

Privacy Policy

This privacy policy tells you what you should expect me to do with your personal information when you visit my website, make an enquiry, or engage in counselling services with me.

If you have any questions about this Privacy Policy or how your information is handled, please contact me at: openfields.affirmingpractice@gmail.com

Who I Am

- I am **Sophie Le Roy**, a counsellor providing counselling and psychotherapy services in the United Kingdom.
- I am a registered member of the British Association for Counselling and Psychotherapy (BACP) and with the Information Commissioner's Office (ICO) ([registration reference: ZC013069](#)).

Information I Collect and Why

1. Website Enquiries

When you contact me through the enquiry form on Open Fields - Affirming Practice website, I may collect:

- Your name
- Email address
- Telephone number (if provided)
- Information you choose to include in your message

Please avoid including extensive sensitive personal information in your initial enquiry where possible.

2. Client Information

If you become a counselling client, I collect and use the following information to provide counselling services and to administer your account:

- Contact details including your name, address, telephone number and email address
- Your date of birth
- Bank details (for payment processing)
- Health and therapy-related information, including relevant medical history, the issues you wish to address in counselling, details of current medication and details of your GP

Where I Get Personal Information From

I collect your personal data from you in the following ways:

- When you make contact with me to enquire about counselling services (including through my website, online directories, email, telephone, or WhatsApp Business)
- During your initial consultation and subsequent sessions
- Through our ongoing communication between sessions
- When you make payments by bank transfer

How Your Information Is Used

I use the information you provide to:

- Respond to your enquiry and discuss counselling services
- Arrange consultations and appointments
- Provide therapeutic counselling services
- Maintain appropriate administrative and clinical records
- Meet professional, legal, ethical and insurance requirements

Lawful Basis for Processing

To comply with UK data protection law I must have a "lawful basis" for collecting and using your personal information. I rely on the following legal bases:

- **For Website Enquiries**

Legitimate interests: responding to enquiries about counselling services and managing professional communications.

- **For Counselling Clients**

Performance of contract: Processing your data to provide therapeutic counselling services as described in our counselling agreement.

Special category data: Health and therapy-related information is processed under Article 9(2)(h) of the UK GDPR, which permits processing necessary for the provision of health or social care or treatment.

Technology and Third-Party Services

I use the following third-party services to operate my practice and provide counselling services:

- **Website Hosting**

- My website is hosted by **Wix.com Ltd.** Wix provides the online platform that enables me to operate my website.
- When you visit my website or submit information through forms on the website, certain data may be processed by Wix on my behalf, including user journeys and cookie tracking.

For more information about how Wix processes personal data, please see their privacy policy: <https://www.wix.com/about/privacy>

- **Google Services**

I use various services provided by Google LLC for communications, online sessions, and website analytics:

- **Gmail:** I use Gmail for all email communications with clients. Email communications may be processed and stored by Google.
- **Google Meet:** For online therapy sessions, I use Google Meet to conduct secure video calls. This platform processes audio, video, and chat data during sessions. Google Meet uses encryption to protect data in transit.
- **Google Analytics:** My website may use Google Analytics to understand how visitors use my website.

For more information about how Google processes personal data across all these services, please see their privacy policy: <https://policies.google.com/privacy>

• **Optional Communication Services**

- I also offer **WhatsApp Business** (Meta Platforms Inc.) as an optional communication channel.
- Messages sent via WhatsApp are end-to-end encrypted.

For more information about how WhatsApp processes personal data, please see their privacy policy: <https://www.whatsapp.com/legal/privacy-policy>

Online Directories

- I am listed on multiple online therapist directories, including Counselling Directory, NeuroDirect, London Counselling & Therapy Directory.
- When you contact me through these directories, your enquiry is sent to me via the directory's platform.
- These directories may collect and process your personal information (such as your name, email address, and message) in accordance with their own privacy policies.

- Once your enquiry reaches me, your information is handled in accordance with this Privacy Policy.

