



HEALING STATE

COUNSELLING AND
PSYCHOTHERAPY

Privacy & Cookie Policy

Last updated: August 2026

1. Your Privacy

Healing State Counselling and Psychotherapy respects your privacy and is committed to protecting the personal information you share with me. I handle personal information in accordance with current and applicable UK data protection law and adhere to the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and the Privacy and Electronic Communications Regulations 2003 (PECR), as amended.

Counselling and psychotherapy can involve deeply personal and sensitive information. I therefore take confidentiality, privacy and security seriously and only collect, use, share and retain personal information where there is a lawful and appropriate reason to do so.

This privacy policy explains how I handle personal information when you use my website, make an enquiry, become a client, or receive individual or couples counselling online or face-to-face. It should be read alongside the counselling agreement or terms of working provided before therapy begins.

2. Data Controller

Karen Hegarty, trading as Healing State Counselling and Psychotherapy, is the data controller responsible for deciding how personal information is collected, used, stored, protected and processed in connection with the practice.

- Email: contact@healingstatecounselling.com
- ICO registration number: ZB371128

3. Information Collected

I may collect your name, contact details, date of birth, emergency contact information where appropriate, appointment details, enquiry information, information necessary to provide counselling or psychotherapy, relevant information you choose to share about your wellbeing and circumstances, brief clinical or session notes, correspondence, payment information and information contained as part of the counselling agreement.

You do not need to provide detailed health or therapeutic information when making an initial enquiry. Please avoid sending highly sensitive information by ordinary email, text or a website contact form unless necessary.

Most information is collected directly from you. I may sometimes receive information from a partner in couples counselling, an emergency contact, a referring professional, or another person or organisation where you have authorised information sharing or another lawful basis applies.

4. Lawful Basis for Processing Your Information and Special Category Data

Under UK data protection law, I must have a lawful basis for processing your personal information. This may include **contract**, where processing is necessary to arrange and provide your counselling or psychotherapy and manage the professional agreement between us; **legal obligation**, where I process and retain information where legally required to do so; and **legitimate interests**, where I may process limited personal information necessary to safely and professionally run my practice and maintain appropriate records.

During counselling, you may share personal and sensitive information about your physical or mental health, experiences and circumstances that meet the legal definition of special category data which has additional protection under the UK GDPR. Where I process special category data, I will only do so where I have both an appropriate **Article 6 lawful basis** and an **Article 9 condition** under the UK GDPR.

For the purposes of providing Counselling and Psychotherapy, the condition for processing special category personal information is for the purpose of the ‘provision of health treatment’, as I handle health information, including mental health information, during Counselling and Psychotherapy sessions. This is necessary for the provision of confidential Counselling and Psychotherapy for the performance of the professional agreement between Counsellor/Psychotherapist and client.

Safeguarding, serious-risk situations and legal matters will be managed in accordance with the circumstances and applicable law.

I do not use counselling or health information for advertising, marketing, profiling or automated decision-making.

5. Why Information Is Used

- Responding to enquiries and arranging appointments.
- Providing and managing counselling or psychotherapy.
- Maintaining appropriate professional records.
- Professional supervision and safe, ethical practice.
- Managing payments, accounts and tax obligations.
- Safeguarding and responding to serious risk.
- Handling complaints, insurance matters or legal claims.
- Protecting the website, communications and information systems.

I need sufficient identity, contact, appointment and relevant therapeutic information to manage the counselling relationship safely. If reasonably necessary information is not provided, I may be unable to offer, continue or safely manage the service.

I do not sell, rent or exchange client information with third parties for marketing purposes.

I do not use your counselling information to build marketing profiles or target you with advertising.

6. Confidentiality and disclosure

Confidentiality is fundamental to counselling and psychotherapy. I will keep information you share with me confidential and will not normally disclose information about you without your knowledge and permission. There are, however, circumstances when confidentiality may need to be limited.

