



HEALING ROOTS COUNSELLING & PSYCHOTHERAPY

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Privacy Notice

Introduction

My work relies heavily on my ability to uphold the privacy and confidentiality of the highest category of personal data: your personal mental health information. As such, your privacy and the responsible handling of your data are extremely important to me. You can be confident that your personal information will be kept safe and secure, and will only be used for the purpose for which it was given to me. I adhere to current data protection legislation, including the General Data Protection Regulation (EU/2016/679) (the GDPR), the Data Protection Act 2018 and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

This privacy notice tells you what I will do with your personal information from the initial point of contact through to after your therapy has ended, including:

- Why I am able to process your information and what purpose I am processing it for
- Whether you have to provide it to me
- How long I store it for
- Whether there are other recipients of your personal information
- Whether I intend to transfer it to another country,
- Whether I do automated decision-making or profiling
- Your data protection rights

I am happy to chat through any questions you might have about my data protection policy. You can contact me via email, text, or call if you wish to do so.

‘Data controller’ is the term used to describe the person/ organisation that collects, stores, and is responsible for people’s personal data. In this instance, the data controller is me. I am registered with the Information Commissioner’s Office under the reference number ZB286620. My contact details can be found at the top of this document.

My lawful basis for holding and using your personal information

GDPR states that I must have a lawful basis for processing your personal data. There are different legal bases depending on the stage at which I process your data. I have explained these below:

If you have had therapy with me and it has now ended, I will use legitimate interest as my lawful basis for holding and using your personal information.

If you are currently having therapy or if you are in contact with me to consider therapy, I will process your personal data where it is necessary for the performance of our contract.

GDPR also ensures that I handle any sensitive personal information you disclose to me appropriately. This type of information is called 'special category personal information'. The lawful basis for my processing of special categories of personal information is the provision of health treatment (in this case, counselling) and the need for a contract with a health professional (in this case, a contract between you and me).

How I use your information

Initial Contact

When you contact me with an enquiry about my counselling services, I will collect information to help me satisfy your enquiry. If you contact me via the Counselling Directory, any information you provide on the website will be stored, handled and deleted by them, and is subject to their privacy policy. Separately, during your consultation, I may collect information for the purpose of assessing your needs and whether I am the right counsellor for you, as well as your contact information, which will be used to inform our first session together. This will include your name, the date you contacted me, a summary of why you are seeking counselling, your counselling history, and practical information about your appointments, such as what method and how often you would like to have sessions.

You will also be sent a counselling agreement to sign, and a client intake form, which will require you to provide your name, date of birth, address, GP information, bank card details, a list of diagnoses relevant to your physical and mental health, any medications you are currently taking, a self-assessment of your current wellbeing, and your signature. This information is encrypted and stored securely, with both a password and 2FA, to assess your progress since initial contact, to ensure awareness of external factors that may affect sessions and how we prioritise our work, and to ensure session payment.

Your GP or another health professional may send me your details when making a referral, or a parent or trusted individual may provide them when making an enquiry on your behalf. If you decide not to proceed, I will ensure all your personal data is deleted within three years. If you would like me to delete this information sooner, please let me know.

While Accessing Counselling

Rest assured that everything you discuss with me is confidential. That confidentiality will only be broken if I feel you are at immediate risk of harm to yourself or others. Full information on this and specific occasions where confidentiality must be extended or broken can be found in the Terms and Conditions and Counselling Agreement. Should this need to happen, I will always try to speak to you about this first, unless safeguarding issues prevent it.

I will keep a record of your personal details to help the counselling services run smoothly. These details are kept securely by a locked mobile phone and laptop with encryption. I use a management software called splose which is specifically made for healthcare providers like me to store your information securely and in compliance with all data protection laws relevant to counsellors in the UK. I will keep digital notes for most of our sessions via splose. These will be written with the help of splose's dedicated integrated AI, manufactured specifically for the responsible and secure processing of highly sensitive healthcare information. Splose and OpenAI, the company that created the AI model that splose uses, maintain a Business

Associate Agreement, which ensures OpenAI cannot retain or use your data for any other purpose than what was agreed. It is important to note that sessions are transcribed and summarised automatically. The transcript and recording are not retained, and any AI summary of our session is reviewed and edited before the final form is saved to your client profile.

