Data & Privacy

How we handle your information

These documents explain how St Francis Clinic collects, stores, and protects your personal data in line with UK GDPR and the Data (Use and Access) Act 2025.

ICO-registered
UK GDPR compliant
DUAA 2025 compliant
Updated 16 June 2026

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Privacy Policy

Last updated: 16 June 2026

Who we are

St Francis Clinic is a private therapy practice run by Anthony Morgan. I am registered with the Information Commissioner's Office (ICO) under registration number 14225253.
If you have any questions about how I handle your personal data, please contact me at info [at] stfrancisclinic.co.uk

What personal data we collect

I collect and process the following types of personal data:

- **Contact details** — your name, address, telephone number, and email address
- **Health and therapy-related information** — the reasons you have come to therapy (your presenting issues), relevant medical history, current medications, and details of other healthcare professionals involved in your care
- **Session notes** — my records of our sessions together, including observations and agreed actions
- **Emergency contact information** — details of someone I can contact in an emergency, if you choose to provide this
- **Financial records** — invoices and payment records

Important: Health and therapy-related information is classified as "special category data" under Article 9(1) of the UK GDPR. This means it receives enhanced legal protection, and I take particular care to keep this information secure and confidential.

How we collect your data

I collect your personal data directly from you:

- When you first contact me to enquire about therapy
- When you complete an intake form or assessment at the start of our work together
- During our therapy sessions
- Through email or telephone communications between sessions

I do not collect data about you from any other source.

Why we process your data — lawful basis

Under UK data protection law, I must have a valid legal reason (a "lawful basis") for processing your personal data. Because therapy records include health information, I need to satisfy two separate legal requirements:

Article 6 basis (general personal data):

I process your personal data under Article 6(1)(f) UK GDPR — legitimate interests. Specifically, my legitimate interest in retaining the information necessary to provide you with the best possible treatment and to comply with my professional indemnity insurance requirements as a practitioner in private practice.

Article 9 basis (special category health data):

I process your health-related data under Article 9(2)(h) UK GDPR — processing is necessary for the provision of health care treatment by a health professional subject to a professional obligation of confidentiality.

The additional DPA 2018 Schedule 1 condition is Part 1, paragraph 2 (health or social care). My professional obligation of confidentiality is grounded in the common-law duty of confidence owed by health and wellbeing practitioners to their clients, and the standard professional practice expected of practitioners in private practice.

Professional obligations and CPD

I engage in ongoing continuing professional development (CPD) appropriate to my practice to ensure I maintain and develop my skills and knowledge.

I am not required to attend clinical supervision, and I do not currently engage in peer consultation. Your records are not discussed with any external party.

Who we share your data with

Only I have access to your records — they are not shared with any other party except where required by law.

I do not share your personal data with third parties except where:

- I am legally required to do so (for example, by a court order)
- There is a serious risk to your safety or the safety of others

- There are safeguarding concerns relating to children or vulnerable adults

I never sell your personal data.

International data transfers

I do not transfer your personal data outside the United Kingdom.

How long we keep your data

I retain your personal data for the following periods:

- **Therapy records (adult clients):** 8 years after our last session, in line with the Limitation Act 1980 and standard professional indemnity insurance requirements
- **Therapy records (clients under 18 at time of therapy):** until the client reaches the age of 25
- **Financial records:** 6 years (this is a legal requirement set by HMRC)
- **Website enquiries (non-clients):** 12 months

After the applicable retention period, paper records are securely destroyed by shredding.

Your rights under UK GDPR

You have the following rights regarding your personal data:

1. **Right to be informed** — to know how your data is being used (which this policy explains)
2. **Right of access** — to request a copy of the personal data I hold about you. Under the Data (Use and Access) Act 2025, I will conduct a reasonable and proportionate search when responding to your request
3. **Right to rectification** — to ask me to correct any inaccurate information I hold about you
4. **Right to erasure** — to ask me to delete your personal data in certain circumstances. Please note this right may not apply where I am required to retain records in line with the Limitation Act 1980 and standard professional indemnity insurance requirements
5. **Right to restrict processing** — to ask me to limit how I use your data in certain circumstances
6. **Right to data portability** — to receive your data in a format that can be transferred to another provider
7. **Right to object** — to object to certain types of processing
8. **Rights relating to automated decision-making** — I do not use automated decision-making or profiling

To exercise any of these rights, please contact me at info [at] stfrancisclinic.co.uk
I will respond to your request within one month.

Data protection complaints — your right under the Data (Use and Access) Act 2025

You have the right to make a data protection complaint directly to me. You can submit a complaint at https://stfrancisclinic.policydiary.co.uk (Make a complaint tab) or contact me at info [at] stfrancisclinic.co.uk
I take all complaints seriously and will respond promptly.
If you are not satisfied with my response, you have the right to escalate your complaint to the Information Commissioner's Office (ICO):

- Website: ico.org.uk
- Telephone: 0303 123 1113
- Address: ICO, Wycliffe House, Water Lane, Wilmslow, SK9 5AF

Confidentiality exceptions

Everything you share with me in therapy is treated as confidential. However, there are limited circumstances where I may need to share information without your consent:

- **Risk of serious harm** — if I believe there is a serious risk to your life or the life of another person
- **Safeguarding concerns** — if I become aware of concerns relating to the safety of a child or vulnerable adult
- **Legal requirement** — if I receive a court order requiring disclosure

In most circumstances, I will try to discuss this with you first, unless doing so would itself put someone at risk.

Changes to this policy

I review this privacy policy annually and whenever my practices change. If I make any significant changes that affect how your personal data is handled, I will inform you directly.