PRIVACY NOTICE

Reconnect to your Core

Your privacy is important to The Core Therapy. This notice explains how your personal information is collected, used, stored and shared from your first enquiry through to after counselling ends. It should be read alongside The Core Therapy Client Counselling Agreement. You do not need to sign this notice; please keep a copy for your records.

1. Who I Am and How to Contact Me

The Core Therapy is the private counselling practice of Ravpreet Kaur Garrett. For the purposes of UK data-protection law, Ravpreet Kaur Garrett trading as The Core Therapy is the data controller for personal information processed within this private practice.

Data controller	Ravpreet Kaur Garrett
Professional status	BACP Registered Member - 00964585
Practice	The Core Therapy
Website	www.thecoretherapy.co.uk
Telephone	07583 440852
Email	info@thecoretherapy.co.uk
Practice location	The Eaves, 2 Maritime House, The Hart, Farnham, GU9 7HW
ICO registration number	ZC234787

If you have any questions about this notice or how your information is handled, please contact me using the details above.

2. What Personal Information I May Collect

I only collect information that is relevant and reasonably necessary to provide safe, appropriate and professionally accountable counselling. Depending on your circumstances, this may include:

- your name, preferred name, date of birth, pronouns and contact details;
- your address, preferred method of contact and communication preferences;
- emergency contact and GP / healthcare details where relevant;
- information provided through an enquiry, referral or assessment;
- information about your physical and mental health, medication, neurodiversity, accessibility needs and relevant personal history;
- information you choose to share about relationships, identity, family, work, education, bereavement, trauma or other experiences;
- brief clinical notes, risk assessments, safeguarding information and agreed safety planning where relevant;
- appointment, attendance, cancellation, fee, payment and invoice information;
- emails, text messages or other correspondence where it is necessary to keep them as part of your client record; and
- therapy preferences and practical arrangements, including whether sessions are in person, online or outdoors and any agreed accessibility or therapy-animal considerations.

Special category information. Counselling may involve particularly sensitive information, including information about health, racial or ethnic origin, religious or philosophical beliefs, sexual orientation or other private aspects of your life. UK data-protection law gives this information additional protection.

3. How I Obtain Your Information

Most information is provided directly by you. Information may also be received from another person or organisation where this is appropriate, for example:

- a parent, guardian or trusted person making an enquiry on your behalf;
- a GP, school, healthcare professional, counselling directory, employer-funded service or other referrer;
- an emergency contact or another professional involved in your care, where relevant; or

• a website contact form, email, telephone call or other method you use to contact me.

If personal information is received from another source, I will provide or make this Privacy Notice available to you as soon as reasonably possible and within the period required by law, unless an exception applies.

4. Why I Use Your Information and My Lawful Basis

UK data-protection law requires a lawful basis for processing personal information. The main bases used by The Core Therapy are set out below.

Purpose	How and why the information is used
Enquiries and assessment	To respond to your enquiry, consider whether counselling is suitable and take steps at your request before entering into a counselling agreement. Main basis: contract / steps before contract.
Providing counselling	To provide therapy, manage appointments, communicate with you and administer fees and payments. Main basis: performance of my counselling agreement with you.
Clinical records and professional practice	To keep proportionate records, work safely and ethically, use clinical supervision and protect the practice where necessary. Main basis: contract and/or legitimate interests.
Safeguarding and serious risk	To respond where there is a serious safety or safeguarding concern, or where disclosure is legally required or otherwise justified. The lawful basis will depend on the circumstances and may include legal obligation, vital interests or legitimate interests.
Clinical continuity if I cannot practise	To allow my named clinical executor to contact current clients, cancel or rearrange sessions, respond to urgent risk or safeguarding issues, protect records and support safe closure or continuity if I am unable to do so. Main basis: legitimate interests and, where applicable, legal obligations or vital interests.
After counselling ends	To retain records for professional, insurance, legal and complaints-handling purposes for the stated retention period. Main basis: legitimate interests and, where applicable, legal obligations.

Special category data. Where counselling involves health or other special category information, I will generally process it where necessary for the provision of health or social care or treatment and subject to professional duties of confidentiality. Other lawful conditions may apply in particular circumstances.

Consent may still be sought for specific optional activities or disclosures, for example where you ask me to share information with another professional. Consent is not the only lawful basis relied upon for providing and administering counselling.

5. How I Use Information During Counselling

- to arrange, provide and review counselling sessions;
- to understand your needs and consider whether the service remains suitable;
- to maintain brief and relevant clinical and administrative records;
- to manage risk, safeguarding and emergency situations where necessary;
- to discuss therapeutic work in confidential clinical supervision;
- to communicate with you about appointments and practical matters; and
- to administer fees, payments, invoices and practice records.

