

Privacy Policy

SMART MINDS

Effective date: 18 August 2026 | Review date: August 2027

Your privacy matters. Counselling can involve sensitive personal information, including information about mental health, relationships, family life and religious beliefs. SMART MINDS handles personal information with care, confidentiality and in accordance with applicable UK data protection law.

1. Who we are

SMART MINDS is a counselling service providing support to individuals, young people, couples and families. For the purposes of UK data protection law, SMART MINDS is the data controller for the personal information described in this policy.

Data protection contact: Usman Ahmed, SMART MINDS. Contact email: [INSERT SMART MINDS EMAIL].

Business/contact address: [INSERT ADDRESS OR SERVICE ADDRESS].

2. Information we may collect

Depending on the service you use, we may collect:

- identity and contact details, such as your name, email address, telephone number and date of birth;
- appointment, booking, payment and invoice information;
- information you provide in enquiry, consent, assessment or intake forms;
- counselling notes and information discussed during sessions that is relevant to providing the service;
- information about your physical or mental health, wellbeing, relationships, family circumstances or other personal matters;
- religious or philosophical beliefs where these are relevant to, or voluntarily discussed within, counselling;
- for clients under 18, relevant parent or guardian contact, consent and safeguarding information; and
- communications between you and SMART MINDS, including emails and messages.

Counselling information may include 'special category data' under UK data protection law. We aim to collect only information that is relevant and necessary for the purpose for which it is being used.

3. Why we use your information

We may use personal information to:

- respond to enquiries and assess whether SMART MINDS is an appropriate service for you;
- arrange, manage and deliver counselling sessions;
- maintain appropriate counselling and safeguarding records;
- communicate about appointments, cancellations, payments and service administration;
- meet professional, safeguarding, insurance, legal or regulatory responsibilities;
- protect the vital interests of a client or another person where appropriate; and
- manage and improve the safe and effective operation of SMART MINDS.

4. Our lawful basis

We identify an appropriate lawful basis under Article 6 of the UK GDPR for each use of personal information. Depending on the circumstances, this may include processing that is necessary to provide a service you have requested (contract), compliance with a legal obligation, legitimate interests, vital interests or consent.

Where we process special category information, such as health information or religious beliefs, we also identify an appropriate condition under Article 9 of the UK GDPR and, where required, the Data Protection Act 2018. The precise basis or condition may vary according to the purpose and circumstances. Where explicit consent is relied upon, you may withdraw that consent, although this does not affect processing already carried out lawfully.

SMART MINDS will maintain the additional internal documentation required for any special-category processing condition that requires it, including an Appropriate Policy Document where applicable.

5. Confidentiality and sharing

What you discuss in counselling is treated as confidential. We do not routinely disclose counselling information to family members, employers, schools, community organisations or other third parties simply because they ask for it.

Confidentiality is not absolute. Information may be shared where there is a lawful and necessary reason, for example where there is a safeguarding concern involving a child or an adult at risk, a serious risk to a person, a legal requirement, or where disclosure is otherwise permitted or required by law. Where appropriate and safe to do so, we will seek to discuss a proposed disclosure with you.

We may also use carefully selected service providers for functions such as secure communications, booking, payment processing or data storage. They should receive only the information needed for their role and must handle it under appropriate data protection arrangements.

6. Supervision

Professional supervision is an important part of responsible counselling practice. Cases may be discussed with an appropriate supervisor to support reflective, ethical and effective practice. Wherever practicable, information is minimised or anonymised so that a client is not unnecessarily identifiable. Supervisors are expected to maintain confidentiality.

7. Children and young people

SMART MINDS may work with clients under 18. We will handle their information with particular care and consider the young person's age, understanding, rights, parental or guardian involvement, consent arrangements and safeguarding needs. Parents or guardians do not automatically receive a full account of what a young person says in counselling. The approach to confidentiality will be explained at the outset, including circumstances in which information may need to be shared for safeguarding.

8. How we protect information

We take proportionate technical and organisational measures to protect personal information against unauthorised access, loss, alteration or disclosure. These measures may include access controls, password protection, secure storage, device security, data minimisation and limiting access to people who genuinely need the information.

No system can guarantee absolute security. If a personal data breach occurs, SMART MINDS will assess it and take any notification or remedial steps required by law.

9. How long we keep information

We do not keep personal information indefinitely. Records are retained only for as long as reasonably necessary for counselling, safeguarding, legal, insurance, professional and administrative purposes. SMART MINDS maintains a retention schedule and will periodically review records for secure deletion or anonymisation.

Because appropriate retention periods can differ for adult and child clients and may be affected by professional or insurer requirements, the applicable period will be recorded in our retention schedule and can be provided on request.

10. Your data protection rights

Depending on the circumstances, you may have rights to:

- ask for access to personal information we hold about you;
- ask us to correct inaccurate or incomplete information;
- ask for information to be erased in certain circumstances;
- ask us to restrict how information is used in certain circumstances;
- object to certain processing;
- receive certain information in a portable format; and
- withdraw consent where consent is the basis relied upon.

These rights are not absolute and exemptions may apply, including where information must be retained for legal, safeguarding or other lawful reasons. To exercise a right, contact SMART MINDS using the details in section 1.

11. Website, cookies and online services

If the SMART MINDS website uses cookies, analytics, online booking, payment services or embedded third-party content, additional information about those technologies and providers should be displayed through the website's cookie notice or relevant service information. Non-essential cookies should be handled in accordance with applicable privacy and electronic communications requirements.

12. International transfers

Some technology providers may store or process information outside the United Kingdom. Where this occurs, SMART MINDS will take reasonable steps to ensure that an appropriate legal transfer mechanism and safeguards are in place where required.

13. Complaints

If you have a concern about how SMART MINDS has handled your personal information, please contact us first so that we can try to resolve it. You also have the right to raise a concern with the UK Information Commissioner's Office (ICO).

ICO website: ico.org.uk

14. Changes to this policy

We may update this Privacy Policy when our services, systems or legal obligations change. The latest version should be made available through the SMART MINDS website or on request. The effective date at the beginning of the policy indicates when it was last updated.

Important implementation note

This document is designed as a practical privacy-policy template for a small UK counselling service. Before publishing it, SMART MINDS should complete the contact details above and confirm that the wording accurately reflects its actual booking, payment, record-keeping, cloud-storage, messaging, website/cookie, retention and safeguarding arrangements. In particular, the lawful bases, Article 9 conditions and retention periods should be documented against the service's real processing activities.