therasee

Privacy Notice Template for UK Therapists and Counsellors

A free, plain-English template and checklist from Therasee

Includes: a fill-in privacy notice, a separate consent wording for your intake form, a one-page complaints procedure, a tool record sheet, and a simple record of processing.

Last updated: November 2026. Reflects UK GDPR, the Data Protection Act 2018, the Data (Use and Access) Act 2025, and the BACP Ethical Framework 2026.

> This template is a practical starting point, not legal advice. Adapt it to how you actually work. If you are unsure about anything, the ICO's small organisations helpline (0303 123 1113) is free, and your supervisor, professional body or indemnity provider can help too.

How to use this template

You do not need to be a data protection expert to write a good privacy notice. You need to describe, honestly and simply, what you already do.

1. **Make five decisions first.** Use the checklist on the next page. Most of the notice follows from these.
2. **Fill in the square brackets.** Anything in [square brackets] is for you to complete. Delete the brackets when you are done.
3. **Choose between the options.** Where you see **Option A** and **Option B**, keep the one that fits you and delete the other.
4. **Delete what does not apply.** If you do not work with children, couples or families, or do not record sessions, remove those sections.
5. **Read it as a client would.** If a sentence would confuse a new client, rewrite it. Plain words are part of the law, not just good manners.
6. **Put it in three places.** On your website, in your intake pack, and mentioned briefly in your first session.
7. **Review it once a year**, and whenever you change software, start using an AI feature, or change how you work.

The guidance notes in boxes marked **Guidance** are for you. Delete them before you publish.

Before you start: five decisions

Tick each one when you have decided.

☐ **Your legal reason for health information.**
Most counsellors and psychotherapists use **explicit consent** (Option A).
Most HCPC-registered psychologists use **health or social care** (Option B).

☐ **How long you keep records.**
The common working convention is seven years from the end of therapy for adults, and until a young person turns 25 for clients who were children.

☐ **Every tool that holds client information.**
Practice management software, video, email, phone or text messaging, payments, cloud storage, and any AI features. List them.

☐ **Your clinical executor.**
The person who would contact clients and look after records if you could not.

☐ **How clients can complain to you.**
An email address, plus a short form or postal address.

You will also need your **ICO registration number**. You can find it on the ICO's register of fee payers.

[Your practice name] Privacy Notice

Last updated: [date]

Who I am

I am [your full name], a [counsellor / psychotherapist / psychologist / CBT therapist] working in private practice as [practice name, if different]. I am responsible for the personal information you share with me. In data protection law this makes me the "controller".

I am registered with the Information Commissioner's Office (ICO), the UK's data protection regulator, under registration number [ICO number].

I am a [member / accredited member / registrant] of [professional body, for example the BACP, UKCP, NCPS, BABCP or HCPC] and I work within its [code of ethics / Ethical Framework].

You can contact me about anything in this notice at:

- Email: [email address]
- Phone: [phone number]
- Post: [postal address, or "on request"]

> **Guidance**
>
> Most sole practitioners do not need to appoint a Data Protection Officer. If you work in a larger organisation that has one, add their contact details here.

The information I collect

When you contact me and while we work together, I may collect:

- **Contact details:** your name, address, email address, phone number and date of birth
- **Emergency contact and GP details**, if you choose to give them
- **Appointment and payment information:** session dates, invoices and payment records
- **What you share in sessions and forms:** my session notes, assessment questionnaires, and any forms you complete
- **Messages** you send me, by email, text or secure messaging
- **[Video session details, if applicable]**

Some of this is about your health, including your mental health. The law treats this as especially sensitive ("special category data"), and I take extra care with it. The fact that you are having therapy with me is itself sensitive, and I treat it that way.

Why I hold your information, and my legal reasons

I hold your information so that I can provide therapy safely and well, arrange and manage appointments, take payment, keep the records my professional body and insurer expect, and meet my legal obligations.

The law asks me to have a legal reason for this, and an extra reason for health information.

My everyday legal reason is that I need your information to provide the therapy we have agreed (UK GDPR Article 6(1)(b), "contract"). For financial records, I also have a legal obligation to keep them for tax purposes (Article 6(1)(c)).

My extra legal reason for health information is:

> **Option A (most counsellors and psychotherapists)**
> your explicit consent (UK GDPR Article 9(2)(a)). I will ask you to confirm this separately before we begin. You can withdraw your consent at any time by telling me. If you do, I will stop using your information for anything other than what the law requires me to keep, and we can talk about what that means for our work together.

> **Option B (HCPC-registered psychologists and other regulated health professionals)**
> that I am providing health care as a professional bound by a legal duty of confidentiality (UK GDPR Article 9(2)(h), together with the Data Protection Act 2018, Schedule 1, paragraph 2).

> **Guidance**
> Keep one option and delete the other. Agreeing to therapy is not the same as agreeing to how information is handled, so if you use Option A, ask for consent to data use as its own clear step. The consent wording at the end of this template does that.

