

.Web: <https://brighterdayscounselling.com/>

Email: info@brighterdayscounselling.com

Call/ Text/ WhatsApp: [07378 372 358](tel:07378372358)



BRIGHTER DAYS
COUNSELLING

Privacy Notice

As a UK professional counsellor registered with the NCPS, I am registered with the Information Commissioner's Office (ICO ref: ZB438046). This means I am legally bound to hold your personal details and story carefully and confidentiality under The General Data Protection Regulation (2018).

GDPR requires me, Suzie Bright (*"the data controller"*) to let you know how I store and keep your personal information safe, and what your rights are. If you have any questions about this privacy notice, or about how your information is handled, you can contact me at:

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Phone: 07378 372 358

Website: www.brighterdayscounselling.com

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The type of personal information I collect:

I only collect information that is necessary for providing therapy safely, ethically and Professionally and this may include:

- *Personal identifiers, contacts, and characteristics.* This is information I need to collect to perform my service for example, your name, date of birth, address and contact details.
- *Economic and financial data.* This is information I need to collect in order to agree a discounted fee for counselling. For example your latest 3 months of bank statements.
- *Special category data.* This is any information about yourself which you may choose to disclose to me during the course of our therapeutic work together. EG: info regarding your racial or ethnic origin, gender reassignment, medical health and wellbeing information including formal diagnoses and your health practitioner names and contact details, religious or philosophical beliefs, sexual orientation, and whether you have any criminal convictions or offences.

How I get the personal information and why I have it:

The personal information I process is provided to me directly by you in order for us both to perform the counselling contract and develop our therapeutic relationship. In some cases personal information about you may be provided to me by another person. EG: your referrer, a health professional, or a member of your social network. I will let you know if this is the case.

How I use your information:

I use your personal information to:

- Respond to enquiries.
- Arrange initial calls and appointments.
- Provide therapy.
- Keep appropriate clinical records.
- Manage payments, invoices and appointments.
- Communicate with you about sessions.
- Meet legal, professional and ethical responsibilities.
- Manage risk, safeguarding or emergency situations where necessary.
- Maintain insurance, tax and accounting records.
- Respond to data protection requests or complaints.

I do not sell your personal information.

Lawful basis to process your information:

Under UK GDPR, I need a lawful basis for using personal information. For different parts of my work, I may rely on different lawful bases under Article 6 UK GDPR. For example, I may rely on **contract** where processing is needed to arrange or provide therapy, **legitimate interests** where I need to run my practice safely and keep appropriate records, and **legal obligation** where I need to keep or share information to comply with the law.

- **Contract:** where information is needed to arrange and provide therapy
- **Legitimate interests:** where I need to use information to run my practice safely, respond to enquiries, keep appropriate records and protect both you and me.
- **Legal obligation:** where I need to keep or share information to comply with the law

Where I process special category data, such as information about health or mental health, I must also identify a separate condition under Article 9 UK GDPR before I begin that processing and reflect this in my privacy information. Depending on the reason for processing, I may also need to meet additional conditions and safeguards under the Data Protection Act 2018.

Where I ask for your consent for something specific, I will explain what I am asking for and whether you can withdraw that consent. Consent is not the only lawful basis available under data protection law, and I will only rely on it where it is appropriate to do so.

Confidentiality:

Therapy is confidential, but confidentiality is not absolute. I will not share what you tell me unless there is a lawful, ethical or safeguarding reason to do so, and where possible I will limit any sharing to the minimum information necessary.

There are some limits to confidentiality. I may need to share information if:

- I believe there is a serious risk of harm to you or someone else.
- There is a safeguarding concern involving a child, vulnerable adult or person at risk.
- I am required to do so by law, court order or legal process.
- Disclosure is necessary to prevent or detect a serious crime.
- There is a medical emergency, and information is needed to protect life.
- I need to consult my clinical supervisor, while protecting your identity as far as possible.

