towards meaning counselling

Last updated: 12.11.26

Privacy policy

Data controller

Towards Meaning Ltd (trading as Towards Meaning Counselling) is the data controller for the personal information described in this policy. If you have any questions about how I handle your data, please contact:

Lii Brooke

Email: lii@towardsmeaningcounselling.co.uk

Postal address: Kings Head House, 15 London End, Beaconsfield, HP9 2HN

Towards Meaning Ltd is registered with the Information Commissioner's Office (ICO) under reference ZB644821.

About this policy

I understand how important your privacy is. I take care to maintain your confidentiality in accordance with current UK data protection law (the UK GDPR, the Data Protection Act 2018 and the Data (Use and Access) Act 2025) and the Ethical Framework of the British Association for Counselling and Psychotherapy (BACP). These frameworks protect your confidential material and ensure that your therapist conducts themselves with professionalism and integrity.

In order to provide you with the best service possible, I will hold your personal contact details and brief records of your therapy sessions. Please find below important information about how this data will be held and used.

Information I collect

I use Google Workspace (business-tier), a secure and password-protected cloud storage solution, to keep the minimal personal data collected with your consent.

When you first contact me, whether by phone, email or my website contact form, I may hold your name, email address, phone number and any information you choose to share about what you are seeking support with.

When you book your first session, you will be asked for your date of birth, home address, the name and address of your GP and the contact details of a person to reach in an emergency. I collect this so that I can respond safely if I have a serious concern for your wellbeing. I would contact your GP or emergency contact only with your consent or where there is a serious risk of harm to you or others.

During therapy, I keep brief notes of our sessions. These notes are health data and are treated as "special category data" under UK GDPR, which means I must keep them especially secure and use them only for providing your therapy and meeting my professional responsibilities.

How long I keep your information

I will keep a record of your minimal personal details and brief session notes for seven years after the end of your therapy, so that I can respond effectively to any legitimate requests or legal claims relating to your clinical notes. This retention period reflects BACP guidance and my professional insurance requirements.

Lawful basis for processing

I process your personal data on the following lawful bases:

- Contract, to arrange and deliver the counselling service you have engaged
- Explicit consent, for holding and processing your session notes as health data
- Legitimate interests, for the ongoing administration of my practice, such as maintaining accurate records

How I use your information

I will never pass on your personal data to any third-party organisations for the purposes of sales, marketing or research. I use your personal data only to administer the counselling service I am providing to you, such as to arrange, cancel and rearrange appointments and to collect payment for sessions.

I do not use any form of automated decision-making or profiling with your personal data.

Who I may share your information with

I keep your information confidential. I will share it only in these circumstances:

- with your consent
- where the law requires or permits it
- where there is a serious risk of harm to you or others. Please see the safeguarding policy
- with my clinical executor, who is bound by confidentiality, if I die or am otherwise unable to contact you due to serious adverse circumstances. The clinical executor would receive your first name and contact details only, to inform you.

I use anonymised information in clinical supervision.

Digital tools and AI

I use Google Meet, Microsoft Teams, WhatsApp, email and Calendly to deliver therapy and manage appointments. These applications make remote sessions and scheduling possible but they involve third-party providers who process data such as your name, contact details and session times. No online tool is risk-free. I keep messages on WhatsApp and email to practical matters where I can.

I store client files in Google Workspace, where I have switched off Gemini, the native AI feature. I do not enter identifiable client information into any AI tool and I do not use AI to make decisions about your care. If that ever changes, I will ask for your explicit consent first. Some of these providers may process data outside the UK. Where they do, I rely on the safeguards they have in place to protect your data.

Your rights

Under UK data protection law, you have the following rights:

1. **Right of access.** You can request to view the information that I hold about you (contact details, appointment logs and session notes) at any time. If during therapy you would like to see your session notes, please let me know.

2. **Right to rectification.** At any point during your time using my service or during the seven years thereafter while I retain your records, you have the right to request amendments to your contact details or session notes if you believe they are inaccurate or incomplete. This right can be exercised either by speaking directly to me or by contacting me in writing.

