

## **TCCTP Data Protection Policy**

### **Introduction**

The Centre for Creative Therapeutic Practice (TCCTP) is licensed in accordance with the legal requirements of the General Data Protection Regulation (GDPR) 2018. This means that we follow strict procedures specified by this legislation when collecting and handling information about individuals.

We are registered with the Information Commissioner as The Centre for Creative Therapeutic Practice Ltd and our Data Controller is Dr Patricia Watts.

Our registration number (also known as our notification number) is ZB341287.

### **Privacy Notice**

All personal information data held by TCCTP must be:

- Fairly and lawfully processed, for relevant purposes only;
- Secure, accurate and up to date
- Not kept longer than necessary
- Processed in accordance with the individual's rights

TCCTP will only share your personal data with other organisations where there is a clear requirement to do so; we will never pass on your details to other companies for marketing purposes.

### **Fair Processing of Data**

TCCTP processes data on behalf of learners and TCCTP staff and course participants. The purposes for gathering this data are known under GDPR law as “lawful bases” and include:

- Performance of a contract with the data subject
- Compliance with legal obligations
- Occasionally other lawful bases may also be relevant

An internal document known as an “information audit” lists individual pieces of data with the rationale for processing them, a retention period, a description of its format and how consent was obtained.

### **Security of Data**

#### **Rectification of your Data (see also Subject Access Requests)**

Candidate data is gathered by the centre and requests to make alterations may be accepted up to the point of certification. Please note that after this time certificates can only be re-printed in a different name where the candidate is initiating a new identity, for example as part of gender reassignment; this policy is designed to ensure the integrity of the qualification and to prevent fraud.

Tutor data is gathered by the centre and relevant data is forwarded to CPCAB via the online tutor CV template. Tutors are requested to check periodically that the data held by CPCAB remains accurate.

Staff data, including for external consultants and actors (who are required to sign a separate release form relating to their filmed material), may be amended at any point on request; supporting

information may be required as appropriate. Marketing information (email addresses) may be amended on request.

### **Deletion of your Data**

You are able to request that the data TCCTP holds on your behalf is deleted. In the absence of such a request, candidate data is retained over time in order to monitor standards, prevent fraud and provide replacement certificates for example. Learners are reminded that if you request to have their data deleted it may not be possible to issue a replacement certificate in the future or to verify their achievement. 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 of law.

TCCTP Archiving Policy (available on request) explains the retention periods for assessment material and the rationale behind the decisions.

### **Data Breaches**

TCCTP takes its responsibilities in respect of the retention of data seriously and undertakes to handle any data breach promptly, thoroughly and transparently. In the event of a data breach TCCTP will:

- Identify the scale of the breach; and
- Identify the sensitivity of the data.

Depending on the outcome, TCCTP will, if appropriate:

- Notify the Information Commissioner's Office
- Notify the Police
- Notify its regulators
- Notify the data subject(s)
- Formally record any lessons learned
- Initiate an appropriate action plan, such as extra security measures or staff training

### **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 awarding organisation. In practice the data we hold on you is limited and we recognise that it's unlikely that this service will be helpful to you but do please get in touch if you'd like to explore this option.

### **General Security**

TCCTP operates a range of processes to ensure that the data it processes is retained securely. They include, amongst others:

- Staff computers are password protected at log-in
- Sensitive documents are further password protected, for example external assessment papers, staff annual reviews, financial documents etc

- SAR requests and replacement certificates require a range of ID to be submitted in support of each request
- Payments for on-line sales, e.g. support DVDs are processed by GDPR-compliant service providers.
- There is a separate internal policy that relates to the procedures that apply when a member of staff leaves TCCTP's employment.

### **Data Storage Equipment**

Redundant equipment does not leave TCCTP premises until all of the files stored – whether they contain personal data or not – have been permanently erased beyond any possibility of retrieval. In the case of hard disks, for example, this means securely re-formatting each disk. Redundant data storage devices are rendered physically useless before disposal. Any redundant hard copy which contains personal data is also destroyed securely.

### **Subject Access Requests**

We acknowledge your right to be informed by us whether your personal data is being processed by TCCTP and, if so, to be given by us a description of the personal data involved and the purposes for which it is being (or is to be) processed.

You can apply for copies of your personal data under the Subject Access Request (SAR) scheme. 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 ask for advice.

### **Your Right to Complain**

You are able to complain about the data held by TCCTP on your behalf if it is:

- Inaccurate. Please note that it is the responsibility of centre staff to upload personal data to the Portal on behalf of their learners and inaccurate information may lead to incorrectly printed certificates and/or failure to upload Learner Achievement Data.
- Inappropriate. If you feel that it is not appropriate for TCCTP to hold any of your personal information, please liaise with TCCTP (if you are a tutor) for advice. If you are a learner, please liaise with your tutor.
- Insecure. Data held by TCCTP is securely stored but learners should be aware that their work both within their centre and in external assessment is regarded as assessable material and may be seen by others.

For further information from TCCTP please contact our postal address:

The Centre for Creative Therapeutic Practice,

Office 8,

Platinum House,

151 Merrylee Road,

Glasgow

G44 3DL

Email: [hello@tcctp.org](mailto:hello@tcctp.org) (please mark "for the attention of the GDPR team")

**For further information (or queries) about the GDPR Act:**

Office of the Data Protection Commissioner

Wycliff House, Water Lane

Wilmslow, Cheshire SK9 5AF

Tel: 01625 545700 E-mail: [mail@dataprotection.gov.uk](mailto:mail@dataprotection.gov.uk)

Web: <https://ico.org.uk/>

The Centre for Creative Therapeutic Practice, January 2024