Data Protection Policy and Client Consent Form

Ground & Grow Therapy · Rachael Hacker MBACP (Registered Member 419962)

How I store your information

I use a secure digital system called TherapyLock to store information about our therapy sessions. This form explains what TherapyLock is, what information it holds, how that information is kept safe, and what your rights are. Please read it carefully. You are welcome to ask me any questions before deciding whether to give your consent.

1. Who is responsible for your data?

I am what UK GDPR calls the **Data Controller**. I decide what information is recorded and why. TherapyLock is the **Data Processor**: it stores and processes information on my behalf and under my instructions. TherapyLock does not use your information for any other purpose, and does not share it with anyone for marketing or advertising.

2. What information is stored?

- A reference I use to recognise your record, such as your initials or a code. TherapyLock does not have a field for your full name.
- Your contact details, if I record them (such as an email address, phone number or address), so I can reach you about appointments.
- An emergency contact, if I record one, and the name and contact details of your GP or another professional involved in your care, if I record those.
- For a child or young person, further details if I record them, such as the name and contact details of a parent or guardian, the school attended, or a social worker or other professional involved.

- Details of your appointments: dates, times, whether sessions were in person or online, and whether you attended.
- Clinical notes I write after our sessions.
- Any documents I upload in connection with your care.
- Fees and payment records.

Apart from the reference, everything above is optional. I choose what to record, and any field left blank holds nothing at all. If you would like to know exactly what is held about you, just ask and I can show you.

TherapyLock does not collect your date of birth, and it does not hold your NHS or wider medical records. It holds only what I choose to record about our sessions.

3. How is your information kept safe?

- Your data is stored on servers within the European Union (Frankfurt, Germany) and does not leave the EU.
- While data travels between my device and the server, it is protected by strong encryption (TLS 1.2/1.3, the same standard used by banks).
- While stored, your data is encrypted at rest (AES-256).
- Only I can open my clients' records. The system enforces this at the database level, so no other therapist, and no member of TherapyLock's own staff, can view your notes through the service.
- TherapyLock uses no artificial intelligence to read, analyse or process your therapeutic data. No AI tools have access to your information.
- The system keeps a log of activity on your record.

4. How long is your information kept?

I decide how long to keep your records, in line with the requirements of my professional body (BACP) and UK GDPR. You can ask me at any time how long your records will be kept. When they are no longer needed, they will be destroyed securely.

5. Who can see your information?

- Me, as your therapist. I remain responsible for your records and for all decisions about your care.
- A small technical support team at TherapyLock, who may need to reach the underlying database for maintenance, or if I ask them to investigate a specific problem. This access is for technical purposes only, is limited to what is necessary for

the task, is not used to read clinical content, and is governed by a data-protection agreement between me and TherapyLock.

TherapyLock does not sell, share or pass your information to any other company or organisation.

6. Your rights under UK GDPR

- **To be informed.** This form is part of that.
- **Access.** Ask me for a copy of the information held about you. I can export your full record, including notes and documents.
- **Rectification.** Ask for inaccurate information to be corrected.
- **Erasure.** Ask for your records to be deleted, subject to my professional obligation to keep certain notes for a minimum period.
- **Restrict or object.** Ask me to limit how your information is used.
- **Data portability.** Receive your data in a structured, machine-readable format.

If you have any concerns, please raise them with me first. You also have the right to contact the Information Commissioner's Office (ICO) at ico.org.uk or on 0303 123 1113.

7. Consent is voluntary

You are not obliged to give consent, and your therapy does not depend on it. If you do not consent, I will discuss other ways of keeping records with you. You can withdraw your consent at any time. If you do, I will discuss with you what happens to existing records, which may still need to be kept in line with my professional requirements.

My full privacy notice is available at: **groundandgrowtherapy.co.uk/privacy.html**

Your declaration

I have read and understood the information in this form. I have had the opportunity to ask questions, and any questions I had have been answered. I understand my rights regarding my personal data. I consent to Rachael Hacker (Ground & Grow Therapy) storing information about me and my therapy sessions in TherapyLock.

Client name (or identifier)	
Client signature	
Date	



Registered Member **419962**
MBACP