

NLPtCA General Data Protection Regulation (GDPR) 2018 Policy

Privacy Policy: NLPtCA Members

1. This policy sets out how NLPtCA uses and protects members' information that is provided to it.

For the purposes of General Data Protection Regulation NLPtCA is the Data Controller. This means that NLPtCA is responsible for, and control and processing of, your personal data in accordance with GDPR. Our third party administrator, Cygnul Ltd, is the Data Processor. We collect and retain only information that is necessary for the effective functioning of NLPtCA for the benefit of its members.
2. We collect information about members from application forms and annual renewal documentation and, if relevant, from individual email or postal correspondence.
3. We keep details of name, home address, practice address, email address, contact phone numbers, membership status, other information a member may have had put on their individual member listing details on the website, copy of membership application, details of complaints against members. For NLPtCA Board Members and Role Holders we may also hold bank account information. Information may be kept in paper or electronic formats. Paper records are kept in secure premises. Electronic data is kept on file in our Data Processor's secure password protected systems.
4. This information is retained for current members. We will destroy by shredding and disposing of in a secure manner any paper records and/or delete such information kept electronically 12 months after membership ceases, unless requested by the former member to do this sooner.

In respect of complaints the Association will retain details of complaints against members as per our then current Complaints Procedure - currently files will be kept for a minimum of seven years from the completion of the complaint process or seven years from the date that the complaint was closed.
5. Information may be passed to the UK Council for Psychotherapy (UKCP) as part of the annual re-registration process with UKCP, and/or Constructivist and Existential College for any relevant membership matter (eg, complaints). For the purposes of health and safety, event venues may be provided with a register of delegates names. Event caterers may be provided with a list of delegate names and dietary requirements.
6. Information is accessible to NLPtCA Board Members , NLPtCA Role Holders and Data Processors in order for them to fulfil ongoing duties and membership activities - annual membership renewal, annual re-accreditation, annual supervisor re-registration, complaints, expenses payment and administration, updating members on changes to the Association's policy and standards, member activities.
7. The information is retained and used under the 'lawful basis' of 'legitimate interest' - to manage and process membership related activities and announcements; liaise with relevant third parties; address queries arising from within and without NLPtCA in respect of membership.

8. What is available to the public - selected member information is on public view on the NLPtCA website.
9. It is a member's responsibility to ensure the information NLPtCA holds is accurate and up to date.
10. A member can request at any time for their information to be destroyed and/or deleted. This may result in their membership being terminated. This request to be sent via email to admin@nlptca.com , or in writing to NLPtCA's Registered Office 8-9 Acorn Business Park, Hanley Swan, Worcester, England, WR8 0DN
11. A member can elect at anytime to be removed from any 'marketing' distribution lists by changing their communication preferences.
12. This policy will be reviewed on a regular basis and Data Protection and management is a standard Board Meeting agenda item. The Association recommends that members regularly review the current Data Policies of the Association, as these will be reviewed on a regular basis.
13. In respect of member surveys or statistics, or forecasting, members have the right to have the anonymised data relating to them deleted and excluded.
14. We confirm that the current processing identified is necessary and that there is no less intrusive way to achieve the same results. This will be kept under review so as not to collect or hold on to unnecessary data.
15. We will ensure that our third party Data Processors will manage risks against data breaches and maintain effective anti-virus/malware systems. We will do all we can to ensure the 'confidentiality, integrity and availability' of the systems and services and the personal data processes within them. We will inform the ICO within relevant time scales of data breaches.
16. We will include in our contract with our third party Data Processors that all personal member data kept by them will be returned to NLPtCA should our contract with them be terminated.
17. A member can request that their data is passed to a third party.
18. In certain circumstances NLPtCA may be legally required to disclose personal data. In these circumstances. the legal obligation overrides any obligation the individuals may have:
 - by or under any UK enactment
 - by any rule of common law or
 - by an order of a court or tribunal in any jurisdiction
19. Information requested by a member will be supplied within a month of request, or for any complex requests the member will be informed as to the reason for any extension of time required to this period.
20. All bank account information is protected for the period of time necessary to ensure business transactions have been completed or until the business relationship has ended and then destroyed
21. In the event of a Data Breach the Association will ensure processes are in place with its Data Processors so that regulatory requirements in respect of appropriate notifications are followed.