Privacy Notice

Riches Counselling

Last updated: 13 November 2026

1. Who I am

I am Hannah Riches, an independent counsellor working under the company name Riches Counselling. I provide face-to-face and online counselling to individuals aged 13 and over.

I am the data controller for the personal information I collect and use through Riches Counselling. This means I am responsible for deciding how your information is used and for keeping it safe.

This privacy notice applies to anyone who contacts me about counselling, current and former clients, and visitors to my website.

If you have any questions about this notice or how I handle your information, you can contact me:

Hannah Riches – Riches Counselling

Email: hannah@richescounselling.co.uk

Website: www.richescounselling.co.uk

2. What information I collect

I only collect information that is relevant and necessary to respond to enquiries, provide counselling and run my practice safely and professionally.

When you contact me, I may collect:

- Your name.
- Your email address.

- Your telephone number.
- Information you choose to share in your initial enquiry.
- Your preferences around contact, availability and counselling arrangements.

If we arrange an initial conversation or begin working together, I may also collect:

- Your address and date of birth.
- GP details and emergency contact information, where appropriate.
- Relevant physical health, mental health and wellbeing information - in order to keep you safe in case of a medical emergency and to inform my work with you.
- Information about your personal history, relationships, family, work, identity and circumstances.
- Information about your reasons for seeking counselling.
- Brief counselling notes and records of our work together.
- Appointment, attendance and payment information.
- Correspondence between us.

Some of this information is classed as special category data under UK data protection law. This includes information about your physical or mental health and other sensitive information you may choose to share during counselling.

Where I work with someone under the age of 18, I may also collect information necessary to support their counselling safely and appropriately.

3. How I use your information

I use your personal information to:

- Respond to enquiries about counselling.
- Arrange initial conversations and appointments.
- Provide counselling and support.
- Keep appropriate professional and clinical records.
- Communicate with you about appointments and our work together.
- Manage payments and invoices.
- Meet my legal, professional and ethical responsibilities.
- Consider and respond to safeguarding concerns or situations involving risk.
- Maintain appropriate insurance, tax and accounting records.

- Respond to requests about your personal information or data protection concerns.

I do not sell your personal information or use it for unrelated marketing purposes.

4. Lawful basis for processing your information

Under UK GDPR, I need a lawful basis to collect and use personal information.

Depending on the purpose, I may rely on:

- **Contract:** where information is needed to arrange and provide counselling.
- **Legitimate interests:** where processing is necessary to run my practice, respond to enquiries, maintain appropriate records and practise safely.
- **Legal obligation:** where I need to process or retain information to meet legal responsibilities.

Some information collected during counselling is special category data, particularly information relating to physical and mental health. This requires an additional condition for processing under Article 9 of UK GDPR, alongside an Article 6 lawful basis.

Special category data (including health information)

As part of providing counselling, I may collect and process information about your physical and mental health, as well as other sensitive information you choose to share during our work together.

I process this information under Article 9(2)(h) of the UK GDPR, relating to the provision of health or social care, where the relevant legal requirements and safeguards apply. This includes the requirement for professional confidentiality.

Where appropriate, I may also rely on your explicit consent under Article 9(2)(a) of the UK GDPR.

In exceptional circumstances, where it is necessary to protect someone's life and they are physically or legally unable to give consent, I may rely on Article 9(2)(c), the vital interests condition.

5. Confidentiality

Counselling is a confidential space. I take your privacy seriously and will treat what you share with care and respect.

However, confidentiality is not absolute. There may be circumstances where I need to share information for legal, ethical or safeguarding reasons.

These may include:

- Where I believe there is a serious risk of harm to you or another person.
- Where there is a safeguarding concern involving a child or an adult at risk.
- Where disclosure is required by law, a court order or other legal process.
- Where sharing information is necessary to prevent or detect a serious crime.
- Where there is a medical emergency and information is needed to protect someone's life.

Where possible and appropriate, I will aim to discuss any concerns with you before sharing information. However, there may be circumstances where this is not possible or where doing so could increase risk.

Where information needs to be shared, I will aim to share only what is necessary and relevant to the situation.

6. Clinical supervision

I undertake regular clinical supervision as part of my professional and ethical responsibilities.

Supervision provides an opportunity to reflect on my work, consider clinical issues and ensure that I am practising safely and effectively.

I may discuss aspects of our work in supervision. Wherever possible and appropriate, I minimise identifying information. My supervisor is also bound by confidentiality and professional standards.

7. Counselling notes and records

I keep electronic counselling records to support safe, ethical and professional practice.

These may include:

- Dates of sessions and attendance.
- Brief notes about themes discussed.
- Relevant clinical or safeguarding information.
- Risk assessments or considerations, where appropriate.
- Agreed actions or important decisions.
- Relevant administrative information and correspondence.

My notes are intended to be proportionate, relevant and factual. I do not routinely record or produce transcripts of counselling sessions.

