



Data Protection and Record Retention Policy

Business Name: Guided by... Adelle

Practitioner: Adelle Northall

Professional Membership: Registered Member of the National Counselling and Psychotherapy Society (NCPS)

ICO Registration: Registered with the Information Commissioner's Office (ICO)

Role: Counsellor

Effective Date: 13 July 2026

Review Date: 13 July 2027

1. Purpose of this Policy

Guided by... Adelle is committed to protecting the privacy, confidentiality and security of personal information.

This policy explains how client records are collected, stored, used, retained and securely disposed of in accordance with:

- UK General Data Protection Regulation (UK GDPR).
- Data Protection Act 2018.
- Information Commissioner's Office (ICO) guidance.
- National Counselling and Psychotherapy Society (NCPS) Code of Ethical Practice.

The purpose of this policy is to:

- Protect client confidentiality.
- Ensure personal data is processed lawfully, fairly and transparently.
- Maintain accurate and secure records.
- Comply with legal, professional and insurance requirements.
- Explain how long records are retained and how they are securely destroyed.

This policy applies to all personal information collected in connection with counselling services provided by Guided by... Adelle.

2. Principles of Data Protection

Guided by... Adelle processes personal information in accordance with the principles of UK GDPR.

Personal data will be:

- Processed lawfully, fairly and transparently.
- Collected for specified and legitimate purposes.
 - Limited to information that is necessary.
- Accurate and kept up to date where appropriate.
 - Stored securely.
- Retained only for as long as necessary.
- Protected against unauthorised access, loss or misuse.

3. Information Collected

Depending on the service provided, records may include:

- Name.
- Date of birth.
- Contact details.
- Emergency contact details.
- GP details (where appropriate).
- Parent or guardian details (for children and young people).
 - Session dates and attendance.
 - Brief counselling notes.
 - Risk assessments.
 - Safeguarding records.
 - Correspondence.
- Invoices and payment records.
- Signed agreements and consent forms.

Only information necessary for the provision of counselling services will be collected.

4. Storage and Security

Guided by... Adelle takes appropriate measures to keep personal information secure.

This includes:

- Password-protected electronic devices.
- Secure email and digital storage where appropriate.
 - Locked storage for any paper records.
 - Restricted access to client information.
- Regular review of data security procedures.

Client information will only be accessed where there is a legitimate professional need.

5. Confidentiality

Client records are treated as confidential.

Information will not normally be shared without the client's knowledge or consent unless:

- There is a safeguarding concern.
- There is a serious risk of harm to the client or another person.
 - Disclosure is required by law or court order.
 - Disclosure is necessary to prevent serious crime.
- Professional or legal obligations require information to be shared.

Information will only be shared on a lawful, proportionate and need-to-know basis.

Further information is available in the Privacy Policy and Confidentiality Policy.

6. Record Retention

Records are retained in accordance with legal, ethical, professional and insurance requirements.

Adult Clients

Client records will normally be retained for seven (7) years after the final counselling session.

Children and Young People

Records relating to clients under the age of 18 will normally be retained until the client reaches 25 years of age, or 26 years of age if they were 17 when counselling ended, in accordance with current professional guidance and limitation periods.

Safeguarding Records

Safeguarding records will be retained in line with legal obligations, professional guidance and the nature of the safeguarding concern. Where appropriate, safeguarding records may be retained for longer than standard counselling records.

Financial Records

Financial records will normally be retained for six (6) years in accordance with HM Revenue & Customs (HMRC) requirements.

Where there is an ongoing legal claim, complaint, insurance matter or regulatory investigation, records may be retained for longer where necessary.

7. Secure Disposal of Records

When retention periods have expired, records will be securely destroyed.

This may include:

- Cross-cut shredding of paper records.
- Secure deletion of electronic records.
- Permanent removal from storage systems where appropriate.

Records will be disposed of in a manner that protects confidentiality and complies with data protection legislation.

8. Data Subject Rights

Under UK GDPR, clients have rights regarding their personal information.

These include the right to:

- Be informed about how personal information is used.
- Request access to their personal information.
- Request correction of inaccurate information.
- Request restriction of processing in certain circumstances.
 - Request deletion where applicable.
 - Object to certain types of processing.
- Lodge a complaint with the Information Commissioner's Office (ICO).

Some rights may be limited where legal or professional obligations apply.

Requests should be made in writing to:

Email: info@guidedbyadelle.co.uk

9. Data Breaches

Guided by... Adelle takes data security seriously.

If a personal data breach occurs, appropriate action will be taken, including:

- Assessing the nature and impact of the breach.
 - Taking steps to minimise any risk.
 - Recording the breach.
- Reporting the breach to the Information Commissioner's Office (ICO) where legally required.
- Informing affected individuals where there is a high risk to their rights and freedoms.

10. Professional Responsibilities

Guided by... Adelle will:

- Maintain secure client records.
 - Protect confidentiality.
- Process personal information lawfully.
- Keep records accurate and up to date where appropriate.
 - Maintain appropriate data security measures.
 - Review data protection procedures regularly.
- Complete ongoing professional development relating to confidentiality and data protection.

11. Policy Review

This Data Protection and Record Retention Policy will be reviewed annually or sooner if there are changes to legislation, professional guidance or working practices.

Policy Approval

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Approved by:

Adelle Northall

Signature:

Adelle Northall

Date Approved:

13 July 2026