



Privacy policy

Introduction

Welcome to Abingdon Music Therapy's privacy policy.

We respect the privacy of our clients and the people involved in arranging or supporting their care. We are committed to protecting the personal data we collect and process.

This privacy policy explains how we collect and use personal information relating to people who receive our services ("clients"), as well as parents, carers, referrers and other individuals who communicate with us in connection with those services.

Throughout this policy, "client" means the person receiving the service. The client may be an adult or a child or young person. Where the client is a child or young person, a parent or carer may provide personal information to us on their behalf. In these circumstances, some of the personal information we collect will relate to the child or young person and some may relate to the parent or carer themselves.

Where this policy refers to "your personal data", this means personal data relating to you personally. Where it refers to "the client's personal data", this means information relating to the person receiving the service.

We collect, use and are responsible for certain personal information about our clients and the people involved in their care. When we do so we are subject to data protection

laws which apply across the European Union and the United Kingdom and we are responsible as 'controller' of that personal information for the purposes of those laws.

You can access our Data Complaints Policy at the bottom of this policy.

1. Important information and who we are

Purpose of this privacy policy

This privacy policy explains how we collect and process personal data relating to clients and, where relevant, parents, carers, referrers and other individuals involved in arranging or supporting the service. It is important that you read this privacy policy together with any other privacy policy or notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other policies and notices and is not intended to override them.

Where the client is a child or young person

Where you provide personal data about a child or young person on their behalf, you confirm that you are authorised to provide that information and, where consent is the appropriate lawful basis for the relevant processing, that you have authority to provide such consent on their behalf. You also confirm that, to the best of your knowledge, providing the information is in the child's best interests.

We may collect personal information about the child or young person directly from them and/or from their parent or carer, referrer, school, healthcare professional or other person involved in their care, where appropriate.

You should note the following in relation to children's data: the rights under data protection law belong to the child, even where the parent or guardian has provided the data; and once the child is deemed competent to exercise their rights, they may:

1. Access their personal data;
2. Request rectification or erasure of their data;
3. Object to processing; or
4. Withdraw consent previously provided by their parent or guardian

Controller

Abingdon Music Therapy is the controller and responsible for the personal data described in this policy (collectively referred to “we”, “us” in this privacy policy). If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us using the details set out below.

Contact details

If you have any questions about this privacy policy or our privacy practices, please contact us. Our email address is: susie@abingdonmusictherapy.co.uk

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). However, we care deeply about your data protection rights and we would appreciate the chance to deal with your concerns before you approach the ICO so please contact us using the details above in the first instance.

Your duty to inform us of changes

Please let us know if personal information you have provided to us about yourself or the client changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy or notice of every website you visit.

2. The personal data we collect

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect personal data about:

- Clients receiving our services
- Parents, carers or guardians
- People referring clients to our services
- Professionals and other individuals involved in a client's care; and
- People who enquire about our services

We collect, use, store and transfer different kinds of personal data depending on the individual's relationship with us. These may include:

- Identity Data includes the client's name, date of birth, gender and other identifying information. Where the client is a child, we will also collect identity information about their parent(s) or carer(s). Where relevant, we may also collect identity information about a parent, carer, referrer or other person involved in arranging the client's care.
- Contact Data includes contact details for an adult client or, where a client is a child, their parent or carer, including billing address, delivery or postal address, email address and telephone numbers. It may also include contact information for referrers or professionals involved in the client's care.
- Financial Data includes bank account and payment card details relating to the person or organisation paying for the service.
- Transaction Data includes details about payments made in connection with our services and the services purchased or commissioned from us.
- Technical Data includes internet protocol (IP) address, your log-in data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices individuals use to access this website.
- Usage Data includes information about how individuals use our website, products and services.
- Marketing and Communications Data includes individuals' preferences in receiving marketing from us and our third parties and individuals' communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal

your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature.

Special category and other sensitive personal data

Because we provide therapy services, we are likely to process special category personal data concerning a client's physical or mental health, disability, diagnoses, therapeutic needs and other information relevant to their care.

This information may be contained within clinical notes, assessments, clinical reports, safeguarding records, records of professional meetings and, where applicable and appropriately authorised, creative materials or audio/video recordings.

Depending on the nature of the work, we may also process other special category data where relevant, such as information concerning racial or ethnic origin, religious or philosophical beliefs, or sex life or sexual orientation.

We will only process special category personal data where we have an appropriate lawful basis and applicable conditions for processing it.

