

# The Minster Centre Privacy Statement

The Data Protection Act 1998 (DPA) (the General Data Protection Regulation GDPR from May 2018) protects the rights of individuals by setting out certain rules about 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.

The Minster Centre 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 Minster Centre's Data Protection Policy can be accessed here.](#)

The following statement will outline what personal data we collect, how we use it and who we share it with. 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.

The Minster Centre's official contact details are:

Data Protection Officer  
The Minster Centre  
20 Lonsdale Road  
London  
NW6 6RD

Tel: +44 (0)20 7644 6240

The Minster Centre's Data Protection Officer is [Justine Walsh](#)

## How and why does The Minster Centre use personal data?

The largest volume of personal data The Minster Centre processes is in relation to students. The primary purposes we process information about students include:

- to enable us to administer student-related functions from original applications through to graduation and to provide alumni services
- to plan and account for the use of the services provided
- to produce information including statistics for relevant external bodies such as Middlesex University, the Higher Education Statistical Agency (HESA), the Higher Education Funding Council for England (HEFCE) and the Office for Students, Quality Assurance Agency, UKCP and BACP
- to enable The Minster Centre staff to communicate with students
- 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 post-study
- to monitor, complaints, disciplinary cases and academic appeals
- to provide student support services, including financial, pastoral and IT/learning resources
- to monitor, develop and update The Minster Centre systems to ensure they continue to operate effectively and securely
- to monitor equality and diversity objectives within The Minster Centre and
- to process DBS applications and to carry out safeguarding.

The Minster Centre also processes personal data in relation to staff, Members and alumni, clients of The Minster Centre Counselling and Psychotherapy Service (MCPCS) and as part of research activity.

The Minster Centre processes personal data in relation to staff, both academic and non-teaching, and volunteers (including Trustees). This is undertaken to facilitate recruitment activity and to administer the requirements The Minster Centre must meet as an employer in line with UK law. In addition, it is used to facilitate operational activity.

The Minster Centre processes personal data in relation to alumni and members to build an engaged community for alumni and members and to support their professional development. It underpins a range of activities for our alumni and members, for example, providing discounts on room hire and CPD events sending event invitations, and alerting recipients to job opportunities, consultations and Minster Centre news. We also hold data to support professional registrations especially UKCP Accreditation, maintenance of UKCP Membership, and support to members who are audited.

We do not currently, but may in future, also use digital tracking tools to monitor the impact of our communications. This would provide us with metrics that enable us to gain a better understanding of what interests our alumni.

The Minster Centre processes personal client data in relation to The Minster Centre Psychotherapy and Counselling Service for clinical and professional purposes in line with our [Code of Ethics](#) and [Code of Practice](#), which includes meeting the requirements of current data protection legislation. The primary purposes we process information about clients and potential clients include

- to carry out our obligations arising from any contracts entered into to provide psychotherapy and counselling services
- to plan and account for the use of the services provided
- to provide information about our services or similar services that may be relevant;
- to improve our products and services
- to notify you about changes to our services or services of our therapists
- to monitor complaints and disciplinary cases
- to monitor, develop and update our systems to ensure they continue to operate effectively and securely
- to monitor equality and diversity objectives within The Minster Centre
- in order to effectively process payments.

The Minster Centre processes personal data as part of research activity. This is done in line with [The Minster Centre Code of Practice](#) and under the guidance of The Minster Centre Ethics Committee. This includes meeting the requirements of current data protection legislation.

## What personal data does The Minster Centre collect?

The Minster Centre 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 number, email address)*
- *course / area of interest*

Details from application forms:

- *name and address*
- *contact details (telephone number, email address)*
- *age / date of birth*
- *gender*
- *nationality and country of residence*
- *educational records to date*
- *academic and personal references*
- *personal biography*
- *disability declaration*
- *health declaration*
- *criminal conviction declaration*

Further data collected at enrolment or updated during a student's time at The Minster Centre:

- *Home address and emergency contact*
- *Entry and other qualifications*
- *Demographic information (including some sensitive personal information (special category information))*
- *Funding, bursary and fee related information (potentially including bank details for any credits)*
- *Information needed to provide services in relation to disability, wellbeing or any other type of pastoral support*
- *Course and stage details*
- *Attendance, progress, tutorial notes, use of IT/learning resources and current status*
- *Assessment results*
- *Photograph for identification card*
- *A DBS Clearance will be completed and recorded to allow students to commence a placement.*
- *Placement records*
- *Extra-curricular activities, including attendance at events*
- *A history of communication and interaction we have had with you, for example, events, surveys, emails or mailings, and use of services such as the library and Moodle.*

