

The Link Centre

Privacy Notice

The purpose of this notice is to detail the forms of data that the Link Centre holds regarding you to aid in our work with you and how it is used. It is also to inform you of your rights concerning that data. This is to comply with the General Data Protection Regulation (GDPR), as of the 25th May 2018.

In the majority of cases, the legal basis for holding this data is based on explicit consent, which means that you are required to opt-in and agree that you are willing for this data to be held. If you wish at any time to remove that consent, please contact the Link Centre either via e-mail or phone for us to discuss.

Your Rights

The General Data Protection Regulation (GDPR) provides the following rights for individuals:

1. The right to be informed
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
8. Rights in relation to automated decision making and profiling.

More information can be found on the Information Commissioners Office (ICO) Website at <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

The remainder of this notice seeks to work within and in some cases specifically address the rights outlined above.

Data held and its Purpose

Mailing List

- Details of people's names and e-mail addresses are maintained within our mailing list.
- These are used to send out mailings and newsletter information to promote our workshops and services.
- People are added to the mailing list based on their explicit consent.
- Details of our mailing list are not shared with people outside of the Link Centre.
- Mailings sent using the mailing list are clearly indicated as coming from the Link Centre.
- If anyone wishes to be removed from our mailing list, they can unsubscribe by contacting the Link Centre by e-mail or phone, or by unsubscribing via the link on the newsletter.

Students, Applicants and Workshop Delegates

- Information on Students is maintained by the Link Centre in the following forms
 - Contact details – in the form of e-mail addresses, phone numbers, home addresses, and in some cases skype addresses.
This is for contact outside of training sessions, regarding the ongoing administration of the Link Centre or the course.

- Student records – in the form of information on assessments completed, respective grades, completion of therapy hours, supervision reports received, percentages of modules completed.
This is to track the students progress throughout their training.
- Assignments – copies of assignments are held by the Link Centre while being marked and details of feedback on essays are kept as part of the student records.
This is to process assignments and offer examples to future students, and to track student progress throughout their training. If examples of essays are to be kept, explicit consent will be obtained.
- Written Exam Submissions – copies of written examinations are held by the Link Centre while being marked and details of feedback on examinations are kept for the oral examination panel to review.
This is to process examinations and offer examples to future students, and to track student progress throughout their training. If examples of essays are to be kept, explicit consent will be obtained.
- Personal, Career and Qualification information – held in the form of CVs and an application form (including referee contact details and references).
This is for the interview process and to evidence meeting requirements from our governing bodies (i.e. UKCP)
- Communications – in the form of e-mails, texts, and skype mail.
This is regarding aspects affecting the administration of the Link Centre or their courses.
- Training Webinar recordings – On occasions and in particular during core training modules on our counselling / psychotherapy training courses delivered using webinar platforms, we may record sessions. This is for students to revisit concepts and also for students that were absent to be able to access the training. We inform participants beforehand if we will be recording the webinar to replay later. Our host also informs participants once again when the webinar begins so that there is recorded evidence of us obtaining informed consent. If consent is specifically withheld, then the webinar is not recorded.

Trainers

- Information on Trainers is maintained by the Link Centre in the following forms
 - Contact details – in the form of e-mail addresses, phone numbers, home addresses, and in some cases skype addresses.
This is for contact outside of training sessions, concerning communication relating to the provision of training.
 - Professional standing – information concerning meeting the requirements of the trainers governing body and whether any ethical complaints had been made against them.

Administrative Staff

- Information on Administrative Staff is maintained by the Link Centre in the following forms
 - Contact details – in the form of e-mail addresses, phone numbers, home addresses, and in some cases skype addresses.
This is for contact outside of usual office hours concerning administration of the Link Centre business.
 - Professional CV – meeting the requirements of the Link Centre’s accrediting bodies.

How Data is Processed

Mailing List

- Names and e-mail addresses are obtained on initial contact and explicit consent sought to include on the Link Centre mailing list. These are entered onto the mailing list held on Mailchimp and in many cases are input into Link Centre e-mail accounts for direct contact between staff and the individual.

Mailchimp gathers behaviour from the email newsletter based on people's behaviour to an email sent. This could be in the form of opens, clicks and bounces. It can tell us who opened an email, and what they clicked, and whether they unsubscribed from our list. This is then used to give our audience a "score" calculated by how engaged they are with our content. This then helps in the promotion of future Link Centre marketing material.

