



COSCA (Counselling & Psychotherapy in Scotland)  
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## COSCA Privacy Notice

COSCA (Counselling & Psychotherapy in Scotland) is Scotland's professional body for counselling and psychotherapy - [www.cosca.org.uk](http://www.cosca.org.uk).

This privacy notice explains how we use any personal information we collect about individuals who submit personal information to COSCA (Counselling & Psychotherapy in Scotland).

The privacy notice aims to make sure that individuals who submit information feel confident about how we process their information under the General Data Protection Regulation (GDPR).

### ***What information do we collect?***

We collect personal information supplied by individuals in relation to the work of COSCA e.g. names, addresses, email address, phone numbers etc.

When COSCA's website is accessed, we collect information about your computer and about your visits to and use of the website. COSCA's website uses cookies to monitor browsing preferences. Cookies cannot be used to identify you personally. The website uses session cookies – this type of cookie allows websites to link the actions of a user during a browser session so that the website is able to store certain information whilst the user is browsing the site. The website also uses third party cookies. These are cookies that are not set by COSCA but are instead set by a third party. The third party cookies on this website are set by Google Analytics. Google Analytics sets cookies to help us accurately estimate the number of visitors to the website and volumes of usage. This is to ensure that the service is available when you want it and fast.

### ***How will we use the information about individuals?***

We collect personal information from individuals in order that we can carry out our work as Scotland's professional body for counselling and psychotherapy, and to help us to make relevant decisions about those individuals.

We will use information collected to:

- make decisions about suitability to join COSCA and to inform, on request, third parties concerning whether or not named individuals are currently members or subscribers of COSCA, and the category of membership held
- publish the names of individual members or subscribers of COSCA whose membership of COSCA has been terminated by us and to give the reasons for the termination

- make decisions about trainer and counsellor accreditation, complaints, information passed to COSCA and course validation
- improve your browsing experience of our website
- collate surveys and feedback
- organise events and meetings
- verify identity
- deal with queries
- make and receive payments
- send individuals key information relevant to COSCA, counselling and psychotherapy, membership, accreditation, events etc. unless advised not to
- carry out administration relevant to COSCA's work
- to meet our legal and regulatory obligations.

In the event that COSCA becomes insolvent, bankrupt, or ceases to operate, we will share the personal information collected from individuals currently involved with COSCA with another organisation with a similar purpose to COSCA. In doing so, we will take steps to ensure that the information shared will be used for a similar purpose to that of COSCA's. Individuals will be given the opportunity to request that their personal information is not shared in the above circumstances.

## **Marketing**

We would like to send individual members of COSCA (Counselling & Psychotherapy in Scotland) and subscribers information about the work of COSCA, our services and products. We would like to send the above information in a variety of means including by post, telephone, email, fax and via our website.

We would also like to send our individual members and subscribers information on the above from other organisations and individuals that we think may be of interest to them.

When individuals apply to join COSCA we ask them for consent to send the above information.

Individual members of COSCA and subscribers have a right at any time to stop us from contacting them in respect of passing on the above information. So, if individual members of COSCA or subscribers no longer wish to be contacted in respect of receiving the above information, please let us know in writing.

The personal information of individual members and subscribers held by COSCA will not be shared with other organisations for the purposes of marketing. It will also not be sold or rented to other organisations for the purposes of marketing.

## **Sharing Personal Information**

Where relevant, we may share your personal information with other companies. This could be:

- payroll service providers
- approved IT specialists who support our IT systems
- ID authentication and fraud prevention agencies
- financial advisers of individuals concerned
- pension scheme providers

We may also share personal information with other companies where relevant, such as:

- auditors
- medical agencies
- legal advisors and legal/regulatory bodies.

When we send you electronic copies of our e-bulletin, e-shots or other member updates, MailChimp will have access to your e-mail address.

We may also obtain information from third parties e.g. if we lose touch with individuals.

We make sure that the use of the above personal information by other parties is subject to appropriate protection, and we do not allow others to contact individuals using the information we have shared with them.

### **Access to personal information**

Individuals have the right to request a copy of the information that we hold on them. Proof of identity will be required for this service. If you would like a copy of the above information, please contact us.

### **Correction and Erasure**

We want to make sure that the personal information we hold is accurate and up to date. Individuals may ask us to correct or remove information they think is inaccurate.

### **Objection to Use of Personal Information**

Individuals can object to COSCA processing their personal information on grounds relating to their particular situation. COSCA will stop processing personal information when individuals object unless we can a) demonstrate compelling legitimate grounds for the processing, which override the interests, rights and freedoms of the individual or b) the processing is for the establishment, exercise or defence of legal claims.

### **Retention Periods**

The retention of COSCA personal data guidelines cover the periods of time that COSCA retains personal information about individuals. These retention periods vary depending on the nature and purpose of the personal information.

The future use of the records held by COSCA is the guiding principle for how long they are retained. Very few of these records are likely to be held for permanent preservation, with only those relating to complaints connected to very significant or historical cases being likely to be held on a permanent basis.

### **Breach Notification**

In the case of a personal data breach, if it is likely to result in a risk to people's rights and freedoms, COSCA will report this to the Information Commissioner's Office (ICO) where feasible within 72 hours of becoming aware of it. If it is a high risk to individual rights and freedoms, COSCA will also report the breach to the individuals who have been affected.

## **Publication of Sanctions**

As laid down in COSCA's Complaints Procedure, following the completion of complaints investigations by COSCA and its members who have their own complaints procedures COSCA publishes details of all sanctions applied to its registrants as a matter of public interest.

The information published on the above sanctions applied in respect of registrants are listed in the Sanctions Notice – see the About section of the COSCA Register of Counsellors and Psychotherapists.

Decisions to terminate membership following a complaint and/or other investigation by COSCA will also be published in COSCA's Journal. These decisions will also be passed onto to other Accredited Registers accredited by the Professional Standards Authority for Health and Social Care, and other relevant professional and statutory bodies.

The publication of the above sanctions provides valuable information about the standards COSCA expects of its members, assists people using the services of COSCA's members to make informed choices, and helps to maintain public confidence in counselling and psychotherapy.

## **Changes to our privacy notice**

We keep our privacy notice under regular review and we will place any updates on this page of the website.

## **General Data Protection Regulation**

COSCA is a registered Data Controller with the Information Commissioner's Office. Registration No: Z7357442.

## **How to contact us**

Please contact the Chief Executive if you have any questions about our privacy notice or information we hold about you:

- by email: [info@cosca.org.uk](mailto:info@cosca.org.uk)
- or write to: COSCA (Counselling & Psychotherapy in Scotland),  
16 Melville Terrace, Stirling FK8 2NE

Brian Magee  
Chief Executive  
COSCA (Counselling & Psychotherapy in Scotland)