

□ Cherry Blossom Therapy

Privacy Policy (UK GDPR & Data Protection)

Practice Name: Cherry Blossom Therapy

Therapist: Sarah Musselwhite, Paediatric Psychotherapist

Professional Memberships: PTUK Registered Play Therapist / BACP Registered Member

Data Controller: Cherry Blossom Therapy

ICO Registration Number: ZC057834

Policy Version: 1.2

Date Implemented: 1.12.2025

Review Date: 11.2.2026

Next Review Due: 11.2.2027

1. Introduction

Cherry Blossom Therapy is committed to protecting your personal data and handling it lawfully, fairly and transparently in accordance with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- ICO guidance
- PTUK Standards of Practice
- BACP Ethical Framework for the Counselling Professions

For the purposes of data protection law, **Cherry Blossom Therapy is the Data Controller.**

2. What Information Is Collected

The following types of personal data may be collected:

a) Personal Information

- Name
- Address
- Telephone number
- Email address
- Date of birth
- GP details
- Emergency contact details

b) Special Category Data (Health Data)

As a therapeutic service, Cherry Blossom Therapy processes special category data, including:

- Session notes
- Assessment information
- Safeguarding information
- Information relating to emotional or mental health

c) Administrative Information

- Consent forms
 - Contracts and agreements
 - Attendance records
 - Invoices and payment records
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3. Lawful Basis for Processing

Under UK GDPR, personal data is processed under the following lawful bases:

Article 6 – Lawful Basis

- **Article 6(1)(f) – Legitimate Interests:** To provide safe and effective therapy services.
- **Article 6(1)(c) – Legal Obligation:** Where safeguarding or legal duties apply.

Article 9 – Special Category Data

- **Article 9(2)(h):** Provision of health or social care treatment.
- **Article 9(2)(f):** Establishment, exercise or defence of legal claims (where applicable).

Processing of your information is necessary for the provision of therapeutic services.

4. How Your Information Is Used

Your data is used to:

- Provide safe and effective therapeutic services
- Maintain accurate clinical records
- Communicate regarding appointments
- Meet safeguarding obligations
- Comply with legal and professional requirements
- Defend potential legal claims

Information is processed in a way that ensures appropriate security and confidentiality.

5. Confidentiality and Information Sharing

Confidentiality is fundamental to therapy but is not absolute.

Information may be shared without consent where:

- There is risk of significant harm to a child or vulnerable adult
- There is serious risk of harm to you or others
- Disclosure relates to serious crime
- Required by court order
- Required to comply with safeguarding legislation

Where possible, you will be informed before information is shared, unless doing so increases risk.

Information may also be shared:

- With clinical supervisors (anonymised where possible)
- With professional indemnity insurers in the event of a complaint
- With professional bodies if required

Information is shared on a **strict need-to-know basis**.

6. Data Storage and Security

Cherry Blossom Therapy takes appropriate technical and organisational measures to protect data, including:

- Password-protected electronic systems
- Secure encrypted devices
- Locked storage for paper records
- Limited access (sole practitioner)

All data is stored securely in accordance with GDPR requirements.

7. Use of Third-Party Processors

Cherry Blossom Therapy may use third-party service providers for:

- Secure email communication
- Online therapy platforms (where applicable)

- Cloud storage
- Accounting services

All third-party processors are required to comply with UK GDPR and appropriate data processing agreements are in place where necessary.

8. Data Retention

Records are retained in accordance with professional indemnity insurance requirements and limitation periods for legal claims.

- **Children:** Records retained until age 25 (or 26 if aged 17 at the end of therapy).
- **Adults:** Records retained for 7 years after therapy ends.

After the retention period, records are securely destroyed.

9. Your Rights Under UK GDPR

You have the right to:

- Access the personal data held about you (Subject Access Request)
- Request correction of inaccurate data
- Request erasure (where legally appropriate)
- Restrict processing
- Object to processing
- Request data portability

Please note: Some rights may be limited where records must be retained for legal, safeguarding or insurance purposes.

Requests should be made in writing to Cherry Blossom Therapy.

10. Data Breaches

A data breach is any loss, unauthorised access, disclosure, or destruction of personal data.

In the event of a data breach:

- The breach will be assessed promptly
- Where legally required, the ICO will be notified within 72 hours
- Affected individuals will be informed if there is high risk to their rights and freedoms

All breaches are documented in line with GDPR requirements.

11. Complaints

If you have concerns about how your data is handled, please contact Cherry Blossom Therapy directly.

If you remain dissatisfied, you have the right to lodge a complaint with:

Information Commissioner's Office (ICO)

Website: www.ico.org.uk

Helpline: 0303 123 1113

12. Policy Review

This Privacy Policy will be reviewed annually or sooner if:

- Legislation changes
 - ICO guidance is updated
 - Professional body requirements change
 - Practice circumstances change
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13. Contact Details

Cherry Blossom Therapy

Northamptonshire, NN14 1GS

Phone: 07311 473976

Email: cblossomtherapy@gmail.com

Website: <https://cherryblossomconsulting.co.uk>

Data Controller:

Sarah Musselwhite

PTUK Registered Member

BACP Registered Member