

## Website Privacy Policy

This privacy policy outlines my (Anna Rexha) obligations as a therapist and your rights as a client.

Please take your time to read through the whole document that has been created to explain how I collect, store and protect information provided by users of this website [www.indigocounsellingsolutions.com](http://www.indigocounsellingsolutions.com).

This agreement includes my new data responsibilities under the **General Data Protection Regulation** which came into effect on **25<sup>th</sup> May 2018**. All my current and previous clients will continue to fall under the Data Protection Act of 1998.

By visiting [www.indigocounsellingsolutions.com](http://www.indigocounsellingsolutions.com), you are accepting and consenting to the practices described in this privacy policy and cookies policy included on this website.

Under the **General Data Protection Regulation** (GDPR) that came into effect on 25th May 2018, the **data controller** is Anna Rexha, Indigo Counselling Solutions, 1B Law Street, Hoole, Chester, CH2 3AT and Stanlaw Abbey Business Centre, Dover Drive, Ellesmere Port, CH65 9BF.

I am registered with the Information Commissioners Office (ICO) on their register of data controllers. My Data Protection Registration Number is A8371487 Please visit [www.ico.org.uk](http://www.ico.org.uk) for further details.

### **Therapist Responsibilities**

In order to comply with the new regulations regarding contact and consent, I (Anna Rexha) need to make you (client) aware of your rights and confirm that you give consent for Indigo Counselling Solutions/ Anna Rexha and any relevant parties mentioned to collect and store your data in the way described below.

### **What is collected and why?**

When visiting this website, you may contact me via phone, email or my contact form. My contact form collects data such as your name and email address which is then used to contact you to arrange a counselling session or answer some questions that you may have. The information from the contact form is not in any way used by the hosting provider (OVH). My contact form together with the [www.indigocounsellingsolutions.com](http://www.indigocounsellingsolutions.com) website is SSL protected so fully encrypted. Indigo Counselling Solutions will collect and store your **name, date of birth and age**. This is basic information that helps me (Anna Rexha) to get to know you better but is also stored for lawful and safeguarding purposes (see confidentiality/ sharing of information statement).

Your **Address, Email address and phone number** is recorded and stored as a means of contacting you regarding your sessions. The next of kin details would be used in an emergency. I will usually contact you using the method you first contacted me on but if I can't reach you I will try a different method. These details may also be used for emergency purposes where there is an evident risk of harm to yourself (see confidentiality statement). **GP details** are recorded for safeguarding purposes whereby I have cause concern for your wellbeing and safety I may have to contact your GP. Where possible I will seek to get your consent and inform you before doing so. **Session notes**, I keep very brief anonymous notes of key themes discussed in our sessions. The purpose of recording this is for my own recollection and to monitor the work we are doing and needs to be retained for lawful purposes.

### **Confidentiality/sharing of information**

All information collected and shared will not be shared with anyone else. Indigo Counselling Solutions/Anna Rexha will not sell your information and will not use it for any purposes other than those related to therapy.

There are however **exceptions** that may require me to share your information with a third party, details of which are outlined below. Please note that a decision to breach confidentiality is not taken lightly and all due consideration to your privacy is taken into account. Confidentiality may need to be breached in the following circumstances:

- There is significant risk of harm to yourself, in this instance information may need to be shared with a GP or other professional. I will explore this with you, however may ask for your written consent to contact them in order to support you effectively.
- There is information shared that suggests a child/vulnerable adult is being harmed or is at risk of harm. In this instance information may need to be shared with relevant services.
- If there is disclosure of terrorism or money laundering I am legally obliged under the terrorism and money laundering act to disclose this information to the police.
- Finally, if I am subpoenaed by court to share any information then I must do so upon request.
- As a Registered Member of The British Association for Counselling & Psychotherapy (BACP), I am required to have a monthly supervision. This means that I may at times share my case work with my supervisor who is a qualified counsellor and adheres to the same confidentiality and privacy requirements. All information shared is anonymous to avoid identification.
- In the event of my death or terminal injury resulting in me being unable to carry out my work my colleague whom is a qualified counsellor who also adheres to the same confidentiality requirements will have access to all my clinical records in order to inform clients and end therapy and destroy data as required.

