



Privacy Notice - Hallows Therapy

Last updated: June 2026

Introduction

At Hallows Therapy, your privacy and confidentiality are important to me. I am committed to protecting your personal information and handling it in a safe, respectful and transparent way.

This Privacy Notice explains how I collect, use, store and protect your personal information when you contact me, engage in counselling or clinical supervision, and after our work together has ended.

I comply with relevant UK data protection legislation, including:

- The UK General Data Protection Regulation (UK GDPR)
- The Data Protection Act 2018
- The Privacy and Electronic Communications Regulations (PECR)

Please read this notice carefully. If you have any questions about how your information is handled, please contact me.

Data Controller

Sarah Moore
Hallows Therapy

Email: sarah@hallowstherapy.com

As the owner of Hallows Therapy, I am the Data Controller responsible for deciding how your personal information is collected, processed and stored.

Information I Collect

Depending on the service provided, I may collect the following information:

Personal Information

This may include:

- Name
- Date of birth

- Contact details (telephone number and email address)
- Address where required
- Emergency contact details
- GP details where relevant and appropriate
- Appointment and attendance information
- Payment and invoice information

Special Category Information

During counselling or supervision, I may collect information relating to:

- Mental health and emotional wellbeing
- Personal circumstances
- Relevant life experiences
- Physical health where relevant
- Risk and safeguarding concerns

This information is considered Special Category Data under UK GDPR and requires additional protection.

How I Collect Information

Information may be collected when you:

- Contact me by telephone, email or through my website
- Complete an assessment or counselling agreement
- Attend counselling or supervision sessions
- Provide information during our work together

Most information is provided directly by you.

Why I Use Your Information

I use your information to:

- Provide counselling and psychotherapy services
- Provide clinical supervision
- Assess your needs and support therapeutic work
- Maintain appropriate professional records
- Arrange and manage appointments
- Communicate with you about your sessions
- Maintain safe and ethical practice

- Meet professional, legal and insurance requirements
 - Address safeguarding concerns where necessary
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Lawful Basis for Processing Information

Personal Information

Under Article 6 UK GDPR, I process personal information because it is necessary for:

- Providing agreed counselling or supervision services
- Managing my professional practice
- Meeting legal and professional responsibilities

Special Category Information

Under Article 9 UK GDPR, I process health and wellbeing information because it is necessary for:

- Providing counselling and supervision services
 - Supporting safe and ethical therapeutic practice
 - Protecting your vital interests where there is a serious risk of harm
 - Establishing, exercising or defending legal claims where necessary
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Counselling Records and Clinical Notes

During our work together, I may keep brief professional notes to support safe and effective counselling practice.

Notes are:

- Factual and relevant
- Proportionate to the service provided
- Stored securely

Where possible, information discussed within clinical supervision is anonymised.

Confidentiality

Counselling and supervision are confidential spaces.

However, there may be exceptional circumstances where confidentiality cannot be maintained, including:

- A serious risk of harm to yourself or another person
- Safeguarding concerns involving a child or vulnerable adult

- Prevention or detection of serious crime or terrorism
- Legal requirements, including court orders
- Professional or regulatory requirements

Where possible, I will discuss any need to share information with you beforehand.

Clinical Supervision

As part of my professional responsibilities, I regularly attend clinical supervision with a qualified supervisor. Supervision supports safe, ethical and effective practice. Client information shared in supervision is anonymised wherever possible. My supervisor is bound by confidentiality and professional data protection responsibilities.

Supervision Records

I may keep brief professional supervision records to support safe and effective supervision practice.

Records are:

- Factual
- Relevant
- Proportionate
- Limited to information necessary for professional purposes

Supervision notes are not a transcript of sessions.

Where client material is discussed, I aim to record information in an anonymised and non-identifiable way wherever possible.

Confidentiality Within Supervision

Supervision discussions are treated as confidential within the limits of professional and ethical practice.

Information discussed in supervision will not normally be shared with others.

However, confidentiality may need to be limited where there are concerns relating to:

- Serious risk of harm to a client, supervisee or another person
- Safeguarding concerns

- Serious ethical or professional concerns
- Legal obligations or court requirements
- Professional, regulatory or insurance requirements

Where possible, I will discuss any need to share information with you before doing so.

Use of Supervision Records for Professional Accountability

As a supervisor, I have professional responsibilities to ensure that supervision is conducted safely and ethically.

