Reaching Minds

A safe place to explore, talk and be heard

Reaching Minds Counselling — Privacy Policy

Last updated: 27 November 2026

This policy is general information based on ICO guidance and the practice of other UK counsellors. It is not legal advice. If you want advice on a specific legal question, speak to a solicitor.

Who we are

Reaching Minds Counselling is the counselling practice of Catherine Prosser, a BACP-accredited counsellor, based in Penkridge, Stafford. Reaching Minds is run as a sole trader.

Catherine Prosser is the data controller for the personal information described in this policy. That means she decides why and how your personal information is used.

Contact her about your information at: Email: reachingminds.counselling@gmail.com — Phone: 07857 194625 — Practice: Reaching Minds Counselling, Penkridge, Stafford.

ICO registration number: ZA776157.

This policy explains what personal information we collect, why we use it, who we share it with, how long we keep it, and your rights. It applies to people who enquire about counselling, people who receive counselling, and visitors to our website, reachingminds.uk.

We follow the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the Data (Use and Access) Act 2025, and the BACP Ethical Framework.

1. What personal information we collect

When you enquire or book: your name, email address and phone number; what you tell us in your message or enquiry form, and any information you give us to arrange a first session.

When you become a client: your name, date of birth, address, email address and phone number; emergency contact details; GP details; your counselling agreement and any consent forms you sign; payment and invoicing information, including the amount paid and the date of payment — clients pay by bank transfer, processed by Catherine Prosser; brief, factual session notes, appointment and attendance records, and any correspondence between us about your counselling. Audio recordings, used only to create session notes as described in the session recording section below, are not stored.

Information you share in sessions: what you choose to tell us in counselling, including information about your health and emotional wellbeing, relationships and personal circumstances. This is special category data (see section 3), and we treat it with extra care.

When you visit our website: information you give us through the contact form (name, email address, phone number and your message); technical information such as your IP address and how you use the site, collected through cookies and similar technologies (see section 8).

We collect information directly from you. We do not buy personal information from anyone else.

2. How we use your information, and our lawful basis

Under UK GDPR we must have a lawful basis for each use of your information.

- Reply to enquiries and arrange a first session — Article 6(1)(b) contract (pre-contract steps); Article 6(1)(f) legitimate interests in running the practice.
- Provide counselling and keep brief session notes — Article 6(1)(b) contract.
- Keep records, manage appointments and administer the practice — Article 6(1)(f) legitimate interests.
- Take and record payments, and keep invoices — Article 6(1)(b) contract; Article 6(1)(c) legal obligation.
- Share information to protect you or someone else from serious harm — Article 6(1)(c) legal obligation; Article 6(1)(d) vital interests.

- Deal with a complaint about your information — Article 6(1)(c) legal obligation.

We do not use your information for marketing, and we do not sell, rent or trade it. We do not use automated decision-making or profiling that has a significant effect on you.

3. Special category data — health information

Information about your physical or mental health, and about your emotional wellbeing, is special category data under UK GDPR. It needs an extra legal condition as well as a lawful basis.

We rely on: (1) your explicit consent — Article 9(2)(a) UK GDPR. You will be asked to give explicit consent, in writing in your counselling agreement and intake form, for us to keep and use health information for the purpose of providing counselling. You can withdraw that consent at any time (see section 7), although withdrawing it may mean we cannot continue to provide counselling; and (2) provision of health or social care — Article 9(2)(h) UK GDPR, with the conditions in Schedule 1, paragraph 2 of the Data Protection Act 2018. Counselling is a health-related service provided by a practitioner bound by a duty of confidentiality under the BACP Ethical Framework.

Where we must share information to protect someone from serious harm, we may also rely on the safeguarding condition in Schedule 1, paragraph 18 of the Data Protection Act 2018, and on Article 9(2)(c) (vital interests).

Electronic session notes are kept in Upheal and paper notes in a locked filing cabinet, for the retention periods in section 6.

I will only record with your consent, given in writing in your counselling agreement and intake form. You can ask for a session not to be recorded, and I will take handwritten notes instead. For children and young people, consent is given by a parent or guardian, with a young-person line where appropriate.

The audio is processed by Upheal to generate session notes. Audio storage in Upheal is not turned on, so the audio is not stored. I review every note before it is saved. Upheal is GDPR/DPA compliant and SOC 2 certified, does not sell data, and does not train its AI on your data unless both you and I consent (and then only de-identified data).

Sessions are recorded by audio only (voice recording only), to help me make accurate session notes. There is no video recording. I record in person, and on Zoom or Teams. I do not record on FaceTime — FaceTime sessions are written notes only, with no recording.

Session recording and notes made with Upheal

4. Who we share your information with

We share your information only where we need to, as follows:

- Our clinical supervisor — for professional supervision, which is a BACP requirement. Session material is discussed using your first name only, and your supervisor is bound by the same duty of confidentiality.
- Your GP, emergency services or other health professionals — only with your consent, or where we believe you or someone else is at serious risk of harm.
- Safeguarding authorities — for example children's services or the police, where we believe a child or vulnerable adult is at risk, or where the law requires it.
- The BACP or our professional indemnity insurer — only if a complaint or claim is made, and only the information needed for that purpose.
- Our accountant / HMRC — financial information only, where required by law.
- Organisations that handle data on our behalf: Gmail / Google (email), Wix (website and contact form), Google Calendar (appointments), Royal Bank of Scotland (bank transfer payments), and Upheal (session notes system).

These providers act on our instructions and must keep your information secure. Some of them are based outside the UK, or store information outside the UK (for example Google and Wix). Where information is transferred outside the UK, we rely on the safeguards UK GDPR requires, such as an adequacy decision or standard contractual clauses in the provider's terms.

