



Psychotherapy and Counselling Union (PCU)

The Psychotherapy and Counselling Union: standing up for therapists and therapy.

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Privacy and Data Protection Policy

Title	PCU Privacy & Data Protection Policy
Status	Agreed
Version	Version 2
Date	January 2022
Approved by	Executive Committee/May AGM
Circulated to	All members
Review	January 2023



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1. Introduction

The PCU is run by volunteers who are also counsellors or psychotherapists. We want to make sure all the personal information we have collected about you is safe and secure whether we collect it through our website, Membership Applications Forms or from other sources. This Policy sets out our commitments to you in compliance with the General Data Protection Regulation 2018 (GDPR) and explains how we collect, store and use your personal information. This policy reflects our duties to use your personal information fairly, to use it for a limited purpose, to keep it secure and make sure it is accurate and kept up to date, and to delete it when no longer necessary. Please read the following policy to understand how your personal information will be treated. It may change from time to time, so please check back periodically.

2. Contacting the PCU about GDPR matters

Under the GDPR the PCU is the “Data Controller” of your personal data. The Executive Committee of the PCU oversees our compliance with data protection laws. If you have any questions about this Policy or what we do with your personal information, contact PCU’s Administrator in the "Contact" section below.

Contact Section

Website: <https://www.psychotherapyandcounsellingunion.co.uk/>

Email: admin@pcunion.org.uk

Telephone: 07388 010189/ 07307 873367



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3. What is personal data?

Reference to personal data may include any information which directly or indirectly identifies you. The personal data you supply to us will be held in electronic and/or manual format.

4. The categories of personal data obtained

PCU is a Trade Union, it acts to further the interests of its members and secure these aims by organisation and unity of action, as well as providing support, legal advice and representation. The categories of personal data obtained may include such things as your name, address, contact details, date of birth, bank details, professional title, training organisation name, employment status and information for equality monitoring. Where necessary, for example, if you request support from the Member Support Team, it may include sensitive and Special Category Data such as casework data relating to your employment, training, and professional or personal difficulties.

5. The purposes for processing your personal data as a member of the PCU

We collect and may process your personal data as a member for the following purposes:

- a. the administration and management of your membership records
- b. to provide you with information and updates about PCU 's activities, campaigns, benefits and services
- c. to notify you of changes to our services and benefits
- d. to determine eligibility for and administer benefits
- e. to conduct elections and ballots
- f. to administer membership meetings (as well as meetings of any committee or conference within the union to which you may be elected, invited or a delegate)



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- g. to provide you with support, assistance, advice and/or representation in an individual or collective case
- h. to process your membership subscription payments
- i. for equality monitoring when voluntarily provided by you. The provision of equality monitoring information is not compulsory, but providing you agree to give it, it will allow the PCU to accurately monitor our membership diversity and to take appropriate action to ensure that all kinds of workers (including Black, Asian, Minority, and ethnically diverse people, disabled people, women, LGBTQI+ and disadvantaged workers), are fully represented and supported within the union.
- j. to comply with legal requirements for other trade union-related purposes, objects or activities, including those set in PCU's constitution and rules.

6. Keeping your data safe

We will have measures to keep your personal data:

- confidential
- protected against loss, theft or misuse
- safeguarded

By joining the PCU you should understand that we may use some or all of the personal data you have provided for the above purposes.

7. PCU's Lawful basis for processing your personal data:

'Legitimate Interests' (GDPR Article 6(1)(f)).

The primary basis upon which PCU processes your personal data is because it is necessary for the "Legitimate Interests" of the PCU as a trade union. The PCU's Legitimate Interests are broadly defined in our Constitution and Rules; these are things that benefit you as an individual member, but also members collectively or the union generally. Certain processing is also carried out because it is necessary to



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comply with the law, including the requirement that trade unions keep an accurate register of members' names, telephone numbers and addresses. If you wish to be a member, you must provide this information to us.

8. The table below provides more detail.

	Purpose	Personal information used	Lawful basis
01	To administer any membership account(s) you have with us and manage our relationship with you.	All contact and membership details, transaction and payment information, records of your interactions with us, and marketing preferences.	This is necessary to enable us to properly manage and administer your membership contract with us.
02	To comply with legal obligations to ensure compliance with obligations to maintain accurately and up to date records of membership for compliance with financial auditing and trade union legislation	All contact and membership details. Transaction and payment information.	This is necessary to ensure that we are compliant with legislation.
03	To arrange and manage any contracts for the provision of any products and/or services.	All contact and membership details. Transaction and payment information.	This is necessary to enable us to properly administer and perform any contract for the provision of products and/or services.
04	To send you information which is included within your membership benefits package, including details about events, partner offers and discounts and any updates about the PCU	All contact and membership details	This is necessary to enable us to properly manage and administer your membership contract with us.



