

DATA PROTECTION AND PRIVACY POLICY

Tanya Mowbray MBACP

Data Controller

ICO Registration Number: ZB326823

Introduction

I am the Data Controller for the purposes of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. I am registered with the Information Commissioner's Office (ICO) under registration number ZB326823. This Privacy Policy explains what personal information I collect, why I collect it, how it is stored, how long it is retained, and your rights regarding your personal information. Any personal information you provide is given voluntarily and is processed solely for the purpose of providing counselling.

Lawful Basis for Processing

In accordance with the UK GDPR, the lawful bases for processing your personal information are: Article 6(1)(b): performance of our counselling contract; Article 6(1)(f): legitimate interests in providing safe, ethical and effective counselling services; Article 9(2)(h): processing of special category data for the provision of therapeutic or counselling services. As counselling involves discussing emotional wellbeing and mental health, I process special category personal data only where necessary to provide professional counselling.

Information I Collect

- a) Contact details and personal information completed on the contract form.
- b) Brief electronic counselling notes, copies of relevant emails or text messages relating to appointments or counselling, initial enquiries, questionnaires or assessment forms completed by you.
- c) Appointment attendance records and payment records. I only collect information relevant to providing counselling safely, ethically and professionally.

Storage and Security

Electronic records are stored on password-protected and encrypted devices. I take reasonable steps to ensure that your personal information is protected against unauthorised access, accidental loss, destruction or disclosure.

Email and Electronic Communication

Email and text messaging are convenient but cannot be guaranteed to be completely secure. I ask that they are used primarily for arranging or changing appointments. By choosing to communicate by email or text, you acknowledge the small inherent security risks associated with these methods. Should confidential information need to be shared electronically, we can discuss the most appropriate and secure method.

Recording of Sessions

Neither you nor I will audio-record or video-record any counselling or supervision session, or any part of a session, without the prior knowledge and explicit consent of everyone involved.

Confidentiality and Sharing Information

Everything discussed during counselling is treated as confidential. However, confidentiality may be broken where there is a serious risk of harm; safeguarding concerns; disclosure is required by law or court order; or disclosure is required to prevent serious crime. Where possible, I will discuss any necessary disclosure with you beforehand. As part of good professional practice, I receive regular clinical supervision. Client information discussed in supervision is anonymised wherever possible.

Retention of Records

Counselling and supervision records are normally retained for seven years after the end of our professional relationship, unless there is a legal, safeguarding or insurance reason requiring longer retention. Initial enquiries that do not proceed are normally deleted after one month. Records are securely destroyed when no longer required.

Your Rights

Under the UK GDPR you may request access, correction, deletion (where applicable), restriction of processing, object to certain processing, request data portability where applicable, and withdraw consent where consent is the lawful basis. Exercising certain rights may affect my ability to continue providing counselling safely.

Subject Access Requests

Requests should be made in writing with proof of identity. I will respond within one calendar month unless an extension is permitted. Counselling notes are professional working notes and are not intended for legal proceedings. Reports will normally be limited to factual attendance information and will not include diagnoses outside my competence.

Complaints

If you have concerns about how I have collected or used your personal information, please contact me at trmowbraycounselling@gmail.com. I will acknowledge your complaint within five working days and investigate it without undue delay. If you remain dissatisfied, you may complain to the Information Commissioner's Office: <https://ico.org.uk/make-a-complaint/> Telephone: 0303 123 1113.

Changes to this Privacy Policy

This Privacy Policy may be updated from time to time to reflect changes in legislation, professional guidance or my practice. The most current version will always be available on request and significant changes will be brought to your attention.

Private Counsellor Policy Reviewed: July 2026