Where possible and appropriate, I would aim to discuss this with you before sharing information. However, I may not be able to do so if this would increase risk, prejudice safeguarding action, undermine the purpose of the disclosure, or would otherwise not be possible.

Supervision:

Like other ethical therapists, I use clinical supervision to support safe and effective practice. In supervision, I may discuss aspects of client work to support safe and effective practice. I aim to minimise identifying detail where possible and appropriate, and my supervisor is also bound by confidentiality and professional standards.

Clinical notes and records:

I keep brief clinical notes to support safe and ethical therapy. These are usually factual, proportionate and relevant to the work. Clinical records may include:

- Session dates
- Brief themes discussed
- Relevant risk, safeguarding or clinical information
- Agreed actions or important decisions
- Contact and administrative information

I do not aim to keep a full transcript of sessions.

How long I keep information

I keep information only for as long as necessary for the purpose for which it was collected. Retention periods may vary depending on the type of record, the nature of the work, legal and professional requirements.

- Enquiry information may be deleted if we do not begin therapy, usually within 6–12 months.
- All client records are stored for 3 years after ending your counselling sessions, as advised by my insurance company.
- Financial records may be kept for the period required for tax and accounting purposes.
- Emails, messages and administrative records are reviewed periodically and deleted when no longer needed.

There may be times when I need to keep records for longer, for example where there are safeguarding, legal, insurance, complaint-related or professional-body reasons. I keep my retention periods under review and aim to make sure they remain justified and proportionate.

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Where I store your personal information:

Digital Notes and Records

I hold some of your information securely on my private laptop. I use password protection and encrypted folders. I install anti-virus software. When not in use, my laptop is stored in a locked safe with a passcode. My passwords and passcodes are strictly private and confidential, and known only to me.

Written Notes & Records

I hold some of your information securely in paper form, and when not in use it is stored in a locked safe with a passcode which is known only to me.

Communication Methods

Your information may be stored in the following systems:

- **Website contact form:** My website is managed by Webhealer.
- **Emails:** I use a secure hosted email service set up by the providers of my website, Webhealer. I also use a Gmail webmail account which is safeguarded by *Advanced Protection* (Google's strongest account security). Both email providers have the strongest Transport Layer Security (TLS) possible to make sure email data is protected. TLS is an encryption protocol that protects data when it moves between computers. However, a secure TLS connection requires that both the sender and recipient use TLS. If the receiving server doesn't use TLS, the email providers will still deliver messages, but the connection isn't secure. So, for your peace of mind please check if your email provider uses TLS to send and receive messages.
- **Phone calls and messages:** I use WhatsApp & Signal because both apps use end-to-end encryption (the gold standard level of security protection).
- **Video calls:** These are currently hosted through Google Meet and are end-to-end-encrypted.
- **Payments/ invoicing:** Payments are taken by bank transfer, or Stripe.

Online therapy

If we work online, sessions will take place using Google Meet video calls. I will take reasonable steps to protect confidentiality from my side, and I ask that you also choose a private space where you cannot easily be overheard or interrupted.

Online platforms may process technical information such as IP address, device information or connection data. Please also check the privacy notice of the platform we use if you would like more detail.

Outdoor therapy

If we meet outdoors, I will discuss confidentiality with you in advance. Outdoor therapy can

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be discreet, but it cannot guarantee the same level of privacy as a private therapy room. We will agree how to manage the possibility of seeing other people, being overheard, or needing to pause the conversation.

AI tools, transcription and recording

I do not record, transcribe or use AI tools to process therapy sessions. I may use digital tools for general practice administration, writing, planning or education. Where I do, I avoid putting identifiable client material into tools that are not appropriate for confidential clinical information, and I take data protection and confidentiality into account when choosing how to use those tools.

Website visitors and cookies

When you visit www.brighterdayscounselling.com some technical information may be collected automatically, such as your IP address, device type, browser type, pages visited and the time of your visit. This may happen through website hosting, security, analytics or cookie tools.

