

BCPC Data Protection Policy



Purpose

BCPC needs to keep certain information about its past, current and potential trainees, members and staff to allow us to function effectively, meet legal and contractual requirements and monitor performance and achievements. BCPC also keeps data to help deliver its other purposes, such as client information relating to the BCPC Referral Service and Low-Cost Counselling Service.

BCPC will be transparent with those whose data is held, provide appropriate training and support for staff who handle personal data and follow the data protection principles set out in the UK General Data Protection Regulation (UK GDPR), the [Data Protection Act 2018](#) and the [Data Use and Access Act 2025 \(DUAA\)](#).

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

General provisions

- This policy applies to all personal data processed & held by BCPC
- This policy shall be reviewed every 2 years
- BCPC's ICO (Information Commissioner's Office) Registration number is Z6292431

What is personal data?

Personal data is information relating to an identified or identifiable person. Examples include an individual's name, age, address, date of birth, gender and contact details.

All data processed by BCPC must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests ([see ICO guidance for more information](#)).

Individuals have the right to access their personal data, and any such requests shall be dealt with in a timely manner.

Article 5 of the GDPR requires that Personal data is:

1. processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency')
2. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical

purposes shall, in accordance with [Article 89\(1\)](#), not be considered to be incompatible with the initial purposes ('purpose limitation')

3. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation')
4. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy')
5. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with [Article 89\(1\)](#) subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject ('storage limitation')
6. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').

BCPC will ensure that:

- personal data is relevant and limited to what is necessary in relation to the purposes for which they are kept
- reasonable steps are taken to ensure personal data is accurate & steps shall be implemented to ensure that personal data is kept up to date.
- personal data is stored securely using modern software
- access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information
- personal data is kept for no longer than necessary, BCPC has an archiving policy which is renewed annually, taking into account what data should be retained, for how long and why
- when personal data is deleted, this will be done safely & securely to ensure that the data is irrecoverable
- appropriate back-up solutions are in place.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted via the Website or email; any transmission is at your own risk. Once we have received your information, we will use strict procedures to try to prevent unauthorised access.

Data Breaches

Whilst not every potential data breach will need to be reported to the ICO, all potential data incidents MUST be reported to the BCPC Office Manager immediately at officemanager@bcpc.org.uk

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, BCPC shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the individual involved and the ICO. Further information on when the ICO should be contacted can be found here:

<https://ico.org.uk/for-organisations/law-enforcement/guide-to-le-processing/personal-data-breaches/>

Complaints

If you wish to make a complaint about how your personal information has been used, please email the BCPC Office Manager at officemanager@bcpc.org.uk to request an electronic complaints form.

Your complaint will be acknowledged by BCPC within 30 days and BCPC will investigate, respond and advise the complainant of the outcome without undue delay, in accordance with the requirements of the Data (Use and Access) Act (DUAA).

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

<https://ico.org.uk/make-a-complaint/>

Why we keep data

Graduate Members

Where trainees graduate and remain BCPC members, we will retain personal contact information including names, addresses, and contact details, to process members' professional accreditation and reaccreditation, as well as to contact members with continuing professional development opportunities & other news and events.

This data is stored in a secure database (MS Access), as well as in a secure MS SharePoint site and BCPC's finance systems, which are accessed only by BCPC office staff.

If membership of BCPC ceases, graduates will have their personal data deleted seven years after relinquishing BCPC membership (only names and dates of training will be retained on file).

Students/Trainees

BCPC keeps personal data, including names, addresses, and other contact details, in order to meet training commitments, to monitor academic progress over the period of enrolment towards completion of a qualification, enable staff to contact students, invoicing for training, produce information including statistics for relevant external bodies such as Middlesex University, UKCP and BACP, to monitor equality and diversity objectives within BCPC and circulating professional development opportunities and other news & events that may be of interest.

This data is stored in a secure database (MS Access), as well as in a secure MS SharePoint site and in BCPC's finance systems, which are accessed only by BCPC staff.

Students/trainees who do not remain BCPC members after graduation for any reason, will have their personal data deleted seven years after leaving or completing the training (only names and dates of training will be retained on file).

Retention of Student/Trainee Work

BCPC may retain copies of students'/trainees' completed assessments, coursework, portfolios and other submitted work for quality assurance, internal verification, external moderation, staff training and organisational assessment purposes. Such retention is carried out in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Student work will be retained only for as long as is necessary to fulfil these legitimate purposes and access to retained work is restricted to authorised BCPC employees who require it for the performance of their duties. Where possible and appropriate, student work will be anonymised or pseudonymised before being used for training, quality improvement or other organisational purposes.

Referral Service (RS) & Low-Cost Counselling (LCCS) Clients

BCPC collects personal **client** data in relation to BCPC Referral Service and Low-Cost Counselling Service for clinical and professional purposes, to carry out our obligations arising from any contracts entered into to provide psychotherapy and counselling services in line with our Code of Ethics and Code of Practice.

Printed forms relating to Low-Cost Counselling (LCCS) client data is stored in a locked cupboard in the BCPC office with the cupboard key locked in a key safe. LCCS data is stored in a secure MS SharePoint site, accessed only by relevant BCPC staff. RS data is received via email transfer from a secure form on the BCPC website and is stored in a secure MS SharePoint site, accessed only by the relevant BCPC staff member.

Staff

BCPC collects personal data in relation to **staff**, both academic and non-teaching, and volunteers (including Trustees) to facilitate recruitment activity, to facilitate operational activity and to administer the requirements BCPC must meet as an employer in line with UK employment law.

The data is stored securely within a Microsoft Access database, a secure Microsoft SharePoint site, and BCPC's finance systems. Access to these systems is restricted to authorised BCPC employees with a legitimate business need.

How long does BCPC keep personal data?

BCPC takes its obligations under the DPA/GDPR seriously in terms of not holding onto personal data for longer than is necessary. BCPC has a retention schedule in place for the different categories of data it holds. In some cases, there are good reasons why BCPC needs to retain data about students and other individuals for a significant period of time.

For instance, records of awards and transcripts will be held indefinitely. Key student, graduate, 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.

Who do we share personal data with?

BCPC is required to share personal data with certain other organisations to meet statutory requirements (such as tax, pensions and employment law, money laundering regulations) or to provide services to students, graduates, members, clients and staff. 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 BCPC shares personal data with on a periodic basis.

Professional and Funding Bodies:

- UKCP and BACP to process student, graduates and any other relevant individual's professional membership
- 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

National/Local Government Departments and other public bodies:

- 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 organisation's insurers and legal advisers for the purpose of providing insurance cover or in the event of a claim
- 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, agencies and other academic institutions who request a reference from BCPC (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, bank loans and scholarship schemes - to allow for fees to be paid, students to access loans or to determine whether support should continue.

Subject Access Requests

Individuals have the right to request access to the personal data BCPC holds about them by submitting a Subject Access Request (SAR). Requests should be made to the BCPC Office Manager at officemanager@bcpc.org.uk.

BCPC will verify the identity of the requester before processing the request and will respond without undue delay and, in any event, within one month of receipt.

Where a request is complex or multiple requests have been received from the same individual, the response period may be extended by up to a further two months, in accordance with UK GDPR (Article 12). The requester will be informed of any extension and the reasons for it within the initial one-month period.

Policy Ownership	Reviews & updates	Next Review
Office Manager	2022, 2024, Sep 2025, Aug 2026	Sep 2027