



WMIP Data Controller

The data controller in WMIP is the Chair of the Board of Trustees who can be contacted at chair@wmip.org.

Whose Data is Held

WMIP holds personal data on two groups of people:

- WMIP Members & Trustees
- Non-Members

This privacy notice concerns only personal data held by WMIP about its members and trustees.

What Data is Held

The personal data held by WMIP about its members and trustees falls into the following categories:

- Name and contact details
- Records of WMIP training courses attended
- What professional bodies members belong to
- Other professional qualifications
- Re-accreditation information for professional bodies where processed through WMIP
- Records of CPD events attended
- Names and contact details of professional executors
- Information pertaining to a grievance referred to the ethics committee
- Type of service offered (as published on our web site)
- Member's professional profile (only circulated to other WMIP members)
- Insurance details
- Personal information, e.g., supervisors' reports, held by the training committees

This information is used and processed in the following context:

- Register of Members (accessed by WMIP Members and administrators; i.e., NOT the public)
- Find a Therapist Directory on the WMIP web site (accessed by public and administrators)
- Mailing list for the WMIP bulletin (accessed by the editor and administrators)
- Mailing lists held by administrators, individual officers and/or committees for WMIP purposes (rather than personal purposes)

Purpose for Holding & Processing Data, Lawful Basis and Period for which it will be Kept

Data can only be held and processed for a specified purpose and on a lawful basis for each purpose. The GDPR set out six lawful bases – see the ICO web site for more information. WMIP will generally use only two of these:

- Consent (by the individual for a specific purpose)
- Legitimate interests (of WMIP which the individual would reasonably expect)

The following is a list of purposes and legal bases for holding and processing the data and a statement of how long the data will be kept for.

Data may be deleted earlier than stated below when appropriate; for example, when a member or trustee resigns from WMIP.

Data will be corrected or deleted at any time on the request of the data subject/individual.

- a) Names and contact details will be held by WMIP for administrative purposes and so that WMIP can inform members and trustees about professional activities: training courses, seminars, conferences, etc., and other matters pertaining to the professional activities of WMIP and its members.
This data is held and used on the basis of legitimate interest.
Names and contact details will be held for 6 years from the date it is collected or re-confirmed.
- b) Databases of members' and trustees' contact details are also held for the purpose of the WMIP bulletin and other mailing lists.
This data will be held on the basis of legitimate interest.
Names and contact details will be held for 6 years from the date it is collected or re-confirmed.
- c) Training and CPD records, and other professional memberships and qualifications are kept for the validation of WMIP membership and re-accreditation to other professional bodies.
This data will be held on the basis of legitimate interest.
The data will be kept for 6 years after each event or for 6 years from the date it is collected or re-confirmed.
- d) Personal data held by the training committees to help in the assessment of trainees during their course work and at the end of their training to become full members of WMIP.
This data will be held on the basis of legitimate interest.
Data held by training committees will be held until 6 years after the individual completes their training, graduates or ceases to be a WMIP trainee.
- e) Details of Professional executors are kept so that patients and clients can be managed professionally in the event of a WMIP member's death or incapacity.
This data will be held on the basis of legitimate interest.
The names and contact details of professional executors for members will be kept until 1 year after the death of the member, or 1 year after the individual ceases to be a member of WMIP.
- f) Details of professional indemnity insurance are held as a condition of WMIP membership and also for reaccreditation purposes.
This data will be held on the basis of legitimate interest.
Details of professional indemnity insurance will be held for a period of 6 years from the date it is supplied or re-confirmed.
- g) Grievance data and correspondence is kept for the purpose of dealing with any grievance referred to WMIP.
This data will be held on the basis of legitimate interest.
Data associated with a grievance procedure will be kept 7 years after a procedure has been resolved/decided.
- h) Data is held by WMIP in order to process the periodic reaccreditation of members to other professional bodies.
This data will be held on the basis of legitimate interest.
Re-accreditation information for professional bodies will be kept for 6 years after re-accreditation is confirmed. This allows for an overlap between reaccreditation periods.
- i) Type of service offered is used to inform the public via the WMIP web site (find a therapist and the referral service) and, in a more detailed form, to other WMIP members via the Register of Members.
This data will be held and processed on the basis of consent.
Data provided about the types of services offered by a member will be kept for 1 year after it is supplied or confirmed.

Data Sharing

For administration data may be shared with an outside agency for the purposes and duration set out above.

Re-accreditation data will be shared with the professional body or their agent only for the purpose of re-accreditation and shall not be passed on to any other body for any purpose. Data will not be shared or passed to any other bodies, except as described above.

Rights

WMIP members and trustees have the following rights over their personal data:

- To be informed as to what data is held
- To have access to a copy of the data held
- To have errors in the data corrected
- To be forgotten; i.e., to have their personal data deleted from the WMIP records, so long as it is not legally required to be kept
- To object about the data holding or processing or sharing

Further Information

If a data subject does not agree with the data being held or wishes to complain about the holding or processing of their data they should in the first instance contact the Chair of the WMIP board of trustees at chair@wmip.org. If the Chair of the WMIP board of trustees is unable to resolve the issue to the satisfaction of the individual they should contact the Information Commissioner's Office at <https://ico.org.uk/>.

Further information about WMIP, its activities, the code of ethics, and the code of practice can be found at <http://www.wmip.org/index.html>.