

The Bedfordshire Centre for Therapeutic Studies

Privacy policy

The Bedfordshire Centre for Therapeutic Studies is committed to ensuring that the privacy is protected of everyone associated with the Centre (data subjects) including applicants, past students and current students. The General Data Protection Regulations gives users of the centre the right to know how personal information is collected, how it's used and the procedures that are in place for it to be safeguarded. There are some other rights that the data subject has which you'll find below. Importantly the legislation requires that we gain consent to record and process data.

Definitions : Personal information is any information related to a person who can be identified either directly or indirectly through that information.

Individual rights

Under data protection legislation, individuals have the right;

- a. To have their information kept confidential.
- b. To view and have a copy of information held about them.
- c. To request the amendment of any inaccuracies in the information held about them.
- d. To request the erasure of any information held about them.
- e. To withdraw any previously given consent for the Centre to hold any personal information.

Purposes of collecting data:

- **For initial assessment and course delivery** – in order to assess suitability for the training and to form part of the initial assessment for the training we collect personal data and other more sensitive information in the form of personal reflections. We also collect personal data to register candidates with the Counselling and Psychotherapy Central Awarding Body (CBCAB) and to deliver the required training.
 - Information collected includes: name, address, telephone number, email address, date of birth, ethnicity, gender, qualifications including copies of relevant qualifications, learning needs and relevant employment history. Photocopies of ID are also collected. We also ask reflective questions where more sensitive information may be collected.

- Name, date of birth, ethnicity and gender are required for Candidate Registration with CPCAB. CPCAB require that we hold proof of ID.
- Contact details for correspondence. Your tutor and course supervisor may hold your mobile phone number on their phone for emergency use only. Once the course has finished your number will be deleted. The Centre Manager liaises by email for administration purposes and occasionally for the delivery of the course.
- Tutorial Records – to support the delivery of the course and offer pastoral support. To keep track of assignments, personal therapy and client hours. These records are kept in the tutor file and at the end of the course handed to the Centre Manager for storage.
 - Your supervisor will also take notes of the session which will be kept securely and in line with our storage policy.
- Progress Reports – brief update on each student, twice a year – handed to Centre Manager to be kept on Managers File in secure storage.

Our Policy at the Centre, in regards to the rights of the data subject, is as follows:

- a. **Confidentiality** : Data is kept mainly in hard copy form in files and securely stored in a lockable cabinet. Applications emailed to the Centre are kept in the Yahoo.com inbox until the end of the course where they are deleted. All other correspondence in email form is destroyed unless it is relevant to keep as hard copy form with student records. Hard copy paperwork is destroyed 7 years after the end date of the course. Phone numbers are deleted from mobile devices, held by tutors/supervisors at the end of the course.
- b. **To view and have a copy of records** : Data subjects can request to view records. Under Data Protection Law the centre has up to one month to provide information requested. If a large volume of information is requested and it will take longer than data subjects will be notified.
- c. **To request amendments** : Data subjects can request records to be amended. If this is related to non-factual information (tutorial records) then we may need to obtain advice from the BACP, CPCAB or our insurance company. Changes like change of names, we will require evidence of this type of change.
- d. **To request erasure** : data subjects can ask for data to be deleted once it is no longer relevant in order for us to provide our service to you. Whilst studying with us, we do require contact details and other personal information for correspondence, CPCAB registration and Certificate posting.

- e. **To withdraw consent** : once it is no longer relevant, for the delivery of your training, to hold personal information data subjects have the right to withdraw consent. This will mean that we won't keep you informed of further training and services. If you don't actively withdraw your consent once your course is completed then you may receive CPD type emails from us.

In short, the Centre complies with the above requests unless it considers that there are compelling reasons not to do so e.g. safeguarding. In these cases, the individual is informed of this decision and of the steps that they can take to appeal against the decision.

Sharing information

With the exceptions noted below, the Centre does not share personal information with any third party. However, the Centre will share personal information with a third party if: a. The individual requests this. b. The Centre requests and receives specific permission from the individual to share their personal information, e.g. to gain reasonable adjustments from CPCAB. c. The Centre has a safeguarding concern. d. There is a requirement by law to share this information.

Within the centre certain information may be shared within the team. For example, the Level 4 application is shared with the co-tutor who interviews the candidate in order to assess suitability for the training. Contact details may be shared with a tutor or supervisor for pastoral support or emergency use e.g. if class is to be cancelled. Only relevant information is ever shared and on a needs must basis.

Storage and security of personal information

- The majority of data is kept in hard copy form and is securely stored at the Centre's postal & office address: 12 Venus Avenue, Biggleswade, Beds. Tutors are responsible for storing personal hard copy data (like tutorial records) in secure storage in their homes or offices.
 - Some data (e.g. journals, assignments and tutorial/supervision records) is transported to and from lessons. All tutors take serious care to protect these documents. Should any of these documents be lost then you will be notified.
- Email correspondence is stored on the Centre Managers Yahoo account and is deleted at the end of the course. This includes application forms containing personal data. Any relevant correspondence required for the delivery of the training or to offer pastoral support may be printed and stored with the data subject's records and is retained in

alignment with hard copy data. Sensitive data in correspondence between tutors must be deleted as soon as possible with a hard copy of the email printed for record purposes.

- Email addresses are kept on Centre Managers Yahoo account to alert past students to CPD and other events, unless consent is withdrawn.
- The only personal data kept on a password-protected computer is the student's payment plans which holds their names and payment choice, but no bank details or contact details are held.
- Tutors to operate a clear desk policy when marking.
- To tick on tracking sheet as assignments are submitted prior to the end of the course day/evening. To then P or R once marked.
- Transport assignments in a folder to keep separate from other paperwork.
- Be cautious when transporting by car and only transport where and when necessary.

Retention of records

- All hard copy data is destroyed seven years from the end date of the course. This includes application forms, tutorial records, registers, assignment tracking sheets.
- Email correspondence is deleted at the end of the course. Any sensitive data shared between tutors is required to be printed and kept with tutorial records so emails can be deleted in a shorter timeframe. This is to limit data breaches, of sensitive data, from tutors who access their emails via mobile devices or shared laptops. Once made into a hard copy the information is kept in alignment with hard copy data.
- Numbers are deleted from mobile phones once course has finished and the student isn't returning to the centre for the next level of training. All text messages are deleted.

Breaches

Breaches of data security that involve personal information are managed in accordance with the General Data Protection Regulations. Any breach is:-

- Recorded.
- ICO notified and advise gained.
- Person, whose data was breached, is notified.
- necessary steps taken to ensure any systemic failure is rectified in order to prevent future breaches.

This policy and its implementation is reviewed annually. A record is kept of these reviews.

Last reviewed on 10th October 2019