



# Barnabas Counselling Training

## DATA PRIVACY NOTICE

This policy explains how we collect data, how we use and store information and what it means for you.

### 1. Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (the "GDPR") which comes into force on 25<sup>th</sup> May 2018.

### 2. Who are we?

Barnabas Counselling Training Ltd is the Data Controller for any personal data you give to us. Our full details are:

Barnabas Counselling Training Ltd  
PO Box 752  
Chichester PO19 9QY

Tel: 01243 543403  
email: [info@barnabastraining.com](mailto:info@barnabastraining.com)  
[www.barnabastraining.com](http://www.barnabastraining.com)

### 3. How do we process your personal data?

Personal data is generally provided to Barnabas Counselling Training in three ways:

- Through an enquiry via the BCT website, direct email or telephone call
- Through the submission of an Application Form directly to BCT to join a BCT course
- Following the submission of an Application Form to another host centre to join a BCT course

#### General enquiries

We will store the contact information you supply through your initial communication to provide information relevant to your specific enquiry. It will not be used for any other purposes without your consent. If the information you seek could be provided by one of our host training centres in another location, your permission will be sought to pass on your contact details to the host centre or you will receive their contact details to request the information. The processing of this personal data by Barnabas Counselling Training Ltd is necessary for the performance of a contract to provide training to you or in order to take steps at your request prior to entering into any contract to provide training. (Article 6(1)(b))

Training course applications: Personal Data

	<b>We use your personal data for the following purposes: -</b>	<b>The legal basis for processing this personal data under the GDPR is:</b>
1.	For applications submitted directly to BCT: to process your application to join the course. Applications are forwarded to the Course Tutor to assess your suitability to join a training course and form the basis of the application interview. BCT retains your application form in electronic and paper format.	This is necessary for the performance of a contract to provide training to you or in order to take steps at your request prior to entering into that contract to provide training. (Article 6(1)(b))
2.	For applications submitted directly to BCT: to contact you in regard to any matter arising from your course attendance: fees, session dates, changes, cancellations, coursework.	This is necessary for the performance of a contract to provide training to you or in order to take steps at your request prior to entering into that contract to provide training. (Article 6(1)(b))
3.	For all students: to record your name, address, email, date of birth and telephone no. on the BCT database with a record of the course you are attending. This information is held for a period of 6 years after the course ends to assist with future queries by the student, reference requests and certificate replacement requests (see 6: How long do we keep your data)	This is necessary for the performance of a contract to provide training to you or in order to take steps at your request prior to entering into that contract to provide training. (Article 6(1)(b))
4.	For all students: to process your enrolment with the Counselling and Psychotherapy Central Awarding Body, CPCAB, for CPCAB to process your exam and arrange your course certification.	This is necessary for the performance of a contract to provide training to you or in order to take steps at your request prior to entering into that contract to provide training. (Article 6(1)(b))
5.	For all students: to apply for your Unique Learner Number (ULN) with the Learner Records Service to pass to CPCAB to process your course enrolment.	This is necessary for the performance of a contract to provide training to you or in order to take steps at your request prior to entering into that contract to provide training. (Article 6(1)(b))
6.	For all students: to provide details of your Emergency contact information to the Course Tutor to have available during training sessions for the duration of the training course. This information is destroyed when the course ends.	Consent: your consent is sought for this purpose on the Application form or form completed during the first course session. (Article 6(1)(a) Consent)
7.	For direct course applications: to provide contact details to other students in your training group: name, address, email address, telephone contact	Consent: your consent is sought for this purpose on the Application form (Article 6(1)(a) Consent)
8.	For direct course applications: to provide information about future training courses which may be of interest to you.	Consent: your consent is sought for this purpose on the Application form. (Article 6(1)(a) Consent). You may withdraw your consent at any time by contacting <a href="mailto:info@barnabastraining.com">info@barnabastraining.com</a> .

### Training course applications: Sensitive Data

Under the GDPR certain categories of data are classed as “sensitive personal data”. This includes information on race, ethnic origin, religion and health. This requires a further legal basis for processing under the GDPR.

