Data Privacy Policy

Alexandra Counselling is committed to complying with the terms of the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the Data (Use and Access) Act 2025, and the BACP Ethical Framework 2026, and to the responsible and secure use of your personal data. As a registered and accredited counsellor and clinical supervisor, I process your personal and special category (health) data to deliver professional therapeutic and supervisory services, fulfil our contractual agreement, and meet my statutory and ethical obligations. This policy is intended to give insight into the data I collect about you, how I use and store it, how your data is disposed of, how you can access your data, and how it is shared.

As a BACP registered and accredited counsellor and clinical supervisor, I am also registered with the Information Commissioner's Office (ICO) as follows:

Mrs Alexandra Kiss | Reference Number: C1181542 | Date Registered: 06/09/2022

Contact details: Alexandra Kiss | Alexandra Counselling | info@alexandracounselling.co.uk | Lynch Lane Offices, Lynch Lane, Weymouth, DT4 9DN | +447746972747

BACP registration number: 00959332

The type of personal information I collect

1. Enquiries and Consultations

When you contact me via my website, directory, email, or telephone, I collect your: name, email address, telephone number, and preferred contact times. Brief background details about your reasons for seeking counselling or supervision, which you choose to share in initial communications or consultations.

2. Assessment & Contract Data

Before beginning therapy, I collect:

- Personal data: Full name, date of birth, postal address, telephone number, and email address.
- Emergency & Professional Contacts: Next of kin / emergency contact details (name and telephone number) and your GP surgery's details
- Special Category (Health) data: Information regarding your emotional and mental wellbeing, medical history if relevant, current medications if relevant, or lifestyle context relevant to therapy, risk if relevant, in order to ensure clinical suitability and safety.

- If you engage with me as a clinical supervisor, I collect your full name, postal address, telephone number, email address and your next of kin information. I also collect information about your practice, membership body, insurance, qualification/training organisation if relevant and/or you're a trainee, and client groups you're working with, including any ethical dilemma and interventions used.
- Clinically relevant emails, letters, reports if relevant, and practical administrative messages are treated as part of your overall record.

3. Session notes

- I keep brief, factual notes following our sessions to support our clinical work and maintain professional standards. These records summarise the key themes explored, any therapeutic interventions used, significant context, and any safeguarding or risk assessments. For in-person sessions, this may include brief handwritten notes taken during or immediately after the session. All paper-based notes are anonymised using your unique client code and stored securely in a locked filing cabinet until they are securely shredded.

4. Website & digital data

When you browse my website, technical data such as IP address, approximate geographical location, and browser type etc. may be collected via cookies (such as Google Analytics). For information on how cookies are used and how to manage your preferences, please consult my website Cookie Notice. If you interact with my professional social media accounts, any personal information visible is determined by your personal privacy settings on those platforms.

How is information collected?

I collect personal information from you in several ways:

- Directly from you when you provide it to me, as described above; part of initial communication, assessments and contracts (before, during and after sessions).
- When you communicate with me through business social media platforms.
- Automatically when you visit my website.

I also receive certain types of personal information about you from other sources, such as third-party service providers like Google, which may provide basic browsing information as you navigate my website. This information is determined by the service provider. When you pay me for the service I offer, this is through bank transactions, so bank information is also collected.

Finally, if you are referred to me via a third-party organisation, I will receive your information from them. (Please see the section below: "What if you have been referred via another organisation?")

Why I collect personal information - Lawful Bases for Processing

To provide you with safe, professional, and ethical counselling or clinical supervision, data protection law requires me to have clear and valid reasons for handling your information.
Because therapy and supervision involve both practical details and deeply personal experiences, I hold your data for the following reasons:

- To deliver our agreed service: I hold your contact details, assessment information, agreements, and appointment records so that we can communicate, book sessions, manage invoices, and carry out our therapeutic or supervisory work together.
- To provide professional care: I process this sensitive information solely to provide you with support, held under my professional duty of confidentiality as a counsellor.
- To meet tax and business rules: I keep basic financial and invoice records to comply with UK legal and accounting requirements.
- To protect life and safety: In an acute emergency where there is an urgent threat to your life or safety, or the safety of someone else, I may need to share essential details with emergency services, a doctor, or safeguarding authorities.
- To run a responsible, ethical practice: I maintain appropriate administrative and session records (i.e.: session notes, assessments and contracts) to meet professional standards and satisfy my professional insurance and tax requirements.

Are there any circumstances where my data might be shared?

I normally do not need to disclose your personal information to any third party, and I will not sell or use your data for any unlawful or unethical purposes. There may be certain circumstances in which I need to disclose your personal information, for instance:

- If I am obliged by a court of law to share information, or to represent myself in a legal proceeding.
- When required under the "Recognised Legitimate Interests" framework to break confidentiality due to an emergency condition (a threat to life, health, or safety) or the safeguarding condition (to protect children or vulnerable adults at risk of neglect or physical,

mental, or emotional harm). In such a situation, I would contact the appropriate emergency or social services, or your next of kin/GP as necessary.

