Privacy Notice for Williamina Baillie / WB Counselling

(Updated October 2026 in preparation for the revised BACP Ethical Framework taking effect 3 November 2026)

This privacy notice explains how I collect, use, store and protect personal information in my counselling practice.

I am **Williamina Baillie,** a counsellor / psychotherapist working in person, online and by phone. I am the data controller for personal information I collect and use in connection with my practice. This means I am responsible for how that information is handled and protected. I do not sell your personal information.

This notice applies to people who contact me about therapy and to current and former clients.

If you have any questions about this notice or how your information is handled, you can contact me at:
Email: wbctherapy@gmail.com Website: https://wbcounselling.com

Information I collect
When you contact me, I may collect:

- Your name, phone number and email address
- Information you choose to share in your enquiry
- Your preferences around contact, availability or therapy format

If we arrange an initial call or begin therapy, I may also collect:

- Your address
- Emergency contact details
- Relevant health, mental health or wellbeing information
- Information about your personal history and reasons for seeking therapy
- Brief clinical notes
- Attendance, payment and appointment information
- Correspondence between us, such as emails, texts or WhatsApp messages

I only collect information relevant to responding to enquiries, providing therapy and meeting my professional and legal responsibilities.

How I use your information
I use your personal information to:

- Respond to enquiries and arrange initial calls
- Arrange and provide therapy
- Keep appropriate clinical records
- Manage payments, invoices and appointments
- Maintain insurance, tax and accounting records
- Communicate with you about sessions
- Meet my legal, professional and ethical responsibilities
- Manage risk, safeguarding or emergency situations where necessary
- Maintain insurance, tax and accounting records
- Respond to data protection requests or complaints

Lawful basis for using your information

Under UK GDPR, I need a lawful basis for using personal information. Depending on the purpose, these may include:

- Contract: to arrange and provide therapy.
- Legitimate interests: to respond to enquiries, run my practice and maintain appropriate records, while considering your rights and interests.
- Legal obligation: where I need to comply with the law.

Confidentiality
Therapy is confidential. I will not share what you tell me unless there is a lawful, ethical or safeguarding reason to do so. I may need to share information where:

- There is a serious risk of harm to you or someone else.
- There is a safeguarding concern involving a child or an adult at risk.
- I am legally required to do so, including by court order.
- Disclosure is necessary to prevent or detect a serious crime.
- There is a medical emergency.
- I need to discuss aspects of the work with my clinical supervisor.

I aim to share only what is necessary and, where possible and appropriate, will discuss this with you beforehand. There may be circumstances where this is not possible or appropriate.

Professional supervision
I use clinical supervision to support safe and ethical practice. I may discuss aspects of our work with my supervisor, minimising identifying details wherever possible. My supervisor is also bound by confidentiality and professional standards.

Clinical notes and records
My clinical notes are brief and are kept to support safe and ethical therapy. They are usually factual, proportionate and relevant to the work. I do not aim to keep a full transcript of sessions. Clinical records may include:

- Session dates and brief themes discussed
- Relevant risk, safeguarding or clinical information
- Agreed actions or important decisions
- Contact and administrative information

How long I keep your information
I retain client records for as long as necessary to meet my legal, professional and insurance obligations and to protect against potential legal claims. The retention period will depend on the nature of the information and the circumstances of the work. Records are reviewed periodically and securely destroyed when they are no longer needed.

Information relating to enquiries where counselling does not proceed is retained only for as long as necessary. Financial records are retained in accordance with legal tax and accounting requirements.

Where your information is stored and how it is protected
I use email, phone messaging, Microsoft Word and Excel, and payment services to communicate with you and manage my practice. You may also contact me through professional directories. I use any information passed on to me for the purpose of responding to your enquiry. The information held will depend on what you share with me and the purpose for which it is needed. This may include contact details, appointment information, correspondence and payment details. Clinical notes are kept separately from routine administrative communications. Your information may be stored in the following systems:

- Website: WordPress, hosted by Bluehost
- Email: Gmail
- Practice records and documents: Microsoft Word
- Payments and invoicing: Starling
- Cloud storage or backup: Apple iCloud
- Phone and messages: SMS and WhatsApp
- Online sessions: secure video platforms, which may require your name, phone number or email address to arrange or join a session.

I use appropriate technical and organisational measures to keep information secure. These may include password protection, device security, two-factor authentication, restricted access and secure storage.

External providers may process personal information on my behalf. I use reputable providers with appropriate data protection and security arrangements.

Online therapy
I use a video platform to conduct our sessions. I will take reasonable steps to protect confidentiality from my side and ask that you also choose a private space where you cannot easily be overheard or interrupted.

The platform may process technical information in accordance with its own privacy notice.

AI tools, transcription and recording
I do not record or transcribe therapy sessions or use AI tools to process session content.

I may use digital tools for marketing or website content. I will never use identifiable client material into tools that are not appropriate for confidential clinical information and take data protection and confidentiality into account.

Website visitors and cookies
My website, wbcounselling.com, is hosted by Bluehost and uses WordPress.

When you visit the website, technical information such as your IP address, browser type, device information and pages visited may be collected automatically by the hosting provider for website operation, security and performance.

I do not currently use website contact forms or deliberately installed analytics or marketing cookies. Some technical cookies may nevertheless be used by the website or its hosting provider.

Sharing your information
I will not share your personal information unless there is a clear reason to do so. Depending on the circumstances, I may share limited information with:

- My clinical supervisor
- Professional advisers, such as an accountant, insurer or legal adviser
- My professional body, if required in relation to a complaint or ethical matter
- Safeguarding services, emergency services or your GP, where there is a serious risk or safeguarding concern
- A court or legal authority, if required by law
- My executor or other appointed person, where necessary to deal with arrangements if I die or become unable to practise
- Trusted digital service providers who process information on my behalf

I aim to share only what is relevant and necessary for that purpose.

If I or one of my service providers transfers personal information outside the UK, I will only do so where the law allows it and an appropriate transfer mechanism or safeguard is in place where required.

Arrangements if I am unable to practise / Clinical Will
I have arrangements in place so that clients can be contacted if I die or become unable to continue practising. My clinical supervisor will contact clients in these circumstances. My executor will deal with the necessary administrative arrangements, with client confidentiality maintained.

Your rights
Under UK data protection law, you have rights over your personal information. These may include the right to:

- Be informed about how your information is used
- Access a copy of your personal information
- Ask for inaccurate information to be corrected
- Ask for information to be deleted in some circumstances
- Restrict or object to certain processing
- Complain about how your information has been handled

Some rights are not absolute and depend on the circumstances. For example, I may need to keep some information for legal, professional, safeguarding, insurance or complaint-related reasons. There may also be limits on what can be disclosed where information includes details about another person or where a relevant legal exemption applies.

If you would like to exercise your rights, please contact me using the details above. I aim to respond within one calendar month. If a request is particularly complex or an extension is permitted by law, I will let you know.

Data protection concerns and complaints
If you have a concern about how I have handled your personal information, please contact me using the details above. I will acknowledge your complaint within 30 days and investigate it without undue delay.

Please explain what your concern is and what you would like me to look into. I will let you know the outcome.

If you are not satisfied with my response, you can contact the Information Commissioner's Office (ICO):

Website: www.ico.org.uk
Telephone: 0303 123 1113

Changes to this privacy notice

I may update this privacy notice from time to time to reflect changes in my practice, legal requirements, professional guidance or the systems I use.

The latest version will be available on my website.