



Kim Sturgeon
Counselling & Psychotherapy

PRIVACY POLICY

Introduction

The **General Data Protection Regulation (UK GDPR)** sets out how personal information must be collected, used, and protected. Because I collect and process personal information as part of my counselling practice, I have a legal obligation to manage your data responsibly and transparently.

For the purposes of UK data protection law, **I, Kim Sturgeon**, act as the **Data Controller** for the personal information you share with me.

I am registered with the Information Commissioner's Office (ICO), and my registration number is: **ZA688679**.

What information do I collect?

Initial contact

When you first get in touch, I ask for your name, telephone number, email address, location, and a brief summary of what you are seeking help with. This allows me to communicate with you and make an initial decision about whether an introductory meeting is appropriate. I may also request information such as your availability to arrange an initial appointment.

Initial appointment

At our first meeting, I may ask about your current personal, social, medical, and financial circumstances, as well as relevant background or family history. This helps me assess whether I can work safely, ethically, and competently with you.

Client details form

If we decide to work together, I will ask you to complete a form that includes your address, GP name and surgery, next-of-kin contact details, relevant medical conditions, and any prescribed medication. This information is collected for safeguarding and duty-of-care purposes.

You will also be asked to sign a two-way counselling agreement so that you know what you can expect from me and what I ask of you.

Session notes

After each session, I write brief case notes containing the date, time, and main themes discussed. These notes are coded and do not include full transcripts of what was said.

Lawful basis for processing your data

I process your personal data under the following lawful bases:

- **Contract (Article 6(1)(b))** – to provide the counselling services you have requested.
- **Legitimate Interests (Article 6(1)(f))** – to manage my practice safely and ethically.
- **Vital Interests (Article 6(1)(d))** – in rare situations where there is serious and imminent risk of harm and information may need to be shared to protect you or others.

Some information you share may be **special category data** (e.g., health, sexual life, trauma history). I process this under:

- **Article 9(2)(h)** – provision of health or social care (including counselling and psychotherapy).

How your information is stored

All personal information is stored digitally on my personal laptop, which is secured using biometrics and protected by encrypted personal-vault software.

Session notes are stored in a separate encrypted folder.

If you prefer to complete your client details form on paper, I will scan it, store it securely as above, and then shred the paper copy.

Please note that **email transmission is never completely secure**. While I take steps to protect your information, I cannot guarantee the security of data sent via email or through website forms. If you have concerns, please discuss alternative options with me.

Sharing your personal data

Your personal data is treated as **strictly confidential**. I will not share it with third parties except in the following circumstances:

- **Safeguarding concerns** – if I believe there is serious and imminent risk of harm to you or others, I may contact your GP, next of kin, or emergency services.
- **Legal obligation** – if I am required by law to disclose information relating to a serious crime.

Any sharing of information will be limited to what is necessary and proportionate and will rely on the appropriate lawful basis under UK GDPR.

How long I keep your information

Unless you request erasure sooner, I retain your data for **7 years** from the end of our counselling agreement.

This retention period reflects common professional practice for counsellors and meets ethical, legal, and insurance requirements.

Your rights

You have the following rights under UK GDPR:

- **Right of access** – to request a copy of the information I hold about you.
- **Right to rectification** – to ask me to correct any inaccurate or incomplete information.
- **Right to erasure** – to request deletion of your data where it is no longer necessary.
- **Right to withdraw consent** – you may withdraw consent for me to hold or process your information at any time, though this would mean counselling must end.
- **Right to restrict processing** – to request limits on how your data is used in certain circumstances.
- **Right to object** – to object to particular types of processing (e.g., where I rely on legitimate interests).
- **Right to data portability** – to request transfer of your data to another provider where technically feasible and appropriate.

To exercise any of these rights, please contact me via email at:

kimsturgeon@protonmail.com

Data Protection Complaints (effective 19 June 2026)

I take your privacy, confidentiality, and data protection rights seriously. If you have concerns about how I collect, store, or use your personal data or therapy notes, please contact me directly in writing at:

kimsturgeon@protonmail.com

In line with UK GDPR and BACP's commitment to openness and accountability, I will:

- Acknowledge your complaint in writing within 30 days.
- Investigate the concern thoroughly and respond without undue delay.
- Provide a clear explanation of my findings and any actions taken.

If we are unable to resolve the issue together, you have the right to escalate your complaint to the Information Commissioner's Office (ICO):

<https://ico.org.uk/make-a-complaint/>