

Data Retention Policy

Last updated: 18 June 2026

1. Why we Retain Your Data

As therapists in private practice, we keep records of our work together for several important reasons:

- **Legal obligations** — we must comply with UK GDPR and the Data Protection Act 2018, which require us to keep data only as long as necessary and to be able to demonstrate lawful processing
- **Professional standards** — The ethical standards expected of therapists in private practice require us to maintain adequate records of client work
- **Insurance requirements** — Our professional indemnity insurance requires us to retain records in case a claim is made after therapy ends
- **Limitation Act 1980** — This legislation sets time limits during which legal claims can be brought, which influences how long records must be kept
- **Continuity of care** — If you return to therapy in the future, accurate records help us provide consistent support

2. Retention Periods

TYPE OF RECORD	RETENTION PERIOD	REASON
Client therapy records (adults)	7 years after our last session	In line with the Limitation Act 1980 and standard professional indemnity insurance requirements
Enquiry and contact data (people who contact me but do not become clients)	12 months from last contact	Allows reasonable time for you to decide whether to proceed with therapy

Financial records and invoices	6 years from the end of the financial year in which the transaction occurred	HMRC legal requirement
Insurance records	7 years	To support any insurance claims that may arise

3. What we Retain

The records we keep typically include:

- **Session notes** — Written records of our therapeutic work together, including themes discussed, interventions used, and progress made
- **Contact details** — Your name, address, telephone number, and email address
- **Payment records** — Invoices, receipts, and records of payments made
- **Correspondence** — Emails, letters, and text messages relating to appointments or your care
- **Assessment and consent forms** — Initial assessment information and your signed consent to therapy
- **Emergency contact information** — Details of someone to contact in an emergency, where you have provided this

4. How Your Data Is Stored

Clinical session notes are kept as paper records only. These are stored on our online case management system, Halaxy. Access is restricted to each therapist via a password and passcode.

We have appointed a Clinical Executors — trusted colleagues who is also bound by professional confidentiality. Should we become incapacitated or die, our Clinical

Executors will contact you to explain what has happened and discuss how your records will be handled. They will either arrange secure transfer of your records to another therapist of your choosing, return them to you, or ensure their secure destruction according to your wishes.

Financial records such as invoices may be stored electronically in password-protected files and are shared with my external bookkeeper for accounting purposes only. Our accountant does not have access to your clinical notes.

Contact and calendar information may be shared with administrative support to help manage appointments. Administrative staff do not have access to your clinical notes.

Anonymised case material — with all identifying details removed — may be discussed with our clinical supervisors to maintain high standards of practice. Our supervisors cannot identify you from these discussions.

5. Your Right to Erasure

Under UK GDPR, you have the right to request that we delete your personal data. However, this right is not absolute. We may need to refuse or partially refuse your request where:

- Retention is necessary for the establishment, exercise, or defence of legal claims
- We have a professional or legal obligation to keep the records
- Retention is required for insurance purposes

If we cannot fully comply with an erasure request, we will explain our reasons clearly and in writing. We will always delete any data that is no longer necessary to retain.

6. Secure Disposal

When the retention period for your records has ended:

- **Paper records** are securely shredded using a cross-cut shredder or a confidential waste destruction service
- **Electronic data** (such as contact details, invoices, or correspondence) is permanently deleted from all systems and backups

We maintain a record of when client files are destroyed, without retaining any clinical content.

7. Questions or Complaints

If you have any questions about how long we keep your data or would like to discuss your records, please contact us:

Email: hello@thewellbeinggardenbath.co.uk

If you are unhappy with how we have handled your data, you have the right to complain to the Information Commissioner's Office (ICO):

- **Website:** <https://ico.org.uk>
- **Telephone:** 0303 123 1113

We would appreciate the opportunity to resolve any concerns directly before you contact the ICO, but you are not obliged to do so.

This policy is reviewed annually and updated as necessary to reflect changes in law, professional guidance, or my practice arrangements.