

PRIVACY POLICY

Practitioner: Tracey Langrill BA (Hons) PGDip (Psych) AdvDip (Couns) MA MSc GMBPsS MBACP

Contact Details: 07762 008799 / tracey@tjlangrillcounselling.co.uk

I am registered with the Information Commissioner's Office (ICO):

Ms. Tracey Jane Langrill, Registration Number ZB876417.

In accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, as the Data Controller I am required to inform you of how your personal data is collected, processed, and protected. Details of the lawful bases relied upon to process your information (under Articles 6 and 9 of the UK GDPR) are set out in Section 4 below.

1. INTRODUCTION

This Privacy Policy explains how I collect, use, store, and protect personal information in accordance with UK data protection legislation, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. For the purposes of data protection legislation, I am the Data Controller responsible for the personal information you provide.

2. INFORMATION I COLLECT

As part of providing counselling services, I may collect and process:

- Name, Address, Telephone number, Email address, and Date of birth
- Occupation
- GP details and Emergency contact details
- Information relating to family relationships and significant life events
- Information relating to physical and mental health
- Information relating to risk of harm to yourself or others
- Information discussed during counselling sessions and session notes
- Appointment records and correspondence relating to counselling services
- Payment and administrative records where applicable

I only collect information that is relevant to the provision and administration of counselling services.

3. WHY I COLLECT THIS INFORMATION

I collect and use personal information in order to:

- Provide counselling services
- Arrange and manage appointments
- Maintain appropriate counselling records
- Manage risk and safeguarding concerns
- Meet professional, ethical, legal, and insurance requirements
- Operate and administer my counselling practice

4. LAWFUL BASES FOR PROCESSING

I use personal information only where there is an appropriate lawful basis under UK GDPR:

- **Contract — Article 6(1)(b):** to respond to enquiries about counselling, make arrangements at your request, and provide the counselling services we agree.
- **Legitimate interests — Article 6(1)(f):** to administer my practice, maintain appropriate records, manage complaints and protect the rights and safety of clients and others. I consider whether these interests are outweighed by your rights and freedoms.
- **Legal obligation — Article 6(1)(c):** where a specific legal requirement requires me to process or disclose information, including relevant tax requirements or a binding court order.

Information about your physical or mental health requires additional protection. For information necessary to provide counselling and maintain appropriate clinical records, I rely on **Article 9(2)(h)**, together with Schedule 1, Part 1, paragraph 2 of the Data Protection Act 2018. This processing is subject to a legal duty of confidentiality.

Where necessary for safeguarding, I identify the appropriate lawful basis and additional condition for the circumstances. This may include **Article 9(2)(g)** and the safeguarding condition in Schedule 1, Part 2, paragraph 18 of the Data Protection Act 2018, where its requirements are met. Where necessary for establishing, exercising or defending legal claims, **Article 9(2)(f)** may apply.

If I rely on your consent for a particular use or disclosure, I will explain what you are agreeing to and obtain explicit consent where required. You may withdraw that consent by contacting me. Withdrawal does not affect processing already carried out lawfully or processing that continues under another applicable lawful basis.

Your right to object: You may object to processing based on legitimate interests. I will consider your objection in accordance with UK GDPR.

5. HOW INFORMATION IS STORED

Client contact information, appointment records, correspondence, and administrative records are stored electronically on password-protected devices and systems.

- **Intake Information & Storage:** Initial intake forms are completed electronically via JotForm and transferred directly to password-protected Google Workspace folders. Submissions are deleted from JotForm upon transfer to ensure personal data is not retained on external form platforms longer than necessary.
- **Session Notes:** Notes are recorded using a reMarkable Paper Pro device. These notes are identified using a unique reference code rather than client names wherever possible and are synchronised securely using the reMarkable cloud service.

- **Contact Details:** Maintained within a password-protected spreadsheet.
- **Email & Calendar:** Email correspondence and appointment scheduling are managed using Google Workspace (Gmail and Google Calendar).

Reasonable technical and organisational measures are used to reduce the risk of unauthorized access, loss, disclosure, or misuse of personal information.

6. HOW LONG INFORMATION IS RETAINED

Counselling records are retained for seven years following the end of therapy in accordance with professional, insurance, and risk-management requirements. At the end of the retention period, records will be securely deleted. Administrative information and correspondence will be retained only for as long as reasonably necessary for practice operations and legal compliance.

7. CONFIDENTIALITY AND INFORMATION SHARING

Information shared within counselling sessions will remain confidential except where:

- You have given explicit permission for information to be shared
- Disclosure is required by law or court order
- There is a serious concern regarding your safety or the safety of another person
- Disclosure is necessary for statutory safeguarding purposes involving children or vulnerable adults

Professional Practice Disclosures:

- **Clinical Supervision:** Aspects of my clinical work are discussed with a qualified supervisor. Information is strictly anonymised or minimised.
- **Therapeutic Executor:** I have formal arrangements in place with a Therapeutic Executor who may access client contact details strictly in the event of my death or sudden incapacitation, to ensure you are notified and supported.

8. REFERRALS FROM OTHER ORGANISATIONS

Where counselling is arranged or funded through another organisation, I will comply with relevant information-sharing and data protection requirements applicable to that service. Only information necessary for the provision and administration of counselling will be processed.

9. YOUR RIGHTS

Under UK GDPR you have the right to:

- Request access to personal information held about you (Subject Access Request)
- Request correction of inaccurate or incomplete information
- Request restriction of processing in certain circumstances
- Object to processing in certain circumstances
- Request erasure of information where appropriate
- Receive personal information in a portable format where applicable

These rights are not absolute. I will consider requests under applicable data protection law and explain any lawful reason for refusing or limiting a request.

10. DATA PROTECTION COMPLAINTS

If you have concerns about how your personal information has been handled, please contact me in the first instance at tracey@tjlangrillcounselling.co.uk

I will acknowledge your complaint within 30 days, investigate the matter, and respond as promptly as reasonably possible. If you remain dissatisfied following my response, you have the right to lodge a complaint with the Information Commissioner's Office (ICO):

Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Telephone: 0303 123 1113

Website: www.ico.org.uk

11. INTERNATIONAL DATA PROCESSING

Some cloud infrastructure used within my practice (including JotForm, Google Workspace services, and the reMarkable cloud service) may process or store information on servers located outside the UK. Where personal information is processed internationally, appropriate safeguards (such as a UK International Data Transfer Agreement or EU Standard Contractual Clauses with the UK Addendum, where applicable) are relied upon in accordance with UK GDPR requirements.

You can contact me for further information about where your information is processed and, where applicable, how to obtain a copy of the safeguards used.

12. CONTACT DETAILS & ADMINISTRATION

If you have any questions about this Privacy Policy or how your information is handled, please contact:

Tracey Langrill

Telephone: 07762 008799

Email: tracey@tjlangrillcounselling.co.uk

ICO Registration Number: ZB876417

- **Version:** 1 October 2026
- **Review Date:** 30 September 2027