Any physical data collected, such as written notes, will be securely destroyed immediately after our session unless needed to supplement the writing of session progress notes, in which case they will be retained for no more than a week before being destroyed. Any notes on my whiteboard are erased as soon as your session is over. I may take a photo of these with my mobile phone before the notes are erased, to upload to your client profile on splose to supplement the session summary. This photo will not be taken until all identifying information has been removed from the notes, and will then be immediately deleted from my device.

After Counselling

For security reasons, I do not retain texts or emails for more than three years from your last session. Once counselling has ended, your records, including your client profile and notes, will be kept for 3 years from the end of our contact and then deleted. I have chosen the three-year mark because it is the period during which you can make a complaint to the BACP about me after the incident has occurred. If you want me to delete your information sooner than that, please let me know.

Third parties

I sometimes share personal data with third parties, for example, where I have contracted with a supplier to carry out specific tasks. In such cases, I have carefully selected which partners I work with. Third parties that may process your information on my behalf are:

- Google Workspace/Private Email - To securely manage client communications.
- Wix - To store your contact information and manage sessions, as well as store any data you supply to me through my website, such as via contact forms.
- Splose - To manage sessions, client contact, and the transcription, summarisation, and storage of session notes. It is also used to collect legitimate interest and contract-vital information via forms, such as your Intake Form and monitoring forms.
- Microsoft Teams - To facilitate online video counselling sessions, including transcribing.
- ZoHo Forms - To collect your personal details, consent, and signature for our Counselling Agreement.
- Stripe - To securely store, process, and charge your bank card to recover session fees.

Your rights

You have the right to ask me to delete your personal information, limit how I use it, or stop processing it. You also have the right to ask for a copy of any information I hold about you and to object to the use of your personal data in certain circumstances. You can read more about your rights at ico.org.uk/your-data-matters. If I do hold information about you, I will:

- Give you a description of it and where it came from.
- Tell you why I am holding it, how long I will store your data, and how I made this decision.
- Tell you who it could be disclosed to.
- Let you have a copy of the information in an intelligible form.

You can also ask me at any time to correct any mistakes in the personal information I hold about you. To request any personal information I may hold about you, please submit the request in writing to tara@rootsinhealing.com. If you have any complaints about how I handle your personal data, please do not hesitate to get in touch with me by writing or emailing me at the contact details given above. I would welcome any suggestions for improving my data protection procedures. If you want to make a formal complaint about the way I have processed your personal information, you can contact the ICO, which is the statutory body

that oversees data protection law in the UK. For more information, go to ico.org.uk/make-a-complaint.

Data security

I take the security of the data I hold about you very seriously and as such I take every effort to make sure it is kept secure. I comply with GDPR regulations in the handling of your personal information by ensuring that any devices used are password-protected and encrypted. The accounts and software used on these devices, such as splose, are also password and 2FA-protected where possible. Physical notes that cannot be destroyed immediately are stored in a locked room for no more than a week before being destroyed securely by shredding.

Visitors to my website

When someone visits my website, I use a third-party service, Wix, to collect standard internet log information and details of visitor behaviour patterns. I do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way that does not identify anyone. I do not make, and do not allow Wix to make, any attempt to identify those visiting my website. I use legitimate interests as my lawful basis for holding and using your personal information in this way when you visit my website. I use Wix so that I can continually improve my service to you. You can read Wix's privacy notice here:

<https://www.wix.com/about/privacy>. I use Wix as the hosting and content management system for my website. I use splose to manage client communications, transcribe, summarise, finalise and store notes to client profiles - find out about splose and data protection here: <https://splose.com/uk/resources/security>. Like most websites, I use cookies to help the site work more efficiently. You can opt out of this with the pop-up that appears when you first access my website.