

## **Group Analysis North (GAN)**

### **Privacy Policy**

- This policy is based on the principals of informed consent and respect for confidentiality and guidance from the implementation of the General Data Protection Regulation (GDPR).
- GAN asks all students to read this policy, encouraging clarification if necessary and asks all to sign their consent to the handling of confidential information as detailed in the table below.
- GAN collects personal information from people who apply for courses, workshops and those who become members and/or Trustees of the Charity.
- GAN does not share personal data except for those on IGA training courses when some data will be shared with training course personnel and IGA committees.
- Financial details maybe shared with the GAN Treasurer.
- All personal data will be provided by the individual via a training course application form, event/workshop registration form or student/staff agreement form.
- GAN will store confidential personal information securely and will control who has access to it. The GAN Training Administration Manager in conjunction with the Courses Director will control access to all personal data.
- Administration/clerical staff abide by the same need-to-know respect for student confidentiality and storage of documents at all times.
- The GAN website links to other websites: This privacy policy only applies to GAN's website.

### **GDPR Privacy Notice - May 2018**

- GAN is registered with the Information Commissioner – registration number Z9847591.
- GAN does not sell or swap any information with third parties.
- GAN does not use call centres or robots to contact people.
- GAN uses Microsoft outlook to send email mailshots.

## Details of personal data collected, why, where stored and when deleted

Source of Data	Information Stored	Purpose	Computer Programme/Processing/Storage	Access/Security	Deletion Policy
<b>Current Foundation Course students</b>	<ul style="list-style-type: none"> <li>Details from course application forms: Name, address, ethnicity, gender, employment details, age, email address, contact phone number, photograph, emergency contact details</li> </ul>	<ul style="list-style-type: none"> <li>Managing stranger groups on the courses.</li> <li>Processing of courses fees – sending invoices</li> <li>Email course information during time on the course.</li> <li>Email training materials as appropriate.</li> <li>Correspondence</li> <li>In case of emergency, contact details held</li> </ul>	<ul style="list-style-type: none"> <li>Commercial software for invoices – QuickBooks.</li> <li>Microsoft Access database for personal details.</li> </ul>	<ul style="list-style-type: none"> <li>Held on password protected laptop.</li> <li>Hard copies of application forms kept in locked office.</li> </ul>	<ul style="list-style-type: none"> <li>6 years for computer files.</li> <li>Paper application forms shredded at end of academic year.</li> </ul>
<b>Current Diploma Course Students</b>	<ul style="list-style-type: none"> <li>Details from course application and student agreement forms: Name, address, employment details, DOB, email address, contact phone number, photograph, emergency contact details</li> <li>Student progress reports</li> <li>Clinical Interview assessment summary shared with Courses Director to inform their courses admission assessment.</li> </ul>	<ul style="list-style-type: none"> <li>Processing of courses fees – sending invoices</li> <li>Allocation to therapy groups - clinical interview summary shared by courses director and training group analysts to select most suitable therapy group for the new student.</li> <li>Email course information during time on the course.</li> <li>Email training materials as appropriate.</li> <li>Correspondence</li> <li>Monitoring student progress</li> <li>In case of emergency, contact details held</li> </ul>	<ul style="list-style-type: none"> <li>Commercial software for invoices – QuickBooks.</li> <li>Microsoft Access database for personal details.</li> <li>Microsoft Word for Progress reports and clinical reports.</li> </ul>	<ul style="list-style-type: none"> <li>Application forms and reports held on password protected laptop.</li> <li>Hard copies of application forms kept in locked office.</li> </ul>	<ul style="list-style-type: none"> <li>6 years for computer files</li> <li>Paper application forms shredded at end of academic year.</li> </ul>
<b>Current Qualifying Course students</b>	<ul style="list-style-type: none"> <li>Details from student agreement form: Name, address, mobile phone number, email address, emergency contact details and employer details</li> <li>Clinical interview carried out as part of the IGA Qualifying Course application process. This interview report is shared with the Courses Director who is part of the IGA Admissions Board.</li> </ul>	<ul style="list-style-type: none"> <li>Processing of courses fees – sending invoices</li> <li>Allocation to therapy groups – clinical interview summary shared by courses director and training group analysts to select most suitable therapy group for the new student.</li> <li>Email course information during time on the course.</li> <li>Email training materials as appropriate.</li> <li>Correspondence</li> <li>Monitoring student progress</li> <li>In case of emergency, contact details held</li> </ul>	<ul style="list-style-type: none"> <li>Commercial software for invoices – QuickBooks</li> <li>Microsoft Access database for personal details</li> <li>Microsoft Word for Progress reports</li> </ul>	<ul style="list-style-type: none"> <li>Application forms Held on password protected laptop.</li> <li>Courses Director keeps clinical interview notes on password protected laptop.</li> </ul>	<ul style="list-style-type: none"> <li>6 years for computer files.</li> <li>Paper agreement forms shredded when student completed the course.</li> </ul>

