Privacy Notice

How we use and protect your information

Your privacy matters

ReflectiveMe Ltd provides counselling, therapeutic support in schools, and training and workshops. We understand that this can involve sensitive information. This notice explains what we collect, why we use it, who may receive it and your rights.

Who we are

ReflectiveMe Ltd (company number 17327145; ICO registration ZC236493), 38a Morton Road, Chester, CH1 5NP. Data protection contact: Stephen Ortega, stephen@reflectiveme.co.uk, 07727 124 783. Claire Ortega provides cover when needed. ReflectiveMe independently manages its confidential counselling records, including after school contracts end.

Information we collect and where it comes from

Depending on the services you use, we may collect:

- Names and contact details.
- Referral information from parents, carers and schools.
- Counselling agreements, assessments, session notes and outcome measures.
- Health and neurodivergence information, and safeguarding records.
- Workshop feedback, invoicing information and website enquiries.

We receive information directly from you and, where relevant, from schools, parents, carers and referring professionals.

For professional contacts, we may obtain contact details through existing relationships, referrals, networking or publicly available school and organisation websites.

Why we use information and the legal grounds

Purpose	Usual UK GDPR basis to assess
Responding to enquiries and arranging services	Steps before a contract or legitimate interests
Delivering counselling and managing clinical records	Contract or legitimate interests, as applicable
Safeguarding and required disclosures	Legal obligation, legitimate interests or another applicable basis
Invoicing and financial compliance	Contract and/or legal obligation
Professional outreach to schools	Legitimate interests where permitted by marketing law
Optional photographs or communications	Consent where relied upon

Counselling and safeguarding records may contain special category health information. We also identify a separate condition under Article 9 UK GDPR, and any applicable Data Protection Act 2018 safeguards, for this processing. Our final internal lawful-basis assessment determines which grounds apply to each activity. Counselling consent is not automatically GDPR consent.

Confidentiality and information sharing

Your counselling discussions are confidential. We do not routinely share what you discuss in sessions with schools or families. Where necessary and lawful, we may share attendance information, proportionate summaries of progress or safeguarding concerns.

We may also share information with:

- Clinical supervisors, using anonymised information wherever possible.
- Safeguarding agencies and relevant professionals.
- Providers of secure hosting, storage, communications, accounting and payment services.

Access to information is limited according to professional responsibilities. We do not sell personal data.

Children and young people

We explain privacy and its limits in accessible, age-appropriate language. Schools and parents/carers may be involved in referrals and consent arrangements, but young people have their own confidentiality and data protection rights. ReflectiveMe retains responsibility for the counselling records it independently controls.

Keeping information safe and how long we retain it

We protect your information using password-protected systems and devices, two-factor authentication and access appropriate to each person's role.

How long we keep information depends on the type of record:

- **Adult counselling records:** Our current general retention period is seven years after the final session, subject to relevant requirements.
- **Children's and safeguarding records:** Before disposal, we review these records in light of additional professional, legal and safeguarding considerations.
- **Enquiries that do not lead to services:** We normally keep these for 12 months after the last meaningful contact.
- **Financial records:** We keep these in line with applicable tax and accounting requirements.

When records are no longer required, we dispose of them securely.

International processing

Some technology providers may process information outside the UK. Where a restricted transfer occurs, the required UK data protection transfer rules and safeguards apply. Details of applicable transfer arrangements can be requested from our data protection contact.

Your rights and complaints

Depending on the circumstances, you may:

- Ask to access, correct or erase your information, or restrict how it is used.
- Object to certain uses of your information, including direct marketing.
- Request portability of your information.
- Withdraw consent where we rely on consent to use your information.

To make a request, contact stephen@reflectiveme.co.uk. We respond within the applicable legal timeframes.

You can also complain to the Information Commissioner's Office at ico.org.uk.

As part of the counselling services described in this notice, we do not make decisions based solely on automated processing that have legal or similarly significant effects.

Marketing and website

Where permitted, we may email schools and professional contacts about relevant services. You can opt out by replying to the email or emailing us.

Enquiries submitted through our website are stored by our website service and forwarded to our business email. For information about the technologies used on our website, please see our separate Cookie Policy.

We update this privacy notice when our practices change.