I do not routinely make or retain audio or video recordings of counselling sessions. If I propose using Heidi for live transcription, I will explain how it works and seek your explicit agreement before starting. You may decline or ask me to stop, and I will prepare notes without live transcription. Heidi processes speech to create a written transcript; this is different from retaining an audio recording. Heidi states that audio is not retained after transcription. Any separate audio or video recording would require prior discussion and explicit agreement.

I use Heidi Health, an AI-assisted clinical documentation system, to help prepare and manage clinical notes. Depending on the functions used, it may process information I type or dictate, or a transcript produced with your agreement. This may include sensitive information discussed in therapy. I limit the information entered to what is necessary and minimise identifying details where practicable. I review and correct AI-generated drafts before treating them as final clinical notes. I remain responsible for my records and clinical judgement; Heidi does not replace my assessment or make decisions about your therapy.

6. Confidentiality, Supervision & Sharing Information

What you discuss in counselling is treated as confidential. Information is not routinely shared with other people or organisations without your knowledge or permission.

There are limited circumstances in which information may need to be shared without your consent. These include:

- where I believe there is a serious or immediate risk of harm to you or another person;
- where there are safeguarding concerns involving a child or an adult at risk;
- where disclosure is required by law, a court order or another legal obligation; or
- where another exceptional circumstance creates an ethical or legal responsibility to disclose relevant information.

Wherever it is safe and appropriate to do so, I would aim to discuss a disclosure with you before taking action. Any disclosure would be limited to information that is relevant and necessary.

I attend regular clinical supervision. Your therapeutic work may be discussed with my clinical supervisor to support safe and ethical practice. Identifying information is minimised where possible, and my supervisor is also bound by professional confidentiality.

Clinical executor and continuity arrangements. If I die, become seriously ill or incapacitated, or am otherwise unexpectedly unable to contact clients or manage the practice, I have appointed a clinical executor to carry out essential continuity arrangements. My current clinical executor is Ellie Tingle. She may access only the minimum personal information necessary to identify and contact current clients, cancel or rearrange sessions, respond to urgent safeguarding or risk concerns, protect records and support safe endings, continuity or onward signposting. She is required to maintain confidentiality and may not use your information for any unrelated purpose.

7. Third Parties & Service Providers

I may use carefully selected third-party providers to support the practical running of the practice. Depending on the systems in use, these may include:

- secure email, calendar, video-conferencing or cloud-storage providers;
- payment, banking, accounting or bookkeeping services;
- website hosting, contact-form or IT support providers;
- consulting-room or premises providers where limited information is necessary for access or administration;
- professional advisers, insurers or legal advisers where necessary; and
- regulators, statutory bodies, healthcare professionals or safeguarding agencies where disclosure is required or justified.

Only the minimum information necessary for the relevant purpose will be shared. Where a provider processes personal information on my behalf, appropriate data-protection arrangements will be used where required.

Heidi Health processes clinical information on my behalf to support documentation. This can include relevant clinical context, transcripts where used, and draft and final notes. Heidi states that consultation data, transcripts and generated notes are not used to train its AI models. Further information is available at www.heidihealth.com/en-gb/safety and www.heidihealth.com/en-gb/legal/privacy-policy. These explain Heidi's arrangements and supplement this notice; I remain responsible for how I use your information within my practice.

8. International Transfers

Some technology providers may process or store information outside the United Kingdom. Where this happens, I will use providers that put appropriate safeguards in place, such as UK adequacy arrangements or approved contractual safeguards, where required by law.

For UK customers, Heidi's published privacy policy states that data is stored in the United Kingdom and processed within the United Kingdom or European Economic Area. Any processing outside the UK must have the applicable lawful transfer arrangements. I will update this notice if the arrangements relevant to my practice change.

9. How I Keep Information Secure

I take reasonable technical and organisational steps to protect your information against loss, unauthorised access, misuse or disclosure. I use password-protected devices and accounts, access controls and secure storage. I use multi-factor authentication (MFA) with Microsoft Authenticator as an additional layer of account protection: signing in requires verification in addition to a password. Paper records, where used, are kept securely.

Where practicable, identifying information is kept separately from brief clinical notes. You are also encouraged to avoid sending highly sensitive therapeutic information by ordinary text message or email unless necessary.

Heidi states that information is encrypted both during transfer and while stored. This helps protect information from unauthorised access. These provider safeguards work alongside my own account and device protections; no electronic system can be guaranteed completely risk-free.