These may include:

- Where you authorise information to be shared with another professional or individual.
- Where disclosure is required by law, court order or another valid legal process.
- Where there is a serious concern about your safety or another person's safety, where disclosure is necessary to prevent or respond to serious harm, including safeguarding concerns, or where disclosure is in the public interest or necessary for public protection.
- Where limited information is necessary to be shared for professional supervision. Client information shared will be anonymised.
- Where I am seeking advice or guidance, or where required to comply with professional, legal, ethical, regulatory or insurance requirements.
- Where information is necessary for a complaint, claim or professional-body process.
- Where information is required under a Clinical Will or professional contingency arrangement following my death, serious illness or incapacity.

Where disclosure is necessary, I will seek to share only the minimum information reasonably required. Where safe and appropriate, I will normally discuss a proposed disclosure with you beforehand.

These limitations are consistent with the ethical responsibilities of counselling and psychotherapy. BACP guidance recognises confidentiality as fundamental while also recognising circumstances involving serious harm, safeguarding, legal requirements and professional supervision.

7. Professional Supervision

I undertake professional supervision as part of safe and ethical practice.

Supervision provides an important opportunity to reflect on my therapeutic work, consider ethical and clinical issues, and ensure that I am working safely and appropriately with each client.

Where client work is discussed in supervision, the information is discussed in an anonymised or non-identifying way and names and direct identifiers are not used. Information is minimised and shared only to the extent necessary for supervision. My supervisor is subject to appropriate professional confidentiality obligations.

8. Couples Counselling

In couples counselling, the therapeutic relationship is with the couple as a whole.

I will discuss the boundaries of confidentiality with both partners before or at the beginning of couples counselling so that everyone understands how information shared during the work will be handled.

Where either partner communicates with me individually in relation to the couples work, information may need to be considered in the context of the joint therapeutic relationship.

I aim to maintain fairness, openness and trust between both partners.

I do not routinely act as a confidential intermediary for one partner against the other.

There may be exceptional circumstances where information shared individually needs to remain confidential, particularly where disclosure could create a significant risk to someone's safety. Any such situation would be considered carefully and, where appropriate, discussed in professional supervision.

Each partner has their own data protection rights. Because joint records may contain information about both partners, a request for access or disclosure may require information about the other partner to be withheld or redacted where appropriate.

9. Online and Face-To-Face Counselling

Online Counselling: Recordings and Transcriptions

Where counselling or psychotherapy is provided online, sessions take place using Zoom.

I provide the client with the Zoom meeting link for their scheduled appointment. For confidentiality and security reasons, I do not join counselling sessions using Zoom links provided by clients.

Zoom counselling sessions are not recorded by Healing State Counselling and Psychotherapy.

I do not use Zoom recording, automated transcription, AI-generated meeting summaries or similar functions during counselling sessions.

No audio or video recordings of counselling sessions are retained by me.

Clients are also asked not to record, screenshot, photograph or transcribe sessions, including through Zoom or another device, unless this has been specifically discussed and agreed with me in advance.

I take reasonable steps to conduct online counselling in a private and confidential environment. Clients are asked to do the same by joining sessions from a private space where they cannot reasonably be overheard or interrupted.

The use of Zoom does not change the confidential nature of the therapeutic relationship.

Face-To-Face Counselling

I provide face-to-face counselling at Bearsden and Milngavie Therapy Centre. I remain responsible for the personal information that I collect as part of my practice. The therapy centre may have its own separate privacy policies covering information that they collect or process independently of my practice.

I will not share your counselling information with the therapy centre.

Any information that I disclose to another person or organisation will only be disclosed where there is an appropriate lawful, ethical or professional reason to do so.

10. Clients Aged 16 or 17 Years Old

Where counselling is provided to a client aged 16 or 17, the same principles of confidentiality and data protection apply. I will respect and protect the young person's privacy and data protection rights, taking into account their capacity, individual circumstances, the nature of the therapeutic work and safeguarding requirements. Information shared during counselling will normally remain confidential, subject to the limits of confidentiality explained at the start of therapy, including situations where information may need to be shared because of safeguarding concerns or a serious risk of harm. A parent or person with parental responsibility does not automatically have unrestricted access to a competent young person's counselling information or records. Any request for information will be considered in accordance with the young person's rights, capacity, confidentiality and applicable law.

