



Privacy Policy

Counselling JCT | Last updated: June 2026

Data Controller	Jacqueline Connaughton, Counselling JCT
Contact	jackie.counsellingjct@gmail.com 07432 373270
Website	counsellingjct.co.uk

1. Introduction

Counselling JCT is committed to protecting your privacy and handling your personal data with care, transparency, and respect. This policy explains how I collect, use, store, and protect your personal data, and sets out your rights under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Counselling JCT is operated by Jacqueline Connaughton as a sole practitioner. I am the data controller for all personal data collected in connection with counselling services.

2. What Data I Collect

Depending on how you interact with me, I may collect the following personal data:

- Identity data: name, date of birth, gender, marital status
- Contact data: email address, phone number, home address
- Health data: relevant medical information, GP details, emergency contact details
- Financial data: records of session fee payments (processed via Starling Bank)
- Session data: brief notes made during or after counselling sessions
- Communication data: correspondence by email, phone, WhatsApp, iPhone Messages, or through the website contact form
- Usage data: website interactions, IP address, and cookies via the counsellingjct.co.uk website

3. How I Collect Your Data

- Directly from you: when you make an enquiry, complete the personal data form, sign the counselling agreement, or communicate with me
- Via third-party platforms: initial enquiries may come through Counselling Directory; contract signatures are collected via LegaleSign
- Via messaging: where you have consented to contact by WhatsApp or iPhone Messages
- Automatically: through website cookies and basic usage tracking via the Webhealer website platform
- Via the website contact form: enquiries submitted through the contact form on counsellingjct.co.uk are delivered directly to my email address and are not stored separately by the website



4. Why I Process Your Data

I use your personal data to:

- Provide counselling services and manage appointments
- Maintain professional session records as required by my professional obligations
- Contact you regarding appointments, cancellations, or important service information via your chosen communication method
- Meet legal obligations, including safeguarding requirements
- Ensure your safety and manage risk where necessary

5. Legal Basis for Processing

- Consent: for the collection and processing of health data, for messaging via WhatsApp or iPhone Messages, and for marketing or service communications
- Contractual necessity: to fulfil the counselling agreement with you
- Legal obligation: where required by law, such as safeguarding or court orders
- Legitimate interests: for professional record-keeping, supervision, and service improvement

6. Use of Artificial Intelligence (AI)

Artificial intelligence (AI) tools are used by Counselling JCT for general administrative purposes only, such as drafting template emails and creating non-client content. AI is never used to process, analyse, or generate content relating to any individual client. No personal data, identifying details, or session information is ever entered into any AI tool. AI plays no part in the counselling process itself.

7. Third-Party Processors

The following trusted third-party services process personal data in connection with the delivery of counselling services. I do not sell your data to any third party.

- Zoom — video platform for online counselling sessions. Sessions are encrypted. Please protect your own device and connection during sessions.
- LegaleSign — secure digital contract signing. Your name, email, and signature are processed to enable contract signing.
- Google (Gmail) — used for general correspondence. Sensitive communications are password-protected with passwords sent separately.
- Meta (WhatsApp) — used for appointment reminders, scheduling, and general non-sensitive communication where you have given explicit consent. WhatsApp is not a clinically secure platform. Some clients choose to share information via WhatsApp and this is accepted on the understanding that they do so by informed choice. Meta processes data in accordance with their own privacy policy.
- Apple iPhone Messages (iMessage) — used for appointment reminders, scheduling, and non-sensitive communication where you have consented. iMessage is end-to-end encrypted between Apple devices.
- Starling Bank — payment processing and bank account management. Transaction data is held by Starling in accordance with financial regulations.
- Counselling Directory — professional directory listing and initial client enquiries.
- Webhealer — website hosting and management for counsellingjct.co.uk.

8. Your Rights

Under UK data protection law you have the right to:

- Access your personal data
- Request correction of inaccurate or incomplete data
- Request deletion of your data where it is no longer necessary
- Restrict or object to processing in certain circumstances
- Receive your data in a portable format
- Withdraw consent at any time, where processing is based on consent

To exercise any of these rights, please contact me at jackie.counsellingjct@gmail.com or 07432 373270.

9. How I Protect Your Data

I take appropriate steps to keep your data secure, including:

- Secure, password-protected storage of session notes and client records
- Password protection of sensitive documents sent electronically, with passwords communicated separately
- Use of encrypted platforms (Zoom, LegaleSign, iMessage) for sessions, contract signing, and where applicable messaging
- Limiting access to personal data to myself only, except where third-party processors are involved as described above
- Ensuring AI tools are never used with personal data or client-identifying information

Where you have given explicit consent, WhatsApp or iPhone Messages (iMessage) may be used for appointment reminders, scheduling, and general non-sensitive communication. Full details of how these platforms are used, and their respective privacy considerations, are set out in Section 7. Your consent to use either platform can be withdrawn at any time.

No system is completely secure. If you believe there may have been a breach of your data, please contact me immediately.

10. Data Sharing

I do not share your personal data without your consent, except in the following circumstances:

- With my clinical supervisor, for professional development purposes. All identifying details are removed.
- With your GP or other health professionals, where you have given consent for care continuity
- With legal authorities, where required by law or to manage a safeguarding concern
- With third-party processors as listed in Section 7 above, to the extent necessary to deliver the service



11. Data Retention

Counselling records are retained for six years following the last session, in line with professional guidelines and UK data protection law. After this period, records are securely deleted or destroyed.

Financial payment records are retained for seven years in accordance with HMRC requirements.

12. Cookies

The counsellingjct.co.uk website is hosted by Webhealer and uses only essential cookies required for the website to function. No tracking, analytics, or marketing cookies are used. You can manage or disable cookies through your browser settings at any time.

13. How to Make a Data Protection Complaint

If you have a concern about how I have handled your personal data, please raise it with me directly in the first instance. I take all complaints seriously and will acknowledge your complaint within 30 days.

Contact me by:

- Email: jackie.counsellingjct@gmail.com
- Phone: 07432 373270

If you remain dissatisfied, you have the right to escalate to the ICO:

- Website: ico.org.uk/make-a-complaint
- Telephone: 0303 123 1113
- Post: ICO, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

14. Data Breaches

If a personal data breach occurs, I will notify affected individuals without undue delay and report it to the Information Commissioner's Office (ICO) within 72 hours where required by law.

15. Changes to This Policy

I may update this policy periodically. The current version will always be available at counsellingjct.co.uk. Active clients will be notified of any significant changes.

This policy was last updated in June 2026.