Client Records System

- I use **TherapyLock**, a secure, encrypted client records system designed specifically for UK counsellors and psychotherapists.
- TherapyLock provides encrypted storage for session notes and client records, secure appointment management, and compliance with UK data protection laws.
- All client data stored in TherapyLock is encrypted and accessible only by me through secure login credentials.

For more information, see TherapyLock's privacy policy: <https://therapylock.co.uk/privacy>

Professional Supervision

- As a registered member of the BACP, I am required to participate in regular professional supervision sessions.
- During supervision sessions, I may discuss my counselling work; however, no personal identifying information is shared in these sessions and only anonymised case material is shared.
- My supervisor is a qualified professional who is also bound by the same confidentiality obligations and professional ethical framework as I am.

Who I Share Information With

- I will keep your personal information confidential and will never sell your personal data to anyone.
- Your information will not be sold or shared with third parties for marketing purposes.

- I may, under very specific circumstances, share your information with other professionals as required by UK law or to safeguard your wellbeing, or the wellbeing of others.
- These circumstances are set out in the counselling agreement that we agree at the start of our counselling relationship.

How Long I Keep Information

- I keep your personal data only for as long as is necessary to fulfil the purpose for which it was collected and as set out by legal and professional requirements.
 - **Website or email enquiries that do not lead to therapy:** 1 year
 - **Therapy records** (including contracts, assessments, session notes and correspondence): 5 years - BACP and insurance requirements
 - **Financial records:** 6 years - HMRC requirements.
- Client session records are coded (anonymised) and kept separate from contact details.
- All records, whether physical or electronic, are securely disposed of at the end of the retention period.

Security

- Reasonable technical and organisational measures are used to help protect personal information from unauthorised access, misuse, loss or disclosure.
- All records are stored securely and accessed only by me
- Electronic records are password-protected and stored on encrypted devices or secure cloud services compliant with UK data protection standards
- TherapyLock provides encrypted storage for all client records
- Google Meet uses encryption to protect data in transit for online sessions
- WhatsApp Business messages are end-to-end encrypted

Your Rights Under UK GDPR

You have the following rights regarding your personal data:

- **Right to be informed** about how I collect and use your personal data.
- **Right of access:** You can ask for a copy of any personal information that I hold about you. I will respond within one calendar month (31 days).
- **Right to rectification:** You can ask me to correct personal information that is inaccurate or incomplete.
- **Right to erasure:** You can ask me to delete your personal information, except where I need to keep records for professional indemnity insurance purposes or to comply with legal obligations.
- **Right to restriction of processing:** You can ask me to limit how I use your personal information.
- **Right to object to processing:** You can object to the processing of your personal data for certain reasons.
- **Right to data portability:** You can ask me to transfer the personal information you provided to another provider.

How to Make a Data Protection Rights Request

- If you **make a request**, I will respond to you without undue delay and in any event within one calendar month (31 days).
- To make a data protection rights request, please contact me at:
openfields.affirmingpractice@gmail.com
- Please make clear in the email subject line that you are making a request using your rights under UK GDPR

How to Make a Data Protection Complain

- If you have any concerns about my use of your personal information, you can make a data protection **complaint to me** at: openfields.affirmingpractice@gmail.com.

Please make clear in the email subject line that you are making a complaint under UK GDPR.

- If you remain unhappy with how I've used your data after raising a complaint with me, you can also **complain to the ICO:**

- Address: *Information Commissioner's Office
Wycliffe House, Water Lane
Wilmslow, Cheshire, SK9 5AF*

- Helpline number: 0303 123 1113

- Website: www.ico.org.uk/make-a-complaint

- You also have the **right to raise concerns with the BACP** if you believe I have not adhered to their Ethical Framework.

Contact details for the BACP can be found at www.bacp.co.uk

Changes to This Policy

- I may update this Privacy Policy from time to time to reflect changes in my practice or legal requirements.
- The updated version will be available on my website with a new "Last updated" date.