

PRIVACY AND DATA-PROTECTION STATEMENT

Client information | Last reviewed: 4 September 2026

This statement explains how Life in Action Counselling & Psychotherapy Ltd collects, uses, stores and protects personal information. It also explains the rights available to clients and how to raise a data-protection concern or complaint.

1. Who we are

Life in Action Counselling & Psychotherapy Ltd provides counselling, psychotherapy, clinical supervision, coaching and related professional services. For the purposes of UK data-protection law, Life in Action Counselling & Psychotherapy Ltd is the data controller and is responsible for deciding how and why personal information is collected, used, stored and protected.

You may contact us through the contact details published at www.lifeinaction.co.uk.

2. Our commitment to confidentiality

We recognise that clients may share highly personal and sensitive information during therapy. We are committed to protecting clients' privacy and maintaining confidentiality in accordance with UK data-protection law and applicable professional and ethical standards.

Personal information will only be collected and used where it is relevant and reasonably necessary for the provision of our services, the protection of clients or others, or the fulfilment of our professional and legal responsibilities.

3. Information we may collect

Depending upon the service being provided, we may collect:

- names, addresses and contact details;
- dates of birth and relevant identity information;
- emergency-contact and next-of-kin details;
- referral, assessment and appointment information;
- invoices, payment records and limited financial information;
- relevant health, wellbeing and medication information;
- information about relationships, family circumstances and personal history;
- risk, safeguarding and welfare information;
- correspondence and communications;
- therapeutic agreements, questionnaires and minimal clinical records where appropriate; and
- information required by an insurer, employer, agency, school or other referring organisation where it is funding or arranging the service.

Information will normally be obtained directly from the client. It may also be supplied by a parent or person with parental responsibility, authorised representative, referrer, insurer, employer, school, healthcare professional or another relevant third party.

4. Minimal record-keeping

Life in Action follows the principle of data minimisation. This means that we seek to collect and retain only the information that is adequate, relevant and reasonably necessary.

We do not routinely keep detailed accounts or transcripts of therapy sessions. Routine records are kept to a minimum and may include appointment details, attendance, payments, therapeutic agreements, assessments, significant communications and brief information required to support safe, ethical and effective

practice.

Additional factual records or notes may be created where there is a substantial clinical, safeguarding, professional or legal reason to do so. This may include concerns relating to:

- the protection or welfare of a child or vulnerable adult;
- serious harm, or a significant risk of serious harm, to the client or another person;
- abuse, neglect, exploitation or safeguarding concerns;
- terrorism, serious organised crime or other serious criminal activity;
- a legal requirement, court order or request from an authorised public body;
- a serious complaint, professional concern or insurance matter; or
- another substantial reason connected with protecting a person, maintaining public safety or meeting a legal or professional responsibility.

Wherever it is safe, lawful and reasonably practicable, the reason for creating such a record or considering the disclosure of information will be discussed with the client beforehand.

There may be exceptional circumstances in which prior discussion is not possible or appropriate. This could occur where there is an immediate risk of harm, where discussion could increase the risk to a child, vulnerable adult or another person, where it could prejudice the prevention or investigation of serious crime, or where disclosure without prior notification is required or permitted by law.

Any decision to create additional records or disclose information will be considered carefully. Only information that is relevant and necessary will be recorded or shared, and the reasoning behind the decision will be documented where appropriate.

5. Why we use personal information

Personal information may be used to:

- respond to enquiries, assess suitability and arrange appointments;
- provide counselling, psychotherapy, supervision, coaching or training;
- manage the professional relationship and communicate with clients;
- maintain appropriate clinical, financial and business records;
- process payments and manage accounts;
- protect the health, safety and welfare of clients and others;
- meet safeguarding, insurance, contractual, ethical and legal responsibilities;
- respond to complaints, information requests or legal claims; and
- maintain and improve the safety and quality of our services.

6. Lawful basis for using information

Depending upon the circumstances, we may rely upon one or more lawful bases under the UK GDPR: contract, legal obligation, legitimate interests, vital interests or consent.

Counselling and therapy information may include health and other special-category data. Where such information is processed, we will also identify an appropriate condition under Article 9 of the UK GDPR. This may include processing necessary for the provision or management of health or social-care treatment by a professional subject to confidentiality obligations, explicit consent, protection of vital interests, or the establishment, exercise or defence of legal claims.