Additional data collected for statutory monitoring and reporting purposes:

- *Religious belief*
- *Sexual orientation*
- *Ethnic origin*
- *Nationality details*

Additional personal data may be collected by The Minster Centre where relevant in relation to placements, professional body requirements, extenuating circumstances applications, appeals/complaints/disciplinary cases and any further optional student services.

The Minster Centre collects the following information from academic and non-teaching staff:

Initial application:

- *name and address*

- *national insurance number*
- *contact details (telephone number, email address)*
- *self-declaration of permission to work in the UK and upload of passport/visa copy if necessary*
- *relevant qualifications or indication of highest qualification held*
- *professional development / training and membership of any professional body*
- *employment history*
- *supporting statement*
- *Referee details*
- *Criminal record disclosure*
- *Data captured for equal opportunities monitoring (gender, date of birth, nationality, marital status, sexual orientation, religious belief, ethnicity)*
- *Declaration about any disability as defined under the Equality Act 2010*

Once a candidate has been made an offer of employment:

- *Bank details*
- *Emergency contact details*
- *Qualification information required to be shared with HESA*
- *Data captured for equal opportunities monitoring (as above)*
- *Health information*
- *Certain positions also require a DBS compliance check to be completed*

Further personal data captured about an employee is likely to relate to any performance or appraisal process and any information needed to maintain a sickness/absence record.

The Minster Centre collects the following information from alumni and members.

Alumni

- *Name and address*
- *Email address and telephone number*
- *Biographical information such as name, gender, date of birth*
- *Contact details and communication preferences, professional information such as place of work and job title*
- *Academic history*
- *Any other connections with The Minster Centre– for example voluntary positions such as mentoring, positions held as a student*
- *Extra-curricular activities, including attendance at events and use of services such as the library,*
- *A history of communication and interaction we have had with you, for example, events, surveys, emails or mailings*
- *We might store information available in the public domain, including information you have shared on social media such as job title and organisation worked for depending on your privacy settings*

UKCP registrants and members (through the Minster Centre)

- *Name and address*
- *Email address and telephone number*
- *Practice address*
- *Relevant qualifications and employment history*
- *Anonymised record of qualifying clinical hours*
- *UKCP membership history and number*

- *Professional insurance details*
- *CPD records*
- *Supervision arrangements and reports*
- *Professional Will arrangements*
- *Criminal record disclosure*
- *Record of complaints, disciplinary measures, suspensions and restrictions,*
- *Bank details*

The Minster Centre collects the following information from people seeking and using its Psychotherapy and Counselling services.

For assessment

- *name and address*
- *contact details (telephone number, email address)*
- *Data captured for equal opportunities monitoring (gender, date of birth, nationality, marital status, sexual orientation, religious belief, ethnicity)*
- *Declaration about any disability as defined under the Equality Act 2010*
- *Income*
- *Health information*
- *Emergency contact details including GP or other medical professional*
- *Housing*
- *Personal background information needed to provide psychotherapy and counselling services*

Once allocated to a therapist:

- *Attendance and payment records*
- *Anonymised session notes and recordings*
- *Anonymised student work for assessment*

## Sharing of personal data

The Minster Centre is required to share personal data with certain other organisations in order to meet statutory requirements (such as tax, pensions and employment law, money laundering regulations, and the Prevent Duty) or to provide services to students, staff, clients and Members. 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.

The information below outlines the key partners with whom The Minster Centre shares personal data with on a periodic basis:

Middlesex University in order to process the administration of enrolment onto and graduation from the relevant validated programme(s). For further information please see the [Middlesex University](#) privacy notice;

Professional and Funding Bodies:

- Validation of registrations and awards; and
- Approval of funding applications.
- UKCP and BACP to process student, alumni and any other relevant individual's professional membership.

