



## **As Light As A Feather Counselling**

### **Privacy Statement for Clients**

In order to provide a quality, professional service, As Light As A Feather Counselling needs to collect, store, and use information from clients. This statement explains what information the service collects, why it is collected, how it is stored, who has access to it, who it might be shared with, and how long it will be retained.

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#### **What the Service Collects**

The service collects personal information from the initial assessment form, including:

- Name
- Contact details and emergency contact information
- Reasons for accessing counselling
- Relevant health information that may impact the counselling process
- Information regarding disabilities or additional needs that may impact the client's ability to fully engage in therapy (e.g., physical, cognitive, or sensory disabilities)

Appointments are logged on the service's counselling telephone using initials only. Brief session notes are also made to monitor each client's therapeutic journey, which may include additional personal data disclosed during therapy.

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#### **Why the Service Collects This Information**

The information enables the service to:

- Assess and determine the support each client needs
- Contact clients when necessary (e.g., to confirm, rearrange, or follow up on appointments)
- Provide necessary adjustments or support for clients with disabilities or additional needs to ensure accessibility in the therapeutic process.

The lawful basis for processing client data is *contract* (to deliver counselling services) and *legitimate interests* (to ensure safe and effective practice).

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## **Storage**

Each client is assigned a unique reference number.  
All client files are kept securely within a locked safe.  
Electronic information (where applicable) is stored securely and password protected.

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## **Access**

Client information is only accessible to the service.  
Session notes and records are anonymised and securely stored.

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## **Third-Party Services**

Online counselling sessions are delivered using Zoom Pro with end-to-end encryption (E2EE) enabled, ensuring that all conversations remain private and secure. Sessions are never recorded, and access is further protected through the use of waiting rooms and password-protected meeting links.

If you would prefer a more secure method of communication, I'm happy to discuss alternatives, such as password-protected documents or secure messaging platforms.

### **Email Communication and Security**

Initial communication, including requests for counselling sessions and the sending of Zoom invitations, is conducted via an Outlook.com email account. Only minimal personal data is used at this stage — typically a first name or initials and an email address. No sensitive or therapeutic information is shared over email. Emails containing consent confirmations are stored securely and deleted once no longer needed.

All other client information is handled offline, printed and securely stored in a locked safe.

While Outlook.com uses encryption in transit (TLS), clients are advised that this email method does not offer full end-to-end encryption. By choosing to engage in therapy, you acknowledge and accept the limitations of email-based communication for basic administrative use.

The service uses WhatsApp Business as a communication tool for practical and time-sensitive updates, such as appointment confirmations, changes, or cancellations. Messages are limited to essential information only. I do not use WhatsApp for marketing purposes.

Your phone number will only be used on WhatsApp if you have provided it to me as a contact method. Conversations are kept to a minimum and are not stored outside the app unless necessary for record-keeping (e.g., confirmation of cancellations). WhatsApp is a third-party service provided by Meta Platforms Inc. While messages

are end-to-end encrypted, WhatsApp may collect metadata. You can choose not to be contacted via WhatsApp by letting us know your preference at any time.

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## **Sharing**

Client information will not be shared with other individuals or agencies without the client's written consent, unless required to do so by law or under a court order.

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## **Retention Timescales**

Client information will be retained for the duration of the client's therapy and typically for seven years following the date of the last session, in line with professional guidelines from the British Association for Counselling and Psychotherapy (BACP).

This retention period allows for the potential of further support being sought and ensures continuity of care if needed. It also enables service assessment across a range of considerations, including legal obligations and professional standards.

After the retention period has elapsed, all personal and sensitive data will be securely deleted or destroyed in accordance with our Data Retention and Deletion Policy.

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## **Consent**

The service can only collect and store information with the client's consent, which is requested via email.

Clients are asked to confirm their agreement to the contract and privacy statement by replying to the email. This serves as written proof of consent, and clients can withdraw their consent at any time.

Clients are also informed that without the necessary information, the service may not be able to provide counselling support.

Clients have the right to request access to their records. Please note that brief session notes may be redacted in accordance with legal guidelines, as they are considered the personal reflections of the counsellor.

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## **Data Protection**

This statement is provided in line with the European Union General Data Protection Regulation (GDPR) 2017 and the UK Data Protection Act 2018.

As Light As A Feather Counselling is registered with the Information Commissioner's Office (ICO). Registration number: ZB893295. Clients can request access to, correction of, or deletion of their personal data by emailing **aslightasafeathercounselling@outlook.com**

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## **Cookies Notice**

The As light as a feather website uses cookies to ensure basic functionality and to help me understand how visitors use the site. No personal data is collected through cookies. You can manage or disable cookies through your browser settings.

## **Accessibility Statement**

At As Light As A Feather Counselling, I aim to make online counselling accessible and inclusive for everyone. Sessions are delivered via secure online platforms, and I'm happy to discuss any adjustments that could help you engage comfortably, for example, using captions, adapting communication methods, or providing written summaries after sessions.

If you experience any barriers to accessing online counselling, please let me know so we can find a solution together.

**Please read the following carefully and indicate your consent by replying to the email with your confirmation.**

I confirm that:

- I have read and understood the Privacy Statement provided by As Light As A Feather Counselling.
- I understand the reasons why my personal information is collected, how it is stored, how long it is kept, and under what circumstances it may be shared.
- I understand that I have the right to withdraw my consent at any time, although this may affect the ability of the service to continue providing counselling support.
- I understand that I have the right to request access to my information, subject to applicable legal guidelines.
- I understand that my disability or additional needs may be used to provide appropriate support in my therapy and that this information will be handled with care and confidentiality.

