

Fiona Ball Counselling

Privacy Policy — UK GDPR & DPA 2018 Compliant

Who we are

Fiona Ball is a private counselling practice run by Fiona Kate Ball. I am a qualified counsellor registered with BACP and committed to protecting your personal information in accordance with UK GDPR and the Data Protection Act 2018.

Contact details:

Email: contact@fionaballcounselling.com

Website: <https://www.fionaballcounselling.com/>

Data protection registration: Fiona Counselling is registered with the Information Commissioner's Office (ICO). Our registration number is ZA540452

What personal data we collect

When you contact me or engage in therapy, I may collect and process the following types of personal data:

Contact and identity information:

- Your name, address, telephone number, and email address
- Emergency contact details
- GP details

Health and therapy-related information:

- The reasons you are seeking therapy (presenting issues)
- Information about your mental and emotional wellbeing
- Relevant medical history you choose to share
- Session notes recording key themes and our therapeutic work together
- Risk assessments where appropriate

Important: Health and therapy-related information is classified as "special category data" under Article 9(1) of the UK GDPR. This type of data receives enhanced legal protection because of its sensitive nature, and I take additional care in how I collect, store, and process it.

Administrative information:

- Appointment dates and times

- Payment and invoicing records

How we collect your data

I collect personal data directly from you:

- When you first contact me by email or telephone to enquire about therapy
- During your initial assessment or intake session
- Throughout our therapy sessions as part of the therapeutic process
- Through any ongoing communication between sessions

I do not collect personal data about you from third parties unless you have given explicit consent for this, or in exceptional circumstances such as safeguarding referrals.

Why we process your data — lawful basis

UK GDPR requires me to have a valid legal reason (known as a "lawful basis") for processing your personal data. Because therapy involves health-related information, I need to satisfy two separate legal requirements:

Article 6 basis — general processing: Article 6(1)(b) UK GDPR — processing is necessary for the performance of the therapeutic contract between us. When you engage me as your counsellor, we enter into an agreement for me to provide therapy services. I need to process your personal data to fulfil that agreement.

Article 9 basis — special category data: Article 9(2)(h) UK GDPR — processing is necessary for the provision of health or social care treatment by a health professional. As a qualified counsellor, I am permitted to process health-related data as part of providing therapeutic care.

The additional condition required under UK law is DPA 2018 Schedule 1, Part 1, paragraph 2 (health or social care). This applies because I am a qualified counsellor subject to the professional obligation of confidentiality under the BACP Ethical Framework for the Counselling Professions.

Professional obligations and CPD

As a BACP-registered counsellor, I am required to attend regular clinical supervision. This is a professional requirement that supports good practice and ensures you receive safe, effective therapy.

When I discuss my therapeutic work with my supervisor:

- Full name and any identifying details are NOT shared with my supervisor
- I use anonymised case material only — this means I describe the therapeutic work without including information that could identify you
- My clinical supervision is provided by a qualified professional bound by the same confidentiality obligations as I am
- My supervisor is bound by their own professional code of ethics and practice

Clinical supervision is about reflecting on my practice and ensuring I am working safely and effectively.

Who we share your data with

I treat everything you share in therapy as confidential. However, in order to run the practice and provide services, certain third parties may process limited data:

Clinical supervisor: As explained above, my supervisor receives anonymised case material only. No identifying information about you is shared.

Third-party services: I use the following services which may process some of your data:

- Zoom — for online therapy sessions where applicable
- Whatsapp video – for online therapy sessions where applicable
- Wix — the platform that hosts my website – if you make initial contact this way
- Clinical Will app – stores contact information for all clients to ensure that in the case of my incapacity or death, you are appropriately informed and supported

Each of these services operates under a data processing agreement or equivalent terms. Links to their privacy policies are available on request.

I never sell your personal data.

How long we keep your data

I retain different types of data for different periods:

Type of record	Retention period	Reason
Therapy records (session notes and agreement)	5 years after our last session	In line with indemnity insurance guidance Holistic Services Insurance
Financial records (invoices, payment records)	6 years	HMRC legal requirement

Your rights under UK GDPR

Under UK data protection law, you have the following rights regarding your personal data:

- **Right to be informed:** You have the right to clear information about how I use your data. This privacy policy fulfils that right.
- **Right of access:** You can ask me for a copy of the personal data I hold about you. This is sometimes called a "subject access request." Under the Data (Use and Access) Act 2025, I will conduct a reasonable and proportionate search to locate your data and respond within one month.
- **Right to rectification:** If any personal data I hold about you is inaccurate or incomplete, you can ask me to correct it.

- **Right to erasure:** You can ask me to delete your personal data in certain circumstances. However, this right is not absolute. I may need to retain your records until the end of the applicable retention period where this is required by professional guidelines, insurance requirements, or law.
- **Right to restrict processing:** You can ask me to limit how I use your data in certain circumstances, for example while a complaint is being investigated.
- **Right to data portability:** Where processing is based on consent or contract and carried out by automated means, you can ask to receive your data in a commonly used format. As I keep paper records only, this right has limited application to my practice.
- **Right to object:** You can object to processing based on legitimate interests. As my lawful basis for processing therapy data is contract and health care provision, this right has limited application.
- **Rights related to automated decision-making:** You have the right not to be subject to decisions based solely on automated processing. I do not use automated decision-making in my practice.

To exercise any of these rights, please contact me at contact@fionaballcounselling.com

Data protection complaints

Your right under the Data (Use and Access) Act 2025: If you have concerns about how I handle your data, please contact me directly on: contact@fionaballcounselling.com If you are not satisfied with my response, you may escalate your complaint to the Information Commissioners Office: ico.org.uk

Confidentiality exceptions

Everything you share in therapy is treated as confidential. However, there are limited circumstances where I may need to share information without your consent:

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Everything you share in therapy is treated as confidential. However, there are limited circumstances where I may need to share information without your consent:

- **Risk of serious harm:** If I believe there is an immediate risk of serious harm to you or someone else, I may need to share information with appropriate services to help keep people safe.
- **Safeguarding concerns:** If I become aware of concerns about the safety of a child or vulnerable adult, I have a legal and ethical duty to report this to the relevant authorities.
- **Court order:** If a court orders me to disclose information, I am legally required to comply.

Wherever possible, I will discuss any potential disclosure with you first, unless doing so would itself put someone at risk.

Reviewed October 2026