How I keep your information safe

- I keep records in [name of your practice management system or "a secure, encrypted system"], which is protected by encryption and two-step sign-in.
- [My devices are encrypted and password protected.]
- [Any paper notes are kept in a locked cabinet and do not include your name; they are filed under a code.]
- Only I [and named colleagues, if any] can access your records.

Who else may see your information

I will not share your information except as described here, or where the law requires or allows it.

- **Clinical supervision.** Like all therapists, I discuss my work with a qualified supervisor to make sure I am working safely and well. I do not share your name or details that could identify you.
- **Companies that provide my practice tools.** These companies process information on my behalf, under written contracts called Data Processing Agreements, and only as I instruct:
  - [Practice management software, for example "Therasee Ltd, for records, appointments, forms, messaging and invoices"]
  - [Video platform]
  - [Email provider]

    - [Payment provider, for example "Stripe, for card payments"]
    - [Text message provider, if separate]
    - [Cloud storage, if any]

- **My accountant**, for financial records only. They do not see clinical information.
- **My clinical executor**, only if I become unable to practise (see below).
- **My professional body, insurer or legal adviser**, only if needed to respond to a complaint or claim.

The limits of confidentiality

What you tell me is confidential. There are a small number of situations where I may need to share information without your agreement. Wherever it is safe and possible, I will talk to you first.

- If I believe you, or someone else, are at serious risk of harm
- If I believe a child, or an adult at risk, is being harmed or is at risk of harm
- If a court orders me to share information
- If the law requires me to, for example under terrorism legislation

> **Guidance**
> The BACP Ethical Framework 2026 asks you to make sure clients know about, and agree to, any foreseeable limits to confidentiality. Check this list matches your own contract, your professional body's code and your supervisor's advice.

Technology and AI

> **Option 1**
> I do not use artificial intelligence (AI) tools with your information.

> **Option 2**
> I use [name the feature, for example "speech-to-text dictation"] within [name of tool] to help me [for example "write session notes"]. It runs under the same Data Processing Agreement as the rest of the system, your information stays in [the UK], and it is not used to train AI models. I check everything it produces, and all decisions about your care are mine.

I never put information that could identify you into general-purpose AI tools such as ChatGPT.

> **Guidance**
> The BACP Ethical Framework 2026 asks you to assess the risk of any AI or digital tool before using it, and to have clients' informed consent before putting their personal data into one. Complete a tool record sheet (Appendix B) for each tool.

Online sessions and recordings

> **Guidance**
> Keep this section if you offer online sessions. Delete it if you do not.

If we meet online, our sessions take place through [video platform], which is encrypted. I take part from a private space where I cannot be overheard, and I ask that you do the same where you can.

> **Option 1**
> I do not record sessions.

> **Option 2**
> I only record a session with your written agreement, for [purpose, for example "clinical supervision as part of my training"]. Recordings are stored securely, are seen only by [who], and are deleted [when]. You can change your mind at any time.

Information outside the UK

> **Option 1**
> All the information I hold about you is stored in the UK.

> **Option 2**
> Some of the companies I use may process information outside the UK, for example [name, and where]. Where this happens, it is protected by legal safeguards approved for UK data, such as the UK's International Data Transfer Agreement or a UK adequacy decision.

> **Guidance**
> Check each provider's Data Processing Agreement or privacy policy. It should say where data is stored and processed, and what protects it.

How long I keep your information

I keep your records for [seven] years after our work ends. This is so I can respond to any questions or claims, and it is in line with my professional body's guidance and my insurer's expectations.

If you were under 18 when we worked together, I keep your records until you reach [25], or for [seven] years after our work ends, whichever is later.

Financial records are kept for [six] years for tax purposes.

When this time is up, I securely delete or destroy your records.

> **Guidance**
>
> There is no fixed legal period. Choose one you can justify, and apply it consistently. In Scotland, time limits for claims work differently, so check with your insurer or professional body.

If I cannot continue to practise

If I become seriously ill, or die, my clinical executor, [name, or "a qualified colleague I have chosen"], will contact you to let you know, help you find support if you want it, and look after your records securely for the rest of the time they must be kept. My executor is bound by the same duty of confidentiality as I am.

> **Guidance**
>
> BACP members have been required to have a clinical will and named executor since 3 November 2026, and other professional bodies expect similar arrangements. Therasee's free clinical will template can help.

Children and young people

> **Guidance**
>
> Keep this section only if you work with under-18s.

If you are under 18, your information still belongs to you. If you are mature enough to understand your rights, I will usually talk to you, not your parent or carer, about your information, and ask for your agreement before sharing it. In Scotland, young people aged 12 and over are presumed to be able to make these decisions for themselves.

Couples and family work

> **Guidance**
>
> Keep this section only if you work with couples or families.

When I work with more than one person, I keep each person's contact details, forms and consent separate. If one person later asks to see their records, I may need to remove information that relates only to the other person.

Your rights

You have the right to:

- **See the information I hold about you.** Just ask, in any way. I will respond within one month. This is usually free.
- **Ask me to correct it** if it is wrong or incomplete.
- **Ask me to delete it.** I may need to keep some records for the period above, but I will always explain why.

