Katherine Wilson - Counsellor
Keystone Counselling
c/o Medipod Clinics
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PRIVACY NOTICE

Keystone Counselling | Katherine Wilson, Counsellor

This notice explains how I collect, use, protect and retain personal information when you enquire about or receive counselling or supervision. I respect your privacy and work in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and the BACP Ethical Framework for the Counselling Professions.

Who is responsible for your information?

I, Katherine Wilson, trading as Keystone Counselling, am the data controller for information I collect for my own practice. My ICO registration number is ZB307278. You can contact me using keystonecounselling@icloud.com or the practice contact details above. For work undertaken through another organisation, such as The Lawrence House Psychological Services, that organisation may be responsible for its own records and privacy information.

What information do I collect and why?

At enquiry stage, I may collect your name, contact details, reason for contacting me and relevant information needed to assess whether counselling is appropriate. During counselling I may collect your address, date of birth, GP and emergency contact details, referral information, attendance dates, questionnaires, correspondence, risk and safeguarding information, and brief clinical notes. I use this information to arrange appointments, deliver counselling, communicate safely, maintain professional records, manage payments and meet safeguarding and other legal obligations.

If you enquire but do not proceed, I normally delete enquiry information within one month unless a justified reason requires longer retention. Please contact me if you wish to know what information I hold.

Lawful bases for processing

For ordinary personal data, my Article 6 UK GDPR lawful basis may be contractual necessity for providing agreed counselling, legitimate interests for appropriate practice administration and record retention, or

legal obligation where a law requires processing. Vital interests may apply in an emergency. The applicable basis depends on the specific purpose.

Counselling records may include special-category information, including health information. In addition to an Article 6 basis, processing requires an appropriate Article 9 condition. Where the legal requirements are met, this may include Article 9(2)(h), provision of health or social care, with the required confidentiality safeguards. Other conditions may apply in specific circumstances, such as safeguarding or legal claims. The precise bases and conditions should reflect my documented processing activities and be reviewed where necessary.

Confidentiality and clinical supervision

What you discuss in counselling is confidential. I may share limited information where required by law or where necessary and proportionate to address serious harm or safeguarding concerns. Where safe and appropriate, I will discuss this with you first. I receive regular clinical supervision and may discuss aspects of our work without identifying you wherever possible. Sessions are not recorded.

Children and young people

Young people have their own rights to privacy and confidentiality. Being under 18 does not automatically mean parents or carers are entitled to information about sessions. I consider each young person's understanding, capacity, consent, welfare and safeguarding needs before sharing information. Where appropriate, I may involve parents, carers, referrers or other professionals and will explain what information may be shared.

How information is stored

My paper client records are held in locked storage at my Medipod office. I use a paper diary for current appointments and client information. Clinical notes and identifying details are kept securely; where notes are coded and held separately, this reduces unnecessary identification. Professional email and devices are protected by appropriate access controls. I take reasonable measures to prevent unauthorised access, loss or disclosure.

How long records are kept

My usual retention period for adult counselling records is seven years after counselling ends. Different or longer periods may be necessary for children and young people, safeguarding matters, insurance, contractual obligations or legal proceedings. I retain records only for a justified period in accordance with my record-retention policy, then arrange confidential destruction. You may request earlier erasure, but this right is not absolute.

Who may receive information?

I do not sell client information or disclose it for third-party marketing. Limited information may be shared, where appropriate and lawful, with my clinical supervisor, relevant safeguarding or emergency services, professional advisers, insurers, accounting providers or service providers supporting secure communications. Information is shared only to the extent necessary. Where service providers process information on my behalf, appropriate data protection arrangements are required.

Clinical Will and Continuity of Care

If I die or become seriously ill or unable to continue practising, I have nominated Sukh Bhomera, my clinical supervisor, as Clinical Executor. Subject to her acceptance and lawful authority, she may access the minimum necessary information to identify and safely contact current clients, address urgent safeguarding concerns, manage appointments and help arrange alternative support. Confidentiality and data protection obligations continue to apply. Records will remain securely held and subject to appropriate retention arrangements.

Your information rights

Depending on the circumstances, you may have rights to be informed, access your information, correct inaccuracies, request erasure, restrict processing, object to certain processing, and data portability. You can make a request by contacting me. I normally respond within one month, subject to applicable extensions or exemptions. You may complain to me or to the Information Commissioner's Office (ICO) at ico.org.uk/make-a-complaint.

Changes to this notice

I review this notice when my working arrangements or legal obligations change. The current version is available on request.