



Privacy Policy

Introduction

At City Solace Psychotherapy, protecting your privacy and keeping your personal information secure is a top priority. This privacy policy explains how I collect, store, use, and safeguard your data, in compliance with the General Data Protection Regulation (GDPR) (EU 2016/679), the Data Protection Act 2018, and related laws.

This policy applies to all personal information you provide when contacting me, during therapy sessions, and after therapy ends, including information collected via my website and mailing list.

Data Controller

I am the data controller responsible for your personal data. My Information Commissioner's Office (ICO) registration number is ZB670769. You can reach me at:

- Phone: 07471 788227
- Email: jodun@citysolacepsychotherapy.com

Lawful Basis for Processing Your Data

I process your personal data based on the following lawful grounds:

- Contractual necessity: When you engage in therapy or consultations, processing your data is necessary to deliver the agreed services.
- Legitimate interest: For record keeping after therapy ends, practice management, and compliance with legal obligations.
- Health treatment: Processing sensitive personal data (such as health information) is essential to provide you with therapy.

I only collect and process personal data necessary for providing psychotherapy and related administrative functions.

Information I Collect and Use

- Initial Contact and Enquiries: When you contact me, I collect your name, email, phone number, and a brief explanation of your enquiry. I may also receive relevant information from referrals by other professionals or trusted individuals, if appropriate.
- Consultation stage: I collect further basic data and also your next of Kin and GP. This data is collected in case of an emergency or if I feel there is risk to your well being. I obtain consent in this form. I also collect information about any previous therapy and

your general wellbeing this is to assist my assessment of suitability for working together. I also collect market research.

- Therapy stage: When you proceed to signing a therapy agreement and we start work together I do keep your basic information (name, date of birth, address, phone number, and next of kin details) on an encrypted USB memory stick for emergency circumstances (see below).

All therapy notes are stored on *Writeupp*, a cloud based clinical management software, both GDPR-compliant and encrypted storage solutions.

- Sessions are not recorded and AI technology is not used within any stages of the therapeutic intervention or processing of Data.

- Client Documents and Forms: All client information and forms are completed via *Jotform.com*, a secure, GDPR-compliant online platform to collect this data. Once the forms are completed, I move these to *Writeupp*. They are then deleted from Jotform. I do not print, keep, or store any paper copies at any time.

- Artwork: Physical artwork made during in-person sessions is stored securely and anonymously in coded folders within a locked cabinet for the duration of therapy. After therapy ends, uncollected artwork is held for 1 week, or 3 months if therapy ends without a formal close, before being securely disposed of.

With your written consent, I may photograph (in-person) or screenshot (online) artwork to support the therapeutic process and for supervision. Images are added to *Standard notes* (GDPR compliant and encrypted) and later transferred to *Writeupp*. Images are deleted immediately from device, and retained securely for 7 years. During online sessions, I will always ask for clear verbal consent before taking a screenshot, and only the artwork is captured — never you or your surroundings. You may decline at any time without it affecting your therapy. Occasionally, I may request permission to use anonymised images of artwork for professional presentations, training, or marketing. This is entirely optional and requires separate written consent.

Data Storage and Security

- All electronic records and notes are stored exclusively on *Writeupp*
- No paper records or handwritten notes are kept at any time apart from (for in person sessions) the goals we identify. These are anonymous and coded and kept in your art folder in a locked cabinet. This is so we can easily refer back to them at reviews.

- Email correspondence and text messages are deleted after one month unless important information is copied and transferred to *Writeupp*.
 - Client phone numbers are not stored on any personal phone.
 - The encrypted memory stick is kept in a locked container within a secure, private location, accessible only by me.
-

Retention and Deletion

- All client data, including notes, forms, and correspondence, is retained for seven years after therapy ends, per professional guidelines. If a client decides not to proceed with therapy following an initial enquiry or telephone call, all personal data provided will be deleted within 72 hours.
 - After this period, all data is securely deleted or destroyed.
 - You may contact me to request early deletion of your personal data at any time where legally and ethically appropriate
-

Sharing Your Information

I only share your data when necessary and with strict controls:

- Supervision: I discuss therapeutic work with my supervisor to ensure quality care, always anonymising your identity.
- Accountant and HMRC: Payment records with your initials are shared for tax and accounting purposes.
- Invoicing: Your name, email, and phone number are securely stored in Tide bank's invoicing system for billing.

