



# Privacy Policy

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| <b>Author</b>      | Mark Dixon |
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## Purpose

This document forms part of the policies, procedures and professional standards of Ash Roots Counselling. It should be read in conjunction with any related documents and will be reviewed periodically to ensure continued compliance with legal, ethical and professional requirements.

## **Introduction**

Ash Roots Counselling is committed to protecting your privacy and handling your personal information with care, transparency and respect. This Privacy Policy explains how personal information is collected, used, stored and protected when you visit this website, contact Ash Roots Counselling, or enquire about counselling services.

## **Data Controller**

For the purposes of UK data protection legislation, the Data Controller is: Mark Dixon

Trading as: Ash Roots Counselling

Email: [mark@ashrootscounselling.co.uk](mailto:mark@ashrootscounselling.co.uk)

ICO Registration Number: ZC179039

## **What Information May Be Collected**

Information may be collected when you contact Ash Roots Counselling through email, a website contact form, telephone, or during the process of arranging counselling.

This information may include:

- Your name
- Email address
- Telephone number
- Information you choose to share regarding your reasons for seeking counselling
- Records of communications relating to appointments and enquiries
- Client intake forms and consent records

Technical information may also be collected automatically through website hosting services, such as IP addresses, browser information, and website usage data.

## **How Your Information Is Used**

Personal information is collected and processed for the following purposes:

- Responding to enquiries
- Arranging appointments
- Providing counselling services
- Maintaining counselling records
- Managing payments and administration
- Meeting legal, ethical and professional obligations
- Protecting clients where there are safeguarding concerns

Only information necessary for these purposes will be collected and retained.

## **Lawful Basis for Processing**

Under UK GDPR, personal information is processed under the following lawful bases:

- Legitimate Interests: To respond to enquiries and manage the operation of the counselling practice.
- Contract: To provide counselling services once an agreement has been entered into.

- **Legal Obligation:** To comply with legal requirements, safeguarding responsibilities, accounting obligations and professional standards.
- **Special Category Data:** Counselling may involve the processing of sensitive personal information relating to mental health and wellbeing. This information is processed for the provision of counselling services and in accordance with applicable UK GDPR provisions relating to health and social care.

## **Confidentiality**

Confidentiality is an important part of counselling. Information shared during counselling will be treated confidentially and will not normally be disclosed to third parties without your knowledge or consent. However, there may be circumstances where confidentiality cannot be maintained, including:

- Where there is a serious risk of harm to yourself or another person
- Where safeguarding concerns arise
- Where disclosure is required by law
- Where a court order requires disclosure

Where possible, any concerns will be discussed with you before information is shared.

## **Disclosure to statutory or legal organisations**

Ash Roots Counselling respects clients' right to privacy and confidentiality. Personal information and counselling records will not be routinely disclosed to police, courts or other organisations. Information may only be shared where:

- there is a legal requirement or court order;
- there is a significant concern about risk of serious harm;
- safeguarding duties apply;
- the client provides explicit consent.

Any decision to disclose information will be carefully considered and documented, taking into account ethical responsibilities, the client's welfare, proportionality and necessity.

## **Clinical Supervision**

As part of professional practice and in accordance with ethical requirements, Ash Roots Counselling undertakes regular clinical supervision. Client work may be discussed within supervision to support safe and effective practice. Information shared in supervision is anonymised wherever possible and supervisors are bound by professional confidentiality requirements.

## **How Information Is Stored**

Reasonable technical and organisational measures are used to protect personal information. Electronic records are stored securely using Microsoft 365 and OneDrive with password protection, and multi-factor authentication. Access to electronic records is limited to those who have a legitimate need to access them as part of providing counselling services, meeting legal obligations, or ensuring the safe operation of the practice. Appointment records maintained in digital diary and calendars use client reference codes rather than identifying personal information.

## **Practice Mobile Phone**

The practice mobile phone is used solely for business purposes. Client contact details may be stored on the device where necessary to facilitate communication. The device is protected by appropriate

security measures, including biometric and passcode protection. Information stored on the device is kept to the minimum necessary for the provision of counselling services. Client names will normally be omitted, with codes or reference numbers used instead where appropriate. Messages will be deleted as soon as reasonably practicable once read and acknowledged or responded to.

### **Sharing Information**

Personal information will not be sold, rented or shared for marketing purposes. Information may be shared where necessary with:

- Professional supervisors (in anonymised form wherever possible)
- Professional indemnity insurers where required
- Legal authorities where disclosure is required by law
- Emergency services or safeguarding agencies where there is a serious risk of harm

### **Microsoft 365 Services**

Ash Roots Counselling uses Microsoft 365 Business services, including Outlook, OneDrive, Microsoft Forms and Microsoft Teams, to support the delivery of counselling services and the secure storage of information. These services may be used for communication, appointment arrangements, online counselling sessions, client intake forms, record storage and general practice administration.

Microsoft acts as a data processor in relation to some personal information and processes data in accordance with its published privacy and security documentation. Reasonable steps are taken to protect personal information, including password protection, multi-factor authentication, device security and access controls.

Some information may be stored using Microsoft's cloud-based systems. Microsoft uses a range of security measures to protect information, including encryption, access controls and other safeguards designed to meet applicable data protection requirements.

Microsoft operates large, secure data centres, some of which may be located outside the UK. Where this occurs, Microsoft says it applies legal, contractual and technical safeguards designed to protect personal information and comply with applicable data protection laws. Further information about Microsoft's privacy practices can be found on the Microsoft website.

### **Retention of Information**

Personal information is retained only for as long as necessary to fulfil the purposes for which it was collected and to meet legal, professional and insurance requirements.

- **Prospective Clients**

Where an enquiry does not result in counselling taking place, enquiry information and correspondence will normally be retained for up to 12 months before being securely deleted.

- **Client Records**

Clinical records, assessment information, counselling agreements and other records relating to the provision of counselling services will normally be retained for seven years following the end of counselling. After this period, records will be securely deleted or destroyed.

- **Emergency Contact and GP Information**

Emergency contact and GP details are collected to support client safety, safeguarding and professional practice during the provision of counselling services. Where counselling has ended and



there has been no further contact for a period of six months, this information may be removed from active records where it is no longer necessary for the purposes for which it was collected.

- **Reflective and Supervision Notes**

Personal reflective notes created for professional development and supervision purposes are maintained separately from client records and are anonymised. Where such notes cannot reasonably be linked to an identifiable individual, they do not constitute personal data. Reflective notes will be retained only for as long as they remain necessary for professional reflection, supervision or practice development and will then be securely destroyed.

## **Your Rights**

Under UK GDPR you have the right to:

- Request access to your personal information
- Request correction of inaccurate information
- Request restriction of processing in certain circumstances
- Object to processing in certain circumstances
- Request erasure where applicable
- Request information about how your data is processed

Requests relating to personal data should be made using the contact details above. Please note that while you have the right to request the deletion of personal information in certain circumstances, this right is not absolute. Counsellors may have legal, professional, safeguarding, insurance or regulatory reasons for retaining some records for a specified period of time. Any request for deletion will be considered carefully in accordance with UK GDPR and relevant professional requirements.

## **Complaints**

If you are dissatisfied with how your personal information has been handled, you are encouraged to raise this directly with Ash Roots Counselling in the first instance. You also have the right to complain to the Information Commissioner's Office (ICO). Further information is available from the Information Commissioner's Office.

## **Changes to this Policy**

This Privacy Policy may be updated from time to time to reflect legal, professional or operational changes. The most current version will always be available on this website.