

## **Website Privacy Policy**

This privacy policy details how I, Angela Hughes of Marble White Counselling will collect, store and protect any information provided by users of this website. This will come into effect from 25<sup>th</sup> May 2018. All current and previous service users will continue to fall under the Data Protection Act of 1998.

When visiting this website (Marble White Counselling), you are consenting to practices explained in this policy and the use of cookies. Please see Cookie Policy attached to the footer of this website.

Under the General Data Protection Regulation (GDPR) effective from 25<sup>th</sup> May 2018, the data controller is Angela Hughes, Marble White Counselling.

I am registered with the Information Commissioners Office (ICO) on their register of data controllers. Data Protection Registration Number: ZA109970. Please see [www.ico.org.uk](http://www.ico.org.uk) for further details.

When visiting this website, you may contact me via email or phone. Details such as your name, email address, telephone number or any sensitive information you choose to disclose (for adults over the age of 18) will be kept for six years and then shredded. Those under the age of 18, details will be kept for 6 years after their 18<sup>th</sup> birthday. This falls under the basis of a legal obligation for processing (See [www.ico.org.uk](http://www.ico.org.uk) for further details). Six years is the time limit for legal action to be brought against a counsellor. This data is required in order to contact you regarding your sessions. Any personal information disclosed by you in the initial email or by phone will help me to know whether I am competent as a practitioner to work with you.

Both my email accounts [info@marblewhitecounselling.co.uk](mailto:info@marblewhitecounselling.co.uk) and [angelahughes40@hotmail.co.uk](mailto:angelahughes40@hotmail.co.uk) are password protected. Hotmail and Vistaprint's sites are securely protected with an SSL Certificate to help prevent unauthorised access. Please see [www.vistaprint.co.uk](http://www.vistaprint.co.uk) and [www.hotmail.co.uk](http://www.hotmail.co.uk) for their compliance with GDPR.

My business phone is password protected and I erase all telephone numbers, voice messages and texts from the phone within 24 hours of receipt. I do not store any client telephone numbers in the contact section of my phone. This complies with the GDPR principle of not keeping excessive amounts of personal data. See [www.ico.org.uk](http://www.ico.org.uk).

In the event that texts contain sensitive information, which may be required for future legal compliance or potential legal action brought against Angela Hughes of Marble White Counselling, these will be documented and kept secure in a locked filing cabinet or via computer for the time limits as stated above, then subsequently shredded and deleted.

The computer is password protected and securely protected with relevant virus and malware systems. An external hard drive is used for back up should the computer fail. This is also password protected and stored in a fire proof, locked container.

I will only contact you via email or telephone if necessary when you are using my service or within the six-year retention period should a third party contact me about our liaison. I will not give out any information to third parties without your permission, unless I am issued with a Court Order from a judge; whereby I am legally obliged to comply with any requests for information.

I regard information you disclose as confidential. Exceptions include if you are at significant risk of harm to yourself or others. I will explore this with you, however may ask for your written consent to contact another professional such as your G.P in order to support you effectively. I retain the right to break confidentiality without prior consultation should I consider the urgency of the situation requires me to act immediately to protect the safety of yourself or others. This complies with vital interests under GDPR, as I am lawfully processing the data in order to protect another person's life (See [www.ico.org.uk](http://www.ico.org.uk)). I am also required by law to report information which assists in the prevention of terrorist activities and drug money laundering (Bond, 2015).

As an Accredited, Registered Member of The British Association for Counselling & Psychotherapy (BACP) and The National Counselling Society, I work within their 'Ethical Framework for Good Practice' and 'Code of Ethics'. This means I attend monthly clinical supervision, which is a form of professional consultation that protects both of us and ensures I offer best practice. Anonymised cases may sometimes be used for the purposes of academic assessment, individual and peer supervision or the supervision and/or training of counsellors. This falls under a contractual basis for processing, (see [www.ico.org.uk](http://www.ico.org.uk) for further detail) as I have an ethical obligation within my professional bodies to embark upon supervision

In the unlikely circumstances I am unable to contact you due to serious illness or death of the therapist, my supervisor or a trusted colleague will inform you of the situation and if necessary refer you onto another therapist should you wish to continue your counselling. Again, this conforms to a contractual basis for processing, as I am duty bound under my ethics to ensure this process is in place for service users.

In regards to you contacting me via other social media sites such as my business pages on Facebook, LinkedIn or Twitter, the same procedures apply to that of my business phone above. For example, I will delete all messages within 24 hours of receipt, in order to comply with keeping as minimal data as possible. However, I may document any sensitive information which could be needed for legal compliance or legal action against myself in a locked filing cabinet for the duration of six years if over 18 or six years after a child's 18<sup>th</sup> birthday. The information will then be shredded.

For individuals using my service, you have a right of access to the data I hold about you. This will be issued free of charge, unless deemed excessive or unfounded. In the cases where a request is viewed as 'excessive or unfounded', a 'reasonable fee' will be charged. The data will be made available within a month of the person's written request. A meeting will be held to discuss the information provided. This then gives the recipient an opportunity to explore any points necessary.

The General Data Protection Regulation (GDPR) details the client's right to erasure or right to be forgotten. This is counteracted should the counsellor require the information to be kept for legal processing purposes. The client has a right to have information stored on them corrected if they believe this is not an accurate representation of the matter at hand. If there is any dispute between the professional and client in regards to this and no mutual agreement reached, this will be recorded alongside the relevant information.

Testimonials are used on my website and other marketing products such as directories, leaflets and business cards to offer reassurance to potential clients that the service provided supports the information I have presented. This fulfils the consent basis for lawful processing under GDPR (See [www.ico.org.uk](http://www.ico.org.uk)). Clients are under no obligation to give a testimonial. At the end of therapy, clients are invited to offer some feedback based upon their experience of therapy and this is entirely voluntary. It can help both parties to reflect on the process and bring closure to the relationship. Explicit consent is obtained via written permission and complete client anonymity is maintained. Consent forms will be kept in a locked filing cabinet for the duration that Marble White Counselling operates and then subsequently shredded. Service users can at any point withdraw consent in regards to testimonials. Upon a written request, I will delete any testimonials on my website or marketing materials within a month and shred the evaluation form. Access and modification to testimonials can be made by contacting Angela Hughes at [info@marblewhitecounselling.co.uk](mailto:info@marblewhitecounselling.co.uk) or [angelahughes40@hotmail.co.uk](mailto:angelahughes40@hotmail.co.uk) These will be undertaken within a month of receipt of request.

Whilst I make every endeavour to protect the data transmitted and stored when using this website, unfortunately transmission of data via the internet is not completely secure. This is undertaken at the user's own risk. In the event of any data breach, you will be informed by Angela Hughes of Marble White Counselling. I am also required to notify the Information Commissioner's Office (ICO).

Complaints, questions, or access requests should in the first instance be made to Angela Hughes, Marble White Counselling, Telephone: 07716 124 328. Email: [info@marblewhitecounselling.co.uk](mailto:info@marblewhitecounselling.co.uk) or [angelahughes40@hotmail.co.uk](mailto:angelahughes40@hotmail.co.uk) Alternatively, you can contact the Information Commissioner's Office (ICO) on 0303 123 1113.