

Re-Vision Privacy Policy

1. **About this Policy**

Re-Vision is a charity whose aims are to change people's quality of life – to catalyse psychological, social and spiritual transformation. We accomplish this through our combination of clinical excellence and soulful care in our counselling and psychotherapy training, public courses and affordable counselling.

In the course of our activities, we process personal data about trainers and administrative staff; trustees; graduates; people who train with us; those who use our counselling service; and those who have enquired about training or events.

We are committed to protecting your privacy and take this responsibility very seriously. We therefore take care to safeguard it. This notice outlines what data we collect, how we may use it, how we protect your data and your rights, and how you can exercise those rights.

References to 'we' or 'us' are to Re-Vision, 97 Brondesbury Road, London NW6 6RY. registered charity no: Registered Charity: 1068739 Company limited by guarantee number 02789040.

We regularly check this notice to ensure we provide you with the most up-to-date information regarding our data processing activities. We strongly advise you to read this page from time to time to ensure you are happy with any changes that might be made.

This privacy policy was prepared to be as comprehensive as possible, we would be happy to provide any further information or explanation about our practices.

If you have any questions about this policy, please contact us using the details in the 'Contact us' section below.

This privacy policy was last updated in February 2023.

2. **Why we collect your data**

We collect personal data for several reasons. Depending on how you interact with us, we may process data for the following reasons:

- a) to provide you with training that you have requested
- b) to provide you with counselling services that you have requested.
- c) to process personal details required for the administration of your booked training course
- d) to record and contact you regarding payments you make to Re-Vision
- e) to communicate with you regarding Re-Vision's work and events
- f) for our own internal administrative purposes, and to keep a record of your relationship with us
- g) to gather feedback

3. **Information we collect**

We collect the following personal information depending on your relationship with us - In most cases the information we have is only:

- a) your name
- b) your email address
- c) Possibly your telephone number and postal address
- d) A record of any of our courses or events you attend

For students of our professional training we also collect

- a) Biographical information. This may include sensitive, personal data.
- b) Records of attendance, feedback etc.

We will get your explicit consent in the training contract for us to keep this information for a reasonable period of time while you are training. We have a training data retention policy which means that after three years we will safely destroy the majority of the materials we hold, and the remainder after another three years.

For clients of our low-cost counselling service we keep

- a) A cover sheet of your contact details which is stored completely separately from any notes containing sensitive data
- b) A brief note from your assessment session
- c) When you start your counselling sessions you will be asked for your consent for the counsellor to keep brief notes.

We keep this data securely for the minimum time recommended by BACP (five years). One set of notes only is kept in a locked filing cabinet.

4. Using your personal data

If you are on one of our training courses or receiving counselling from our low-cost counselling service, we need to process your data because of **your specific relationship with us**.

Keeping you informed of our courses

If you have trained with us, or undertaken or directly enquired with us about our courses or events, we would love to keep you up to date with information about upcoming courses. We will continue to send you such marketing emails on the basis of it being within our legitimate interests to do so, unless you opt out which we will make it easy for you to do.

Re-Vision Graduates and people who have partially completed courses. We keep in touch with graduates and others who have partially completed our courses, not only to let them know of forthcoming events and further training but also to send them our regular newsletter, Acorn. We also contact them regarding graduate events and possible job opportunities either at Re-Vision or elsewhere.

You can withdraw your consent, unsubscribe from or update your marketing preferences at any point using the details in the 'Contact us' section below.

Any electronic communications, such as emails, will have a link making it easy for you to unsubscribe from any future electronic communications.

If you make any changes to your consent, we will update your record as soon as we possibly can.

If you tell us you do not wish to receive marketing communications, you may still receive transactional and service-based communications confirming and servicing other relationships you have with us: for instance we may contact you about an event that you have signed up to participate in, to – for example – update you with a last-minute change of venue.

We cleanse and remove out of date data on a regular basis as far as is possible.

Administrative communications to graduates

In addition to the events communications that you receive from Re-Vision, we will also communicate with graduates and others who have completed part of our training by email, or occasionally in relation to administrative and transactional matters. For example, this may be regarding professional re-accreditation via Re-Vision or your membership of Re-Vision as a company.

5. **Applying for a Re-Vision job**

When you apply for a job with us, your personal data will be collated to monitor the progression of your application, and the effectiveness of the recruitment process through the statistics collected. On the application form, you are asked to complete the referee details, and give permission to contact the referee.

Personal data about unsuccessful applicants are held for 12 months after the recruitment exercise is complete for that vacancy. You, as an applicant, can ask us to remove your data before this time if you do not want us to hold it. If we feel there is another suitable vacancy available, we will contact the applicant prior to sharing your application details with the relevant person.

Once you have taken up employment with Re-Vision, we will compile a file relating to your employment. The information contained in this will be kept secure and will only be used for purposes directly relevant to your employment. Once your employment with us has ended, we will retain the file in accordance with the requirements of our retention schedule and then delete it from our files.

6. **Professional contacts**

We may collect data about professional contacts and partners with whom we work, such as visiting trainers or speakers at our events. Personal data collected in this way will be processed in accordance with data protection legislation and this policy.

We may send our professional partners information and updates about our work (primarily by email). Such contacts can opt out of receiving this information at any time.

