Privacy Notice

Working Through Trauma Therapy Ltd

1. Who we are

Working Through Trauma Therapy Ltd ("we", "us", "our") provides in-person and online therapy services. We are the data controller responsible for your personal data.

Legal entity: Working Through Trauma Therapy Ltd
Address: International House, 61 Mosley Street, Manchester, M2 3HZ
Email: info@workingthroughtrauma.co.uk
ICO registration number: ZB653545

If any of your information changes, please let us know by emailing the address above so our records stay accurate.

2. The personal data we collect — including health data

We collect and process the following categories of personal data about you:

- Contact details — name, address, telephone number, email address.
- Health and clinical information — including therapy/session notes, information you share about your mental health, history and circumstances relevant to your treatment, and any risk-related information. This is "special category data" under UK GDPR.
- Payment details — billing information and transaction records.
- Communication records — emails, text messages (sent as standard SMS, or as RCS chat via Google Messages), and WhatsApp messages, and any other correspondence between us.
- Enquiry data — information you share with us when you first get in touch to ask about availability or a consultation, whether that's through our website enquiry form, the BACP therapist directory, a text message, a WhatsApp message, or a phone call.

We do collect special category (health) data. This is central to providing therapy, and we treat it with the additional protections UK GDPR requires for this type of information.

Initial enquiries and arranging a first consultation are often handled by text message, WhatsApp, or email, before a formal client record is created in our practice management system. This notice applies equally to anything you share with us at that early stage, even before that first appointment is confirmed.

3. Why we process your data, and our lawful basis

UK GDPR requires us to have a valid "lawful basis" for each way we use your data, and — because clinical notes are special category data — an additional condition under Article 9. The table below summarises this.

Data / activity	Lawful basis (Article 6)	Special category condition (Article 9), where relevant
Clinical / therapy notes	Performance of a contract (providing the therapy service you've engaged us for)	Explicit consent (Article 9(2)(a)) — given at the start of our work together, and confirmed through your signed consent documents
Contact and appointment	Performance of a contract; legitimate	—

communication	interests (running the practice efficiently)	
Payment and billing records	Performance of a contract; legal obligation (accounting and tax law)	—
Website enquiries	Consent (you contacting us) / legitimate interests in responding to enquiries	—
Safeguarding, risk-of-harm, or legally required disclosures	Legal obligation; vital interests, where there is a risk to life	Substantial public interest (safeguarding) or vital interests, where applicable

For your clinical and therapy notes specifically, our basis is your explicit consent, given when you begin therapy with us and recorded in your signed consent documentation. You can withdraw this consent at any time, which stops us processing your notes for the purpose of ongoing therapy going forward. It does not require us to delete records we already hold lawfully — we retain those for the period described in section 7, on the separate legal and professional bases set out there.

4. Confidentiality, and when we may share information without your consent

What you share with us in therapy is confidential. There are limited circumstances where we may need to share information without your consent, in line with our professional obligations:

- Where there is a serious risk of harm to you or to another person.
- Where we have safeguarding concerns about a child or vulnerable adult.
- Where we are required to by law — for example, a court order.
- Anonymised case material discussed in clinical supervision, as required by our professional body's ethical framework.

Where practical, we will discuss this with you before any such disclosure is made.

5. Children and clients who may lack capacity

We see clients from age 16. Clients aged 16 or 17 are generally able to consent to their own treatment and to our processing of their data, in line with the Family Law Reform Act 1969.

For clients who may lack capacity to consent for themselves — whatever their age from 16 upward — we follow the principles of the Mental Capacity Act 2005: capacity is assessed for the specific decision at hand, and where a client cannot consent, we will only accept consent from someone with the legal authority to give it on their behalf — such as a Lasting Power of Attorney for health and welfare, or a court-appointed deputy — or will otherwise act in the client's best interests in consultation with those close to them, consistent with our professional and legal obligations.

6. Who we share your data with

We use a small number of trusted service providers (“processors”) to help us run the practice. They only process your data on our instructions, for the purposes below, and are required to keep it secure and confidential.

WriteUpp is our main platform for individual sessions, and Microsoft Teams for couple and group sessions. Zoom, a WhatsApp Business video call, or a telephone call may be used instead, only as a backup if we run into a technical difficulty with our main platform. A plain telephone call, or a standard SMS text message, doesn't route

through any of the platforms below and isn't separately listed — only RCS-format text messages (sent through Google Messages) do.