My website is hosted by WebHealer. The website may use cookies or similar technologies to make the site work, improve performance, understand visitor behaviour or support security.

You can usually control cookies through your browser settings. If I use cookies or similar technologies that are not strictly necessary, I will make sure the website provides the level of notice, choice or consent required by law. In some cases, current UK rules may allow limited exemptions for certain analytics or functionality cookies, but only where the legal conditions for those exemptions are met.

Sharing your information

I will not share your personal information unless there is a clear reason to do so. Depending on the circumstances, I may share limited information with the following people or organisations where this is necessary, proportionate and lawful:

- My clinical supervisor.
- Professional advisers, such as an accountant, insurer or legal adviser.
- My professional body, if required in relation to a complaint or ethical matter.
- Safeguarding services, emergency services or your GP, where there is serious risk or safeguarding concern.
- A court or legal authority, if required by law.
- An appointed clinical executor if I die or become unable to contact clients myself.
- Trusted digital service providers who process data on my behalf.
- A coroner.

Where I share information, I aim to share only what is relevant and necessary for that

purpose. If I or one of my providers transfers personal information outside the UK to a separate organisation, I will only do so where the law allows it, and an appropriate transfer mechanism or other safeguard is in place where required.

Clinical will

I aim to have arrangements in place so that clients can be contacted if I die or become seriously incapacitated. This may involve a trusted professional colleague or clinical executor having access to the minimum information needed to contact current clients and manage records appropriately. That person would be bound by confidentiality, would only access information if necessary, and would not take on an ongoing therapeutic role unless separately agreed and appropriate.

Your data protection rights:

Under data protection law, you have 8 rights:

1. [Right to be informed](#)
Individuals have the right to be informed about the collection and use of their personal data.
2. [Right of access](#)
Individuals have the right to access and receive a copy of their personal data, and other supplementary information.
3. [Right to rectification](#)
The UK GDPR includes a right for individuals to have inaccurate personal data rectified, or completed if it is incomplete.
4. [Right to erasure](#)
The UK GDPR introduces a right for individuals to have personal data erased.
5. [Right to restrict processing](#)
Individuals have the right to request the restriction or suppression of their personal data.
6. [Right to data portability](#)
The right to data portability allows individuals to obtain and reuse their personal data for their own purposes across different services.
7. [Right to object](#)
The UK GDPR gives individuals the right to object to the processing of their personal data in certain circumstances.
8. [Rights related to automated decision-making including profiling](#)
The UK GDPR has provisions on:
 - Automated individual decision-making (making a decision solely by automated means without any human involvement); and
 - Profiling (automated processing of personal data to evaluate certain things about an individual). Profiling can be part of an automated decision-making process.

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Some rights are not absolute and may depend on the circumstances. For example, I may need to keep some information for legal, professional, safeguarding, insurance or complaint-related reasons, and there may be limits on what can be disclosed where information includes third-party data or where a relevant exemption applies.

You are not required to pay any charge for exercising your rights. If you make a request, I have one month to respond to you. If a request is particularly complex, or if I need to consider whether any restriction or exemption applies, I may need longer, in which case I will let you know.

Please contact me at suzie@brighterdayscounselling.com if you wish to make a request.

What to do if you have a concern, or want to make a complaint:

Step 1: If you have any concerns about the use of your personal information, you can make a complaint to me at suzie@brighterdayscounselling.com

I will acknowledge your complaint within 30 days and take appropriate steps to look into it without undue delay. Please include:

- Your name.
- What your concern is about.
- What you would like me to look into.
- How you would prefer me to respond.

I will investigate your complaint as appropriate, keep you informed where necessary, and tell you the outcome without undue delay.

Step 2: If you are not satisfied with my response, or if you would prefer to contact the UK regulator directly, you can contact the Information Commissioner's Office:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: www.ico.org.uk

Changes to this privacy notice

I may update this privacy notice from time to time to reflect changes in my practice, legal requirements, professional guidance or the systems I use. The latest version will be available on my website.