

Privacy Policy for Jenny Morgan Counselling

1. Introduction & Who We Are

Your privacy is deeply important to me. This privacy notice explains how Jenny Morgan Counselling collects, uses, and protects your personal data from your initial enquiry, through your therapy, and after your sessions have ended.

For the purposes of data protection law, I am the "Data Controller."

- **Name:** Jenny Morgan
- **Email:** jenny@jennymorgancounselling.co.uk
- **Address:** Address: Thame Therapy Clinic, 23 Upper High Street, Thame, Oxfordshire, OX9 3EZ

ICO Registration Number: C1546732

2. The Type of Data Collected

I collect and process the following information:

- **Basic Personal Data:** Your name, date of birth, home address, email address, and phone number.
- **Emergency Contact Data:** Name and contact details of an emergency contact or your GP.
- **Special Category Data:** Notes from our counselling sessions, relevant medical/mental health history, and any details you volunteer about your psychological well-being.
- **Website Usage Data:** IP addresses and cookies (if you use the contact form or accept cookies on my website).

3. Lawful Bases for Processing Data

Under data protection laws, I must have a legal reason to hold your data. I rely on the following:

- **Performance of a Contract:** I need your basic contact details to communicate with you, manage your appointments, and fulfill our agreement to provide counselling.
- **Legitimate Interests:** Once therapy has ended, I retain records to meet professional accountability standards and defend potential legal claims.
- **Special Category Conditions (Health & Social Care):** To process your sensitive mental health notes, I rely on **Article 9(2)(h)** of the UK GDPR, as providing confidential psychological therapy falls under health and social care treatment.

4. How Data Is Stored & Secured

I take data security extremely seriously.

- **Digital Data:** Any digital records (emails, text messages, or digital session templates) are stored on password-protected devices with up-to-date antivirus software and secure, encrypted cloud storage.
- **Physical Data:** Hand-written notes or paper intake forms are stored securely in a locked filing cabinet accessible only by me.
- **Anonymisation:** Session notes are strictly anonymised using a unique client ID code and kept completely separate from your personal identification details (like your name or phone number).

5. Sharing Your Information (Confidentiality Exceptions)

Everything discussed within our sessions remains strictly confidential. I will never sell or share your data for marketing purposes. However, your data may be shared under the following legal and ethical exceptions:

- **Clinical Supervision:** As required by my professional body the BACP, I regularly discuss my caseload with a qualified supervisor. All client details are heavily anonymised during these sessions.
- **Safeguarding & Serious Crime:** If I have reason to believe you or someone else (especially a child or vulnerable adult) is at risk of serious harm, or if I am legally required by a court of law, I may have to disclose limited information to emergency services or your GP.
- **Administrative Support:** Limited contact details may be accessible to the clinic receptionists at Thame Therapy Clinic or me if you are coming to my house for sessions. In the case of clinic appointments this is purely for invoicing and scheduling.

6. Data Retention (How long I keep your files)

- **Enquiries:** If you contact me but choose not to go ahead with therapy, your enquiry details will be deleted after **1 month**.
- **Therapy Records:** Once our therapeutic relationship has ended, your session notes and personal details will be retained securely for **7 years** to meet professional liability standards. After this period, they will be securely shredded or permanently deleted.

7. Your Legal Rights

Under data protection law, you have specific rights regarding your personal information:

- **The right of access:** You can ask for copies of the personal data and session notes I hold about you.
- **The right to rectification:** You can ask me to correct any information you think is inaccurate.
- **The right to erasure:** You can ask me to erase your personal data in certain circumstances (though this may be overridden by my legal/insurance obligations to retain medical records).
- **The right to restrict or object to processing:** You can ask me to limit how I use your data.

8. How to Complain

If you have any concerns or complaints about how your data is handled, please contact me directly at the email address listed above so we can resolve it.

Following the latest UK data guidelines, I **will formally acknowledge your complaint within 30 days** and provide a full response without undue delay.

If you remain unsatisfied, you have the right to lodge a formal complaint with the Information Commissioner's Office (ICO):

- **Website:** www.ico.org.uk
- **Helpline:** 0303 123 1113

www.jennymorgancounselling.co.uk