National/Local Government Departments and other public bodies:

- Higher Education Statistics Agency (HESA) to produce a variety of statistical reports about higher education that are required to be published in the public interest (for more information see <http://www.hesa.ac.uk/fpn> and the collection notices [Student Collection Notice](#), [Staff Collection Notice](#), [Destinations of Leavers from HE \(DLHE\) Collection Notice](#));
- the Student Loans Company in connection with grants, fees, loans and bursaries;
- the courts, the police and other organisations with a crime prevention or law enforcement function (subject to meeting the conditions of Section 29 of the DPA);
- UK Immigration agencies to ensure compliance with the conditions attached to student/staff visas;

Other individuals / organisations:

- External examiners and moderators for examination, assessment and moderation purposes;
- The Institute's insurers and legal advisers for the purpose of providing insurance cover or in the event of a claim;
- The Office of The Independent Adjudicator to review student complaints;
- For staff - to disclose employee salary details to HMRC, and external payroll and to The People's Pension, our pension providers, to meet legal pension provision requirements.
- Placement providers for the purpose of coordinating student placement activity
- Employers who request a reference from The Minster Centre (for relevant staff and students).
- GPs or other medical or emergency services in the event of a risk of serious harm or to life.
- Sponsors, loan organisations and scholarship schemes - to allow for fees to be paid, students to access loans or to determine whether support should continue.
- Third parties attempting to recover debt on behalf of the Centre where internal procedures have failed.

## How long does The Minster Centre keep personal data?

The Minster Centre takes its obligations under the DPA/GDPR seriously in terms of not holding onto personal data for longer than is necessary. The Minster Centre has a retention schedule in place for the different categories of data it holds.

In some cases, there are good reasons why The Minster Centre 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 alumni services and ongoing relations with The Minster Centre;
- for careers and employability services;
- to deal with complaints, appeals and disciplinary cases;
- for statutory reporting purposes and in order to complete statutory surveys such as the Destination of Leavers from Higher Education Surveys;
- to produce references on request from previous employees; and
- in order to meet pension obligations.

As a guide, records of awards and transcripts will be held indefinitely. Key student, alumni, member and client records will be held for 7 years after the end of training, membership or therapeutic work. Other records will normally be held for shorter periods.

## Your rights

The GDPR provides the following rights for individuals:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling.

For more information about these rights see <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

### **Knowing what we hold about you (the right to be informed and the right to access)**

We provide this privacy notice as a summary of the information we collect and how we process it. Further information may be provided at the point when we collect some information.

An individual has the right to ask The Minster Centre what personal data we hold about them, and to ask for a copy of that information. This is called making a [Data Protection Subject Access Request](#).

A Subject Access Request should be submitted in writing via email to the [Data Protection Officer](#) or in hard copy to the postal address provided above.

The Minster Centre 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 normally receive a reply no longer than one calendar month from the date you make the request in writing.

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

### **Right to correct what we hold about you (rectification)**

If you believe The Minster Centre holds information about you that is factually incorrect or out of date please email [The Registrar](#) if you are a student, the [MCPCS Co-ordinator](#) if you are a client of our therapy service, or the [Data Protection Officer](#) if you are a member of staff, providing the correct information, and The Minster Centre will seek to update it within one month.

### **Right to ask us to stop processing your data or delete it (erasure or restrict processing) –also sometimes called right to be forgotten**

You also have the right to withdraw consent from the processing of your personal data by The Minster Centre at any time, if the basis for processing of your data relies on consent. If you wish to have your personal information deleted or restrict how we are processing it, please let us know and we will take reasonable steps to comply with your request (unless we need to keep it for academic records, legal, auditing, professional regulation, complaint handling or internal risk management reasons which can be valid reasons to retain data).

### **Right to data portability**

The right to data portability gives you the right to receive a copy of personal data that you have provided to us, or have it sent directly to another data controller in a machine readable format. This right only applies when the data processing is based on consent or a contract and the data processing is automated (i.e. excluding paper records).

### **Right to object**

If we become aware of any ongoing concerns or problems concerning our privacy practices, we will take these issues seriously and work to address them with you.

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

The Office of the Information Commissioner

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

### **Rights in relation to automated decision making and profiling**

The Minster Centre does not undertake any automated decision making or profiling.

### **Your responsibilities**

All students, staff and any other relevant individual who handle personal information which The Minster Centre is responsible for must follow the requirements of our Data Protection Policy.

psychotherapy • counselling • training