We will not share your information with anyone else without your consent, unless the law requires it or it is necessary to protect you or someone else from serious harm.

5. Confidentiality and when it may be broken

Everything you tell us in counselling is confidential. We will not share it except: (1) where you ask us to, or you give your consent; (2) where we are legally required to do so; (3) where we believe a child or vulnerable adult is at risk of harm; (4) where we believe you are at risk of serious harm, or in need of the emergency services; (5)

where disclosure is permitted by law and necessary to protect our interests, for example to defend a legal claim.

We will tell you about any disclosure we have to make, wherever it is safe and lawful to do so.

6. How long we keep your information

We keep information only for as long as we need it, and then we securely delete or destroy it.

- Counselling records, including session notes, agreements and correspondence (adults) — 7 years after our last session. Professional, legal and insurance requirements.
- Counselling records for clients who were under 18 — until they are 25 years old, or 7 years after our last session, whichever is longer. To allow time to bring a claim after reaching adulthood.
- Enquiries from people who do not become clients — 12 months after our last contact. To allow time to reply and follow up.
- Financial records (invoices, payment records) — 6 years. HMRC / tax requirements.
- Text messages / emails — 12 months.

At the end of the retention period, paper records are shredded and electronic records are securely deleted.

7. Your rights

Under UK GDPR you have the right to: be informed; access — to ask for a copy of the personal information we hold about you (a subject access request); rectify — to ask us to correct information that is inaccurate or incomplete; erase — to ask us to delete your information, in certain circumstances; restrict — to ask us to limit how we use your information, in certain circumstances; object — to object to our use of your information where we rely on legitimate interests; portability — to receive your information in a structured, commonly used format, and to have it transferred to another organisation, where this applies; and withdraw consent — where we rely on your consent, you can withdraw it at any time. Withdrawing consent does not affect anything we have already done with your information, and it may mean we cannot continue to provide counselling.

To use any of these rights, contact Catherine Prosser at reachingminds.counselling@gmail.com or on 07857 194625. We will respond within one month. If your request is complex, or you have made several requests, we may take up to two more months, and we will tell you within the first month if we need extra time and why. We may need to check your identity first, so that we do not give your information to the wrong person.

Erasure and counselling records: you can ask us to delete your information, but we may need to keep counselling records until the end of the retention period in section 6, where we must keep them to meet professional record-keeping standards, to respond to a complaint or legal claim, to comply with the law, or because our professional indemnity insurer requires it. We will explain this to you if it applies.

8. Cookies and our website

Our website is hosted by Wix. When you visit reachingminds.uk, Wix may use cookies — small files stored on your device — for example to make the site work properly and to understand, in aggregate, how visitors use the site. The site uses essential Wix platform cookies and Wix Analytics only. Google Analytics was disconnected from the site on 27 November 2026 and is no longer in use. The site does not use any advertising, marketing or social-media cookies, and no Facebook Pixel, Google Ads or TikTok Pixel is connected. Instagram and Facebook appear only as links in the footer; they do not set cookies on our site. No map, video or social feed is embedded on the site.

There is no cookie banner on the site. Under the Privacy and Electronic Communications Regulations (PECR), as amended by the Data (Use and Access) Act 2025 from 5 February 2026, consent is no longer required for cookies used solely for statistical purposes (first-party analytics to improve the site), provided visitors are given clear information and a free, simple way to object. Consent is still required for advertising and marketing cookies, which this site does not use. Strictly necessary cookies never need consent. You can object to Wix Analytics, and change your browser settings to block or delete cookies, although this may affect how the site works. You can also contact us at reachingminds.counselling@gmail.com if you would like us to note your objection.

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9. Children and young people

We work with children and young people as well as adults. We take extra care with their information. We will explain, in words they can understand, what information we keep and why, and who we might share it with. Where a child is old enough to understand (often called Gillick competence), we will normally seek their own consent to counselling and to how we use their information. Where a child is not old enough to understand, we will seek consent from a person with parental responsibility, unless doing so would be against the child's best interests (for example in a safeguarding situation). For online services offered directly to a child, UK GDPR sets the age at which a child can give their own consent at 13. A preventive or counselling service is an exception to the rule that parental consent is needed under 13, but we will still assess each young person's understanding. A parent or guardian does not automatically have a right to see a young person's counselling records. We will discuss confidentiality arrangements with the young person, and where appropriate with their parent or guardian, before therapy begins.

10. How we keep your information safe

We take reasonable steps to keep your information secure, including: electronic session notes are kept in Upheal; paper notes are stored in a locked filing cabinet and kept for the appropriate retention time, then shredded; email is via Gmail; appointments are via Google Calendar. Access is limited to Catherine Prosser, except as described in section 4. We will tell you, and the ICO where required, if there is a data breach that is likely to put your rights and freedoms at risk.

11. Complaints about your information

If you are unhappy with how we have handled your personal information, please tell us first so we can try to put it right. Contact Catherine Prosser at reachingminds.counselling@gmail.com or on 07857 194625.

Under the Data (Use and Access) Act 2025, from 19 June 2026 you have a legal right to complain to us as data controller. We will acknowledge your complaint within 30 days of receiving it, investigate it without undue delay, keep you informed, and tell you the outcome.

If you are still not satisfied, you can complain to the Information Commissioner (ICO): Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF — Helpline: 0303 123 1113 — Website: https://www.ico.org.uk.

You normally need to raise your complaint with us first before the ICO will look into it.

12. Changes to this policy

We may update this policy from time to time, for example if the law changes or if how we work changes. The current version will always be on our website, with the date it was last updated at the top.

Last updated: 27 November 2026

Contact: Catherine Prosser, Reaching Minds Counselling, Penkridge, Stafford — reachingminds.counselling@gmail.com — 07857 194625