

Sam Millen Psychotherapy

Data Privacy & Confidentiality Policy

Last updated: 24 July 2026

This policy explains how Sam Millen Psychotherapy ("the Practice", "I", "me", "we") collects, uses, stores, shares and protects personal information belonging to clients, prospective clients and website visitors. It applies to information collected in person, by phone, by email, through the practice website (millenpsychotherapy.net) – including where the website links directly to a messaging app or email to arrange an appointment – and via video-conferencing software or telephone where a session is delivered online.

This policy has been prepared to comply with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and the BACP Ethical Framework for the Counselling Professions.

1. Scope of this policy – who it applies to

Sam Millen Psychotherapy works with clients in two different ways, and your data protection rights differ slightly depending on which applies to you:

- **Private / direct clients:** if you have booked therapy directly with Samantha Millen (for example, via the website, phone or email, without going through a referring organisation), Samantha Millen is the Data Controller for your personal information. This policy applies to you in full.
- **Clients referred by a partner organisation:** if you have been referred for therapy through a partner organisation, that organisation is normally the Data Controller for your personal information, and Samantha Millen acts as a Data Processor, providing therapy services on their behalf under a written agreement with them. In this situation, the referring organisation's own privacy notice or data protection policy is the primary document governing how your data is used, and you should also refer to that. As their processor, Samantha Millen is contractually bound to protect your data to at least the standard set out in this policy, and to only use it for the purposes agreed with the referring organisation.

If you are unsure which of these applies to you, please ask – we are happy to clarify.

Regardless of which category applies, the confidentiality standards, security measures and BACP Ethical Framework principles described in this policy reflect how your information is handled in practice.

2. Who is responsible for your data

For private / direct clients – Data Controller: Samantha Millen, trading as Sam Millen Psychotherapy

For referred clients – Data Controller: The relevant referring organisation, with Samantha Millen acting as Data Processor

Qualification: BSc (hons) Integrative & Humanistic Psychotherapy

Professional registration: BACP – Membership No. 00753431

Email: millenpsychotherapy@gmail.com

Phone: 07837197127

Website: millenpsychotherapy.net

ICO registration number: ZB909306

Where Samantha Millen is the Data Controller, she is personally responsible for deciding how and why your personal data is processed, and for keeping it safe. Where she is acting as a Data Processor for a referring organisation, she processes your data only on their documented instructions and under the terms of their contract with her.

3. What personal information we collect

Depending on how you engage with the Practice, we may collect:

- Contact details: name, address, email address, telephone number, date of birth.
- Referral information: details provided by you, or by a referring organisation, including the reason for referral and number of sessions allocated.
- Health and therapy-related information: information you share in the course of therapy, including mental and physical health history, risk information, session notes, assessment outcomes, and progress notes.
- Payment information: bank details for the purposes of receiving payment (we do not store full card details).
- Communication records: emails, messaging app conversations, text messages and call/voicemail logs relating to arranging or conducting your therapy. Please note the website links directly to a messaging app and email for enquiries and booking, rather than using a dedicated booking system.
- Technical information: if you visit the website, standard technical information such as IP address, browser type and pages visited may be collected automatically (see Section 9, Cookies and Website Data).

Health and therapy-related information is “special category data” under UK GDPR and is treated with an enhanced level of protection, as set out in this policy.

4. Why we collect and use your information (purposes)

We use your personal information to:

- Assess suitability for therapy and arrange an initial consultation.
- Provide, plan and review psychotherapy sessions, including preparing case notes.
- Communicate with you about appointments, cancellations and administrative matters.
- Process payments and maintain financial records.
- Meet obligations to referring organisations, including reporting session numbers, completion of allocated blocks, and invoicing, where you have been referred by one of these organisations.
- Comply with legal, regulatory and professional obligations, including safeguarding duties and BACP Ethical Framework requirements.
- Maintain clinical supervision, in which anonymised or pseudonymised case material may be discussed to support the quality and safety of your care.

5. Our lawful basis for processing your data

For private / direct clients, where Samantha Millen is the Data Controller, we rely on the following lawful bases:

- Contract (Article 6(1)(b)): to provide therapy services you have engaged us to deliver.
- Legitimate interests (Article 6(1)(f)): for administrative purposes such as invoicing referring organisations, and to maintain accurate business records.
- Legal obligation (Article 6(1)(c)): where we are required to disclose information by law, for example in response to a court order or safeguarding referral.
- Vital interests (Article 6(1)(d)): where disclosure is necessary to protect your life or the life of another person in an emergency.

Because therapy notes are health data, we also rely on one of the following conditions under Article 9 of UK GDPR:

- Explicit consent (Article 9(2)(a)): you consent to the processing of health information as part of agreeing to therapy.
- Health or social care purposes (Article 9(2)(h)): processing that is necessary for the provision of health or social care treatment, carried out by, or under the responsibility of, a professional subject to a duty of confidentiality.

For referred clients, the lawful basis and Article 9 condition for processing are determined by the referring organisation as Data Controller, and are set out in their own privacy notice. Samantha Millen, as their processor, processes your data strictly in line with their documented instructions and the data processing terms in her contract with them, and remains bound by professional confidentiality at all times.

6. Confidentiality

Everything discussed in sessions is treated as strictly confidential in line with the BACP Ethical Framework. This confidentiality is not absolute and may need to be broken in the following limited circumstances:

- Where there is a serious and credible risk of harm to you or to another person.
- Where disclosure is required by law, for example a court order, or safeguarding obligations relating to children or vulnerable adults.
- Where anonymised material is discussed in clinical supervision, to support safe and effective practice. Supervisors are bound by the same confidentiality standards.
- Where you have referred to us via a partner organisation and limited information (such as attendance, session numbers, or completion of an allocated block) needs to be shared with that organisation for billing or care-coordination purposes, as agreed at referral.