In exceptional circumstances, relevant information may need to be shared with appropriate professional, regulatory or legal bodies where there is a serious concern about practice, safety or professional conduct.

Only necessary information will be shared.

How Your Information Is Stored

I take reasonable technical and organisational steps to protect your information.

Records may be stored using:

- Secure electronic systems
- Password-protected devices
- Locked physical storage where applicable

I take steps to protect information from:

- Unauthorised access
 - Loss
 - Misuse
 - Accidental disclosure
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Third-Party Service Providers

To support the running of Hallows Therapy, I use trusted service providers who may process information on my behalf.

Google Workspace

I use Google services for practice administration, email communication and secure storage of business information. Google may process information using servers located

outside the UK. Where this occurs, appropriate safeguards are relied upon to protect personal information in accordance with UK GDPR requirements.

GoDaddy

My website is hosted by GoDaddy. If you contact me through my website, information you provide may be processed through GoDaddy's website hosting services. GoDaddy has its own privacy and security arrangements in place. I take reasonable steps to ensure that third-party providers processing information on my behalf handle information securely.

Accountancy services

I utilised accountancy services to facilitate submissions required by HM Revenue & Customs (HMRC). Financial data may be shared with these accountancy services and HMRC as required by law. I expect accountancy services and HMRC to respect the security of your data and to treat it in accordance with the law and in line with their own privacy policies.

Online Counselling and Supervision

Where sessions take place online, I use appropriate secure platforms wherever possible. Although reasonable measures are taken, no online communication system can be guaranteed to be completely secure.

Sharing Your Information

Your information will not normally be shared without your knowledge.

Information may be shared where:

- You provide consent
- There is a serious risk of harm
- There are safeguarding concerns
- Disclosure is required by law
- Disclosure is required by a court order
- Disclosure is required for professional, regulatory or insurance purposes

Only information that is necessary and relevant will be shared.

International Transfers

Some service providers, including technology providers, may process information outside the UK. Where this occurs, appropriate safeguards will be used to ensure your information remains protected under UK GDPR.

Website Cookies

My website may use cookies and similar technologies to support website functionality and understand how visitors use the site.

Cookies may be used to:

- Improve website performance
- Monitor website usage
- Improve user experience

You can manage cookie settings through your browser. Links to other websites may be provided. I am not responsible for the privacy practices of external websites.

Retention of Records

I retain personal information only for as long as necessary and in line with professional, legal and insurance requirements.

As a general guide:

- Counselling records: retained for 7 years after the end of therapy
- Supervision records: retained for 7 years after supervision ends
- Enquiry information where therapy does not proceed: retained for up to 6 months
- Financial records: retained according to HMRC requirements

Records are securely deleted or destroyed when no longer required.

Data Breaches

If a personal data breach occurs, I will respond in accordance with UK GDPR requirements. Where required, this may include notifying the Information Commissioner's Office (ICO) and affected individuals.

Your Rights

Under UK GDPR, you have rights including:

- The right to be informed about how your information is used
- The right to access your personal information
- The right to request correction of inaccurate information
- The right to request deletion in certain circumstances
- The right to restrict processing in certain circumstances
- The right to object to certain processing
- The right to withdraw consent where consent is the lawful basis

Please note that some records may need to be retained to comply with legal, ethical, insurance or professional obligations and may therefore be exempt from deletion requests

Automated Decision Making

I do not use automated decision-making or profiling in relation to your personal information.

Data Protection Complaints Procedure

If you have concerns about how I collect, use or store your personal information, I encourage you to raise them with me first.

Making a Complaint

You can submit a complaint by contacting:

Sarah Moore - Email: sarah@hallowstherapy.com

Please provide as much information as possible regarding your concern.

What Happens Next

I will:

- Acknowledge your complaint within 7 working days
- Investigate the matter fairly and impartially
- Respond in writing, usually within 30 days
- Explain any action taken as a result of the complaint

If additional time is required, I will inform you and explain the reasons.

Escalating a Complaint

If you remain dissatisfied, you have the right to complain to the Information Commissioner's Office (ICO).

The ICO can be contacted via:

Website: <https://ico.org.uk/make-a-complaint/>

Telephone: 0303 123 1113

Contact

If you have any questions about this Privacy Notice, please contact:

Sarah Moore

Hallows Therapy

Email: sarah@hallowstherapy.com

This Privacy Notice is reviewed regularly and may be updated to reflect changes in legislation, professional guidance or practice arrangements.