



The Wellbeing Garden:

Bath, Somerset

Writhlington, Somerset

Online

Telephone:

07480 174498

E-mail:

hello@thewellbeinggardenbath.co.uk

Website:

<https://thewellbeinggardenbath.co.uk>

Mission:

The Wellbeing Garden is a private therapy practice and placement provider committed to cultivating a compassionate, client-centred space that empowers individuals and couples to achieve emotional wellbeing and personal growth. We are equally committed to nurturing the next generation of mental health professionals by offering high-quality, ethical placement opportunities that combine practical experience with clinical and professional development. We aim to foster a sense of deeper connection to self and the natural world from our family-owned, 5-acre estate.

Privacy Policy

Last updated: 18 June 2026

1. Who we are

This privacy policy explains how The Wellbeing Garden collects, uses, stores, and protects your personal information. We are The Wellbeing Garden [WBG] a private practice and placement provider.

You can contact us at: hello@thewellbeinggardenbath.co.uk

2. What personal data we collect

The WBG collects and processes the following categories of personal data:

Contact and identification details:

- Your name, address, telephone number and email address
- Emergency contact details

Therapy-related information:

- The reason you have come to therapy (your presenting issues)
- Information about your background, relationships, and circumstances relevant to our work
- Session notes recording the themes and content of our sessions
- Relevant medical and mental health history
- Details of any medication you are taking
- Your GP's contact details (where appropriate and with your consent)

Administrative information:

- Appointment dates and times
- Invoices and payment records
- Correspondence between us

Important: Health and therapy-related information is classified as "special category data" under Article 9(1) of the UK GDPR. This type of data receives enhanced legal protection because of its sensitive nature, and I take additional care to keep it secure and confidential.

3. How we collect your data

The WBG collects personal data directly from you in the following ways:

- When you first contact us to enquire about therapy (by telephone, email, or through our website)
- During our therapy sessions, through what you share with us
- Through any correspondence between us (emails, text messages, or telephone calls)

We do not collect personal data about you from third parties unless you have given explicit consent for someone else to share information with us.

4. Why we process your data — lawful basis

Under UK GDPR, the WBG must have a valid legal reason (a "lawful basis") for processing your personal data. Because therapy involves health-related information, we rely on two separate legal bases:

Article 6 basis (general personal data):

Article 6(1)(b) UK GDPR — processing is necessary for the performance of the therapeutic contract between us. When you engage the WBG as your therapist, we enter into a contract. We need to process your personal data to provide the therapy service you have requested, to schedule appointments and to manage our therapeutic relationship.

Article 9 basis (special category health data):

Article 9(2)(h) UK GDPR — processing is necessary for the provision of health or social care treatment by a health professional. As qualified therapists, we are permitted to process your health-related information in order to provide you with appropriate therapeutic care.

The additional condition required under UK law is found in DPA 2018 Schedule 1, Part 1, paragraph 2 (health or social care purposes). This processing is carried out by a qualified therapist subject to the professional obligation of confidentiality under the ethical framework of COSRT.

5. Professional obligations and CPD

We are required by COSRT to attend regular clinical supervision. Supervision is a professional requirement that helps us maintain high standards of practice and ensures we are providing you with the best possible care.

When we discuss our therapeutic work with our supervisors:

- Your name and any identifying details are **not** shared within supervision
- We use anonymised or pseudonymised case material only — this means we discuss the therapeutic themes and our clinical approaches without revealing who you are
- Our supervisors are qualified professionals bound by the same confidentiality obligations as we are
- Our supervisors are bound by their own professional body's ethical framework

Supervision is about our professional development and ensuring safe, effective practice. It is not about sharing your personal information.

6. Clinical will — what happens to your records if I am unable to practise

The WBG have appointed a Clinical Executor — a trusted fellow therapist — who will act on our behalf if we become seriously ill, incapacitated, or die. Our Clinical Executor is bound by the same professional confidentiality standards that we follow.

In such circumstances, our Clinical Executor will:

- Contact you to let you know we are no longer able to practise
- Offer you information about finding another therapist if appropriate
- Handle your records confidentially, in accordance with this privacy policy and our professional obligations
- Ensure your records are either securely transferred to you, transferred to a new therapist with your consent, or securely destroyed in line with our retention policy

This arrangement ensures you will be informed and your records will be handled with care, even if we are suddenly unable to continue practising.

7. Who we share your data with

Clinical notes and therapy records:

Your clinical notes are confidential. Beyond ourselves, the following people may have limited access to certain information:

- **Clinical supervisor** — receives anonymised case material only (no names or identifying details)
- **Bookkeeper/accountant** — has access to invoice data only (your name and payment amounts for accounting purposes), not to any clinical information
- **Administrative support** — may have access to calendar and contact details for scheduling purposes only; they do not have access to clinical notes or session content

Third-party digital services:

We use the following third-party services which may process some of your data:

- **Google Analytics** — website analytics
- **Facebook Pixel** — advertising measurement
- **WebHealer** — website hosting
- **Microsoft Teams** — video sessions

Each of these services is bound by a data processing agreement. Links to their privacy policies are available on request.

