

Data & Privacy

# How we handle your information

This document explains how Di Barry Counselling collects, stores, and protects your personal data in line with UK GDPR and the Data (Use and Access) Act 2025.

ICO-registered  
UK GDPR compliant  
DUAA 2025 compliant  
Updated 22 June 2026

## Privacy Policy

Last updated: 22 June 2026

### Who we are

Di Barry Counselling is a private therapy practice providing counselling services. I am Di Barry a qualified counsellor registered with NCPS.

You can contact me at [dibarrycounselling@gmail.com](mailto:dibarrycounselling@gmail.com)

I am registered with the Information Commissioner's Office (ICO). My registration number is ZB343923.

### What personal data we collect

I collect and process the following types of personal data:

**Contact details** — your name, address, telephone number, and email address.

**Health and therapy-related information** — presenting issues, relevant medical history, mental health history, current medications, and GP details where relevant

**Session notes** — records of our therapeutic work together, including my observations and any goals or progress discussed.

**Emergency contact details** — name and contact information for someone I can reach in an emergency.

**Enquiry details** — information you submit via the contact form on my website.

Health and therapy-related information is classified as **special category data** under Article 9(1) of the UK GDPR. This data receives enhanced legal protection because of its sensitive nature, and I take additional care to keep it secure and confidential.

## How we collect your data

I collect your personal data directly from you:

When you first make contact with me (by phone, email, or through my website contact form).

During our initial consultation and intake process.

Throughout our therapeutic sessions together.

Through any ongoing communication between sessions (email, telephone, or messaging).

I do not collect personal data about you from any other source without your knowledge.

## Why we process your data — lawful basis

To process your personal data lawfully under UK GDPR, I rely on the following legal bases:

**Article 6 basis (ordinary personal data):** Article 6(1)(b) UK GDPR — processing is necessary for the performance of the therapeutic contract between us. When you engage me as your counsellor, we enter into a contract for therapeutic services. I need to process your personal data to deliver those services effectively.

**Article 9 basis (special category health data):** Article 9(2)(h) UK GDPR — processing is necessary for the provision of health or social care treatment by a health professional. The additional condition required under DPA 2018 is Schedule 1, Part 1, paragraph 2 (health or social care purposes). This processing is carried out by me as a qualified counsellor subject to a professional obligation of confidentiality under the ethical framework of NCPS.

## Professional obligations and CPD

I am required by NCPS to attend regular clinical supervision. This is an essential part of maintaining high standards of practice and ensuring I provide you with safe, effective therapy.

I may discuss our therapeutic work with my supervisor. When I do so:

Your first name but no identifying details are shared with my supervisor.

My supervisor is a qualified professional bound by the same confidentiality obligations as I am.

My supervisor is bound by their own professional body's ethical framework

This means my supervisor cannot identify you from anything I share with them.

## Clinical will — what happens to your records if I am unable to practise

I am currently putting arrangements in place for a clinical will. A clinical will ensure that, if I become suddenly unable to practise due to serious illness, incapacity, or death, your records will be handled appropriately and confidentially by a designated colleague.

Once these arrangements are finalised, I will update this policy and inform current clients of the details.

## Who we share your data with

I keep your personal data confidential. However, I use the following third-party services which may process limited data on my behalf:

Google Analytics — to understand how visitors use my website

Google Meet — for online therapy sessions where agreed

WhatsApp — for appointment communications where agreed

Google Mail — for email correspondence

Each of these services is bound by a data processing agreement that requires them to protect your data. Links to their privacy policies are available on request.

Beyond these technical services, the following people may have limited access to specific data:

My clinical supervisor — receives first names only, no identifying details.

External IT support — may have incidental access to systems during maintenance, but does not routinely access client records.

My bookkeeper — has access to invoice data only for accounting purposes (your name and payment information, not clinical records).

I never sell your personal data to anyone.

### International data transfers

The following third-party services I use may transfer personal data outside the United Kingdom:

Google Analytics (Google LLC, USA)

Google Meet (Google LLC, USA)

When data is transferred to the USA, I rely on Standard Contractual Clauses (SCCs) or International Data Transfer Agreements (IDTAs) as appropriate safeguards, in accordance with UK GDPR Chapter V and the updated requirements of the Data (Use and Access) Act 2025. The USA does not currently have a UK adequacy decision.

