Data Retention Policy

Last updated: 19 July 2026

Not So Typical

Mrs Georgina Turner — Counsellor and Psychotherapist

Why I Retain Your Data

I keep records about your therapy and our professional relationship for several important reasons:

- **Legal obligations** — The law requires me to keep certain records for specific periods, particularly financial records for HMRC purposes
- **Professional standards** — As a BACP-registered practitioner, I am bound by ethical guidelines that require me to maintain appropriate records of our work together
- **Your protection and mine** — Records may be needed if questions arise about your care, or if you wish to return to therapy in the future
- **Insurance requirements** — My professional indemnity insurance requires me to retain records in case a claim is made

How Long I Keep Different Types of Data

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
Client therapy records (under 18 at time of therapy)	Until you reach the age of 25	In line with the Limitation Act 1980 and standard professional indemnity insurance requirements
Enquiry and contact data (if you do not become a client)	12 months	To respond to your enquiry and follow up if appropriate
Financial records and invoices	6 years	HMRC legal requirement
Insurance records	7 years	To support any potential insurance claims
Website contact form submissions	12 months (unless you become a client)	To respond to your enquiry

What I Retain

The records I keep may include:

- **Session notes** — Brief records of our therapeutic work together, including themes discussed and any agreed actions
- **Contact details** — Your name, phone number, email address, and postal address
- **Health and therapy information** — Details about your presenting issues and relevant medical history
- **Date of birth**
- **GP name and contact details**
- **Emergency contact details**
- **Payment records** — Invoices and payment information
- **Correspondence** — Emails and messages between us relating to your therapy
- **Therapy agreement** — The signed agreement setting out how we work together

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How Your Data Is Stored

I keep digital records only. These are held on password-protected devices with access restricted to me. I do not keep paper clinical records.

In the course of my work:

- My clinical supervisor may hear anonymised case material during supervision sessions — this means no information that could identify you is shared. My supervisor is bound by professional confidentiality obligations
- My external accountant or bookkeeper has access to invoice data only for accounting and tax purposes No other person has access to your therapy records.

Your Right to Erasure

Under UK GDPR, you have the right to request that I delete your personal data. However, this right is not absolute. I may need to retain your records until the end of the applicable retention period where this is required by professional guidelines, insurance requirements, or law.

If you ask me to delete your data and I am unable to do so immediately, I will always explain my reasons clearly and let you know when deletion will be possible.

Secure Disposal

At the end of the relevant retention period, I permanently delete all electronic records relating to your therapy. This ensures your personal data is no longer accessible or recoverable.

Questions or Complaints

If you have any questions about how I retain your data, or if you wish to make a complaint about my data protection practices, please contact me:

Email: welcome [at] not-so-typical.co.uk

(The email above is shown with [at] in place of @ to reduce spam — please replace [at] with @ when emailing) You can also use the complaints form on my compliance page:

https://notsotypical.policydiary.co.uk

If you are not satisfied with my response, you have the right to complain to the Information Commissioner's Office (ICO) at https://ico.org.uk.

ICO Registration Number: ZA874425