rape, terrorism, or money laundering directly to the police. I will always endeavour to discuss this with you first, provided there are no safeguarding risks that prevent me from doing so.

To keep the service running smoothly, I maintain a record of your personal details and digital, typed session notes.
• Storage & Security: These files are stored securely on a digital laptop that is protected by double-password encryption. They are never shared with third parties without your explicit knowledge.
• Communications: For security reasons, I do not retain text messages or emails after our contract has ended. If an email or text contains clinical information relevant to your care, it will be transferred directly into your secure client notes, and the original message will be deleted.

Retention After Therapy Ends
Once our contact has formally ended, your records will be kept for 6 years before being securely destroyed. You have the right to request that I delete your information sooner than this.

4. Third-Party Data Processors
I occasionally share basic personal data with trusted third parties to carry out specific administrative tasks—for example, using your email address to send you a secure invite link for online video therapy sessions.

I carefully vet these partners and maintain strict agreements ensuring they only use your information for the specific task they are contracted to do, keeping it secure at all times.

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5. Your Rights & Subject Access Requests (SARs)
You hold several statutory rights regarding your data, including the right to ask me to delete your information, limit how it is used, stop processing it, or object to its use under certain conditions. You can learn more about these rights at ico.org.uk/your-data-matters.

If you request a copy of the personal information I hold about you, I am committed to acting transparently. I will provide:
• A description and the source of the data.
• The reasons and timelines for storing it.
• Details of any court-ordered disclosures (no information is shared without a court order).
• A copy of the information in a clear, intelligible format.

In line with current data protection rules, any data searches will be "reasonable and proportionate." I will formally respond to all GDPR data rights and Subject Access Requests within 30 days. To submit a request, please contact me in writing via email.

In the event of the therapists death

BACP Clinical Will & Digital Data Access Protocol

My clinical notes are stored digitally in password-protected Google Docs files.

In adherence with BACP ethical guidelines (Section 4.5e), in the event of my death or sudden incapacity:

1. My next of kin holds a password to access a single secure file that contains active client contracts and contact information.
2. That password will be provided to my appointed Clinical Executor (a qualified practitioner bound by strict professional confidentiality) solely to access the contract file of active clients.
3. Each contract contains a password provided by the client, which protects their confidential notes held within the file.
4. No notes or data will be shared or accessed by the Clinical Executor without the client-provided password and a copy of this signed contract and a formal written request and a formal method of identification such as a passport , drivers licence and birth certificate.

6. Complaints Procedure

If you have any concerns or complaints about how I handle your personal data, please contact me directly via email or in writing so we can work to resolve the matter locally.

I am legally committed to acknowledging and responding to any formal data protection complaints within 30 days.

If you are unsatisfied with my final response, or if you prefer to bypass a local resolution, you have a statutory right to lodge a formal complaint with the Information Commissioner’s Office (ICO):

• Website: ico.org.uk/make-a-complaint
• Email: icocasework@ico.org.uk
• Helpline: 0303 123 1113
• Postal Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Tina Cooney.
Reflection’s trauma
Counselling & mindfulness