

KESTREL COUNSELLING- PRIVACY NOTICE

My responsibility to protect your privacy is important to me. Your personal information will be kept safe and secure and used exclusively for the purpose 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 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.

Please do email me if you have any questions about my data protection policy.

'Data controller' is the term used to describe the person or organisation that collects, stores and has responsibility for people's personal data which in this instance is me. I am registered with the Information Commissioner's Office and my registration number is ZB763472.

I operate as Kestrel Counselling, Anna Lear and sessions are held at Mind Tree Cafe, Furlong Close, Rowde SN10 2TQ. My website address is www.kestrel-counselling.co.uk, my email address anna@kestrel-counselling.co.uk and my practice telephone number 07514 183420.

My lawful basis for holding and using your personal information

The GDPR states I must have a lawful basis for processing your personal data. There are different lawful bases depending on the stage at which I am processing your data.

-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.

The GDPR also ensures I look after any sensitive personal information that you may disclose to me appropriately. This type of information is called 'special category personal information'. The lawful basis for me processing any special categories of personal information is that it is for provision of health treatment (in this case counselling) and necessary for a contract with a health professional (in this case, a contract between me as your counsellor and you as the client).

How I use your information

Initial contact

When you make an initial enquiry about my counselling services I will collect information to help me respond to your enquiry. This will include your name, email address and telephone number. Alternatively, your GP or other health professional may send me your details when making a referral. If you decide not to proceed I will ensure all your personal data is deleted within 2 weeks. If you would like me to delete this information sooner, just let me know. Any voicemails received during the enquiry process will be deleted once contact has been made or within 7 days if I have not been able to contact you.

While you are accessing counselling

Everything you discuss with me is confidential. That confidentiality will only be broken in the instances as outlined as part of the therapeutic contract, including but not limited to safeguarding concerns, money laundering, acts of terrorism etc. For a full outline of these please see the contract or ask me.

I will always try to speak to you first about any need for confidentiality breaches, unless there are safeguarding issues that prevent this. I will keep a record of your personal details to help the counselling services run smoothly. These details are kept securely either within a locked filing cabinet or stored electronically and password protected by my management software (provided by Therasee) and are not shared with any third party. I will keep brief notes of each session, again stored electronically, protected by password and hosted by my management software (Therasee). For security reasons I do not retain text messages or voicemail messages for more than 7 days. If there is relevant information contained in a text message I will add these to your client records. Likewise, any email correspondence will be deleted after 14 days if it is not important. If necessary I will add this to your client records.

All professional counsellors and therapists undertake monthly supervision. This is with an experienced and qualified counsellor who has undertaken additional training to become a Supervisor. They are bound by the same confidentiality rules as myself. Sessions with my supervisor are to benefit the support I offer clients, to ensure I am working ethically and effectively and to keep myself and my clients safe during our time working together. I ensure any identifiable detail about my clients is kept minimal and only shared where relevant to our work together.

After counselling has ended

Once counselling has ended your records will be kept for 5 years (in accordance with my insurers requirements) from the end of our contact with each other and are then securely destroyed. If you want me to delete your information sooner than this, please discuss this with me.

Clinical will

Counsellors and therapists ensure they have a clinical will in place to protect their clients. This means that should a significant event occur which prevents me from running sessions and being unable to advise clients of this (ie in the event of a serious medical emergency, or accident or death) the person who I have nominated will enact the agreements within my

clinical will, ie to contact all relevant clients and to offer any support which may be necessary. My nominated person is Louise Blake who is a trusted peer (with whom I trained). Louise is of course bound by the same confidentiality obligations as myself and would only ever have access to any data in the exceptional circumstances as outlined.

Use of AI

I do not use AI to complete any data storage or processing, including transcribing clinical notes.

Online therapy

Where sessions are held online I do this securely via Therasee. They operate in accordance with GDPR and offer encrypted messaging. Sessions are only accessible via secure link issued by myself to the client. Sessions are never recorded.

Third party recipients of personal data

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. I take great care to ensure that I have a contract with the third party that states what they are allowed to do with the data I share with them. I ensure that they do not use your information in any way other than the task for which they have been contracted.

I use Therasee to complete my initial intake forms for new clients. I have chosen their services as they are committed to upholding GDPR regulations and help me collect your personal information in a secure manner.

Your rights

I try to be as open as I can be in terms of giving people access to their personal information. You have a right to ask me to delete your personal information, to limit how I use your personal information, or to stop processing your personal information. You also have a right to ask for a copy of any information that I hold about you and to object to the use of your personal data in some 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, tell you 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 there may be in the personal information I hold about you. To make a request for any personal information I may hold about you, please put the request in writing addressing it to anna@kestrel-counselling.co.uk

If you have any complaint about how I handle your personal data please do not hesitate to get in touch with me by writing or emailing to the contact details given above.

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 by using password protected folders and locked filing cabinets.

Visitors to my website

When someone visits my website, I use a third party service, Webhealer, 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 Webhealer to make any attempt to find out the identities of 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 Webhealer so that I can continually improve my service to you. You can read Webhealer's privacy notice here [Privacy Policy - WebHealer | Therapist Websites. 20 Years Experience](#). I use Webhealer as the content management system for my website. Like most websites, mine uses cookies to help the site work more efficiently. No user-specific data is collected by me or any third party. If you fill in a form on my website, that data will be temporarily stored on the web host before being sent to me.

Data Protection Complaints

If you should wish to raise a data protection complaint please submit this via email to myself. I will provide acknowledgement of this complaint by reply within 30 days of receipt before providing a full response in writing without undue delay following an investigation under the Data (Use and Access) Act 2025. Such instances will be recorded within a complaints logs and documented by myself.

Updated June 2026.