- If you make a complaint against me, I may need to share information with my ethical membership body, insurers, supervisors, or professional advisers.
- To respond to a request from regulators, government authorities, or law enforcement relating to a criminal investigation or suspected illegal activity, including compliance with safeguarding, traffic, money laundering, and terrorism legislation.
- If you are an active supervisee, information may be shared with your training organisation, placement provider, or professional body under our three-way supervisory agreement. This may include: reports, assessments, logs, general liaison if necessary, and immediate disclosure of any serious concerns regarding your fitness to practise, ethical breaches, or client safeguarding issues.

Where appropriate, safe, and legally permissible to do so, I will always endeavour to discuss any concerns and potential disclosures with you prior to sharing information with external parties.

Where do I transfer/store your personal information?

I am based in the United Kingdom. My clinical session notes and paper files are kept locally in the UK (on password-protected, encrypted local devices and in locked physical storage). Digital communications, email correspondence, and calendar scheduling are handled through Google Workspace, which operates via secure, UK GDPR-compliant cloud servers protected by strict data processing agreements and encryption standards.

Who I may share personal information with

I share pseudonymised or heavily disguised case information with my professional counselling supervisor to ensure I am practicing effectively, safely, and ethically. This is a mandatory requirement for professional development under the British Association for Counselling and Psychotherapy. On occasion, I may also discuss aspects of your case with other qualified counsellors in a peer supervision group to gain professional insight. In all these circumstances, your identifying details are completely omitted to protect your privacy. I may also share some of your data with my accountant and professional advisers for the purpose of maintaining my financial accounts and business records.

In accordance with the BACP Ethical Framework 2026, I have a formal Clinical Will in place to protect your wellbeing and ensure continuity of care in the unlikely event of my sudden incapacitation, serious illness, or death. I have appointed a Clinical Trustee (Executor). In an emergency, they will be granted secure, temporary access strictly to your essential contact information (name, phone number, and email) for the sole purpose of notifying you, offering support with therapeutic signposting or referrals, and ethically managing the closure of my practice and the secure archiving or disposal of records.

How will I store your data?

All records stored on my computer and work mobile phone are password-protected. Paper and electronic records are anonymised using a unique client code. My paper records are physically stored in a locked filing cabinet, to which only I have access.

Information about children

My counselling services are not intended for individuals under the age of 18. If you are under 18, please do not provide me with any personal information.

Cookies and web analytics

I use Google Analytics to understand how visitors interact with my website, which allows me to measure site performance and improve my services. Under the Data (Use and Access) Act 2025, analytics cookies used strictly for aggregate, statistical purposes are exempt from mandatory opt-in consent, provided they are not used for tracking or behavioural advertising. I use this service strictly to collect anonymous data about your visit.

The statistical information collected includes:

- The pages you visited and the time you spent on each page.
- The length of your session and the number of times you visit the site.
- The referring website or search engine that led you to my site.
- Your anonymised browser type, operating system, and general location (by country).

Your Right to Opt Out: While these analytics cookies help me improve my website's functionality, you have a legal right to opt out of this tracking at any time. You can easily adjust your preferences via the cookie control banner on my website, or by disabling cookie permissions directly within your web browser settings.

Digital Platforms and Use of Artificial Intelligence (AI)

- All professional email communications are handled through Google Workspace, using my dedicated professional business email. Google Workspace operates as a data processor under strict data processing agreements conforming to UK GDPR security standards.
- For clients who prefer digital completion, I provide a private, secure online link to complete pre-therapy assessment and contractual onboarding forms (e-signature). If you prefer not to use online forms, paper-based forms or completion together during our initial session are available. For remote clients and supervisees, forms are typically completed online. Completed digital forms are transferred to your confidential, password-protected client record, and are deleted from the temporary online collection platform.
- If we work together remotely, sessions take place using Google Meet, which use encrypted video transmission. I do not make video or audio recordings of our therapy or supervision sessions.
- Appointments are organised using a private paper diary and a private Google Calendar. To safeguard your identity, calendar entries use only your unique client code, never your name or personal details.
- I do not use automated AI note-taking software, speech-to-text transcription services, or automated session recorders. All clinical case notes are written by me personally.
- While I may use digital tools for general business administration (such as software for spellchecking and grammar, generating non-client social media imagery, or researching general therapeutic concepts), no client personal information, clinical details, session content, or identifiable data is ever entered into, processed by, or used to train any AI tool or model.

How long will I store your data, and how I will dispose of it?

I hold client and supervisee information including notes (electronic and paper), contracts, assessment forms, text messages, emails, and invoices.

The retention periods for different types of information are as follows:

- Initial enquiries: Information from introductory sessions will be securely deleted after 30 days if we do not proceed with paid sessions.
- Counselling records: In accordance with my professional insurance requirements, all client and supervisee contracts, assessment forms, supervisory logs, and session notes are retained for a minimum of 5 years following the end of our work together. Records are reviewed

annually and securely destroyed or permanently deleted during the 6th year following completion.

