



Creating Core Change - Data Protection and Privacy Policy

Simplified version

Date updated/reviewed: 23rd April 2019
Author: Tanya Collins
Date for next review: May 2020

Policy Statement

Creating Core Change – Transformational Coaching (CCC-TC) is committed to protecting the privacy of individuals. Currently there is one member of staff at Creating Core Change, it's founder, Tanya Collins, who currently works from The National Herb Centre, Warmington, Banbury. She also trains at various locations nationally. Tanya Collins is the Data Controller, and the Data Processor for Creating Core Change – Transformational Coaching and is registered with the Information Commissioners Office. She is fully insured by Towergate Insurance for Coaching and for Training.

CCC-TC aims to process personal information about individuals only in accordance with the applicable data protection laws including GDPR 2018 and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

This policy sets out how CCC-TC will meet those obligations by sharing:

- What information we collect
- How we use your information
- Security of data
- Mailing list information
- Payment information security
- Third parties
- Access to your personal information

(NB – CCC-TC = Tanya = “we” within this policy)

What information we collect

Prior to becoming a client

At present, potential clients contact Tanya via social media (Facebook – both personal and business, LinkedIn, Twitter) or other messenger applications (Text, Messenger, Whatsapp), call Tanya directly, or email her directly via the Creating Core Change Website. Tanya may retain information shared on these platforms in order to start or continue dialogue with clients.

Privacy Policies:

Facebook	https://www.facebook.com/policy.php
Messenger	https://www.facebook.com/full_data_use_policy
LinkedIn	https://www.linkedin.com/legal/privacy-policy
Twitter	https://twitter.com/en/privacy
Whatsapp	https://www.whatsapp.com/legal?eea=1#key-updates

Please also bear in mind that although in most instances, email server administrators have no need nor desire to look at emails, these are saved on the different companies servers.

Yahoo <https://policies.oath.com/ie/en/oath/privacy/index.html>

WebMail

Website / Cookies

The Creating Core Change website does not currently use cookies of any sort to track visitor data. People are able to email Tanya directly from the website.

During consultations

Data / Personal Data / Sensitive Data

During the consultations within, or training by, CCC-TC, data may be gathered which facilitates appropriate coaching or trainings for those individuals. The data may include what is considered to be sensitive or personal. This information may be shared by a client as part of the conversations and questions arising from the coaching or training with Tanya Collins. This data may also be necessary to ensure the safety of the client (for example notes of medications taken, or pertinent aspects of medical or life history).

In the case of CCC-TC, any data that we seek to collect and process will have full permission and explicit consent from the subject. See also the Consent Form/Privacy Notice/How we use your Information Form.

How we use your information

The Lawful Basis for collection and use of data

for processing the data which CCC-TC collects, fall under the following categories:

CONTRACT:

Tanya requires information about her clients before she can effectively coach them using Spectrum Techniques. The information is a pre-requisite before she can deliver the service that she does. This does and will include personal and / or sensitive data since this will impact on the coaching, managing the client safety through the coaching process and supporting the client's future outcomes. (This will include some medical history, life history).

If a person is under the age of 18, Tanya will explain the purpose of keeping the data to this individual whilst also providing a simpler written explanation.

LEGITIMATE INTERESTS:

Tanya cannot provide the coaching that she does without some measure of sensitive or personal data in order to ascertain which areas that she needs to work on with the client. She also keeps data for legal purposes (e.g. insurance and HMRC)

CONSENT:

Consent is applicable for certain aspects of what CCC-TC asks with respect to processing of data. Tanya is clear about what she is asking consent for.

If a person wishes to engage with CCC-TC, Tanya does need to keep some information about that individual and the reasons why she did the work she did, the context within which that was conducted and the rationale for her decision making. Further processing of the data (e.g. collecting video evidence or subjective reports about mood using nationally recognised tools) is consent driven.

Sharing of Data

Tanya Collins will not share your data, except with the clients' explicit prior consent. Data is used to facilitate safe and effective coaching or training. There are however, legal exemptions to this:

Exemptions in Data Sharing for safety purposes:

Following are exceptions to your/the client's right to confidentiality:

1 – If Tanya believes that a child, an elderly person, or a disabled person is being abused, this must be reported to the Police and Social Services.

2 – If Tanya believes that a client is threatening serious bodily harm to another, she is required to take protective actions. These actions may include, notifying the potential victim, contacting the Police or seeking hospitalisation for the client.

3 – If Tanya believes that the client is in imminent danger of harming himself/herself, she may legally break confidentiality and contact the Police, a local crisis team or a family member or other close friend or family member.

4 – If the client indicates that he or she is planning or involved in an act/s of terrorism, is involved with drug trafficking and / or money laundering, it is required under criminal law to report this.