3. How we collect personal data

We use different methods to collect data from and about you including through:

- Direct interactions. We may collect personal data directly from the client or from a parent or carer acting in connection with a child client's care. We may also receive personal data from third parties where appropriate, such as schools, local authorities, healthcare professionals, social workers, other therapists or services, organisations funding or commissioning therapy. We may collect

personal data through intake forms, referrals, correspondence, telephone calls, emails and sessions, for example:

- Enquire about our services
 - Make a referral for yourself or for someone under your care
 - Sign up to our services
 - Give us feedback
 - Contact us between sessions
- Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy for more details
 - Analytics We may receive technical personal data about you from analytics providers such as Google.
 - We may receive Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Paypal.

4. How we use personal data

We will only use your personal data when the law allows us to. Some records may contain personal information relating to more than one person. For example, a child's clinical record may contain information provided by or relating to a parent, carer, sibling or other family member. We will handle such information in accordance with applicable data protection law and will take the rights and privacy of all individuals concerned into account when responding to requests for access or disclosure.

Most commonly, we process personal data in the following circumstances:

- Where processing is necessary to perform a contract with an individual or to take steps at their request before entering into a contract
- Where processing is necessary for our legitimate interests, provided those interests are not overridden by the rights and interests of the individual concerned
- Where we need to comply with a legal or regulatory obligation, such as a safeguarding referral. Please refer to our safeguarding policy.

Ways we use personal data and the lawful bases we rely on

We have set out below, in a table format, a description of all the ways we plan to use the client's or your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process the client's or your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. Our lawful ground for processing your personal data to send you marketing communications is either your consent or our legitimate interests (namely to grow our business).

Under the Privacy and Electronic Communications Regulations, we may send you marketing communications from us if (i) you made a purchase or asked for information from us about our goods or services or (ii) you agreed to receive marketing communications and in each case you have not opted out of receiving such communications since. Under these regulations, if you are a limited company, we may

send you marketing emails without your consent. However you can still opt out of receiving marketing emails from us at any time.

We do not share your personal data with any third parties.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookie policy.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of personal data

We will only share personal data where there is an appropriate lawful basis for doing so.

We may share personal data covered by this policy with:

- service providers who process information on our behalf;

- professional advisers, insurers, accountants or other advisers where necessary;
- HMRC, regulators or other public authorities where required;
- professionals or organisations involved in a client's care where this is appropriate and lawful; and
- other third parties where required or permitted by law.

Safeguarding and risk

We may disclose personal data without the individual's consent where this is necessary and lawful in order to safeguard a child or adult at risk, respond to a serious concern about the safety of the client or another person, prevent or detect crime, or comply with a legal or regulatory obligation.

Where appropriate and safe to do so, we will explain that information is being shared and why. However, there may be circumstances where informing the individual before sharing information would increase risk or otherwise be inappropriate.

We will only share information that is relevant and necessary for the purpose for which it is being disclosed.

6. International transfers

We do not transfer your personal data outside the European Economic Area (EEA).

7. Data security

We have put in place appropriate security measures to prevent personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only

process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify affected individuals and the applicable regulator of a breach where we are legally required to do so.

Personal data and AI

We shall only submit personally identifiable client data into AI platforms to the extent that such submission complies with GDPR and any other applicable legislation. We shall implement appropriate safeguards and comply with applicable data protection laws whenever we use AI.

8. Data retention

How long do we keep personal data?

We will only retain personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

As an HCPC-registered professional, we are required to keep full, clear and accurate records of the care, treatment or other services we provide and to keep those records secure. We therefore retain clinical records for an appropriate period having regard to our professional obligations, the nature of the service provided, applicable guidance, insurance requirements and the needs and rights of the client.

To determine the appropriate retention period for personal data, we consider:

- The nature, and sensitivity of the information
- The age of the client
- The nature and duration of the therapeutic work
- Relevant professional and regulatory guidance
- Insurance and contractual requirements
- Any applicable limitation periods or legal obligations
- The potential need for records to respond to complaints, safeguarding matters or legal proceedings
- The potential risk of harm from unauthorised use or disclosure of personal data
- The purposes for which we process personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

We are required by law to retain certain Identity, Contact, Financial and Transaction Data relating to people or organisations who purchase or fund services for accounting and tax purposes.