3. **Right to erasure ('right to be forgotten').** You can request that I delete and confidentially destroy the information that I hold about you and your sessions. Instances where I may not be able to comply with your request are:

- Where I need to retain records to continue providing an effective service
- Where I am compelled to retain records by a Court of Law
- Where I require records to establish, exercise or defend legal claims
- Where I am required to retain records for regulatory or professional reasons

4. **Right to restrict processing.** You can ask me to limit how I use your personal data in the following circumstances:

- Where you contest the accuracy of the data, while I verify its accuracy
- Where the processing is unlawful but you do not want the data erased
- Where I no longer need the data but you require it for the establishment, exercise or defence of legal claims
- Where you have objected to processing under your right to object (see point 6), pending my verification of whether I have compelling legitimate grounds to continue

5. **Right to data portability.** You can ask me for a copy of the personal data you have provided to me, in a structured, commonly used and machine-readable format. This right applies only to personal data that you have provided directly to me and that I process on the basis of consent or contract. It does not extend to session notes I have created about you, as these are my professional records.

6. **Right to object.** You can object to my processing of your personal data where I rely on legitimate interests as the lawful basis (for example, general practice administration). You can also object at any time to any processing for direct marketing purposes, although I do not currently send marketing communications. If you exercise this right, I will stop processing your data unless I can demonstrate compelling legitimate grounds that override your interests or the processing is necessary for legal claims.

7. **Rights related to automated decision-making.** I do not use automated decision-making, so this right does not currently apply to my service.

If I am unable to act on a request you make under rights 2, 3, 4 or 6, I will inform you of your right to make a complaint both to me directly (under section 164A of the Data Protection Act 2018) and to the Information Commissioner's Office (under section 165 of the Data Protection Act 2018).

A practical note on exercising your rights during active therapy

Some of the rights above, particularly withdrawing consent, requesting erasure or objecting to processing, may affect my ability to continue providing you with therapy. If

you are a current client and wish to exercise any of these rights, I would welcome the opportunity to discuss this with you in a session first, so we can explore any practical implications for your ongoing therapy and agree how to proceed together. This is entirely optional. You remain free to exercise your rights directly at any time, whether or not we have that conversation.

Consent

When you book your first session with me, you will be asked to provide a digital signature in the working agreement to confirm that you consent to the storage and processing of your personal data for the purposes of providing therapeutic services.

You are entitled to withdraw this consent at any time by emailing me at lii@towardsmeaningcounselling.co.uk. Please note that withdrawal of consent may mean I cannot continue to provide you with the counselling service.

Cookies and website data

My website is hosted on Wix, which uses cookies for site functionality and analytics. For details of how cookies are used on the site, please see the cookie information provided by Wix. If you complete my website contact form, the information you provide is transmitted to me by email. Form submissions may also be stored within my Wix dashboard, which I access to review enquiries.

Data protection complaints

If you have any concerns about how I handle your personal data, you have the right to make a complaint.

How to complain to me:

Please email me at lii@towardsmeaningcounselling.co.uk with "Data protection complaint" in the subject line.

I will acknowledge your complaint within five days of receipt, make appropriate enquiries and respond to you without undue delay.

How to complain to the ICO:

You also have the right to make a complaint directly to the Information Commissioner's Office. Complaining to me first is not required, though I would welcome the opportunity to address your concerns.

Information Commissioner's Office

Website: www.ico.org.uk

Telephone: 0303 123 1113

Postal address: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Data breaches

If a breach is likely to result in a risk to your rights and freedoms, I will notify the Information Commissioner's Office within 72 hours of becoming aware of it. If the risk is high, I will also tell you without undue delay.

Changes to this policy

I may update this policy from time to time to reflect changes in law or in my practice. The "Last updated" date at the top of the policy shows when it was most recently revised. Material changes will be brought to the attention of current clients.