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05	To answer your queries or complaints	Contact details and records of your interactions with us	We have a legitimate interest to provide complaint handling services to you in case there are any issues with your membership.
06	To conduct data analytics studies to better understand event attendance and trends within the PCU	Records of your attendance at any events hosted by us.	We have a legitimate interest in doing so to ensure that our membership is targeted and relevant.
07	For the purposes of promoting the PCU, our events and membership	Images in video and/or photographic form.	Where you have given us your explicit consent to do so – and parental consent where children are involved.
08	To comply with health and safety requirements	Records of attendance	We have a legal obligation and a legitimate interest to provide you and other members of our organisation with a safe environment in which to participate
09	To ensure the smooth running of the event for example passing relevant data to event organisers or volunteers	All contact and membership details, transaction and payment data. Dietary requirements, booking preferences, accessibility requirements. Data may be shared with event organisers such as venues.	We have a legitimate interest in doing so to ensure that events run smoothly.
10	To administer any purchases, membership fees payments, donations you make with us and manage our relationship with you, and deal with payments and any support, service or purchase enquiries made by you	All contact, transaction and payment information, records of your interactions with us, and marketing preferences.	This is necessary to enable us to properly manage and administer your purchase with us.



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11	To send you other marketing information we think you might find useful or which you have requested from us, including our newsletters, third party events information, products for purchasing and information about our commercial partners	All contact and membership details and marketing preferences All contact and membership details and marketing preferences, cookie data from site users and any additional information is given to us	Where you have given us your explicit consent to do so.
12	Research and analysis to monitor and improve our services	All contact and membership details and marketing preferences, cookie data from site use and any additional information that is given to us	This is necessary to enable us to monitor and ensure that services run smoothly, and improve them where we can.
13	To provide and track support offered to members seeking Member Support casework and advice	Personal details relating to occupation, training, registration, professional complaints, legal and medical records, and personal difficulties.	This is necessary to enable us to communicate in order to provide an effective support service from the first point of contact onwards.

9. Sensitive and Special Category Data

As PCU collects information on demographics, and as by definition our membership records reveal the individual's trade union affiliation, our membership records are considered 'Special Category Data'. This data will ordinarily, be kept for 7 years after you left the union in line with legal and insurance requirements. PCU maintains additional records for members seeking Member Support casework and/ or legal advice. Casework records and data may include extensive personal details relating to occupation, training, registration, professional complaints, legal and medical records, and personal difficulties.

This means we need a further justification for processing this data, and PCU must conduct a Data Impact Assessment.



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PCU's Lawful basis for processing your data:

Paragraph 'D' in the conditions listed in Article 9(2) of the GDPR:

"Processing is carried out in the course of legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious, or *trade union* aim and on condition that the processing relates solely to the members or to former members of the body, or to persons who have regular contact with it in connection with its purposes and that the personal data are not disclosed outside that body without the consent of the data subjects."

10. How the PCU can contact you and how you can change the method

The PCU may contact you at your home address, by telephone, SMS or email. You can change how we communicate with you at any time by contacting us using any of the methods in the contact section above.

11. Sharing of information within PCU

We may disclose information about you to PCU's officers, staff, volunteers, branch officials, workplace representatives or agents, insofar as reasonably necessary for the purposes as set out in this privacy policy.

12. Sharing information with third parties

The PCU will not disclose any of your personally identifiable information to any third party unless:

- they are processing data on the union's behalf (such as ballot and election administration), as required by law
- we have your consent, to establish, exercise or defend a legal claim and/or we are required to do so by law.
- they supply IT systems support
- they print and/or processing of authorised postal and/or electronic communications from PCU regarding the union's objects, services,



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benefits, campaigns, policies or other matters relating to your membership of PCU, or as required by law

- they are officially concerned with membership and financial audits as required by law
- unless your bank processes your subscription payments according to the payment method you consented to. This applies to your bank if you pay by direct debit or standing order. You can change your subscription payment method at any time by contacting the PCU.