- Invoices and financial records: Invoices and accounting records are legal documents required by UK tax law to be retained for a minimum of 6 full years following the end of the tax year in which they were issued. In practice, these records are securely destroyed or permanently deleted during an annual review in the 7th year. Bank transaction data maintained by my financial institutions cannot be altered or erased.

While some data, like emails and text messages, may be difficult to fully erase from all storage devices, I will delete your phone number and all relevant messages as soon as your therapy is complete. Please note that in the absence of client contact for a period of thirty days, our counselling contract will automatically terminate.

What if you have been referred via another organisation?

If you have been referred by a third-party organisation, I will operate in compliance with their privacy policy, provided it does not conflict with my own. They may provide me with additional information—such as a reference number or other relevant details. This information is typically sent to me via email (or through a separate secure system, if from another agency) and will be securely deleted once the invoice has been paid and our work together is complete.

Do I have a right to see the information that you hold?

Yes, you do. Under the UK GDPR, you have the right to get a copy of the personal information that I hold about you. This is known as a Subject Access Request (SAR). To make a request, please contact me at info@alexandracounselling.co.uk

I will conduct a reasonable and proportionate search for your data and provide you with an electronic copy (via email) of your records free of charge. This will be provided within one calendar month of receiving your request, or within one calendar month of verifying your identity. Please note that if your request requires further clarification to fulfil, I may pause this timeline ("stop the clock") and resume it once the necessary details are provided. You will not be required to provide a reason for the request. For security purposes, I will require you to verify your identity before releasing any records. A reasonable administrative fee may only be charged if a request is manifestly unfounded, repetitive, or if you request multiple additional paper copies.

Our contract and data use

As a condition of our work together and our agreement, I will process your personal data in the ways described in this policy. I will always treat your personal details with the utmost care and respect. If you do not wish me to use your data in these ways, it is unlikely that I will be able to provide my counselling or supervisory services to you. Please note that in the absence of client contact for a period of thirty days, our counselling contract will automatically terminate, unless otherwise agreed.

Information you make public or give to others

If you make your personal information available to other people, such as on social media or public forums, I cannot be held responsible for how that data is used or managed. I advise you to think carefully before sharing any information publicly or with a third party. If you are using another website, please check its privacy policy to understand its data management practices.

Reports and information requests

In the event that a report or summary of our therapeutic work is requested (for example, by a job centre or third party), I will provide a document stating only the dates and times of sessions attended, alongside a brief overview of attendance and engagement. No detailed personal or clinical information will be disclosed without your explicit written consent, unless I am legally required to do so. Please note that as a counsellor, I do not provide medical or psychiatric diagnoses. My role is to offer therapeutic support; any diagnostic assessments must be sought from a qualified medical or psychiatric professional.

For supervisees, any required reports or evaluations (such as training logs, course reports, or professional body submissions) form part of our agreed supervisory contract and will always be discussed and reviewed collaboratively in advance.

Your rights

Unless subject to an exemption under the UK General Data Protection Regulation (UK GDPR), you have the following rights with respect to your personal data:

- The right to access your personal information (also known as a Subject Access Request).
- The right to require me to change any factual mistakes in the information I hold.

- The right to erasure (also known as the right to be forgotten), which allows you to request the deletion or removal of your personal data where there is no compelling reason for its continued processing.
- The right to restrict processing of your personal information in certain circumstances.
- The right to object to the processing of your personal data in certain circumstances.
- The right to lodge a complaint with the Information Commissioner's Office.

Note: Please be aware that there are limits to these rights as laid down in the legislation. For example, your right to erasure does not apply to records that I am legally obliged to keep, such as financial records, or to information that is necessary for the establishment, exercise, or defence of a legal claim (for example, client notes and contracts that I am required to hold as a condition of my professional insurance).

Concerns and Complaints

If you have a concern or complaint, you have two options depending on the nature of your complaint.

1. Complaints about data and privacy

If you are concerned about the way your personal information is being held, please contact me directly in the first instance. I am registered with the Information Commissioner's Office, and my registration number can be found in the introduction of this policy. I have a formal data protection complaints process. I will acknowledge any data protection complaint within 30 days of receipt and provide a full response or formal progress update without undue delay.

If you are still unhappy, you have the right to complain to the Information Commissioner's Office directly: https://ico.org.uk/

2. Complaints about the counselling service

If your complaint is about the counselling service you are receiving, please discuss it with me in the first instance. You can also request a copy of my full complaints procedure by emailing info@alexandracounselling.co.uk

Alternatively, you can raise a professional conduct concern or complaint with my membership body, the British Association for Counselling and Psychotherapy (BACP), via their website at www.bacp.co.uk.

Last reviewed: 28/10/2026