Wherever practicable, we will discuss any decision to share information with you first, unless doing so would increase risk of harm.

7. Who we share your information with

We do not sell or rent your personal information. Information may be shared, only where necessary, with:

- Clinical supervisors, for reflective practice and quality of care (identifying details removed wherever possible).
- Referring organisations. Where you were referred to us by a partner organisation, they are the Data Controller for your information (see Section 1), and information such as attendance, session numbers, and completion of an allocated block is shared back with them for care coordination, funding authorisation and invoicing, as set out in our written agreement with them.

- Emergency services, GPs or safeguarding authorities, where there is a risk to life or a legal duty to disclose.
- Professional advisers, such as an accountant, solely for financial administration, and bound by confidentiality.
- IT and administrative service providers (for example, secure cloud storage, email or calendar providers, and virtual assistant support), acting under confidentiality agreements and only accessing the minimum information needed to perform their role.
- Regulators or legal bodies, such as the BACP or a court, where legally required.

Any third party who processes data on our behalf (a “processor”) is required to protect it to the same standard and is contractually bound not to use it for any other purpose.

8. How we store and protect your information

- Session notes are kept brief, focused on clinical relevance, and stored securely and separately from full identifying personal data wherever possible.
- Electronic records are stored using password-protected devices and secure, encrypted cloud storage (Microsoft OneDrive).
- Paper records, if any, are kept in a locked location accessible only to the Practice.
- Access to client records is restricted to Samantha Millen and, where relevant, bound administrative support acting under a confidentiality agreement.
- Financial and booking systems used to manage appointments are password protected and access-controlled.

9. How long we keep your information

We retain personal data only for as long as necessary for the purposes it was collected, and in line with professional guidance:

- Client session notes and records are typically retained for 7 years after the end of therapy for adult clients.
- Records relating to clients who were under 18 at the time of therapy are typically retained until the client's 25th birthday (or 26th if the client was 17 at the conclusion of therapy).
- Financial records (including invoices) are retained for at least 6 years to meet HMRC requirements.
- Where a longer retention period is required by law, regulation, insurance requirements, or an ongoing safeguarding or legal matter, data will be retained for that longer period.

After the applicable retention period, personal data is securely deleted or destroyed.

10. Cookies and website data

The Practice website displays a cookie consent banner on first visit, giving you the choice to Accept or Decline the use of cookies. Where cookies are used, they are for analysing website traffic and improving the website experience – for example, understanding which pages are viewed and how visitors navigate the site. This information is aggregated with data from other visitors and is not used to identify you personally.

- You can choose to decline cookies at any time via the banner, or by managing cookies through your browser settings.

- Cookies do not give us access to your computer, device, or any personal information beyond what you choose to share directly, such as through a contact form.
- Declining cookies may affect certain website features but will not prevent you from browsing the site or contacting the Practice.

Any contact form on the website is used only to respond to your enquiry and is not used for marketing without your separate, explicit consent. Our contact form is protected by Google reCAPTCHA, which helps prevent spam and automated abuse. reCAPTCHA may set its own cookies and process limited technical data in order to function; this operates independently of our own cookie banner and is governed by Google's Privacy Policy and Terms of Service.

11. International transfers

Client records and documents are stored using Microsoft OneDrive. Your information is normally stored and processed within the United Kingdom or European Economic Area. Where Microsoft or any other service provider (such as an email provider) stores data outside the UK, we ensure appropriate safeguards are in place, such as the provider being subject to UK adequacy regulations or approved standard contractual clauses.

If you contact us via a third-party messaging app to arrange an appointment, please note that such apps are provided by their own operators, and message content and metadata (such as when messages were sent) are handled in accordance with that provider's own privacy policy, which sits alongside this one and is outside our control. Some providers may process data outside the UK. If you would prefer not to use a messaging app, you are welcome to contact us by email or phone instead.

12. Your rights under UK GDPR

You have the following rights in relation to your personal information:

- Right to be informed – to know how your data is used (as set out in this policy).
- Right of access – to request a copy of the personal data we hold about you.
- Right to rectification – to ask us to correct inaccurate or incomplete data.
- Right to erasure – to ask us to delete your data, where there is no legal or professional obligation for us to keep it.
- Right to restrict processing – to ask us to limit how your data is used in certain circumstances.
- Right to data portability – to receive your data in a portable format, where applicable.
- Right to object – to object to processing based on legitimate interests.
- Rights relating to automated decision-making – we do not use automated decision-making or profiling.

To exercise any of these rights, please contact millenpsychotherapy@gmail.com. We will respond within one calendar month. Some rights, particularly around therapy notes, may be limited where disclosure could cause serious harm to you or another person, or would reveal information about a third party – in such cases we will explain our reasoning.

13. Right to complain

If you have concerns about how your personal information has been handled, please contact us first so we can try to resolve the issue. You also have the right to complain directly to the UK's data protection regulator:

Information Commissioner's Office (ICO) Website: ico.org.uk Helpline: 0303 123 1113

You may also raise concerns about professional conduct with the BACP: bacp.co.uk.

14. Changes to this policy

This policy may be updated from time to time to reflect changes in law, guidance, or practice. The current version will always be available on the practice website, and the "last updated" date at the top of this document will be revised accordingly.

15. Contact us

If you have any questions about this policy or how your data is handled, please contact:

Samantha Millen: Sam Millen Psychotherapy

Email: millenpsychotherapy@gmail.com

Phone: 07837197127

Website: millenpsychotherapy.net