I also use WhatsApp for communications where clients prefer this method. WhatsApp processes limited data to deliver its messaging services. For specific details on WhatsApp's data handling practices and international transfers, please refer to WhatsApp's own privacy policy.

You can request a copy of the relevant transfer safeguards or additional information about any of these services by contacting me.

### How long we keep your data

I keep your personal data for as long as necessary to fulfil the purposes for which it was collected, and in line with legal and professional requirements:

| Type of record   | Retention period               | Reason  |
|--|--------------------------------|---|
| Therapy records (including session notes, assessments, and correspondence) | 7 years after our last session | In line with the Limitation Act 1980 and standard professional indemnity insurance requirements |
| Financial records (invoices, payment records)                              | 6 years                        | Legal requirement under HMRC rules  |
| Website enquiries (where you did not become a client)                      | 12 months                      | To respond to your enquiry and follow up if needed  |

After the applicable retention period ends, I securely destroy your records. Paper records are shredded using a cross-cut shredder. Electronic records are permanently deleted using secure deletion software.

## Your rights under UK GDPR

You have the following rights regarding your personal data:

**Right to be informed** — You have the right to know how I collect and use your personal data. This privacy policy fulfils that right.

**Right of access** — You can request a copy of the personal data I hold about you. This is known as a Subject Access Request (SAR). Under the Data (Use and Access) Act 2025, I will conduct a reasonable and proportionate search to locate your data and respond within one month.

**Right to rectification** — If any personal data I hold about you is inaccurate or incomplete, you can ask me to correct it.

**Right to erasure** — In certain circumstances, you can ask me to delete your personal data. However, this right does not apply where I need to keep records for professional indemnity insurance purposes or to comply with legal obligations.

**Right to restrict processing** — You can ask me to limit how I use your data in certain circumstances, for example while I verify its accuracy.

**Right to data portability** — Where technically feasible, you can request that I transfer your data to another service provider in a structured, commonly used format.

**Right to object** — You can object to certain types of processing, though this is unlikely to apply to therapy records processed under contract and health purposes.

**Rights related to automated decision-making** — I do not use automated decision-making or profiling in my practice.

To exercise any of these rights, please contact me at [dibarrycounselling@gmail.com](mailto:dibarrycounselling@gmail.com)

I will respond to your request within one month. There is no fee for most requests, though I may charge a reasonable fee if a request is clearly unfounded or excessive.

## Data protection complaints — your right under the Data (Use and Access) Act 2025

You have the right to make a data protection complaint directly to me. I take all complaints seriously and will investigate promptly.

To submit a complaint:

Contact me at [dibarrycounselling@gmail.com](mailto:dibarrycounselling@gmail.com).

I will acknowledge your complaint within 7 days and aim to resolve it within 28 days.

If you are not satisfied with my response, you may escalate your complaint to the Information Commissioner's Office (ICO):

Website: [ico.org.uk](https://ico.org.uk)

Telephone: 0303 123 1113

Address: ICO, Wycliffe House, Water Lane, Wilmslow, SK9 5AF

### Confidentiality exceptions

Everything you share with me in therapy is confidential. However, there are rare circumstances where I may need to share information without your consent:

**Risk of serious harm** — If I believe you or someone else is at immediate risk of serious harm, I may need to contact emergency services or other appropriate authorities.

**Safeguarding concerns** — If I become aware of concerns about a child or vulnerable adult being harmed or at risk of harm, I have a legal and ethical duty to report this to the relevant authorities.

**Court order** — If a court orders me to disclose information, I am legally required to comply.

Wherever possible, I will discuss any disclosure with you first, unless doing so would itself put someone at risk. I will only share the minimum information necessary and will document my reasons for any disclosure.

### Changes to this policy

I review this privacy policy annually and whenever my practices change. If I make significant changes that affect how I handle your personal data, I will inform you directly.

The current version of this policy is always available on my website at <https://di-barry-counselling.co.uk>