

Privacy Policy

Last updated: 2 October 2026

About this policy

Your privacy matters to me, and coming to counselling means trusting me with some very personal things. This policy explains what information I keep about you, why I keep it, who else can see it, and what you can ask me to do with it.

I'll handle your information in line with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and the ethical framework of the National Counselling & Psychotherapy Society.

Who I am

I'm Catriona Homer, and I run Catriona Homer Counselling. For data protection purposes I'm the "data controller", which simply means I decide how your information is used and I'm responsible for looking after it.

You can contact me about anything in this policy by email at catrionahomercounselling@gmail.com.

I'm registered with the Information Commissioner's Office (ICO) under reference number ZB125560.

What information I keep

When you book your first session, I'll ask for your name, address, email address and phone number.

Before our first session, I'll ask you to fill in an intake form. This covers your GP's details, an emergency contact, some brief medical information and what's bringing you to counselling. Please let your emergency contact know you've given me their details.

During our work together I'll keep brief notes of each session, plus records of appointments and payments.

Why I'm allowed to use it

Data protection law says I need a lawful reason to hold your information. Here are mine.

I use your contact details and appointment records because I need them to provide the counselling we've agreed (in legal terms, to fulfil a contract with you).

Information about your health and wellbeing counts as "special category" data and needs extra protection. I only process it with your explicit consent, which I ask for when you book.

After our work ends, I keep your records for seven years. I do this because professional guidance and my insurers expect it, and so I can respond to any later questions or legal claims about your care. This is based on my legitimate interests and, where it applies, legal obligation. It means I can keep these records even if you later withdraw consent, though I'll stop using them for anything else.

I'll never sell your details or use them for marketing or research.

Who else handles your information

I use a small number of trusted services to run my practice. Each of them stores or processes some of your information on my behalf, under contracts that require them to keep it secure.

- WriteUpp, a secure practice management system, holds your contact details, intake form and session notes.
- Zoom carries our online sessions.
- Google provides my email.

Some of these companies, including Google and Zoom, may process data in the United States. Where that happens, your information is protected by the UK-US data bridge or by contracts approved under UK law.

I also talk about my client work with a clinical supervisor. This is standard practice and helps me give you the best care I can. My supervisor is bound by confidentiality, and I don't share your full name or anything that would identify you.

Confidentiality in our sessions

What you tell me stays between us. There are a few situations where I may have to share information without your agreement:

- if I believe you, or someone else, is at serious risk of harm
- if I have a safeguarding concern about a child or vulnerable adult
- if the law requires it, for example under terrorism or money laundering legislation
- if a court orders me to

Wherever I can, I'll talk to you first before sharing anything.

If someone else pays for or arranges your sessions, such as your employer or a family member, I'll only share invoices and payment details with them. Anything else needs your written consent.

Your session notes

My notes are brief and kept to a minimum. I keep identifying details out of them as far as possible, and they're stored securely in WriteUpp, where only I can see them. They help me keep track of our work together.

Online and phone sessions

For online and phone sessions I'll always be somewhere quiet and private. I use Zoom with encryption switched on. No technology is completely risk-free, though, so I can't be responsible for failures in Zoom's own systems.

Email and phone

My email is password protected and only I read it. Email is encrypted as it travels, but it isn't fully secure, so you may prefer to keep sensitive details for our sessions.

The phone and computer I use for my practice are encrypted, password protected and have up-to-date security software.

I'll use your email and phone number to arrange appointments. Occasionally I may email you something relevant to our work, but never marketing.

My website

If you contact me through my website, I'll use what you send only to reply to you.

My website uses cookies, including ones that help me understand how visitors find me through Google Ads. I'll ask for your permission before setting any cookies that aren't strictly needed for the site to work. You can change your choice at any time through the cookie settings on the site.

How I use AI

I sometimes use an AI tool called Claude, made by Anthropic, to help with my work. I use it to reflect on my practice and plan sessions, in much the same way I might use a textbook.

I never enter your name or anything that could identify you. Before I ask about anything connected to our work, I remove details such as your age, where you live, your job, your family and any events that could point to you.

I use a paid subscription, with the setting that allows my conversations to be used to train AI models switched off. When I'm thinking about client work, I use incognito chats. These aren't saved to my chat history, aren't stored in the tool's memory and aren't used to train AI models.

AI never replaces my own judgement, my supervision or our relationship. I don't use it to make decisions about you or your care, and I check anything it produces before relying on it.

If you have any questions or concerns about this, please ask me. You're welcome to raise it at any point in our work.

How long I keep your information

I keep your records, including session notes, for seven years after our work ends. After that I delete them permanently from WriteUpp and any other system.

Your rights

You have the right to:

- see the information I hold about you, including your session notes
- ask me to correct anything that's wrong or out of date
- ask me to delete your information
- ask me to limit how I use your information
- object to how I use your information
- ask for a copy of your information in a format you can take elsewhere
- withdraw your consent at any time

To use any of these rights, just tell me in a session or email catrionahomercounselling@gmail.com. I'll respond within one month.

There are a few times when I may not be able to delete or limit your information straight away. This would be if I'm legally required to keep it, if I need it to deal with a legal claim, or if a court orders me to keep it. If that happens, I'll explain why.

Your consent

When you book your first session, I'll ask you to sign digitally and tick a box to confirm you're happy for me to hold and use your information as described here.

You can withdraw that consent at any time by emailing me. If you do, I'll stop using your health information for anything other than keeping the records I'm required to hold, as explained above.

If something goes wrong

I take every reasonable step to keep your information safe. If there's ever a breach that puts your information at risk, I'll report it to the ICO within 72 hours. If the breach is likely to affect you seriously, I'll tell you directly and without delay, and explain what I'm doing about it.

Making a complaint

If you're unhappy with how I've handled your information, please tell me first. You can email catrionahomercounselling@gmail.com or raise it in a session.

I'll acknowledge your complaint within 30 days, look into it properly, keep you updated, and let you know the outcome as soon as I can.

If you're still not satisfied, you can take your complaint to the Information Commissioner's Office at ico.org.uk or on 0303 123 1113.

Changes to this policy

I'll update this policy when the law or my practice changes. The date at the top shows when it was last revised.