INSIGHT
COUNSELLING & TRAINING

Privacy Notice

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Effective date: 12 October 2026 | Version 1.1

1. Who is responsible for your information?

Insight Counselling & Training is operated by Mrs Michelle Mitchell, an independent counsellor and psychotherapist. I am the data controller responsible for personal information used in my practice.

Practice address: 151 Berengrave Lane, Rainham, Gillingham, Kent ME8 7UJ

Telephone: 07545 828350 | Website: www.insightcounsellingandtraining.com

Information Commissioner's Office (ICO) registration: ZC244759.

2. What information do I collect?

I may collect your name, contact details, preferred way of being contacted, enquiry and appointment details, and information needed for payments and administration. If you become a client, I may also hold an initial assessment, a signed counselling agreement, relevant background or health information, brief session notes, and records of safeguarding concerns or actions where necessary.

Information about mental health and other aspects of health is particularly sensitive and receives additional protection under data protection law. I aim to record only what is relevant and necessary for providing a safe and professional service.

3. Why do I use this information?

I use information to respond to enquiries; assess suitability for counselling; arrange, provide and manage sessions; maintain appropriate clinical and safeguarding records; manage payments and accounts; and meet legal, ethical and professional obligations. I do not sell client information or use counselling notes for marketing.

4. My lawful bases

Under Article 6 of the UK GDPR, I generally rely on steps taken at your request before entering into a counselling agreement and performance of that agreement (Article 6(1)(b)); compliance with legal obligations where applicable (Article 6(1)(c)); and legitimate interests in running a safe, accountable practice and dealing with enquiries, complaints or claims where appropriate (Article 6(1)(f)).

For special-category information necessary to provide counselling or treatment, I rely on the health or social care condition in Article 9(2)(h), read with Schedule 1, paragraph 2 of the Data Protection Act 2018, where its conditions are met, including the applicable legal duty of confidentiality. Other narrowly applicable conditions may be relevant for safeguarding or legal claims. Agreement to receive counselling and any consent required for sharing information are separate from the UK GDPR lawful basis for processing.

5. Confidentiality and when information may be shared

Your counselling information is treated as confidential. I do not routinely share it with relatives, employers or other professionals. I may discuss client work in professional supervision, taking steps to avoid unnecessary identification.

Information may be disclosed with your agreement or where disclosure is legally required or justified, including a serious safeguarding concern, significant risk of harm, or an appropriately assessed legal request. Where safe and appropriate, I will explain this to you first. I will share no more information than

is necessary. Service providers that support my administration may process limited information on my behalf.

6. Contact forms, Gmail and WhatsApp Business

You may contact me through my Wix website contact form, Gmail, telephone or WhatsApp Business. Gmail and WhatsApp Business are used for enquiries and appointment arrangements, not for delivering therapy or discussing detailed clinical matters. Please avoid sending detailed sensitive information through these channels where possible.

Wix, Google (Gmail) and WhatsApp/Meta may process information using their own systems and, depending on the service, outside the UK. Relevant international transfer protections and provider terms apply where required. Their privacy information explains their own handling of data. Website enquiries may also be retained in Wix form submissions and/or email correspondence.

7. Storage and security

Paper counselling records are kept in a locked filing cabinet with access restricted to me. Electronic information and correspondence are held in password-protected accounts or devices. I take proportionate measures to prevent unauthorised access, loss and disclosure. Identifying information and session notes are kept separately where practicable. No electronic system can be guaranteed completely secure.

8. External security cameras

External motion-activated cameras operate solely outside the premises for domestic security purposes, to protect people and property. They may capture video and audio of clients and other visitors arriving at or leaving the premises. No cameras operate within the counselling room and counselling sessions are not recorded by this system.

The cameras use Tapo Care Premium cloud recording, with up to 30 days of recording history. Recordings are normally deleted automatically at the end of the applicable cloud retention period and may be manually deleted sooner. Footage may be preserved separately where necessary for a legitimate security incident or legal reason. Access is restricted to those authorised to manage the security system; footage is viewed or disclosed only where necessary and lawful.

For business-related CCTV footage, the intended Article 6 lawful basis is legitimate interests (Article 6(1)(f) UK GDPR), subject to an assessment of necessity and proportionality. The practice recognises that footage showing someone attending counselling may be sensitive and that additional protections or legal conditions may be relevant. Tapo Care is provided by TP-Link; cloud processing and any international transfers are subject to the provider’s applicable arrangements and data protection requirements. Individuals may request access to footage containing their personal data, subject to applicable exemptions and the rights of others. A notice at the premises informs visitors that video and audio recording may take place.

9. How long are records kept?

Adult counselling records are normally retained for six years after the final session. For clients who are under 18 when counselling ends, counselling records are normally retained until six years after their 18th birthday. These are practice retention periods, not periods prescribed by BACP. A longer period may be necessary where a safeguarding issue, complaint, legal claim or other justified obligation requires it.

Enquiries that do not lead to counselling are kept only as long as reasonably needed to respond and manage follow-up; financial records are retained for the applicable accounting or tax period. At the end

of the relevant period, paper records are securely shredded and electronic information is securely deleted using appropriate methods, subject to provider backups and lawful retention requirements.

10. Children and young people aged 16–17

I explain confidentiality, record keeping and information sharing in an age-appropriate way. A young person's information is not routinely shared with a parent or carer simply because that person arranged or pays for sessions. Any involvement of parents or carers, and the limits of confidentiality, are discussed at the outset, subject to safeguarding and other legal requirements.

11. Your data protection rights

Depending on the circumstances, you may ask to access your information, correct inaccurate information, have information erased, restrict or object to processing, or receive certain information in a portable format. You may withdraw consent where consent is relied upon. These rights are not absolute, and some records may need to be

retained for lawful reasons. I will normally respond to a valid request within one calendar month, subject to applicable extensions or exceptions. Please contact me using the details above.

12. Cookies and website information

The Wix website may use essential cookies needed for its operation. I do not currently use optional analytics or advertising tracking by choice; however, third-party apps and website settings can affect which cookies are placed. Any non-essential cookies requiring consent should not be used without appropriate consent controls. Further cookie information will be provided through the website where required.

13. Questions, complaints and updates

Please contact me first if you have any questions about how your information is used. You also have the right to complain to the Information Commissioner's Office at www.ico.org.uk or 0303 123 1113. This notice will be reviewed when my working arrangements, providers or relevant legal requirements change.