7. **Our legal basis for processing personal data**

When we use your personal information, we will always consider if it is fair and balanced to do so and if it is within your reasonable expectations. We will balance your rights and our legitimate interests to ensure that we use your personal information in ways that are not unduly intrusive or unfair.

We need a lawful basis to collect and use your personal data in accordance with the Data Protection Act 2018 (DPA). The reasons listed below are relevant to the types of processing that we carry out. This includes information that is processed on the basis of:

- a) a person's consent for example, to send you direct marketing by email
- b) a contractual relationship for example, to provide you with training or counselling
- c) Re-Vision's legitimate interests: Personal data may be legally collected and used if it is necessary for a legitimate interest of the organisation using the data, if its use is fair and does not adversely impact the rights of the individual concerned. These legitimate interests include:
 - sending information about events and training courses similar to those you have already attended or enquired about.
 - Charity Governance: including delivery of our charitable purposes, statutory and financial reporting and other regulatory compliance purposes
 - Administration and operational management: including responding to solicited enquires, providing information and services, research, events management, the administration of volunteers and employment, and recruitment requirements

8. **Disclosure of your personal data**

We will not share any of your personal data to any third party – other than in the most exceptional circumstances where:

- we are required to do so by law, for example to law enforcement or
- regulatory bodies where this is required or allowed under the relevant legislation or
- it is necessary to protect the vital interests of an individual or
- we have obtained your consent.

We will never share or sell your personal data to a third-party organisation for marketing, fundraising, or campaigning purposes.

9. **Security of your personal data**

We use appropriate technical and organisational measures and precautions to protect your personal data and to prevent the loss, misuse or alteration of your personal data. Re-Vision undertakes:

- To ensure that computer held data is protected by firewalls, virus checkers etc
- To ensure that data is only used for the purpose it is collected
- To delete all out of date data
- To keep all data accurate
- To regularly review data protection policies and procedures
- To ensure that access to the building and rooms in which data is held is secure
- To ensure staff are properly trained in security and confidentiality
- To report and investigate any breaches immediately.
- That trainee and qualified therapists will adhere to the guidelines of the appropriate professional bodies such as BACP (British Association for Counselling and Psychotherapy) and UKCP (UK Council for Psychotherapy).

10. **Retention of your data**

Whatever your relationship with us, we will only store your information for a specified amount of time, as set out in our internal data retention policies. See for example our training data policy.

The length of time that data will be kept may depend on the reasons for which we are processing the data and on the law or regulations that the information falls under, such as financial regulations, Limitations Act, Health and Safety regulation etc., or if we have a business case, such as with research data. For business case data, we will anonymise the data so no individual is identifiable.

Once the retention period has expired, the information will be confidentially disposed or permanently deleted.

If you request to receive no further contact from us, we will keep some basic information about you on our suppression list to avoid sending you unwanted materials in the future.

11. **Your rights**

You have many rights under the DPA. These include:

Right of Access: You have the right know what information we hold about you and to ask, in writing, to see your records.

We will supply any information you ask for that we hold about you as soon as possible, but this may take up to 30 days. We will not charge you for this other than in exceptional circumstances. You will be asked for proof of identity as the person dealing with your request may not be a staff member you have met before. We need to be sure we are only releasing your personal data to you.

This is called a data subject access, and can be done by: emailing info@re-vision.org.uk or writing to the Data Protection Manager, Re-Vision, 97 Brondesbury Road, London NW6 6RY.

Right to be informed: You have the right to be informed how your personal data will be used. This policy, as well as any additional information or notice that is provided to you either at the time you provided your details, or otherwise, is intended to provide you with this information.

Right to withdraw consent: Where we process your data based on your consent (for example, to send you marketing texts or emails), you can withdraw that consent at any time. To do this, or to discuss this right further with us, please contact us using the details in the 'Contact us' section below.

Right to object: You also have a right to object to us processing data where we are relying on it being within our legitimate interests to do so to do this, or to discuss this right further with us, please contact us using the details in the 'Contact us' section below.

Right to restrict processing: In certain situations, you have the right to ask for processing of your personal data to be restricted because there is some disagreement about its accuracy or legitimate usage.

Right of erasure: In some cases, you have the right to be forgotten (i.e. to have your personal data deleted from our database). Where you have requested that we do not send you marketing

materials, we will need to keep some limited information to ensure that you are not contacted in the future.

Right of rectification: If you believe our records are inaccurate, you have the right to ask for those records concerning you to be updated. To update your records, please get in touch with us using the details in the 'Contact us' section below.

Right to data portability: Where we are processing your personal data because you have given us your consent to do so, you have the right to request that the data is transferred from one service provider to another.

12. **Complaints**

If you have any complaints about the way in which we have used your data, please get in touch with us using the details in the 'Contact us' section below. We would be happy to help and discuss your concerns.

In addition, you are also entitled to make a complaint to the [Information Commissioner's Office](#).

13. **Contact Us**

If you have any questions about this policy, would like more information, or want to exercise any of the rights set out in section 11 above, you can get in touch with us by: emailing info@re-vision.org.uk or writing to the Data Protection Manager, Re-Vision, 97 Brondesbury Road, London NW6 6RY.