1. Confidentiality Policy

Riverwood Counselling and Wellbeing Practice work within the British Association of Counselling and Psychotherapy Ethical Framework (2026) which requires counsellors to offer the highest possible level of confidentiality to respect the client's privacy, keeping trust and client autonomy. There are exceptions where a counsellor may need to break confidentiality; the details of when this would occur are listed below. This Policy is in place to provide guidance to staff and information for clients on how confidentiality can be maintained, the circumstances it may be breached and what type of information is held.

Responsibilities

All staff working at Riverwood Counselling and Wellbeing Practice are responsible for keeping sensitive information confidential and only shared on a 'need to know basis'. Counsellors have an added responsibility to respect the confidentiality of their clients in line with the BACP Ethical Framework (2026)

All counsellors need to outline the confidentiality agreement of the service within the initial contract when working with a client and aim to receive a signed written copy of this from every client seen.

All counsellors to ensure they keep client anonymity at all times (unless subject to the following exceptions as mentioned below), including in client notes and supervision.

Limits of Confidentiality

Counsellors will not pass on personal information about their clients (including information on attendance at counselling sessions) to anyone outside of the service subject to the following exceptions:

- If the client threatens to cause significant risk of harm to themselves or others
- If the counsellor believes a child or vulnerable adult is at risk of harm or abuse
- If the client shares information relating to the following legislation:
    - The Terrorism Act (2000) requires that the counsellor disclose any belief of suspicion of acts of terrorism.
    - The Drug Trafficking Act (1986) requires the counsellor to disclose to the police information of any individual making money through drug trafficking.
    - The Road Traffic Act (2000) requires the counsellor to provide information to the police that might identify a driver in a traffic offence. In addition, if a counsellor becomes aware that a client may be driving whilst unsafe (e.g. through epilepsy, medical condition, drug or alcohol abuse) the law requires the counsellor to pass this information to the DVLA.

- The counsellor has obtained written consent from the client to pass on information on their behalf
- The counsellor would be liable to a court procedure if the information was not disclosed

The counsellor will usually attempt to gain consent from the client before passing on information, if the counsellor is unable to do so they may pass on the information to the relevant person/agency directly.

If a client discloses a safeguarding issue (in line with the above exceptions) then the counsellor will complete a risk assessment, and if deemed 'high risk' this will be passed on to the appropriate professional in line with the agency's Safeguarding Policy

Riverwood Counselling and Wellbeing Practice continues to respect the client's confidentiality and asks that the client does not bring anyone else into the session with them. There are exceptions when a third party may need to attend the counselling session these include, communicator for the deaf/hearing impaired, translator or interpreter for those with English not at their first language, a guide dog or helping dog, carer for those with a disability or additional needs.

Disclosure of information

It is a responsibility of all staff to only pass on information on a 'need to know' basis. Client information should never be shared with other clients and counsellors must only breach confidentiality in the circumstances mentioned above and aim to gain consent.

When gaining consent from a client (including under 18's and those with additional needs) counsellors use the Fraser guidelines to check clients are deemed 'Gillick competent' and able to understand why and what they are giving consent for.

Whenever possible consent to pass on information should be obtained in writing from the client, (see attached consent form), and where consent is verbal this to be noted in the client's file.

Data Protection/ GDPR - General Data Protection Regulations (2018)

Please refer to our Privacy Policy for more detailed information on how we hold client information and store sensitive and personal data.

Client information (including notes) is to be stored securely in a locked storage unit with limited access to Riverwood Counselling and Wellbeing Practice Staff only. Records or client information should not be left unattended or in an unlocked area. From March 2021, all client notes and records are held on an encrypted cloud based client management system (Write Upp). All staff have individual (password protected) log-in's to the system. Client notes to be recorded electronically via Write Upp, full training is given to practice members on how to navigate and manage Write Upp. All client information is to be kept on file for seven years, when then it will be destroyed appropriately in line with the General Data Protection Regulations (2018), Data Use and Access Act (2025) and our Practice Retention Policy.

To respect the confidentiality and privacy of the client, client information and notes are to be filed anonymously and contain no direct references to client's names.

Client statistical data may be used for monitoring service performance; no client is named or identified during this process.

Failure to abide by these guidelines could result in disciplinary action and passed onto the Counsellors professional body with which they hold their membership.

Retention Policy

Riverwood Counselling and Wellbeing Practice will hold client information and notes for no longer than seven years after the client has left the service (for clients under 18 this will be until their 25th birthday). This information will be stored securely in line with the GDPR - General Data Protection Regulations (2018) and Data Use and Access Act (2025). After seven years all client data will be destroyed unless being used as an ongoing investigation for criminal or child protection/safeguarding purposes.

In the case where a counsellor dies or is unable to continue practicing, a trusted colleague appointed as the clinical executor will make contact with active clients to inform them of the circumstances. They will have access to your contact details and clinical notes only, which will stay confidential and will be kept and destroyed in line with this policy.

AI Policy

Riverwood Counselling and Wellbeing Practice does not actively or intentionally use AI based software or third party tools within organisational operations, administration or clinical work, including therapy sessions or meetings which take place online. When working online (usually over Zoom or a similar video

conferencing platform) clients may be asked to turn off auto transcribing to maintain confidentiality.

Riverwood Counselling Practice staff will not use AI or generative AI chat bots to input client or related clinical and/or sensitive data, to formulate clinical processes, therapeutic explorations or ethical dilemmas, for clinical supervision purposes, safeguarding related concerns or for use in counselling sessions with clients.

Our website hosting and business social media accounts may use analytics to track site visitors and statistics from marketing or advertising campaigns, no personal, sensitive or identifiable data is shared from us or stored for these purposes.

Equality and Diversity Statement

Riverwood Counselling and Wellbeing Practice are committed to the promotion and development of equality and diversity. We work under a statutory duty in line with the Equality Act (2010) which recognises the following Protected Characteristics: Age, Gender, Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion and Belief, Sex (gender), Sexual Orientation and Disability. Riverwood Counselling and Wellbeing Practice respect the client's confidentiality and where sensitive data regarding a client's medical or mental health are kept securely and safely in line with the GDPR – General Data Protection Regulations (2018) and Data Use and Access Act (2025)

Related Policies and Procedures

- GDPR – General Data Protection Regulations (2018) and Data Protection Act (1998)
- Data Use and Access Act (2025)
- Safeguarding Policy and Procedure
- Safeguarding Children and Vulnerable Adults – Everyone's Responsibility
- Gillick Competences/Fraser Guidelines Check list
- BACP Ethical Framework (2026)
- Equality Act (2010)
- Data Protection Act (1998)
- Referral Procedure