13. How we may use your information as a visitor to the website or as a potential member

In general, you may visit the site without revealing any personally identifiable information about you. Personal data submitted on this website will only be used for the purposes (or closely related purposes) that it was collected. We may use your personal information to:

- administer the website
- improve your browsing experience by personalising the website
- enable your use of the services available on the website
- send you email notifications that you have specifically requested
- deal with enquiries and complaints made by or about you relating to the website
- inform you of direct marketing if you have requested information on a particular service
- Inform you about PCU events and market campaigns
- progress your application for membership

An important aspect of using the PCU website includes the use of cookies which is dealt with in a separate paragraph below.

Any personal data provided by you on any social media or other external website or service (including any that you link to from this website), will be



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subject to and governed by the privacy notice and policies of the organisation that operates the relevant platform/website.

14. Cookies

A cookie is a piece of information that is stored on your computer's hard drive. It is normally sent by a web server to you and enables the server to collect information back from your site visit.

We use the Wix website platform and the website has cookies. You must accept essential cookies to have access to the website. However, other cookies will be optional such as the Marketing Cookies, Functional Cookies and Analytics Cookies and it is up to you to enable them or not. Site visitors have the opportunity to accept or decline non-essential cookies.

Wix has a page explaining 'what are cookies', 'which cookies are used' and 'why'. You can find more information about cookies by checking the following link <https://support.wix.com/en/article/cookies-and-your-wix-site> We will collect information about your tastes and preferences, both when you tell us and by analysis of customer traffic, including using "cookies".

Our website has a cookie consent banner which is a notification that informs our visitors on how their cookies are being used on your site. By enabling this banner, only essential cookies are placed on your visitor's device. Using the banner, visitors can approve the usage of other types of cookies as well. When a user first visits our site, only essential cookies and scripts are loaded. In order to use other types of cookies and scripts (e.g., Functional, Advertising, Analytics), you must give consent through the cookie banner. Visitors can either approve all cookie types by simply clicking Accept or only allow specific types by clicking the Cookie Settings button.

15. Your rights as a data subject



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To exercise any of the rights in this paragraph, or if you have any questions relating to them, please contact us by using the details set out in the **Contact** section above.

You have rights as a data subject. These rights are:

- **The right to be informed** – this means we must inform you how we are going to use your personal data. We do this through this privacy policy and by informing you how your data will be used each time we collect it.
- **The right of access** – you have the right to access your personal data (e.g. data that is about you) that we hold. This is called a subject access request. We must respond to your request within one month, save in exceptional circumstances. To request access to your data, it is very helpful if you tell us what part of your personal data you are seeking when you contact us. A fee may be applied if the request is manifestly unfounded or excessive, or if someone requests further copies of their data following a previous request.
- **The right to rectification** – if you think the data we hold on you is incorrect or incomplete, tell us so we can put it right.
- **The right to erasure** – you have the right, in certain circumstances, to request that we remove or delete your data. We will do so, provided that we do not have a compelling reason for keeping it.
- **The right to restrict processing** – you can change your communication preferences (therefore restricting how we communicate with you) by contacting the PCU. There are also certain other circumstances in which you can **'block'** or suppress the processing of your personal data.
- **The right to data portability** – you can obtain and reuse your personal data for your own purposes across different services, for example, different unions.
- **The right to object** – you have the right to object to:



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- i. **Direct marketing from the PCU or from third parties we have shared your data with for direct marketing purposes.** You can opt-out of direct marketing any time by contacting PCU
- ii. **Any processing where our lawful basis is ‘Legitimate Interest’ (see above).** If you would like to formally object to any of our legitimate interest processing, please contact us
- iii. **Any processing that relies on the ‘Legitimate Activities’** justification for processing Special Category data
- iv. **Rights in relation to automated decision making and profiling** – this is not something we do at the PCU. If that ever changes, this policy will be updated accordingly.

16. GDPR Complaints

At the PCU we are committed to upholding your rights as a data subject. If you think we have not done so, please contact the PCU by using any of the contact details in the contact section above.

You may also complain to the Information Commissioner’s Office (ICO) if you believe your rights have not been upheld. The ICO is the data protection regulator and their website is www.ico.org.uk. Psychotherapy and Counselling Union (PCU) ICO reference is ZA815380

17. Amending this policy

Any changes we may make to this Policy in the future will be posted on our website and, where appropriate, notified to you by e-mail. When we change this Policy in a material way, we will update the version date at the bottom of this page. Please check back frequently to see any updates or changes to this Policy and should you object to any alteration, please contact us as set out in the "Contact" section.