10. How Long I Keep Your Information

Personal information is not kept for longer than reasonably necessary. I currently apply the following retention approach:

Type of information	Usual retention approach
Enquiries that do not proceed	Normally deleted within 6 months of the last contact, unless there is a clear reason to retain the information for longer.
Client records	Normally retained for 7 years after counselling ends, unless a longer or shorter period is required because of legal, safeguarding, professional or insurance considerations.
Children and young people	Records may need to be kept for a longer period taking account of the client's age and relevant professional, legal and insurance requirements.
Texts and emails	Routine administrative messages are deleted when no longer needed. If a message contains clinically relevant information, the relevant information may be added to the client record and retained with that record.
Financial records	Kept for the period required for accounting, tax or other legal purposes.

When information reaches the end of its retention period, it will be securely deleted or destroyed unless there is a lawful reason to retain it for longer.

Heidi drafts and transcripts are not automatically treated as the final clinical record. Once I have checked and finalised the relevant notes, I will delete unnecessary drafts and transcripts when they are no longer needed, unless there is a documented clinical, safeguarding or legal reason to retain them. Final clinical notes, wherever held, follow the client-record retention periods above. Heidi's account deletion settings do not replace my responsibility to manage retention.

If this notice's clinical continuity arrangements are activated, my clinical executor may preserve, transfer, securely retain or arrange deletion of records only as necessary to meet the retention periods and professional, legal, safeguarding or insurance requirements described above.

11. Online Counselling & Electronic Communication

For online counselling, reasonable measures are used to protect privacy and confidentiality. Online platforms and internet-based communication can never be guaranteed to be completely risk-free.

At the start of an online session I may ask you to confirm your current physical location. This is used only where necessary for safe practice, particularly if a serious concern about your immediate safety arises.

Telephone, text and email are primarily used for appointment arrangements and brief practical communication. If information sent electronically becomes relevant to your clinical record, it may be retained as part of that record.

12. Children & Young People

Where counselling is provided to a young person, personal information will be handled with particular care and the Privacy Notice will be explained in a way that is appropriate to their age and understanding.

Information may initially be received from a parent, guardian, school, GP or another referrer. The young person's confidentiality remains an important part of the therapeutic relationship. Information will not routinely be shared with a parent or guardian simply because they arranged or are paying for counselling.

Confidentiality may be overridden where there is a safeguarding concern, serious risk of harm or another legal or professional requirement to disclose information.

13. Website, Cookies & Online Enquiries

If you use The Core Therapy website to make an enquiry, the information you submit may be processed by the website hosting or contact-form provider in order to send the enquiry to the practice.

The website may use cookies that are necessary for it to function. If non-essential analytics or marketing cookies are used, information about them should be provided through the website cookie settings or cookie notice and consent will be requested where required.

I do not use information collected through the counselling service for unrelated marketing without an appropriate lawful basis and, where required, your consent.

14. Your Data Protection Rights

Depending on the circumstances and the lawful basis being used, you may have the right to:

- be informed about how your personal information is used;
- ask for access to the personal information held about you;
- ask for inaccurate or incomplete information to be corrected;
- ask for information to be erased in certain circumstances;
- ask for processing to be restricted in certain circumstances;
- object to certain processing, including processing based on legitimate interests;
- receive certain information in a portable format where the right to data portability applies; and
- withdraw consent at any time where consent is the lawful basis for a particular use of your information.

These rights are not absolute. For example, I may need to retain some information because of professional, legal, safeguarding or insurance requirements. If you make a request, I will respond within the timescale required by data-protection law.

15. Accessing Your Records

You can ask whether I hold personal information about you and request a copy of that information. This is commonly called a subject access request.

I may need to confirm your identity before releasing information. In limited circumstances, information may need to be withheld or redacted where data-protection law permits or requires this, for example where disclosure would adversely affect another person's rights.

Requests can be made using the contact details at the beginning of this notice.

16. Concerns, Complaints & Changes to This Notice

If you have a concern about how your personal information has been handled, please contact me first so that I have an opportunity to respond.

You also have the right to raise a concern with the Information Commissioner's Office (ICO), the UK's independent data-protection regulator. Further information about making a complaint is available at ico.org.uk/make-a-complaint.

This Privacy Notice will be reviewed periodically and updated where necessary to reflect changes in the practice, professional guidance or data-protection law. Where a change materially affects how your information is used, reasonable steps will be taken to bring it to your attention.

Document status. Privacy Notice version 1.3 - 12 October 2026. Please keep a copy for your records. You do not need to sign this notice. Receipt can be acknowledged within The Core Therapy Client Counselling Agreement.