

LDPRH PRIVACY NOTICE

updated September 2025

This section outlines how and why LDPRH keeps your Personal Data on file whilst you are studying and, subject to your consent, also for a period of time post-graduation. New regulations (May 2018) dictate that every organisation holding such data must appoint Data Controllers who are the people responsible for its correct use. You are free to contact either appointed DC at any time to discuss any issues of concern you may have. The document is 'dynamic' in the sense that updates are inevitable as good practice evolves.

We have decided it is important to distinguish between sensitive and non-sensitive data. If you feel that our interpretation of non-sensitive data headings is too wide, you are free to contact a data controller to discuss this. We would not knowingly share the sensitive data with anyone without your written consent (this could include an email confirmation).

Sensitive data would include: Gender, ethnicity, disabilities, sexual orientation etc.

DATA CONTROLLERS:

Judi Keshet-Orr. (Director LDPRH) Contact: judi@psychosexualtraining.org.uk

Ulf Ehrenmark (Secretary LDPRH) Contact: youngulf@gmail.com

YOUR PERSONAL (Non-Sensitive) DATA:

The data we hold has been obtained purely from your own submitted Course Application Form. While you are studying, we keep e-records of

- Names
- Addresses
- Email Addresses
- Telephone numbers
- Dates of Birth
- Course payment details
- Status (e.g. 1st year, 2nd year or graduated)

You will have had the option to opt in to *email* addresses being kept as a standard means of contact. If you opt in, you implicitly agree to receive VAT invoices by email through the MS Word Mail-merge process. Alternatively, you can contact a Data Controller at any time to address this or other queries about your data.

USE OF YOUR DATA

We need addresses and telephone contacts in the event of unforeseen circumstances such as change of venue, indisposition of teaching staff causing cancellation or alterations to the schedule etc.

We are obliged to issue students quarterly VAT receipts of any payments made. Where appropriate this is done by email correspondence using an automated Mail-merge system linked to the data spreadsheet. Any student concerned about this process may contact a Data Controller to request a hard-copy instead.

It is possible that our records will be examined from time to time by VAT inspectors who will then have access to your non-sensitive data, for example, through VAT invoicing records.

Any sensitive data is gathered purely to help us enhance your learning and development experience on the course and for us more fully to be prepared for any special needs that might be required to assist your satisfactory progress on the course.

SPECIFIC SHARING OF YOUR (Non-Sensitive) DATA

We are obliged annually to supply the host accrediting University (currently Middlesex) with some of the details you have provided us. This takes the form of

- First Name
- Second Name
- Date of Birth
- Home Address
- Start date
- Status
- Ethnicity
- Age

We also supply COSRT with a subset of your non-sensitive data. This is part of our contractual obligation with COSRT who register every student on our course.

It is mandatory for students to join COSRT as student members and therefore names are crosschecked and references taken up. COSRT state that this information about trainees "...is shared for professional training purposes only".

ACADEMIC WORK

All work is submitted using a password protected format. Please refer to the student manual for procedures to gain client consent for your case study and, if requested by the clinical supervisor, procedures for audio tape consent.

AFTER GRADUATION

We like to keep alumni details for the purpose of providing further guidance about events that might be of interest and also because we occasionally seek testimonials for promotional documentation (e.g. website). We annually invite alumni to opt into this arrangement, otherwise all sensitive data is removed within a period of 3 years from graduation. (it is customary to keep records for this period in case of queries that might arise post-graduation). Likewise, the original application forms are shredded at the end of this period.

DATA STORAGE

Both Data Controllers keep non-sensitive data on their password and firewall protected computers using encrypted technology.

Only the Course Directors have access to the sensitive Data.

This is separate to any data which you give to your placement provider. Essays, marks and your Fitness to Practice reports are kept until graduation.

VAT regulations require the non-sensitive data to be archived for 6 years post-invoice. For the final 3 years of this period, this data is only kept on a San Disk Memory Card.

No sensitive data is kept on a computer, it being purely in the paper form of the application you submitted which gets shredded as described above.

USE OF VIDEO CONFERENCING FACILITIES (such as ZOOM)

The use of these facilities raises questions about data security particularly if recordings are made. As such, we have carried out a DPIA (Data Protection Impact Assessment) and concluded the following:

Faculty members and teachers will have the email addresses of students to invite them to Zoom for the module being taught.

Students will be informed if there is anyone in the room with the faculty member e.g. for technical or teaching assistance and whether that person(s) can hear the group. Students will need to disclose if anyone else is in the room with them or whether they can be overheard.

Any recordings can only be done with the knowledge and consent of the student group and the faculty member(s) present, e.g. only recording with their knowledge, or only when someone is absent from the group. We will not record anything they say during the training that they expressly inform us they don't want recorded. In the case of students making their own recordings, they are expected to adhere to the same policy.

The faculty member facilitating will send the recording to the student group and request that this is deleted after 7 days. The faculty member concerned will also have to delete after 7 days. These recordings are expressly for the private use of the student and must be kept secure until deletion.

Further information can be gained from the Zoom website:

<https://zoom.us/gdpr>

USE OF COOKIES AND ANALYTICS

The site does not place any cookies on your PC or use cookies in any other way. The site administrators use Google Analytics to view the anonymous statistics of the numbers of visitors to the site. No user is identifiable, nor do we participate in any part of the advertising features of the Google service.

COMPLAINTS

If you feel data use has been violated, you have a right to complain to a Data Controller. At all times, you also have a right to complain to the Information Commissioner's Office, (ico.org.uk) if you think there is a more serious problem with the way we are handling your data.