Consent is not necessarily the lawful basis for every aspect of the therapeutic relationship. Where processing is based specifically upon consent, the client may withdraw that consent at any time. Withdrawal will not affect processing that took place lawfully before consent was withdrawn.

7. Confidentiality and sharing information

Personal information will not ordinarily be shared without the client's knowledge or permission. Information may, however, be shared where it is necessary and proportionate:

- to address a serious or immediate risk of harm;
- to protect a child or vulnerable adult;
- to prevent or report serious crime where an appropriate legal basis exists;
- to comply with a legal obligation or valid court order;
- to respond to a properly authorised request from a statutory body;
- to obtain professional or legal advice;
- to notify or respond to an insurer concerning a complaint or legal claim; or
- where the client has requested or authorised the disclosure.

Where disclosure is being considered, its necessity, proportionality and potential consequences will be assessed. Wherever possible, only the minimum information necessary for the particular purpose will be shared.

Clinical supervision may be used to support safe and ethical practice. Information discussed in supervision will be limited and, wherever reasonably possible, identifying details will be removed or minimised. Supervisors are also required to maintain confidentiality.

Administrative and technology providers may process limited information on our behalf, including providers of email, secure record storage, appointments, accounting, payment processing and online therapy platforms. Appropriate confidentiality and data-processing arrangements will be used where required.

8. Security and storage

Reasonable technical and organisational measures are used to protect personal information against unauthorised access, loss, disclosure, alteration or destruction. Depending upon the format of the information, these measures may include password protection, device security, access controls, encryption, secure digital storage and locked physical storage.

Clients should be aware that ordinary email and text messaging cannot always be guaranteed to be completely secure. Clients are therefore asked not to include unnecessary sensitive information in routine messages.

Where a technology provider processes information outside the United Kingdom, we will take reasonable steps to ensure that an appropriate lawful transfer mechanism and suitable safeguards are in place.

9. Retention and deletion

Client records will normally be retained for three years from the date of the client's final session or last substantive contact with Life in Action. At the end of the retention period, records will be securely destroyed or permanently deleted.

Information may be retained for longer where this is reasonably necessary to meet a legal, regulatory, safeguarding, insurance or contractual requirement, or for the establishment, exercise or defence of a legal claim. Where a different retention period applies, only information that remains necessary will be retained.

Records relating to children may require particular consideration because of safeguarding, contractual, insurance or legal requirements. The appropriate retention period will therefore be reviewed in light of the circumstances and applicable obligations. Financial and taxation records may be retained separately for the period required by law.

10. Individual data-protection rights

Depending upon the circumstances and the lawful basis being used, individuals may have the right to:

- be informed about how their information is used;
- request access to their personal information;
- request correction of inaccurate or incomplete information;
- request erasure of information in certain circumstances;
- request restriction of processing;
- object to particular uses of their information;
- request transfer of information in certain circumstances; and
- withdraw consent where processing is based upon consent.

These rights are not absolute and may be restricted where an exemption or another lawful reason applies.

Requests will be considered individually and responded to within the applicable legal timeframe. Reasonable proof of identity or authority may be requested where necessary to protect the information concerned.

Life in Action does not use client information to make solely automated decisions that produce legal or similarly significant effects.

11. Data-protection concerns and complaints

If you have a concern or complaint about how Life in Action has collected, recorded, stored, used, shared or protected your personal information, please contact us using the contact details at www.lifeinaction.co.uk.

You do not need to use a particular form or wording. However, providing your name, contact details and a clear explanation of your concern will help us investigate it effectively. We may request reasonable evidence of identity or authority where this is necessary to protect personal information.

We will acknowledge receipt of a data-protection complaint within 30 days. We will take appropriate steps to investigate it without undue delay, keep you reasonably informed of its progress and provide a clear explanation of the outcome. An appropriate record will be kept of the complaint, investigation, outcome and any action taken.

You may also complain directly to the Information Commissioner's Office at any time. You do not have to complete our complaints process before contacting the ICO.

Information Commissioner's Office
Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
Telephone: 0303 123 1113
Website: www.ico.org.uk

12. Changes to this statement

This statement will be reviewed periodically and may be updated to reflect changes in our services, professional requirements, technology or data-protection law. The current version will be made available to clients upon request and, where applicable, published on our website.