



Privacy Policy

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Privacy Statement – Greenwood Counselling Academy Ltd

Greenwood Counselling Academy's Data Controller:

Greenwood Counselling Academy Ltd: hello@greenwoodcounsellingacademy.co.uk

Joint Data Controller:

Greenwood Counselling Academy Ltd and Counselling and Psychotherapy Central Awarding Body (CPCAB)

1. Brief Overview

Greenwood Counselling Academy Ltd complies with, and is licensed in accordance with the legal requirements of the General Data Protection Regulation (GDPR) 2018. We adhere to strict procedures specified by this legislation when handling, collecting and storing information about individuals. We are registered with the Information Commissioner (ICO) as Greenwood Counselling Academy (this is our 'Data Controller Name'). Our ICO number is: ZB892693.

Due to the nature of our business the majority of the data that we collect and process relates to individuals who wish to train with us, or who have expressed interest in training with us. The majority of candidate information is collected and processed to meet the requirements of Counselling and Psychotherapy Central Awarding Body (CPCAB), the organisation that accredits the training we provide.

<http://www.cpcab.co.uk>

http://www.cpcab.co.uk/public_docs/data-protection-policy

Once we have arranged an interview for a course with an individual, we will ask the individual to either bring along a paper application form or to complete a digital application form provided via email or weblink. This application form will contain sensitive and / or personal information about the individual.

If the individual is successful at interview and is offered a place on one of our courses, they will fill out an enrolment form (either on paper or electronically) that contains sensitive and / or personal information. Some of what is written in these forms will be shared at registration electronically with Counselling and Psychotherapy Central Awarding Body (see Section 2).

We will also share information if there is a lawful legitimate reason to do so such in the public interest or in the case of serious crime to protect you or others from harm.

If an individual enrolls on any course then the personal and / or sensitive information about them will be stored in paper form in a locked filing storage or the electronic information will be stored on a password-protected computer.

Applications we receive that do not result in a place being offered or accepted by an individual will be shredded and destroyed within a 3-months of receipt. Once you are registered both with us and with CPCAB then all records will be maintained as above. Records are then for 2 years following completion of the course the individual completes. After this time, all records are shredded and / or deleted, unless we are requested to store information in the interests of public safety or a complaint against us.

We also process data we keep on you that is primarily related to the recording of the assessment of your course work. This is also stored securely, following the procedures and lifespan described above.

The individuals who have access to all of the data above (registration and assessment) are known as data processors, who process information on behalf of the Controller. Data processors at Greenwood Counselling Academy are tutors registered with CPCAB and External Verifiers sent by CPCAB (see Section 2).

We do not pass on or sell your details to other agencies or third parties. We are, however, sometimes contacted by other organisations, namely placement providers or training agencies for a reference. We will always explicitly confirm this the individual has given consent.

2. Greenwood Counselling Academy's Relationship with CPCAB

CPCAB is the awarding body that certifies our training, and as a CPCAB Recognised Centre we run training on their behalf.

We have a contractual obligation to provide data to CPCAB electronically when a new course begins; this data is taken from the application form and registration forms that an individual fills out.

One of the implications of this is that for data that Greenwood Counselling Academy passes on to CPCAB, we are Joint Data Controllers.

The data that CPCAB requests and we provide includes an individual's:

- a) Name
- b) Date of Birth
- c) Gender
- d) Ethnicity
- e) Reasonable adjustments (difficulty / disability)

- f) Address
- g) Email address

Greenwood Counselling Academy processes this data on a password protected system ("CPCAB Portal") directly with CPCAB – there are no third parties involved.

We will liaise with CPCAB about registered individuals over the duration of a course in the following way:

- a) Professional support and concerns, such as assessment issues.
- b) External Verifier visits – Greenwood Counselling Academy will have two External Verifier visits by a CPCAB representative, and part of this visit will be to appraise the assessment of candidates' coursework as well as to discuss tutors' concerns about candidates.
- c) Amendments to data held by CPCAB on candidates (see Section 6)

3. Your Rights as an Individual

Your principal rights under data protection law are:

- a) the right to access;
- b) the right to rectification;
- c) the right to erasure;
- d) the right to restrict processing;
- e) the right to object to processing;
- f) the right to data portability;
- g) the right to complain to a supervisory authority; and
- h) the right to withdraw consent.

4. Privacy Notice

All personal and / or sensitive information held by Greenwood Counselling Academy must be:

- a) fairly and lawfully processed, for relevant purposes only
- b) secure, accurate and up to date
- c) not kept longer than necessary

d) processed in accordance with the individual's rights

e) not transferred to countries outside the European Economic area, unless there is adequate protection

We do not pass on or sell your details to third parties, other than CPCAB for the purpose of registration, or when requested to do so in the interests of public safety, such as by a court of law.