Students, Applicants and Workshop Delegates

- Contact details – input into mobile phone and computer for when contact outside the training is required, held by both trainers and administration staff. Furthermore, contact details are included on a sheet held in Dropbox where fellow students from the same training group can have access. Explicit consent is sought for inclusion on the Dropbox lists.
- Student records – these are recorded in a student records database, as and when assignments, therapy hours, supervision reports etc are achieved.
- Assignments – these are held in a temporary secure file at the Link Centre whilst all assignments are gathered for a marking date. They are then passed to the internal and external markers either directly or by tracked and signed for post. While being marked they are kept securely by the marker and once marked they are returned with feedback attached to the Link Centre either directly or by tracked and signed for post.
- Written Exam Submissions - these are passed to the marker either directly or by tracked and signed for post. While being marked they are kept securely by the marker and once marked they are returned with feedback attached to the Link Centre either directly or by tracked and signed for post. The Link Centre then send them out with feedback to the candidate either directly or by tracked and signed for post.
- Personal, Career and Qualification Information – these are used by the Link Centre during the interview process and to gain personal and professional references. Upon completion of this process they are filed to show compliance with our governing bodies' regulations (i.e. UKATA and UKCP).
- Communications – stored on computer or mobile phone following communication.
- Training Webinar recordings – when full consent has been obtained, webinar recordings are stored on the webinar platform's cloud facility and accessed using password protection.

Trainers

- Contact details – input into mobile phone and computer for when contact outside the training is required.
- Contract, CVs and annual review forms, held for the purposes of inspection by accrediting bodies

Administrative Staff

- Contact details – input into mobile phone and computer for when contact is required.
- CVs, held for the purposes of inspection by accrediting bodies

Website

Whilst the Link Centre does maintain a website for marketing and course booking services, no information is gathered via the website. On the website cookies are not enabled, and course bookings are made through Eventbrite.

The Link Centre does use Google analytics which gathers data based on the behaviour shown throughout the Link Centre website. However, as cookies are not enabled no personal data is viewed. The only data from visitors is in the form of newsletter (mailing list) sign-ups and traffic analysis.

Limits to Confidentiality

In accordance with UK Association for Transactional Analysis (UKATA) and UK Council for Psychotherapy (UKCP) ethical frameworks there are certain limits set around the confidentiality of clients and related data.

Firstly, to maintain a safe and up to date training practice there is an ethical requirement for trainers to have their practice overseen by a supervisor. This is common practice among all psychotherapy trainers. This means that student information (whilst not viewed directly) may form the basis of material discussed in supervision.

Secondly, concerning the ethical principle of “above all do no harm” in the event of a student intending to harm themselves, someone else, having a psychological breakdown, or witness to some third-party harming another, student information may be shared with a third party. In this instance data concerning background details will be shared with another to seek to ensure that the student or a third-party remains safe.

Right to Access and Rectification

If you wish to see the data held on you, you may make a request for access. This requires the Link Centre to provide you with an electronic copy of the data requested in an accessible format. Data must be provided no later than one month after the date of the request.

If you wish to see the data held, please contact the Link Centre by e-mail or phone for us to discuss what it is that you wish to see.

Should you believe that the data you received is inaccurate in some way you may request that the data is altered (right to rectification)

Security and Storage

All student information is kept securely.

Physical notes such as student file information, CVs and application forms are kept under lock and key in a filing cabinet.

Electronic data such as contact details, communications and diary entries are kept on electronic equipment that is password protected, with additional digital security software on the computer to avoid electronic data breaches.

The GDPR requires that personal data is kept no longer than necessary. In terms of the Link Centre mailing list this means that data will be maintained indefinitely to promote courses and services of the Link Centre. Regarding student files and database, this information is used to track progress towards qualification. The highest qualification being the Certified Transactional Analyst exam or Supervision Diploma, therefore student information will be held until achievement of these qualifications unless

a prior request for erasure is received. Applicant and workshop delegate information is kept indefinitely, in order to deal with requests for historical information.

Should a student or trainer wish for their data to be deleted prior to this point please contact the Link Centre via e-mail or phone.

Once the period for maintaining notes has expired all physical information held will be shredded. In terms of electronic data, this will be deleted from the electronic media and measures taken to ensure that this information cannot be recovered.

In the Event of a Breach

Whilst all measures are taken to ensure that data is kept confidential there is the possibility that all or part of personal data may be accessed by another source – known as a breach. The following outlines what would happen in such an instance.

Firstly, all notifications would need to be made within 72 hours of becoming aware of the breach. You would be notified of the breach. At the same time the professional bodies to which the Link Centre belongs (i.e. UKATA and UKCP) would also be notified. If there is a risk to your “rights and freedoms” (which involves any form of damage to the individual, including emotional distress) then the Information Commissioner’s Office(ICO) will be informed.

Secondly, an investigation would be undertaken to understand how the data was accessed and ensure that recurrence did not occur.

Lodging a Complaint

If you have concerns over how your data is managed, please contact the Link Centre by e-mail or phone to discuss your concerns.

Should this and subsequent discussions fail to satisfy your concerns, and you reside in the UK, you may report a concern to the Information Commissioners Office (ICO) at <https://ico.org.uk/concerns/>

In the event that you do not live in the UK, you would need to report your concern to the appropriate supervisory authority for the country within which you reside. Contact details for supervisory authorities for other EU countries can be found here http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080.