

CWTCH CONSULTING (CC) PRIVACY POLICY

CC DELIVERS TISUK TRAINING ON A THIRD-PARTY BASIS

The General Data Protection Regulation (GDPR) protects the rights of individuals by setting out certain rules as to what organisations can and cannot do with information about people. A key element to this is the principle to process individuals' data lawfully and fairly. In order to meet the fairness part of this we need to provide information on how we process personal data.

CC takes its obligations under the Data Protection Act very seriously and will always ensure personal data is collected, handled, stored and shared in a secure manner. The following statement will outline what personal data we collect, how we use it and with whom we share it. It will also provide guidance on your individual rights and how to make a complaint to the Information Commissioner's Office, the regulator for data protection in the UK.

CC official contact details are:

Dr Coral Harper

c/o 61 Waunscil Avenue, Bridgend, CF31 1TN

HOW AND WHY DOES CC USE PERSONAL DATA?

The largest volume of personal data TISUK processes is in relation to students and former students. The primary purposes for which process information about these individuals include:

- to enable us to administer student-related functions from original applications through to practitioner status and to provide practitioner services;
 - to plan and account for the use of the services provided;
 - to produce information including statistics for relevant partner or affiliated agencies. These agencies include, but is not limited to, TISUK, The University of East London (UEL), The British Association for Counselling and Psychotherapy (BACP) the DFE.
 - to monitor academic progress over the period of enrolment towards completion of a qualification;
 - to carry out assessment, authorise award of qualifications and verification of awarded qualifications pre- and post-study;
 - to monitor complaints, disciplinary cases, breach of contract, disputes, and academic appeals;
 - to provide student support services, including financial, pastoral and IT/learning resources;
 - to monitor, develop and update CC systems to ensure they continue to operate effectively and securely; and
 - to monitor equality and diversity objectives within CC
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CC collects personal data from students at various stages. The volume and nature of the personal data collected is outlined below:

WHAT PERSONAL DATA DOES CC COLLECT?

CC collects personal data from students at various stages. The volume and nature of the personal data collected is outlined below:

- Initial email/telephone enquiry
- name and address
- contact details (telephone numbers, email addresses)
- details from application forms:
 - name and address
 - contact details (telephone numbers, email addresses)
 - gender
 - date of birth
 - nationality/residence/ethnic origin
 - disability/additional educational needs
 - educational qualifications and previous relevant experience
 - criminal convictions
 - language qualifications
 - employment history
 - mental health care history
 - references
 - photograph
 - funding information

Once a candidate has been made an offer:

- Data collected at enrolment or updated during a student's time with CC
- information needed to provide services in relation to disability, wellbeing or any other type of pastoral support
- course stage details
- attendance, progress and current status
- assessment results
- supervision details
- certain courses also require a DBS compliance check completed

Additional personal data may be collected by CC where relevant in relation to work based learning in schools or other organisations, ongoing continuing professional development (CPD), professional body requirements, extenuating circumstances applications, appeals/complaints/disciplinary cases and any further optional student services.

SHARING OF PERSONAL DATA

CC is required at times to share personal data with certain other organisations in order to meet statutory requirements or to provide services to students and graduates. Sharing will always be undertaken in line with the requirements of data protection law, either through the consent of the individual, or another relevant legal gateway. The personal data that is actually shared will always be limited precisely to what the other organisation needs to meet its requirements or deliver its services.

HOW LONG DOES CC KEEP PERSONAL DATA?

CC takes its obligations under the GDPR very seriously in terms of not holding onto personal data for any longer than is necessary. CC has a retention schedule in place for the different categories of data it holds. For full details of the data retention timescales please contact the Data Protection Officer at CC via info@traumainformedschools.co.uk

In some cases, there are good reasons as to why CC needs to retain data about students and other individuals for a significant period of time. The most important reasons are outlined below:

- in order that student awards can be verified in the long-term
 - to produce transcripts and references
 - for graduate services and ongoing relations with CC
 - to deal with complaints, appeals and disciplinary cases;
 - to produce references on request from previous employees; and
 - in order to meet pension obligations
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YOUR RIGHTS

An individual has the right to ask CC what personal data we hold about them, to ask for a copy of that information and to ask how their data is being processed. This is called making a Data Protection Subject Access Request (SAR).

An SAR can be submitted either verbally or in writing. If submitting a SAR in writing, you should direct it to the Data Protection Officer (info@traumainformedschools.co.uk) or in hard copy to CC's postal addresses.

CC reserves the right to ask you to provide proof of identification and for you to clarify your request if it is unclear in the first instance. You will receive a reply no longer than 30 calendar days from the date you make the request.

If you are unhappy with the initial response you can ask CC to undertake a further search if there is specific information you have good reason to believe exists but that hasn't been provided.

You also have the right to complain to the UK Regulator the Information Commissioner's Office (ICO) if you believe your request has not been dealt with properly or you have a complaint to raise against CC for any other data protection related issue. A complaint can be raised via the ICO website or write to the following address:

The Office of the Information Commissioner
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

You also have the right to withdraw consent from the processing of your personal data by CC at any time, if your consent was sought initially to use your personal data.

RIGHT TO RECTIFY

If you believe CC holds information about you that is factually incorrect, please contact Rachel@traumainformedschools.co.uk

YOUR RESPONSIBILITIES

All students, staff and any other relevant individual who handles personal information of which CC is responsible must follow the requirements of the Data Protection Policy.