11. Payments and Communications

Payments are made by bank transfer. I may retain information necessary to identify payments, manage appointments and meet accounting, tax and legal requirements. I do not collect or store debit or credit card details for counselling payments.

I may communicate by email, telephone, text message, Zoom or another agreed method. As a security measure, I have protected my emails with Advanced Email Security from my website provider, which helps protect my email from online threats, malware and viruses through URL defence, encryption and filtering. While I take these measures, no method of electronic communication can ever be guaranteed to be completely secure. As an additional security measure for your personal information, please avoid sending highly sensitive therapeutic information by ordinary email or text unless necessary.

12. Website Security, Protection, Encryption and Storage

I take the security and confidentiality of your personal information seriously and take appropriate technical and organisational measures to protect your personal information from accidental loss, unauthorised access, alteration, disclosure or destruction. Information is stored using password-protected systems and devices.

Measures used to secure, store and protect personal information include:

My website uses appropriate web security measures, including SSL/TLS encryption, HTTPS, daily malware scanning and monitoring, to help protect my website, contact forms and information when it is transmitted through the website.

As an additional security measure, I have in place Advanced Email Security, administered by my website provider, to help protect email communications, contact forms and personal information from unauthorised access.

Although reasonable safeguards are used, ordinary email and internet-based communication cannot be guaranteed to be completely secure.

Digital Data Handling

- Secure passwords or PINs are used on all devices with automatic screen locking. Only I can access these devices.
- All electronic digital records are stored on encrypted, password-protected systems.
- Client personal information is stored on a hard drive, which is kept in a safe when not in use.
- Encryption is used where provided by the device or services used.
- Digital information is securely deleted or destroyed at the end of its retention period.
- Software and systems used to access personal information are maintained and kept up to date.

Physical Data

- I keep brief paper client session notes where necessary, which are all kept securely in a locked filing cabinet when not in use. I am the only person who has access to the room the filing cabinet resides in.

Access to your information

- Access to client information is restricted to me as the Data Controller and practitioner and is protected through security measures, including password protection and physical security.
- Access is restricted except where access or disclosure is lawful, necessary and justified.

Sensitive Data Handling

I only collect and retain information that is relevant and necessary for providing counselling and psychotherapy and for meeting my professional, legal, regulatory and insurance responsibilities.

Sensitive counselling information is treated as confidential and is not used for advertising, profiling or marketing purposes.

I take particular care to minimise the amount of sensitive information recorded and only retain information that is necessary for appropriate professional record keeping.

Third-Party Services

I may use trusted third-party service providers where necessary to operate my practice, website and online counselling services.

These may include providers of:

- Website hosting and website services
- Email services
- Online counselling and communication services, including Zoom
- Secure technology or data-storage services
- Professional, accounting or administrative services where necessary

Where a third party processes personal information on my behalf, I take reasonable steps to ensure that appropriate data protection, confidentiality and security arrangements are in place.

International Data Transfers

To run my practice efficiently, I use trusted third-party service providers, including Google Analytics and Zoom, which may process or store personal information outside the UK, including in the United States.

Google Analytics is used to analyse website traffic and understand how visitors use my website. Google provides contractual and other safeguards for international transfers of personal information, in accordance with applicable data protection requirements.

Zoom is used to provide online video counselling. Zoom provides contractual data protection commitments and appropriate safeguards for international transfers of personal information, in accordance with applicable data protection requirements.

Where personal information is transferred outside the UK, I will ensure that an appropriate transfer mechanism or safeguard is in place in accordance with UK data protection law. I only use service providers that provide appropriate security measures and safeguards for the personal information they process on my behalf.

Where required under data protection law, I will ensure that appropriate contractual arrangements are in place with relevant data processors.

I do not sell, rent or exchange your personal information with third parties for marketing purposes.

13. Data Retention and Deletion

I retain personal information only for as long as necessary for the purpose for which it was collected, taking account of professional, legal, accounting, insurance and safeguarding requirements.

Any non-essential personal data is securely destroyed after the completion of our work together.

