

Privacy Notice

This privacy notice explains how I collect, use, store and share your personal information when you contact me or work with me for counselling. It is designed so that I can update the details to reflect my current practice arrangements.

Who I am

I am Emily Richmond a counsellor in private practice and the data controller for the personal information you provide to me.

If you have any questions about this privacy notice or how I use your information, you can contact me using the details below:

- Name: Emily Richmond
- Practice name: Emily Richmond Counselling
- Email: Every.Life@outlook.com
- Phone: 07938197845
- ICO registration number: ZC243345

What information I collect

I may collect and keep some of the following information, depending on the nature of your enquiry and our work together:

- your name
- your date of birth or age
- your contact details, such as telephone number and email address
- your address, where relevant
- emergency contact details, where appropriate
- your GP details, where appropriate
- information shared during an enquiry, assessment or initial consultation
- information relevant to counselling, such as reasons for seeking therapy, relevant personal history, counselling history, current difficulties, health information, medication, risk information, and session notes
- practical information relating to appointments, attendance and fees
- emails, texts or other messages exchanged about appointments or the counselling process

If you are seeking counselling for a child or young person, I may also collect relevant information from a parent, carer or person with parental responsibility.

Some of the information I collect is special category data under UK GDPR, including information about mental health, physical health, neurodivergence, sexuality, gender identity, or other sensitive personal information where relevant to the counselling work.

Why I collect your information

I collect and use your information in order to:

- respond to your enquiry
- arrange and provide counselling sessions
- assess whether counselling with me is appropriate
- keep brief records in order to practise safely and responsibly
- contact you about appointments, cancellations or changes
- manage risk and respond appropriately in exceptional safeguarding or emergency situations

- meet my professional, legal, ethical and insurance responsibilities
- maintain accounts and payment records where needed

My lawful basis for using your information

Under UK GDPR, my lawful basis for processing your personal data is usually one or more of the following:

- Article 6(1)(b) - Contract: where processing is necessary in order to take steps at your request before counselling begins, or to provide the counselling service we have agreed
- Article 6(1)(f) - Legitimate interests: where processing is necessary for the purposes of running my practice safely and appropriately, including record keeping, supervision, and managing appointments, provided this does not override your rights and interests
- Article 6(1)(c) - Legal obligation: where I need to keep records or disclose information in order to comply with the law

Where I process special category data, I rely on an additional condition under Article 9 of UK GDPR, usually one or more of the following:

- Article 9(2)(h) - provision of health or social care, treatment, or the management of health or social care systems and services
- Article 9(2)(f) - where processing is necessary for the establishment, exercise or defence of legal claims
- Article 9(2)(c) - where processing is necessary to protect vital interests in an emergency

If I rely on consent for any specific optional use of your information, I will make that clear separately. In general, counselling records are not processed on the basis of consent alone.

How I store your information

I keep your information securely and only for as long as necessary.

Your information may be stored in the following ways:

- paper records, such as signed agreements or brief handwritten notes
- electronic records, such as contact details, assessment information and brief session notes
- email and messaging systems, where you contact me this way or where we arrange appointments

I take reasonable steps to protect your information, which may include password-protected devices and accounts, secure storage for paper records, limiting access to your information, and keeping records that are adequate, relevant and limited to what is necessary.

Who I may share your information with

I treat what you share with me as confidential. I do not routinely share your personal information with others unless there is a lawful and justified reason to do so.

Supervision

As part of safe and ethical practice, I discuss my work in professional supervision. This is a normal part of counselling practice and helps support safe, thoughtful and effective work.

Where I discuss my work in supervision, I aim to protect your privacy as far as possible and share the minimum necessary information. Wherever possible, I avoid using identifying details unless there is a clear reason not to do so.

Professional services and processors

I may use third-party services to help run my practice. Depending on the systems I use, these may include:

- email provider: outlook
- phone or SMS provider: giffgaff
- online meeting platforms: to suit client
- calendar, document storage, invoicing or payment systems

- accountant or bookkeeping services, where required for financial records

I aim to use services that are appropriate for professional practice and take reasonable steps to ensure your information is handled securely.

Legal, safeguarding or emergency situations

I may share information without your consent where I have a lawful reason to do so, including for example if there are serious concerns about your safety or the safety of another person, if there is a safeguarding concern, if I am required to do so by law, or if disclosure is necessary in relation to serious crime or the protection of vital interests.

Where possible and appropriate, I would aim to discuss this with you first.

International transfers

Some of the services I use, such as email, messaging, cloud storage or online meeting providers, may store or process data outside the UK.

Where this happens, I will take reasonable steps to ensure that appropriate safeguards are in place in line with UK data protection law. You can ask me for more information about this if you would like it.

How long I keep your information

I keep records only for as long as necessary and in line with professional and legal responsibilities. My current retention periods are:

- Enquiry information: up to 3 months if counselling does not begin
- Counselling records for adults: up to 7 years from the end of our work together
- Counselling records for children and young people: until they are 25 years old.
- Financial records: retained for as long as legally required for tax and accounting purposes

At the end of the relevant retention period, records will be securely destroyed or deleted.

Your rights

Under UK data protection law, you have rights over the personal information I hold about you. These may include the right to:

- be informed about how your information is used
- request access to the information I hold about you
- ask for inaccurate information to be corrected
- ask for processing to be restricted in some circumstances
- object to processing in some circumstances
- ask for your information to be erased in some circumstances
- complain to the Information Commissioner's Office (ICO) if you are unhappy with how your information has been handled

These rights are not absolute, and there may be lawful reasons why I cannot meet a request in full. For example, I may need to retain some information in order to comply with legal, ethical, insurance or professional obligations.

If you would like to make a request about your information, please contact me in writing.

You also have the right to complain to the ICO:

- Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
- Website: <https://ico.org.uk>

Providing your information

If you contact me for counselling, I may need certain personal information in order to respond to your enquiry, assess suitability, and provide a safe and appropriate service.

If you choose not to provide relevant information, this may affect whether I am able to offer counselling.

Changes to this privacy notice

I may update this privacy notice from time to time to reflect changes in the law, guidance, or my practice arrangements. The most recent version will be available on request and, if relevant, on my website.