All third parties I use are contractually required to protect your data and only use it for specified purposes.

Communication

Please be aware that text messages and email are not fully secure methods of communication. For this reason, I do not discuss confidential or sensitive therapeutic content via these channels. If you need to address anything confidential, we can arrange to discuss it during our next session or, if appropriate, over the telephone.

Confidentiality

What we discuss in sessions is confidential. However, if I need to break confidentiality for legal or safety reasons (as outlined in the Therapeutic Agreement), I may share limited, relevant personal data — including your name, contact details, nature of the risk, any steps already taken to reduce harm, and, where appropriate, limited information about any person believed to be at risk. This may include their name or identifying details if essential for safeguarding. I only share information relevant to safeguarding or emergency purposes with relevant third parties such as your GP, emergency services, or social services. I will always aim to discuss this with you first, unless doing so would increase risk or prevent lawful reporting.

Your Rights

You have the right to:

- Access your personal data
- Request correction of inaccuracies
- Request deletion or restriction of processing
- Object to processing under certain conditions
- Withdraw consent at any time
- Lodge a complaint with the ICO if you believe your data has been mishandled. To make a formal complaint, visit: <https://ico.org.uk/make-a-complaint>

To exercise your rights or make requests, please contact me at jodun@citysolacepsychotherapy.com. I will respond to any valid requests within one calendar month, in line with GDPR requirements.

Data Breach Procedure

In the unlikely event of a data breach that risks your rights or freedoms, I will notify you and the ICO promptly and take steps to mitigate any harm.

Use of Website and Cookies

When you visit my website, Wix Analytics and Google Analytics collect anonymous

visitor data to improve the site. No personal identifying data is collected. For details, please see Wix's and Google's privacy policies. Cookies are used on the website to enhance functionality; you have the option to manage or disable cookies via your browser settings.

Mailing List

If you subscribe to my mailing list, your email is stored securely within Wix's system and used solely for newsletters and related communications. You can unsubscribe at any time.

If an emergency

As part of my emergency planning (if something happens to me), I keep a separate encrypted USB memory stick containing only basic client information (name, date of birth, address, phone number, and next of kin details). This separate encrypted USB memory stick is securely stored with and not shared with anyone except in an emergency/if something happens to me. If such a situation arises, I have arrangements in place for this encrypted memory stick to be sent to my supervisor who holds the password, ensuring strict confidentiality and security.

International Data Transfers

Some of the third-party services I use (e.g., Writeupp, Jotform.com) may store data on servers outside the UK or EU. I ensure that any such transfers comply with GDPR by using providers who implement appropriate safeguards such as Standard Contractual Clauses and encryption.

Children, Young People and Vulnerable Adults

For clients under 18 or considered vulnerable adults, I require signed consent from a parent, guardian, or legally authorised representative. I may also seek the young person's own consent, depending on their age and capacity to understand (Gillick competence).

Data for children and vulnerable adults is processed and stored securely, with the same level of confidentiality as for adult clients. Further details on consent and confidentiality are outlined in the parent/guardian contract.

Automated Decision-Making

I do not use any automated decision-making or profiling in processing your personal data.

Policy Updates

I may update this privacy policy from time to time. Changes will be posted on my website, and where appropriate, I will notify you directly.

Contact

If you have questions about this policy or your data, please contact me by email or phone. I am to respond within 3 working days. Feedback to improve my data protection practices is always welcome.

Last updated 09.11.25