### **Data storage and Disposal**

Most data Indigo Counselling Solutions collects is recorded on paper format and is stored in a locked filing cabinet together with a separate folder with your name and unique client number. Your contact number is stored on my password protected phone using only your initials for the duration of therapy.

The length of time I store data varies, throughout the duration of therapy I will keep all records. Once therapy has terminated I will keep your records for a maximum of 30 days after which point they will be shredded. Your session notes and the separate folder with your name and unique client number will be kept for a further 5 years in line with my insurance policy and legal obligations.

I will only contact you via telephone or email if necessary when you are using my service or within the five-year retention period if a third-party contact me about our work together. Phone numbers will only be kept for the duration of therapy. Texts and voice messages will be deleted within 24 hours of receipt unless they contain sensitive information. Emails will be kept for the duration of therapy and will be deleted as soon as work is completed unless they too contain sensitive information that will require me to break confidentiality (see confidentiality/ sharing of information statement). These will be documented and kept secure in a locked filing cabinet or via computer (emails) for the time limits as stated above.

The computer I am using to access emails is password protected and securely protected with an Antivirus software and Firewalls. If you email or text me after ending therapy, you will need to include your name, so I can identify you. Although my email account [indigocounsellingsolutions@gmail.com](mailto:indigocounsellingsolutions@gmail.com) is password protected and both Google Mail (Gmail) and OVH's sites are securely protected with an SSL Certificate, it is said that general mail systems are not secure. This is the reason why I do not recommend you emailing or texting any sensitive information to me. Please visit <https://www.ovh.co.uk/> and <https://policies.google.com/privacy?gl=GB&hl=en-GB> for more information.

### **Your Rights**

Under General Data Protection Regulations, you have the following rights:

- The right to be informed about the collection and use of your personal information as described herein.

- The right to access copies of any information held about you, this can be accessed through a data subject access request, and the right to receive a response to this request within a period of no more than 1 month.
- The right to rectification; to have inaccurate personal data rectified or completed if incomplete.
- The right to erasure; you have the right to opt out of data collection. If you wish to do so please make this request in writing, however some data cannot be erased and will need to be retained for lawful purposes and in line with my insurance policy.
- The right to data portability. You have the right to obtain and reuse your personal data for your own purposes across different services.
- Finally, you have the right to object to any personal data being collected, this will need to be made known in advance or at the start of any therapy commencing. Please note if this is the case all therapeutic work will be terminated as I am required to keep appropriate records in line with my insurance and ethical bodies as well for legal and safeguarding matters.

### **Accessing your data**

If you wish to make a request for your data under a data subject access request, please do so in writing. I will then request you to sign a disclosure consent form. You will then expect to receive the information within 30 days of receipt of the request. We may also arrange a meeting to discuss the information you would be provided with.

### **Data security**

I take confidentiality and privacy very seriously and I am bound by BACP's 'Code of Ethics'. I make sure I do everything to protect the data that goes through this website, but I cannot guarantee that the data transmission is completely secure. Use of the website is at the user's own risk. If data breach occurs, Anna Rexha of Indigo Counselling Solutions will immediately contact you and inform about the breach. The Information Commissioner's Office (ICO) would also be notified in this case.

If you have any questions, want to make a complaint or access your files please contact Anna Rexha, Indigo Counselling Solutions, 1B Law Street, Hoole, Chester, CH2 3AT or Stanlaw Abbey Business Centre, Dover Drive, Ellesmere Port, CH65 9BF, depending on the location of your counselling sessions. Telephone number: 07544 094 617. Email address: [Indigocounsellingsolutions@gmail.com](mailto:Indigocounsellingsolutions@gmail.com). Alternatively, you can contact the Information Commissioner's Office (ICO) on 0303 123 1113 or visit their website [www.ico.org.uk/](http://www.ico.org.uk/).