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<b>Care and Management of Clinical Notes</b>	<ul style="list-style-type: none"> <li>Clinical notes are maintained by training group analysts (for Diploma and Qualifying Courses) and experiential Group Conductors (for Foundation Courses)</li> </ul>	<ul style="list-style-type: none"> <li>Clinical notes are kept as part of conducting therapy groups and experiential groups as part of good practice and these notes are kept under strictly confidential conditions. They are not shared with any other members of staff.</li> </ul>	<ul style="list-style-type: none"> <li>On individual staff hardware – password protected.</li> </ul>	<ul style="list-style-type: none"> <li>All clinical staff maintain good practice with reference to clinical supervision, protecting patient confidentiality at all times unless there is a reason of risk to necessitate sharing with an appropriate other professional</li> </ul>	<ul style="list-style-type: none"> <li>As prescribed by UKCP/IGA or other professional registering bodies.</li> </ul>
<b>Membership</b>	<ul style="list-style-type: none"> <li>Name, address, phone number, email address, provided from membership forms</li> </ul>	<ul style="list-style-type: none"> <li>Email training materials</li> <li>Email GAN news and information</li> <li>Process membership invoices</li> </ul>	<ul style="list-style-type: none"> <li>Commercial software for invoices – QuickBooks</li> <li>Microsoft Access database for personal details</li> </ul>	<ul style="list-style-type: none"> <li>Held on password protected laptop.</li> <li>Hard copies of membership forms kept in locked office</li> </ul>	<ul style="list-style-type: none"> <li>Deleted when no longer a member of GAN</li> </ul>
<b>Workshop Attendees</b>	<ul style="list-style-type: none"> <li>Details from application/booking form: Name, address, mobile phone number, email address, emergency contact details and employer details</li> </ul>	<ul style="list-style-type: none"> <li>Processing of invoices</li> <li>Sending information regarding the workshop, other training opportunities</li> <li>Contact details in case of emergency</li> </ul>	<ul style="list-style-type: none"> <li>Commercial software for invoices – QuickBooks</li> <li>Microsoft Access database for personal details</li> </ul>	<ul style="list-style-type: none"> <li>Held on password protected laptop.</li> <li>Hard copies of membership forms kept in locked office</li> </ul>	<ul style="list-style-type: none"> <li>Hard copies scanned then deleted after event taken place.</li> <li>Scanned forms are kept for 6 years and then deleted.</li> </ul>
<b>Mailing list</b>	<ul style="list-style-type: none"> <li>Email address</li> </ul>	<ul style="list-style-type: none"> <li>Email GAN training activities</li> <li>Email other organisations training opportunities</li> <li>Email GAN news and information</li> </ul>	<ul style="list-style-type: none"> <li>Outlook address book</li> </ul>	<ul style="list-style-type: none"> <li>Held on password protected laptop.</li> <li>Bcc used for all group mailings to protect email addresses</li> </ul>	<ul style="list-style-type: none"> <li>Deleted when requested.</li> </ul>
<b>Trustees</b>	<ul style="list-style-type: none"> <li>Details from Trustee Declaration Form: Name, address, email address, mobile phone number, date of appointment as trustee, national insurance number,</li> </ul>	<ul style="list-style-type: none"> <li>Requirements of charity commission and Companies House</li> <li>For correspondence</li> </ul>	<ul style="list-style-type: none"> <li>Hard copies locked in filing cabinet</li> <li>Microsoft Access database for contact details</li> </ul>	<ul style="list-style-type: none"> <li>Held on password protected laptop.</li> <li>Filing cabinet in locked office</li> </ul>	<ul style="list-style-type: none"> <li>Hard copies scanned then deleted when Trustees resigned. Scanned copies kept for 6 years and then deleted.</li> </ul>

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	place of birth, proof of ID and proof of address				
<b>Visitors to the GAN website</b>	<ul style="list-style-type: none"> <li>Standard internet visitors logging information - no individual data is gathered</li> </ul>	<ul style="list-style-type: none"> <li>Identify how well site is used</li> </ul>	<ul style="list-style-type: none"> <li>n/a</li> </ul>	<ul style="list-style-type: none"> <li>n/a</li> </ul>	<ul style="list-style-type: none"> <li>n/a</li> </ul>
<b>Training Course - Sub Contractors (Self employed Tutors)</b>	<ul style="list-style-type: none"> <li>Name address, mobile telephone number, email address</li> <li>Bank details</li> <li>CV and letter of application</li> </ul>	<ul style="list-style-type: none"> <li>For correspondence and payment</li> <li>Interviews</li> </ul>	<ul style="list-style-type: none"> <li>Commercial software for invoices – QuickBooks</li> <li>Microsoft Access database for personal details</li> </ul>	<ul style="list-style-type: none"> <li>Held on password protected laptop.</li> </ul>	<ul style="list-style-type: none"> <li>Deleted after 6 years once left the training community.</li> </ul>