8. How long I keep your information

I only retain personal information for as long as it is necessary and appropriate.

In line with my professional body's ethical requirements and my insurer's guidance, counselling notes and records for adult clients are retained for **five years** following the end of counselling.

For clients who are under 18, counselling records are retained for **five years after their 18th birthday**.

Different types of information may be retained for different periods, depending on their purpose and any applicable legal, professional or insurance requirements. This includes:

- Initial enquiries where counselling does not go ahead.
- Counselling records for current and former clients.
- Records relating to work with children and young people.
- Financial and accounting records.
- Emails, messages and other administrative correspondence.

There may be circumstances where information needs to be retained for longer than the usual period, for example where there is an ongoing safeguarding concern, legal matter, complaint or insurance requirement.

I periodically review the information I hold and securely delete or dispose of it when it is no longer necessary to retain it.

9. Where your information is stored

I keep electronic client records using secure digital systems.

My current counselling record system is Kiku, with a planned transition to the Konfidens platform.

For online counselling, I use Google Meet or the Konfidens platform.

I also use email, WhatsApp and text messaging to communicate with clients where appropriate.

Payments are made by bank transfer.

I take reasonable steps to protect personal information, including appropriate device security, password protection and restricted access to records.

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

Where personal information is transferred outside the UK, I will ensure that the transfer is permitted by data protection law and that appropriate safeguards are in place where required.

10. Online counselling

Where counselling takes place online, I take reasonable steps to protect confidentiality and privacy from my side.

Online sessions may take place using Google Meet or Konfidens.

I ask that you also consider your privacy when attending online sessions and choose a space where you feel comfortable, private and unlikely to be overheard or interrupted.

Online platforms may process technical information such as your IP address, device information and connection data. You can refer to the relevant platform's own privacy information for further details.

11. AI, transcription and recording

I do not record, transcribe or use AI tools to process counselling sessions.

I do not and will not use AI tools to process identifiable client information.

I may use digital tools for general business administration, writing, planning or professional education, but I take confidentiality and data protection into account when doing so.

12. Website visitors and cookies

When you visit www.richescounselling.co.uk, some technical information may be collected automatically. This may include your IP address, browser type, device information and pages visited.

My website may use cookies or similar technologies for essential website functions, security, performance or analytics.

I am reviewing the cookies and tracking technologies used by my website so that I can provide accurate information about them.

Where cookies or similar technologies require your consent under UK law, I will provide an appropriate choice before they are used.

13. Sharing your information

I will not share your personal information unless there is a clear, lawful and appropriate reason to do so.

Depending on the circumstances, I may share limited information with:

- My clinical supervisor.
- My professional body, where necessary in connection with a professional or ethical matter.
- My insurer, accountant or other professional advisers, where necessary.
- Safeguarding services, emergency services or your GP where there is a serious risk or safeguarding concern.
- A court or legal authority where disclosure is legally required.
- Trusted digital service providers who process information on my behalf.

- An appointed clinical executor if I die or become unable to practise.

Where information is shared, I aim to disclose only what is necessary for the purpose.

14. Clinical will

I have a formal clinical will arrangement in place to help ensure that clients can be contacted and appropriate arrangements made if I die or become seriously incapacitated.

This arrangement involves a trusted professional who may access the minimum information necessary to contact current clients and manage relevant records appropriately.

The person appointed is bound by confidentiality and will only access information where necessary. They will not automatically take on an ongoing therapeutic role.

15. Your data protection rights

Under UK data protection law, you have rights in relation to your personal information.

Depending on the circumstances, these may include:

- The right to be informed about how your information is used.
- The right to request access to the personal information I hold about you.
- The right to ask for inaccurate information to be corrected.
- The right to request deletion of your information in certain circumstances.
- The right to request that processing is restricted in certain circumstances.
- The right to object to certain types of processing.
- The right to complain about how your information has been handled.

These rights are not absolute. For example, I may need to retain certain information for legal, professional, safeguarding, insurance or complaint-related reasons.

If you would like to exercise any of your rights, please contact me using the email address at the beginning of this notice.

I will respond to requests within the applicable legal timescales.

16. Data protection concerns and complaints

If you have a concern about how I have collected, stored or used your personal information, you can raise this directly with me.

You can contact me by email using the details at the beginning of this notice.

I will acknowledge your data protection complaint within 30 days and take appropriate steps to investigate it without undue delay. I will keep you informed where necessary and communicate the outcome once my investigation is complete.

If you are unhappy with my response, or would prefer to raise your concern with the regulator, you can contact the Information Commissioner's Office (ICO).

Information Commissioner's Office

Website: https://ico.org.uk

Telephone: 0303 123 1113

17. Changes to this privacy notice

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

The most recent version will always be available on my website.

If you have any questions about this notice or how your personal information is handled, please do get in touch.

Hannah Riches
Riches Counselling