- **Ask me to limit how I use it**, or **object** to how I use it.
- **Ask for a copy in a format you can take elsewhere.**
- **Withdraw your consent** at any time, where consent is my legal reason.

In rare cases the law allows me to withhold information, for example if seeing it would be likely to cause serious harm to your health or someone else's. I would always explain this to you if it applied.

How to make a complaint

If you are unhappy with how I have handled your information, please tell me first. I would like the chance to put things right.

You can contact me by email at [email], by [online form link], by post, or by telling me in person. I will acknowledge your complaint within 30 days, look into it promptly, keep you updated, and tell you the outcome.

If you are not happy with my response, you can complain to the Information Commissioner's Office (ICO):

- Website: ico.org.uk/make-a-complaint
- Helpline: 0303 123 1113

Changes to this notice

I review this notice at least once a year. If I make significant changes, I will let you know.

Consent wording for your intake form

> **Guidance**
> Use this only if you rely on Option A (explicit consent). Keep it separate from your agreement to therapy, so consent to data use is its own clear choice. Do not pre-tick the boxes.

How I handle your information

I have read [practice name]'s privacy notice, dated [date].

☐ I agree to [your name] keeping and using information about my health, as described in the privacy notice, so that I can receive therapy.

☐ *(Only if you use AI features)* I agree to [your name] using [named feature] with my information, as described in the privacy notice.

☐ *(Only if you record sessions)* I agree to sessions being recorded for [purpose], as described in the privacy notice.

I understand I can withdraw my agreement at any time by telling [your name].

Name: _____ Signature: _____ Date: _____

Appendix A: My data protection complaints procedure

For your own records. You do not need to publish this, but the ICO may ask to see that you have one.

How people can complain: by email to [address], by [online form], by post to [address], or verbally (I will write it down).

When a complaint arrives

1. Log it on the day it arrives: date, who, what it is about.
2. Acknowledge it within 30 days. A short email is enough.
3. Look into it promptly. Check my records and talk to anyone involved, such as my software provider.
4. Keep the person updated if it is taking time.
5. Tell them the outcome in plain language, what I have done, and that they can contact the ICO if they are unhappy.
6. Record what I did and the outcome. Note anything to change in how I work.

If the complaint is also about a data breach, follow my breach plan and consider whether to report to the ICO within 72 hours.

Complaints log

Date received	From	Summary	Acknowledged (date)	Outcome and date	Changes made

Appendix B: Tool record sheet

One sheet for each tool that holds client information. This is your record of why you chose it. It covers your legal duty to check your providers and the BACP 2026 requirement to assess digital and AI tools before using them.

Tool	
What I use it for	
Client information it holds	
Company name and where it is registered	
ICO registration number	
Where data is stored and processed	
Sub-processors it names	
Data Processing Agreement in place?	Yes / No. Date accepted:
Encryption	
Two-step sign-in	
Backups	
Independent security (penetration) testing	Last tested:
AI features: is client data used to train models?	
What I will not use it for	For example: anything that replaces my clinical judgement
How I would get my data out if it closed	
Have I told clients about it (privacy notice)?	
Reviewed on	
Next review	

Appendix C: Record of processing activities

Small organisations are usually exempt from keeping a formal record of how they use personal data, but not when they regularly handle health information. As a therapist, you almost certainly need one. It can be this simple.

Activity	Whose information	What information	Why	Legal reason	Who else sees it	Where it is kept	How long
Providing therapy	Clients	Contact details, session notes, forms, assessments	To provide therapy	Contract; [explicit consent / health or social care]	Supervisor (anonymised), software providers	[System], UK	[7 years]
Appointments and reminders	Clients	Name, contact details, appointment times	To arrange sessions	Contract	Software and messaging providers	[System], UK	[7 years]
Payments and invoices	Clients	Name, invoices, payment records	To take payment	Contract; legal obligation (tax)	Payment provider, accountant	[System], [location]	[6 years]
Enquiries	Prospective clients	Name, contact details, reason for enquiry	To respond	Steps before a contract	Software provider	[System], UK	[For example, 12 months if they do not start therapy]
Clinical will	Clients	Contact details, records	Continuity of care	[As above]	Clinical executor, only if needed	[System], UK	As above

Final checklist

- ☐ Every square bracket filled in, and the brackets deleted
- ☐ One option kept for each choice, the other deleted
- ☐ All guidance boxes deleted
- ☐ Every tool that holds client information listed, with a tool record sheet
- ☐ Limits to confidentiality match your contract and professional code
- ☐ Complaints contact details tested (does the email address work?)
- ☐ Clinical executor named and aware of their role
- ☐ Published on your website, added to your intake pack, and mentioned in first sessions
- ☐ Review date in your diary for next year

About Therasee

Therasee is UK practice management software built for therapists, counsellors, psychotherapists and psychologists. Client records are stored in the UK, a Data Processing Agreement is included with every account, and a clinical will is included on every plan. Read the full guide, UK GDPR for Therapists and Counsellors, at therasee.com/articles/uk-gdpr-for-therapists-and-counsellors.