Processor	What it's used for	Data involved
WriteUpp	Our main platform: video calls for individual therapy sessions, the client file, session notes, scheduling and invoicing	Contact details, clinical/session notes (special category data), video/audio of individual sessions (not recorded unless separately agreed), appointment records, billing information
Microsoft 365	Business email (including BACP enquiry forms received by email) and document storage	Contact details, correspondence content, which may include special category data shared by clients over email
Microsoft Teams	Video calls for couple and group therapy sessions	Contact details, video/audio of couple/group sessions (not recorded unless separately agreed), session metadata
WhatsApp Business (Meta)	Client and prospective-client communication, including initial enquiries and appointment reminders, and as a backup video-call option if there's a technical issue with our main platform	Contact details, message content, and video/audio if used for a backup call
Google Messages (RCS)	Text messaging with clients and prospective clients, when sent as RCS chat rather than standard SMS	Contact details, message content
Zoom	Backup video-call option, used only if there's a technical issue with our main platform	Contact details, audio/video of session (not recorded unless separately agreed), session metadata
Tide	Business banking and payment processing	Payment details, transaction records
WebHealer	Website hosting, online enquiry forms, and our email domain	Contact details and any message content submitted through the website enquiry form

We do not sell, rent, or trade your personal data, and we do not use it for advertising or marketing profiling.

The BACP therapist directory is not one of our processors. If you get in touch with us through the enquiry form on the BACP directory, BACP handles that initial submission itself — they forward your message to our work email without sharing your email address with you directly. BACP decides how that form works and what happens to your details before they reach us, so they're responsible for that first step in their own right, not on our instructions. Their privacy notice is available at bacp.co.uk/privacy-notice. If you use the enquiry form directly on our own website instead (including by following the link from our BACP directory listing), that's handled by WebHealer as set out above, and reaches us the same way.

7. International transfers

Some of our processors (including Microsoft 365, Google, Zoom, and WhatsApp/Meta) are global providers who may process data outside the UK. Where this happens, we rely on the safeguards those providers have in place — such as the UK International Data Transfer Agreement, the UK extension to the EU–US Data Privacy Framework, or equivalent contractual protections — to ensure your data continues to receive a comparable standard of protection to that required under UK law.

8. How long we keep your data

- Clinical and therapy records: retained for 7 years from the end of our work together.
- Financial and billing records: retained for 6 years, in line with HMRC and Companies Act requirements.
- Enquiries that do not proceed to therapy (by whatever channel — website, text, WhatsApp, phone, or BACP): retained for 12 months, then deleted.

After these periods, your data is securely deleted or anonymised, unless we're required to keep it for longer by law or by a legal claim in progress. This applies equally to clients who begin therapy as minors — BACP does not require a longer or age-anchored retention period for former minor clients, so the same 7-year period applies.

9. Cookies

Our website uses a small number of cookies, described in our separate Cookies Policy. We do not use cookies for advertising or targeting purposes.

10. Data security

We use appropriate technical and organisational measures to protect your data against accidental loss, unauthorised access, alteration or disclosure. Access to your data is limited to those who need it to provide your care or run the practice, and our processors are contractually required to protect it to the same standard.

We have procedures in place to identify, investigate and, where legally required, report any data breach to you and to the ICO.

11. Your rights

Under UK GDPR, you have the right to:

- Access the personal data we hold about you.
- Have inaccurate data corrected.
- Request erasure of your data, in certain circumstances.
- Restrict or object to our processing of your data, in certain circumstances.
- Receive your data in a portable format, where relevant.
- Withdraw consent at any time, where consent is our basis for processing.
- Complain to the Information Commissioner's Office (ICO) at ico.org.uk if you're unhappy with how we've handled your data — though we'd welcome the chance to resolve this with you directly first.

To exercise any of these rights, email info@workingthroughtrauma.co.uk. We don't charge a fee for this, other than in cases of clearly unfounded or excessive requests. We may need to verify your identity before releasing information, and we aim to respond within one month.

12. Automated decision-making

We do not carry out any automated decision-making or profiling using your data.

13. Changes to this notice

We may update this notice from time to time to reflect changes in our practice or the law. The current version will always be available on our website, dated below.

Policy date: 21/09/2026