I retain counselling records, including initial assessment information, agreements, relevant correspondence, risk records and counselling notes for 7 years after the final counselling session, in accordance with my professional indemnity insurance guidance and taking account of relevant professional, legal and safeguarding requirements. At the end of this applicable period, records are securely destroyed or permanently deleted. This is subject to any specific lawful reason requiring longer retention, such as an insurer's requirements, a professional obligation, an ongoing complaint, or accounting, legal or other ongoing requirements.

This ensures that:

- I meet my accountability obligations under UK GDPR and maintain appropriate records of my processing activities.
- I can respond to any clinical or legal enquiries within applicable timeframes.
- I retain records for an appropriate period to allow me to respond to potential legal or contractual claims within applicable limitation periods under Scots law.
- I adhere to the ethical framework and record-keeping requirements of my professional body.

14. Website, Cookies and Google Analytics

The website may collect and use cookies or similar technologies which may assign a unique identifier to your device and are typically stored on your computer or other device. Information collected from cookies is used to evaluate and improve the effectiveness of my website and to improve your experience.

Where non-essential cookies are used, visitors can accept or refuse them and can change or withdraw their choice at any time through the website's cookie settings.

Google Analytics

My website uses Google Analytics, provided by Google, to help me understand how visitors use my website and to improve its content, performance and user experience.

Google Analytics may collect information such as pages visited, how visitors navigate the website, approximate location, device and browser information and other technical information. This information is used for website analytics and is not used by me to identify you as a counselling client.

I do not use Google Analytics to collect or record information that you disclose to me during counselling, and I do not use it to identify the individuals who contact me or receive counselling. Analytics data may, however, show which public pages on my website are visited, including pages relating to counselling topics.

Google Analytics is a non-essential analytics service and is only activated where you have given consent through the website's cookie settings.

Further information about how Google processes information can be found in Google's privacy information.

15. Your Data Protection Rights

Under the UK GDPR you have the following rights:

- **Access:** request a copy of the personal information held about you. This is known as a Subject Access Request (SAR). Requests can be made verbally and in writing.
- **Rectification:** ask for inaccurate or incomplete information to be corrected.
- **Erase:** request deletion where the right applies; this right is available in certain circumstances and subject to legal, professional and other requirements to retain records.
- **Restriction:** ask for processing to be restricted in certain circumstances.
- **Data Portability:** request eligible information in a suitable electronic format where the right applies.
- **Withdraw Consent:** where a specific activity is based on consent, withdraw it at any time.
- **Your Right to Object:** where processing is based on legitimate interests, you may have the right to object. Whether an objection must be upheld depends on the circumstances and applicable law.

Not every data protection right applies in every situation, and legal, safeguarding, third-party confidentiality or legal-claims considerations may affect what can be disclosed, erased or changed.

16. Data Protection Complaints

If you have any questions about how I use your personal information, or wish to exercise your data protection rights or have a concern or complaint about the way I have handled your personal information, please contact me by emailing contact@healingstatecounselling.com

I will acknowledge a data protection complaint within 30 days of receiving it, investigate it appropriately and provide you with a response without undue delay.

You also have the right to complain directly to the Information Commissioner's Office (ICO) at ico.org.uk if you are concerned about how your personal information has been handled. I would encourage you to contact me first so that I have the opportunity to address your concerns.

17. Data Breaches

If I become aware of a personal data breach, I will assess it, take appropriate steps to contain and remedy it, document the incident as required and comply with notification obligations under applicable data protection law. Where reporting to the Information Commissioner's Office or notifying affected individuals is legally required, I will do so within the applicable timescales.

18. Changes to Privacy and Cookie Policy

I may update this privacy policy to reflect changes in law, professional requirements, technology, services or the way personal information is processed. The latest version will be published on the Healing State Counselling and Psychotherapy website.

19. Contact

If you have any questions about the Privacy and Cookie Policy, how your personal information is handled, or wish to exercise any of your data protection rights, please contact:

- Karen Hegarty, trading as Healing State Counselling and Psychotherapy
- Email: contact@healingstatecounselling.com
- ICO registration number: ZB371128