

**Family Mediator Bath: Privacy Policy**

1. Shiel Macmilllan, of Family Mediator Bath is registered with the Information Commissioners Office in line with its obligations under the Data Protection Act 1998 and the General Data Protection Regulation 2018. Date of registration 19th May, 2019: date of expiry 19th May, 2020: Registration reference ZA380106. Shiel Macmillan will maintain this registration and be mindful of its statutory obligations under the Act and the Regulation, and of advice and guidance issued by the ICO.

1. Family Mediator Bath will hold all information supplied by clients securely. Computerised records will be held only on an encrypted online computer drive and all computers used to access this drive are secured with up to date antivirus and firewall protection. Security measures are regularly reviewed.
2. Paper records and documentation will be held in lockable filing cabinets at 8 The Havory, Bath. If it is necessary for records to be taken elsewhere they will remain in the possession of the person to whom they are entrusted, that is only a person who is a partner or who has signed a confidentiality agreement with Family Mediator Bath.

1. Mediation and Parenting Coordination are confidential services. All personal data will be confidential to the clients who provide it. They may access all records held relating to themselves at any reasonable time on request. In no circumstances will any personal information on clients be released to any third party without the explicit consent of the person who provided the information.  The only exceptions to this are that Family Mediator Bath:

1. reserves the right to inform the relevant statutory authority of information disclosed in Mediation and Parenting Coordination which indicates that a child or vulnerable adult has suffered or is at risk of significant harm. Normally clients would be informed of any such notification, but if, exceptionally it is felt that such notification could itself expose the child or vulnerable adult to further risk a unilateral notification may be considered necessary.
2. reserves the right to inform the relevant statutory authority of information relating to possible money laundering should evidence of this be disclosed in Mediation and Parenting Coordination. This provision reflects Family Mediator Bath’s obligations under the Proceeds of Crime Act 2002.

1. Family Mediator Bath records will normally be held for one year and then safely destroyed/deleted, except in cases of legally aided mediation (see below).

1. In the case of those eligible for legal aid for family mediation, Family Mediator Bath will provide family mediation services in accord with the policies and procedures of the Compass Resolution Network, copies of which are available on request. The Legal Aid Agency requires family mediation records to be held for six years.  Records may be held at the offices of Compass Resolution or on their electronic systems. Compass Resolution is registered with the Information Commissioners Office.

1. Family Mediator Bath mediator is accredited by the Family Mediation Council (FMC), https://www.familymediationcouncil.org.uk/ (Shiel Macmillian - Unique Registration Number: 0300A) and therefore bound by the FMC Code of Practice both of whom will have access to all records but will exercise this access on a need to know basis.  Family Mediator Bath engages staff to assist in the provision of family mediation and administrative services on a self-employed basis. Currently, Altar Home and Business, who provide administrative services.  All such staff are required to comply with the Family Mediator Bath privacy policy, the principles of confidentiality governing family mediation practice as set out in the Family Mediation Council’s Code of Practice. They are also required to sign a confidentiality agreement.
2. The Family Mediation Council Code of Practice requires accredited family mediators to engage a Professional Practice Consultant. The PPC for Family Mediator Bath is Francis Place, Accredited Family Mediator of Progressive Mediation //www.progressive-mediation.co.uk/.  Francis Place may have access to confidential information held by Family Mediator Bath, in conjunction with her duties as Professional Practice Consultant.

1. Anyone working with Family Mediator Bath who has access to any data is required to sign a confidentiality agreement.

Reviewed and updated 1/6/18

Adapted from C. Place (2018) Privacy Policy. Progressive Mediation. Bristol.