	<b>We use your sensitive personal data for the following purposes: -</b>	<b>The legal bases for processing this sensitive personal data under the GDPR is:</b>
1.	Barnabas Counselling Training Ltd offers training from a Christian perspective. For direct course applications there may be questions relating to your approach to the Christian faith on the Application form to show you are aware of this approach and have considered how it will relate to you during the training sessions.	This is necessary for the performance of a contract to provide training to you or in order to take steps at your request prior to entering into that contract to provide training. (Article 6(1)(b)) Explicit consent. (Article 9(2)(a). On the Application form you will be asked to consent for your responses in this section to be disclosed to the Course Tutor for the purposes of assessing your application. If you withhold consent it would be understood that you are happy to accept the Christian basis of the training.
2.	CPCAB, the awarding body, requires students enrolling on counselling courses to be ‘emotionally stable’. For direct course applications there are questions relating to health and mental well-being on the Application form.	This is necessary for the performance of a contract to provide training to you or in order to take steps at your request prior to entering into that contract to provide training. (Article 6(1)(b))  Explicit consent. (Article 9(2)(a). On the Application form you will be asked to consent for your health information to be disclosed to the Course Tutor for the purposes of assessing your application. We would not be able to process your request for training if you withhold consent.
3.	For all students where you require Reasonable Adjustments to enable you to complete the course or sit the CPCAB exam, we may require further information from you concerning your physical and/or mental health. This will only be used by us, with your explicit consent, to assess your eligibility for Reasonable Adjustments and submit a request to CPCAB.	This is necessary for the performance of a contract to provide training to you or in order to take steps at your request prior to entering into that contract to provide training. (Article 6(1)(b))  Explicit consent. (Article 9(2)(a). Your permission will be sought before a request for Reasonable Adjustments is considered or submitted to CPCAB. We may not be able to process your request for Adjustments if you withhold consent.

4.	For direct course applications if sensitive personal information is disclosed as part of your written coursework (eg. learning journal reflections) the information may be disclosed to CPCAB as part of your Internal and External Assessments as this material included in your Portfolio may be available to their External Verifiers during a routine visit.	This is necessary for the performance of a contract to provide training to you or in order to take steps at your request prior to entering into that contract to provide training. (Article 6(1)(b))  Explicit consent. (Article 9(2)(a). On the Application form you will be asked to consent for your portfolio and information contained therein to be available to CPCAB for verification purposes. We would not be able to process your request for training if you withhold consent.
5.	For all students, if sensitive personal information is disclosed during the course of your training, depending on the nature of the sensitive personal information, BCT may need to liaise with CPCAB to determine how best to help you to continue with your training. Examples of such information could be where you have suffered physical or mental illness, or there are other relevant and material changes in your circumstances. In this case, you would be advised of BCT's intention to advise CPCAB prior to contact being made and your consent sought.	This is necessary for the performance of a contract to provide training to you or in order to take steps at your request prior to entering into that contract to provide training. (Article 6(1)(b))  Explicit consent. (Article 9(2)(a). Your written consent by email or letter would be sought before such sensitive personal information is disclosed to CPCAB.

### 5. Sharing your personal data

Your personal data will only be shared within Barnabas with your course tutor(s) and as necessary with the Management Team in order for us to provide the counselling training service you are requesting. It will be shared with CPCAB and the Learning Records Service as outlined above for the processing and certification of the training course. We will only share your data with third parties with your consent.

### 6. How long do we keep your personal data?

We keep your application information, certification information and details of fees paid to Barnabas Counselling Training for up to 6 years after the end date of your training course. This information would only be used to respond to your queries about the training undertaken. Your consent would be sought at the application process to receive information about further training courses and this consent can be withdrawn at any time.

### 7. Your rights and your personal data

Barnabas Counselling Training Ltd complies with its obligations under the "GDPR" by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data: -

- To request a copy of your personal data which Barnabas Counselling Training Ltd holds about you;
- To request that Barnabas Counselling Training Ltd corrects any personal data if it is found to be inaccurate or out of date;
- To request your personal data is erased where it is no longer necessary for Barnabas Counselling Training Ltd to retain such data;
- To withdraw your consent to the processing at any time
- To request that the Barnabas Counselling Training Ltd provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable)
- Where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- To lodge a complaint with the Information Commissioners Office.

### **8. Further processing**

If we wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

### **9. Contact Details**

To exercise all relevant rights, queries of complaints please in the first instance contact the Barnabas Counselling Training Ltd office using the contact details under Section 2. Who are We? above.

You can contact the Information Commissioners Office:

Tel: 0303 123 1113

Email: <https://ico.org.uk/global/contact-us/email/>

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire SK9 5AF.

**Last updated: January 2019**