



U18/VA

## PRIVACY POLICY

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

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Date of issue: 1 October 2026

**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 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.

**Please read this carefully. You can ask me to explain anything or read it with a trusted adult if you wish.** It explains how I keep your personal information safe, what your rights are, and the rules I follow to protect your privacy.

### 1. WHAT THIS DOCUMENT IS

This Privacy Policy explains to you (and your parents/carers) how I collect, use, store, and protect your personal information when you come to counselling. For the purposes of data protection legislation, I am the Data Controller responsible for looking after your information.

### 2. WHAT INFORMATION I HOLD

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

- Your name, address, phone number, email address, and date of birth
- School/education details or occupation
- GP details and emergency contact details (usually your parent/carer)
- Information about your family relationships, life events, and previous support
- Information relating to your physical and mental health
- Information relating to current or past risks to yourself or others
- Session notes and records of our meetings
- Appointment schedules and email/message correspondence
- Payment and administrative records where applicable

### 3. WHO OWNS THIS DATA? (PARENT/CHILD BOUNDARIES)

Your data protection rights belong to you. I will consider your understanding and ability to make decisions about your information. Parents and carers do not automatically receive session updates or access to your notes, even if they arrange or pay for counselling. Any request for information will be considered carefully, taking account of your wishes, understanding, safety and the law.

### 4. WHY I AM ALLOWED TO USE YOUR INFORMATION

The law requires me to have a good reason for using your information. These reasons are:

- **To provide counselling:** I need some information to arrange our sessions, support you and keep appropriate records. The law calls this “legitimate interests”. I must consider your privacy and rights when deciding what information to use.
- **To manage payments:** If a parent/carer agrees to pay, I use their details to carry out our payment agreement. The law calls this “contract”. Paying does not give them automatic access to your notes.
- **To follow the law:** Sometimes a law or court order requires me to use or share information.
- **To help keep people safe:** I may need to share relevant information to protect you or someone else from harm, where the law allows or requires this.

Information about your physical and mental health has extra legal protection. The law allows me to use it where necessary to provide confidential counselling and keep appropriate clinical records. This is called the ‘health or social care’ condition under UK GDPR Article 9(2)(h).

You can ask questions or object to how I use your information. I will listen, consider your concerns and explain what I can do.

### 5. HOW YOUR INFORMATION IS STORED

I store your information electronically using password-protected, enterprise-grade systems:

- **Intake Forms & Storage:** Initial intake forms are completed electronically via JotForm and transferred directly to password-protected **Google Workspace** folders. Submissions are immediately deleted from JotForm upon transfer to ensure data minimisation.
- **Session Notes:** Notes are written on a **reMarkable Paper Pro** device. Notes are identified using a Unique Reference Code (URC) rather than your name whenever possible and synced securely via the reMarkable cloud.
- **Contact Details & Correspondence:** Kept in password-protected files. Mobile numbers are stored on a password-protected phone and deleted when our contract finishes. Emails and scheduling are managed using Google Workspace.

### 6. HOW LONG I KEEP YOUR INFORMATION

My policy is to retain your counselling records until your 25th birthday, or your 26th birthday if you were 17 when counselling ended. If counselling continues after you turn 18, I apply the adult retention period where this requires keeping your records longer: seven years after counselling ends. At the end of the applicable period, records are securely deleted unless there is a specific lawful reason to retain them longer. Payment and administrative records are kept only for as long as needed for their purpose and applicable legal requirements.

## 7. CONFIDENTIALITY AND SAFEGUARDING

Everything shared in counselling remains strictly confidential except where:

- You give 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 required for statutory child safeguarding under the Children Act 1989/2004

**Devon Safeguarding Protocols:** Where appropriate and safe, I will discuss concerns with you before sharing information. If sharing is necessary and lawful to protect you or another person from harm, I may contact a parent/carer, your GP, Devon Children's Front Door or another appropriate service. I will share only the information needed.

**Professional Support:** I discuss my work with a qualified supervisor to help me support you safely. I do not normally use your name and remove or minimise identifying details as far as possible. My supervisor is also bound by confidentiality. I also have a named Therapeutic Executor; a trusted, qualified colleague bound by confidentiality. If I die or become unable to contact you because of serious illness, incapacity or an emergency, they may securely access the contact details needed to inform you and, where appropriate and safe, your parent/carer, and support next steps.

## 8. REFERRALS FROM OTHER ORGANISATIONS

Where counselling is arranged or funded through another organisation, I will comply with relevant data protection requirements. Any excess administrative data supplied by them will be deleted once therapy administration and reimbursement are concluded.

## 9. YOUR DATA RIGHTS

As the young person (client), you have the right under UK GDPR to:

- Request access to the personal information held about you (Subject Access Request)
- Request correction of inaccurate or incomplete information
- Request restriction or object to certain processing
- Ask me to delete your information. This right is not absolute; I will explain if there is a lawful reason to retain it.
- Transfer your personal information to another party where applicable

## 10. INFORMATION PROCESSED OUTSIDE THE UK

- I use JotForm, Google Workspace and reMarkable to collect or store information, as explained in Section 5. These providers may process some information outside the UK.
- Where this happens, UK data protection law requires suitable protection. This may be because the destination has been recognised by the UK as providing adequate protection, or because an approved data protection agreement applies.
- You can contact me for information about where your information is processed, the protections that apply and, where applicable, how to obtain a copy of those protections.

## 11. COMPLAINTS & CONTACT

If you or your parent/carer have any concerns about how your personal information has been handled, please contact me in the first instance at [tracey@tjlangrillcounselling.co.uk](mailto:tracey@tjlangrillcounselling.co.uk) or 07762 008799. I will acknowledge your complaint within 30 days, investigate as quickly as possible and keep you informed. If you remain dissatisfied, 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](http://www.ico.org.uk)

**Tracey Langrill** (Data Controller)

T J Langrill

1 October 2026

For review 30 Sep 2027