

# York Groupwork Ltd - Privacy Notice

## How we use your information

This privacy notice tells you what to expect when York Groupwork Ltd (YGL) collects personal information. It applies to information we collect about:

- visitors to our website
- people who contact us by telephone, email or letter
- people who use our services, e.g. who attend our courses or subscribe to our newsletter
- our current and former staff and sub-contractors

We treat any personal information (which means data from which you can be identified, including your name, address, e-mail address and the like) that you provide us, or that we obtain from you, in accordance with the provisions of the Data Protection Act. Under this Act, we have a legal duty to protect any information we collect from you.

Your personal information will be used only for the purposes of communicating with you in relation to our services, for assessment and analysis to enable us to review, develop and improve the services we offer, or for any other purposes to which you have given your consent.

## Visitors to our website

When someone visits [www.yorkgroupwork.com](http://www.yorkgroupwork.com) we collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. We collect this information in a way which does not identify anyone. We do not make any attempt to find out the identities of those visiting our websites. We will not associate any data gathered from this site with any personally identifying information from any source. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

## Use of cookies by YGL

Cookies are pieces of data that are often created when you visit a web site and are stored in the cookie directory of your computer either temporarily or permanently.

The web site uses cookies only to measure how you interact with our site; this does not include any personal information and remains anonymous.

You can read more about how we use cookies on our Cookies page

## E-newsletter

We use a third party provider, MailChimp, to deliver our e-newsletter. We gather statistics around email opening and clicks using industry standard technologies including clear gifs to help us monitor and improve our e-newsletter. For more information, please see MailChimp's privacy notice.

## People who telephone us

When you call YGL we manually record such personal information as we need in order to respond appropriately to your enquiry. We will explain what information we need and why. This information will be stored on paper records or on our database.

## **People who email us**

YGL stores emails only for as long as there is a business reason for doing so. Normally this will be for less than 6 months.

Any email sent to us, including any attachments, may be monitored and used by us for reasons of security and for monitoring compliance with office policy. Email monitoring or blocking software may also be used. Please be aware that you have a responsibility to ensure that any email you send to us is within the bounds of the law.

## **People who make a complaint to us**

When we receive a complaint from a person we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint.

We will only use the personal information we collect to process the complaint and to check on the level of service we provide. We may compile and publish statistics showing information like the number of complaints we receive, but not in a form which identifies anyone.

We usually have to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant doesn't want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for two years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

Similarly, where enquiries are submitted to us we will only use the information supplied to us to deal with the enquiry and any subsequent issues and to check on the level of service we provide.

## **People who use YGL services**

York Groupwork Ltd offers various services to the public. We have to hold the details of the people who have requested the service in order to provide it. However, we only use these details to provide the service the person has requested and for other closely related purposes. For example, we might use information about people who have attended a course to carry out a survey to find out if they are happy with the level of service they received.

## **People who subscribe to our Newsletter, or who have opted in to receiving information about our services**

When people subscribe to our services, they can cancel their subscription at any time and are given an easy way of doing this.

## **People who enrol on our courses and therapy groups**

We only ask for information that we need in order to allocate places on and administer our courses and other services.

Personal information about people who apply to attend our courses and therapy groups is stored on our database and in some cases retained as hard copies. Information about those who accept a place on a course is also stored in our accounting system. Information is retained only as long as there is a business reason for doing so, which in the case of financial records may be up to seven years.

Computer-based information is password protected and is only accessible to the Directors and administrative staff of YGL. Hard copy information is stored securely at the YGL office location.

We do not share personal information we hold with any other organisation, except in the following circumstances where this is necessary for provision of the service:

Foundation and Diploma courses: Personal information about course participants is shared with the Institute of Group Analysis for the purposes of awarding the IGA qualifications.

Facilitators of the experiential groups, who are sub-contractors of YGL, maintain their own records of the group work sessions which may include personal information about participants. These records are confidential to the group leader and are not accessible to other York Groupwork Ltd Directors or staff. Our contract with group leaders requires them to store such information securely in line with this policy. Group leaders will normally retain this information for a period of up to five years, for the purpose of providing references.

Block therapy groups: The group conductor, who is a sub-contractor of YGL, will maintain confidential records in line with the IGA Code of Ethics and Professional Conduct. These records are confidential to the group conductor and are not accessible to other York Groupwork Ltd Directors or staff. Our contract with group conductors requires them to store such information securely in line with this policy.

### **Sub-contractors**

We collect personal information about the people we engage as course and therapy group leaders.

We will only use the information they supply to us to process their application and to monitor recruitment statistics. Where we want to disclose information to a third party, for example where we want to take up a reference or obtain a 'disclosure' from the Criminal Records Bureau we will not do so without informing them beforehand unless the disclosure is required by law.

Personal information about unsuccessful candidates will be held for 12 months after the recruitment exercise has been completed. It will then be destroyed or deleted. We retain de-personalised statistical information about applicants to help inform our recruitment activities, but no individuals are identifiable from that data.

Once a person has contracted with YGL, we will compile a file relating to their engagement. The information contained in this will be kept secure and will only be used for purposes directly relevant to that person's contract with us. Once their contract with YGL has ended, we will retain the file in accordance with the requirements of our retention schedule and then delete it.

### **Complaints or queries**

YGL tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of YGL's collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below.

## **Access to personal information**

YGL tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'subject access request' under the Data Protection Act 1998. If we do hold information about you we will, if requested:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form.

To make a request to YGL for any personal information we may hold you need to put the request in writing to Christopher Davies, Director, at the address provided below.

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone. However we may need to ask you for proof of your identity before we can provide you with the information we hold. We reserve the right to charge a fee not exceeding £10.

If we do hold information about you, you can ask us to correct any mistakes by contacting us.

## **Disclosure of personal information**

We do not disclose your personal data to any third parties without your permission except insofar as you have consented to such disclosure or we are required to do so by law for information such as a court order, witness summons, or complaint from governmental authorities.

You can request further information on:

- agreements we have with other organisations for sharing information;
- circumstances where we can pass on personal data without consent for example, to prevent and detect crime and to produce anonymised statistics;
- our instructions to staff on how to collect, use and delete personal data; and
- how we check that the information we hold is accurate and up to date.

## **Links to other websites**

The YGL web site contains links to other web sites. This privacy statement applies only to our web site, so you should always be aware when you are moving to another site and read the privacy statement of that site which collects personal information.

We do not pass on any personal information you have given us to any other web site.

## **Changes to this privacy notice**

We keep our privacy notice under regular review. This privacy notice was last updated on 10 March 2015.

## **How to contact us**

If you want to request information about our privacy policy you can contact us:

York Groupwork Ltd., 31 St Pauls Square, York, YO24 4BD.

Telephone: 01904 633996. Email: christopherdavies@yorkgroupwork.com