



Privacy Notice

Training Service



GENERAL DATA PROTECTION REGULATION (GDPR) 2018

Who Are Training in Mind?

Training in Mind is a social enterprise that provides training in the areas of mental health and wellbeing, a statutory Relevant Person's Representative (RPR) service, a mental health policy consultation scheme for organisations, a counselling service and a Welsh language translations service for which we offer subsidised rates for charitable organisations. We also offer the ASIST course and hold the license for Mental Health First Aid (Wales).

Training in Mind is committed to protecting the privacy and security of your personal information. This privacy notice sets out how we collect and use the personal information we hold about you during and after your working relationship with us and gives you information on your privacy rights and how the law protects you. This includes information you have given us about yourself and what other agencies and individuals have told us about you.

Training in Mind is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to anyone who wishes to access our training services. This notice does not form part of any contract to provide services. We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

If you have any questions or want more details about how we use your personal information, please contact our Data Controller on 01495 707360.

Data Protection Principles

We will comply with data protection law. This says that the personal information we hold about you must be:

- 1.** Used lawfully, fairly and in a transparent way.
- 2.** Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- 3.** Relevant to the purposes we have told you about and limited only to those purposes.
- 4.** Accurate and kept up to date.
- 5.** Kept only as long as necessary for the purposes we have told you about.
- 6.** Kept securely.

What the Law Says

The General Data Protection Regulation 2018 (GDPR) says that we can only process or share your information if we have a lawful basis to do so. We rely on the following 'lawful basis' to process your information:

Consent – When you apply to come on one of our training courses you are giving us consent to process your personal data.

Legitimate Interests – it may be appropriate for us to use your personal information in ways you would reasonably expect us to, or when we can evidence that we have compelling justification for processing your data. When relying on legitimate interests we will ensure that we are protecting your rights and safeguarding your interests at all times.

We process your data to manage our relationship with you or your business, develop new ways to meet our customer needs and to grow our business, to develop and carry out marketing activities, to study how our customers use products and services from us and other organisations, to develop and manages our products and services, to keep our records up to date, working out which of our products and services may interest you and telling you about them, developing new products and services and what we charge for them and to manage customer payments.

Special Category Data

The information we receive on your pre-course questionnaire does include information which GDPR says is more sensitive. This is known as "special category data". We rely on the following lawful basis to process this particular information:

Consent – Our pre-course questionnaire asks for your consent to process information in relation to your ethnicity, specific disability and your sexuality. This data is classed as "special category data". We process this data in order to ensure that we are provided with information which allows us to facilitate a person-centred approach to service delivery which is appropriate for your particular needs. We also use the data to identify areas where we are not meeting community needs. This data is anonymised.

The Article 9(2) Conditions We Rely on to Process Special Category Data

The data subject has given explicit consent to the processing of those personal data for one or more specified purposes.

What Personal Information Do We Hold?

- Name and address
- Contact details including email
- Date of birth
- Gender
- Employment status
- Special needs/access/dietary requirements
- Emergency contact details
- Referrer information
- Ethnicity
- Sexuality

Where Do We Collect Your Personal Information From?

We collect personal information about you from;

- 1.** Booking Forms
- 2.** Pre-course questionnaires
- 3.** Trainers
- 4.** Employers

Who We Share Your Personal Information With

We only share your personal information with the following unless we have your specific consent:

1. Safeguarding agencies if we have any concerns about the safety of you or another individual.
2. Your employer if they have paid for your training with us.
3. Trainers delivering courses on behalf of Training in Mind

1. How secure is my information with third-party service providers?

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

2. What about other third parties?

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

3. Data security

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

4. Data retention

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal,

accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer accessing our services we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

5. Rights of access, correction, erasure, and restriction

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Service Director in writing.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

6. Right to withdraw consent

Where you have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

7. Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you choose not to give personal information

If you choose not to give us this personal information, it may delay or prevent us from providing you with a service. It could mean that we are unable to provide with training you have booked with us.

Marketing

We may use your personal information to tell you about relevant products and offers. This is what we mean when we talk about 'marketing'.

We study the information we hold on you to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

We will ask your permission to send you marketing messages and you can ask us to stop at any time.

How to complain

Please let us know if you are unhappy with how we have used your personal information. Please contact the Data Controller on 01495 707360 or write to us at: Training in Mind, Units 1-4 Church View, Ivor Street, Blaenavon, Pontypool, Torfaen. NP4 9NA.

You also have the right to complain to the Information Commissioner's Office. Find out on their website how to report a concern.