Retention periods may differ depending on the type of information and the individual's relationship with us:

- Clinical records: 7 years or until client turns 25, whichever comes later
- Enquiry/ referral data: 6 years
- Finance records: 6 years
- Unsuccessful referrals: 7 years or until client turns 25, whichever comes later
- Marketing data: 6 years

In some circumstances you can ask us to delete your data: see 'Request erasure' below for further information.

In some circumstances we may anonymise personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

Under certain circumstances, you have the following rights under data protection laws in relation to your personal data:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

These rights belong to the individual whose personal data is being processed. Where the data relates to a child or young person, their rights may in some circumstances be exercised by a parent or carer on their behalf, depending on the child's age, understanding and circumstances.

If you wish to exercise any of the rights set out above, please contact us at susie@abingdonmusictherapy.co.uk

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

Changes to this privacy policy

This policy was last updated on 11.08.2026. We may change this privacy policy from time to time. When we do we shall inform you via email.

Data complaints policy

1. We are committed to providing a high-quality service, in accordance with data protection law. At all times, we seek to comply with data protection principles by ensuring we:

- process personal data lawfully, fairly and in a transparent way;
- collect personal data for specific and legitimate purposes and do not process personal
- data in a way that is incompatible with those purposes;
- collect and use adequate, relevant and minimal personal data;
- take reasonable steps to make sure personal data is accurate and kept up to date;
- do not keep personal data longer than necessary; and
- implement appropriate security measures.

2. We acknowledge that we may not always get things right, so if something has gone wrong, we need you to tell us. This will help us to improve our standards of service and data protection controls.

3. How to make a complaint

3.1. You can contact us in writing (by email to the following email address susie@abingdonmusictherapy.co.uk using the words 'Data Complaint ' in the subject heading.

4. Acknowledging and verifying your complaint

4.1. We will contact you within 20 days acknowledging your complaint.

4.2. We will take reasonable steps to verify the identity of the person making the complaint. This may involve requesting further information or documentation from you. If the complaint is made on behalf of someone else, we will also need to check that the person making the complaint is properly authorised to do so.

4.3. If, having requested additional information, we are not in a position to identify the person making the complaint or we are not satisfied that they have proper authority to make the complaint, we may refuse to deal with it - see section 7.2.1 below.

5. Investigating your complaint

5.1. We will investigate your complaint. This will usually involve:

5.1.1. reviewing your complaint;

5.1.2. locating and reviewing the records we hold about you;

5.1.3. establishing the relevant facts; and

5.1.4. liaising with individuals who you may have dealt with.

5.2. We may also need to ask you for further information or documents. If so, we will ask

you provide the information within a specific period of time.

5.3. We will update you on the progress of your complaint at appropriate times.

6. Notifying you of the outcome of our investigation

6.1. We will contact you at the end of our investigation to tell you what we have done and what we propose to do to resolve your complaint.

6.2. We usually aim to do this within 30 days of the date of receiving your complaint. However, this time period may be extended where:

6.2.1. we ask you to provide further information to verify your identity or your authority to

make the complaint, or in relation to the complaint itself;

6.2.2. your complaint is complex or involves locating and/or reviewing a large volume of

information; or

6.2.3. you have made several complaints, which we need to investigate at the same time.

6.3. We will tell you if we need more time to properly investigate your complaint and explain why.

7. Refusing to deal with your complaint or charging a fee

7.1. We prefer to deal with complaints and, preferably, to resolve them. We will not usually charge a fee for handling a complaint.

7.2. We may, however, refuse to deal with a complaint where:

7.2.1. after requesting additional information in accordance with section 4.2, we are not in a position to identify you and/or to verify that you are authorised to make the complaint; or

7.2.2. we have asked for more information in relation to the complaint itself (section 5.2), but you have not provided this within a reasonable time.

7.3. Where we consider the complaint to be manifestly unfounded or excessive, eg because you have made the same complaint repeatedly, we may:

7.3.1. refuse to act on the complaint; or

7.3.2. charge a reasonable fee for dealing with the complaint, based on our reasonable administrative costs - we will notify you of the proposed fee in advance of incurring it.

8. What to do if we cannot resolve your complaint

8.1. If you are unhappy with the outcome of your complaint, you can complain to the data protection authority of the country where you are based. In the UK this is the Information Commissioner's Office (ICO), or you can seek to take action in the courts.

8.2. The ICO's contact details are:

Address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number 0303 123 1113

More details on how to complain to the ICO are available on the Complaints page of the ICO's website. You should usually submit your complaint to the ICO or other data protection authority within three months of your last contact with us.