SCPTI
Scarborough Counselling & Psychotherapy Training Institute

Data Protection, Management and Retention Policy

Introduction

This policy applies to all personal data, and special categories of personal data (sensitive personal data), that SCPTI collects and processes in the course of its business, in electronic form in any medium and in structured paper filing systems.

To comply with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, SCPTI must collect and use information fairly, store it safely and not disclose it unlawfully to anyone else.

This policy applies to all SCPTI employees, whether permanent or temporary, and to contractors, consultants, trainers, trainees and members. SCPTI and any of its staff or trainers who process or use personal information must always follow the principles in this policy.

SCPTI is registered with the Information Commissioner's Office (ICO) for collecting and using personal data. The registration reference is ZA000703. This policy has been written in line with relevant ICO guidance.

Objectives

SCPTI will make sure that:

- appropriate procedures are in place for processing and managing personal data, including technical and administrative security measures to safeguard personal information;
- staff and trainers know the security procedures they must follow when handling personal or sensitive data;
- the Executive Directors hold specific responsibility for data protection compliance;
- staff are given a supportive environment and a culture of best practice in processing personal data;
- staff understand their responsibilities when processing personal data, and the methods for handling that information are clearly understood;
- staff and trainers report any actual, near-miss or suspected data breach to the Executive Directors for investigation, and any serious breach is reported to the ICO within 72 hours of SCPTI becoming aware of it;
- individuals who wish to make a subject access request, or exercise any of their other rights, know how to do so and whom to contact;
- staff understand that subject access requests and other requests must be dealt with promptly and courteously;
- individuals are assured that their personal data is processed in line with the data protection principles, and is always secure and safe from unauthorised access, alteration, use or loss;
- other organisations or third parties with whom personal data needs to be shared or transferred meet compliance requirements;
- any new system is assessed using a Data Protection Impact Assessment, to establish whether it will hold personal data, whether it presents any risk to privacy or to individuals' data, and whether it meets the requirements of this policy.

Data protection principles and individual rights

Everyone using personal data must follow the data protection principles set out in the law. These say that personal data must be:

- processed lawfully, fairly and transparently;
- used for specified, explicit and legitimate purposes, and not processed in any way incompatible with those purposes;
- adequate, relevant and limited to what is necessary for those purposes;
- accurate and, where necessary, kept up to date;
- not kept for longer than is necessary;
- handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage.

SCPTI is responsible for, and must be able to show, compliance with these principles.

The individual rights set out in the law are:

1. the right to be informed about how data is used;
2. the right of access;
3. the right to rectification;
4. the right to erasure;
5. the right to restrict processing;
6. the right to data portability;
7. the right to object to processing in certain circumstances;
8. rights in relation to automated decision-making and profiling.

Members' data

SCPTI processes members' personal data because it is needed to fulfil the membership relationship, for the purpose for which it was collected. We will only ever use members' data for this purpose, and we never pass members' personal details on to third parties, except where we are required to (for example, reporting to UKCP the names of members whose membership has been suspended or terminated, as set out in the SCPTI Code of Ethics).

Breach of the policy

Any breach of this policy will be taken seriously and may result in formal action. Any member of staff, trainee or member who considers that the policy has not been followed in respect of their own personal data should raise the matter with the Executive Directors in the first instance.

Notification of data held and processed

All staff, trainees, members and other users are entitled to:

- ask what information SCPTI holds about them and why;
- ask how to gain access to it;
- be told how to keep it up to date;

- be told what SCPTI is doing to comply with its obligations under the UK GDPR and the Data Protection Act 2018.

Responsibilities of staff, tutors, trainees and members

All staff, tutors, trainees and members are responsible for:

- checking that any personal data they give SCPTI is accurate and up to date;
- telling SCPTI about any changes to the information they have given, such as a change of address;
- checking any information SCPTI sends out from time to time about the data it keeps and processes;
- making sure that any details tutors keep about trainees' course work comply with this policy;
- making sure that any personal data they hold is kept securely;
- making sure that personal information is not disclosed, orally, in writing or in any other way, to any unauthorised third party.

Members' and trainees' own client records are covered by section 10 of the SCPTI Code of Ethics and Professional Practice for Trainees and Graduates.

Access to information

Staff, trainers, trainees and members have the right to access any personal data SCPTI keeps about them, both on computer and in paper filing systems. Anyone who wishes to exercise this right should make the request in writing to the Executive Directors. SCPTI will respond within one month, as the law requires.

Retention of data

Trainee data of any kind is kept by SCPTI for five years from the completion of the trainee's course, including any time needed to meet legal, accounting or reporting requirements.

When the retention period has passed, electronic data is deleted and paper copies are shredded securely.

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