We do not pass on or sell your details to other agencies or third parties. We are, however, sometimes contacted by other organisations, namely placement providers or training agencies for a reference. We will always explicitly confirm this the individual has given consent.

5. Fair processing of data

Greenwood Counselling Academy collects and processes data from individuals and on behalf of CPCAB, for the following reasons:

- a) Compliance with legal obligations (including the GDPR [2018])
- b) Performance of a contract with the data subject (i.e. an individual wishing to study with us).

The individuals at Greenwood Counselling Academy who have access to such data (registration and assessment) are known as data processors, who process information on behalf of the us. Data processors at Greenwood Counselling Academy are tutors registered with CPCAB and External Verifiers sent by CPCAB (see Section 2).

6. Security

6.1 Security of data:

Once Greenwood Counselling Academy has arranged an interview for the course you have applied for we ask you to complete an application form. This application form will contain sensitive and / or personal information about you.

If you enrol on our course then you will also complete registration forms, also containing personal and / or sensitive information about you.

All data will be stored securely. The data processors are the only individuals to have access to this storage (see Section 5).

Applications we receive that do not result in a place being offered or accepted by an applicant will be shredded and destroyed within a 3-months. Once you are registered both with us and with CPCAB then all records will be maintained as above. Records are then kept in line with legitimate requirements for a period of 2 years following completion of your course. After this time, all records are shredded, unless we are requested to do so in the interests of public safety, or in the event of a complaint or grievance against us.

We also process data we keep on you that is primarily related to the recording of the assessment of your course work. This is also stored securely, following the procedures described above.

6.2 Deletion of data

You are able to request that the data Greenwood Counselling Academy holds on your behalf is deleted. A request to delete data may be refused if it is required in order to provide data to regulatory authorities or as part of a direction from a court.

6.3 Amendment of data

Candidate data is collected by Greenwood Counselling Academy and requests to make amendments may be accepted up to the point of the award of a certificate by CPCAB. Any amendments will be passed on to CPCAB.

6.4 Data Portability

Under the new GDPR legislation you are able to apply for your own data to be provided to you in a format that will allow you to share it with another organisation, such as a different training centre.

6.5 General security

Greenwood Counselling Academy takes data processing seriously:

There is one computer that is used for registration data processing, the data that an individual gives to Greenwood Counselling Academy. This is password protected.

Coursework related data are stored electronically by data controllers on password-protected computers. In paper form, these are stored securely by the centre in line with our general storage principles (see Point 6.1 above)

6.6 Data breaches

Greenwood Counselling Academy takes its responsibilities in respect of the retention of data seriously will handle data breaches promptly, thoroughly and transparently. In the event of a data breach Greenwood Counselling Academy will:

- a) Identify the scale of the breach; and
- b) Identify the sensitivity of the data.

Depending on the outcome, Greenwood Counselling Academy will, if appropriate:

- a) Notify the Information Commissioner's Office;
- b) Notify the data subject(s);
- c) Notify CPCAB in accordance with our obligation to them
- d) Formally record any lessons learned;
- e) Initiate an appropriate action plan, such as extra security measures or staff training

6.7 Data storage equipment

All data will be stored either in paper handwritten form in locked filing storage or on a password protected computer. The data processors are the only individuals to have access to this storage.

7. Cookies

This website uses cookies – small text files that are placed on your machine to help the site provide a better user experience. In general, cookies are used to retain user preferences, store information for things like shopping carts, and provide anonymised tracking data to third party applications like Google Analytics. As a rule, cookies will make your browsing experience better. However, you may prefer to disable cookies on this site and on others. The most effective way to do this is to disable cookies in your browser, although we do offer an active “opt out” at the bottom of the page.

8. Information access requests

You can apply for copies of your personal data under the Subject Access Request (SAR) scheme. Please contact Greenwood Counselling Academy at hello@greenwoodcounsellingacademy.co.uk.

SAR requests must be received in writing and copies of the data will be provided electronically; if you are unable to access an electronic response please contact Greenwood Counselling Academy.

9. Your Right To Complain

You are able to complain about the data held about you by Greenwood Counselling Academy if it is, or you feel it is inaccurate, insecure or inappropriate.

10. Amendments

We may update this policy from time to time by publishing a new version on our website. In all cases, please contact the Greenwood Counselling Academy at hello@greenwoodcounsellingacademy.co.uk.

or in writing at:

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11 Main Street

Keyworth

Nottingham

NG12 5AA