We never sell your personal data to anyone, under any circumstances.

8. International data transfers

Some of the third-party services we use may transfer personal data outside the United Kingdom:

SERVICE	PROVIDER	LOCATION	TRANSFER BASIS
Google Analytics	Google LLC	USA	Standard Contractual Clauses (SCCs)
Facebook Pixel	Meta Platforms Inc	USA	Standard Contractual Clauses (SCCs)
WebHealer	WebHealer Ltd	UK	No international transfer
Zoom	Zoom Video Communications Inc	USA	Standard Contractual Clauses (SCCs)
Microsoft Teams	Microsoft Corporation	USA	Standard Contractual Clauses (SCCs)

Where data is transferred to the USA, we rely on Standard Contractual Clauses (SCCs) or International Data Transfer Agreements (IDTAs) as appropriate safeguards,

in accordance with UK GDPR Chapter V and the updated requirements of the Data (Use and Access) Act 2025.

The USA does not currently have a UK adequacy decision. You can request a copy of the relevant transfer safeguards by contacting me.

9. How long we keep your data

We retain personal data only for as long as necessary. The specific retention periods are:

TYPE OF RECORD	RETENTION PERIOD	REASON
Therapy records (clinical notes, assessments, correspondence)	7 years after our last session	In line with the Limitation Act 1980 and standard professional indemnity insurance requirements
Financial records (invoices, payment records)	6 years	HMRC legal requirement
Website enquiries (if you contact me but do not become a client)	12 months	Legitimate interest in responding to enquiries

After the applicable retention period, records are securely destroyed. Paper records are disposed of by secure shredding.

10. Your rights under UK GDPR

You have the following rights regarding your personal data:

Right to be informed You have the right to know how we collect and use your personal data. This privacy policy fulfils that right.

Right of access You can request a copy of the personal data we hold about you. This is commonly called a "subject access request." Under the Data (Use and Access) Act 2025, we will conduct a reasonable and proportionate search when responding to your request.

Right to rectification If any personal data we hold about you is inaccurate or incomplete, you have the right to ask me to correct it.

Right to erasure In certain circumstances, you can ask us to delete your personal data. However, this right does not apply where we are required to keep records for professional or legal reasons (such as insurance requirements or the Limitation Act 1980).

Right to restrict processing You can ask us to limit how we use your data in certain circumstances — for example, if you dispute its accuracy.

Right to data portability Where technically feasible, you can ask us to transfer your data to another service provider in a commonly used format.

Right to object You have the right to object to certain types of processing, including processing based on legitimate interests.

Rights related to automated decision-making You have the right not to be subject to decisions based solely on automated processing. We do not use automated decision-making in our practice.

To exercise any of these rights, please contact us at:

hello@thewellbeinggardenbath.co.uk

We will respond to your request within one month. There is no fee for most requests, but we may charge a reasonable fee if your request is clearly unfounded or excessive.

11. Data protection complaints — your right under the Data (Use and Access) Act 2025

You have the right to make a data protection complaint directly to us if you are concerned about how we have handled your personal data.

To submit a complaint:

- Contact us at: hello@thewellbienggardenbath.co.uk

We take all complaints seriously and will respond promptly.

If you are not satisfied with our response:

You have the right to escalate your complaint to the Information Commissioner's Office (ICO), the UK's independent data protection regulator:

- Website: ico.org.uk
- Telephone: 0303 123 1113
- Address: ICO, Wycliffe House, Water Lane, Wilmslow, SK9 5AF

12. Confidentiality exceptions

Everything you share with us in therapy is confidential. However, there are rare circumstances where we may need to share information without your consent:

- **Risk of serious harm:** If we believe you or someone else is at serious risk of harm, we may need to share information with appropriate authorities to help keep people safe.
- **Safeguarding concerns:** If we become aware of concerns about a child or vulnerable adult being at risk of abuse or neglect, we have a legal and ethical duty to report this to the appropriate safeguarding authorities.

- **Court order:** If a court orders us to disclose information, we are legally required to comply.
- **Legal requirement:** In very rare circumstances, the law may require us to share information (for example, under terrorism legislation).

Our commitment to you: We will always try to discuss any disclosure with you first, unless doing so would itself put someone at risk. Breaking confidentiality is always a last resort, and we would share only the minimum information necessary.

13. Changes to this policy

We review this privacy policy annually and whenever our practices change significantly.

If we make any significant changes that affect how we handle your personal data, we will inform you directly. Minor updates (such as corrections or clarifications) will be reflected in the "last updated" date at the top of this policy.

The current version of this policy is always available at: [https://
thewellbeinggardenbath.co.uk](https://thewellbeinggardenbath.co.uk)

Contact

If you have any questions about this privacy policy or how we handle your personal data, please contact us:

Email: hello@thewellbeinggardenbath.co.uk

Website: <https://www.thewellbeinggardenbath.co.uk>

Revised June 2026