5 – In certain legal proceedings, particularly those involving child custody or those in which your emotional condition or treatment is an important issue, a judge may order Tanya’s testimony. Confidentiality is not protected when a judge makes such an order, or in certain other legal procedures. Consult with a lawyer if you are involved in a legal situation in which such confidentiality may be at issue.

In addition:

6 – If the client tells Tanya of the behaviour of another named health or mental-healthcare provider that suggests that this person has either (1) engaged in sexual contact with a patient, and/or the client, or (2) is impaired from practice in some manner due to cognitive, emotional, behavioural or health problems then she is required to report this to the practitioner’s licensing board. Tanya would inform you before taking this step. If you are Tanya’s client and also a health-care provider, however, your confidentiality remains protected under the law from this kind of reporting.

7 – If another close family member approaches Tanya for assistance, Tanya will maintain the client's confidentiality. In some circumstances she will refer that person to another practitioner if that will be the most beneficial for that person's therapy or coaching, and to maintain professionalism for the client/practitioner relationships.

In addition, for Tanya’s professional development:

8 – She may occasionally find it helpful to consult other professionals about her methodology when working with a client. During a consultation with another professional she will avoid revealing the identity or any identifying factors or attributes of the client. The other professional is also duty bound to keep the information confidential. Unless you request otherwise, Tanya will not tell you about these consultations unless she feels it is important to your work together.

9 – Tanya is professionally mentored and supervised by Spectrum Affiliates Ltd. As such, her anonymised case notes (by client reference number) are periodically screened and signed off for continuing professional development purposes. Tanya’s clients will not be identifiable either by name or content.

We, CCC-TC, will seek further permissions from clients regarding any further requested data sharing which falls outside the original permissions given and are not covered by the statutory legal exemptions given.

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Data Security

For CCC-TC, hard copy data will be kept in secured locked cabinets.

Electronic data will be encrypted and stored on a protected PC, and/or on electronic back up devices.

Destruction of Data

CCC-TC will keep data for ten years. This retention policy will be reviewed annually.

For the purpose of CCC-TC, destruction will mean:

- Paper records – double cross cut shredding
- Electronic records – removal and deletion of files and backups.

A record of what is destroyed and when it was destroyed will be kept.

Third Parties

Regarding sharing of personal information, please see above Sharing of Data.

Regarding companies that CCC-TC uses in the day to day administration of the business:

Payments

Payments to Creating Core Change are currently via cash, cheque or BACS. The name of the client will show on bank statements , receipts and invoices (and hence could potentially be seen by a tax assessor or bank workers).

Creating Core Change occasionally uses PayPal

Privacy notice:

<https://www.paypal.com/uk/webapps/mpp/ua/privacy-prev>

Communications

At present, potential clients contact Tanya via social media (Facebook – both personal and business, LinkedIn, Twitter) or other messenger applications (Text, Messenger, Whatsapp), call Tanya directly, or email her directly via her Website. She may retain information shared on these platforms in order to start or continue dialogue with clients.

Privacy Policies:

Facebook <https://www.facebook.com/policy.php>

Messenger https://www.facebook.com/full_data_use_policy

LinkedIn <https://www.linkedin.com/legal/privacy-policy>

Twitter <https://twitter.com/en/privacy>

Whatsapp <https://www.whatsapp.com/legal?eea=1#key-updates>

Please also bear in mind that although in most instances, email server administrators have no need nor desire to look at emails, these are saved on the different companies servers.

Yahoo <https://policies.oath.com/ie/en/oath/privacy/index.html>

WebMail

Mailing Lists

Tanya currently use Mozilla Thunderbird (to manage multiple email addresses) and Mailchimp to communicate with clients and send appropriate information. Mailchimp will track email opening rates, links that are clicked and helps us to understand who is engaging with emails from Creating Core Change.

<https://mailchimp.com/legal/privacy/>

At any time, any client or recipient of information can ask to be removed from future communications.

Visit Banbury Community Interest Company

Tanya Collins is now one of eight Directors for Visit Banbury Community Interest Company, which was incorporated in March 2019. As such, and until such time as she receives a Visit Banbury specific email address, she will be conducting some business on behalf of Visit Banbury with her Creating Core Change email address (tanya@creatingcorechange.co.uk). All data collected will be subject to GDPR 2018, and will be treated as such according to the principles outlined in this Privacy Policy.

Access to your personal information

A client or VBCIC contact, may request information about the data which is being kept about them. For CCC-TC, if any person makes a request for the personal information, the request will need to be in writing. You can contact Tanya via her email address:

tanya@creatingcorechange.co.uk

For more information about the rights around your personal information visit <https://ico.org.uk/> for the latest legislation.

Policy Reviewed and updated 24-4-2019

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