

29/4/2019

Dear Member,

This aim of this letter is twofold.

One intention is to introduce you to the IPSS Policy on Data Protection, which should clarify for you how data is held on you at IPSS and on what terms. Also how it is held safely and how the purpose for retaining or alternatively removing/destroying that information is regularly reviewed.

It is a requirement that IPSS, as a member organisation of UKCP has a policy on data protection. The new IPSS Policy on Data Protection is attached. This policy was researched and drawn up by a working group of Council members and the IPSS Administrator; that is by the Chair of Members' Committee, Treasurer and Transitional Chair of Members and Council Chair and has been passed by Council. The policy demonstrates both that IPSS is committed to meeting its requirements under data protection legislation and the action that it is taking to do so.

A second intention is to clarify for you, how IPSS processes and shares internally, members' and applicant-members' data once received; also how IPSS in carrying out its chief responsibilities as a Membership and UKCP Accrediting Organisation, ensures that information it holds on members is not held unnecessarily. Paola Turner in her role of Administrator has identified the following.

Annual membership renewal: The Administrator receives paper copies or electronic copies of renewal applications from members. Electronic copies are kept of all these forms on the Administrator's Computer. She prints all the electronic copies and these paper copies are passed to a delegated member of the Members Committee for when the Committee meets annually to check CPD and renewal information. The paper copies are returned to the Administrator and destroyed at the end of the process, with only the electronic version being kept and a record of how each application meets the requirements of UKCP re-registration.

Where members send their applications late and after the committee has met, the Administrator sends an electronic copy of the renewal document to the Chair of Members' Committee. On this occasion that document will be held on the computers both of the Chair of Members' Committee and other delegated committee members who are reviewing the application, until a decision is taken to remove that information from their computers. The Council reviews every four months what information is held on Council and Committee Members' computers as well as the computer of the Administrator, with the aim of removing/deleting any data that is no longer required.

Accreditation: The Administrator receives paper or electronic copies of Accreditation forms. She scans the paper copies and sends only electronic versions to the Chair of Accreditation and one other member of the Accreditation Committee delegated to work with

the application. The Administrator shreds the paper application and retains the electronic one. This application will also be on both the computers of the Chair of Accreditation's computer and that delegated committee member. The Council reviews every four months what type of information is held on Council and Committee Members' computers as well as the computer of the Administrator, with the aim of removing/ deleting any data that is no longer required.

Five yearly Reaccreditation: The process for this is similar to that of Accreditation. The Administrator, once having received the Accreditation forms, sends out the forms electronically, for review and checking to two delegated members of the Accreditation Committee. These Committee members will hold this information on their computers. The Council reviews every four months what information is held on Council and Committee Members' computers as well as the computer of the Administrator, with the aim of removing/ deleting any data that is no longer required.

You will see from the Data Protection Policy that members should be aiming to meet the requirements of data protection legislation in their private practice, where necessary and in a timely manner. Some members have said at Forum that it is difficult to gain clarification from the ICO on what are their responsibilities. IPSS would consider meeting the cost to pay for an expert on data protection to speak to us as part of a Forum or AGM. It may also be that fellow members would like a space at a Forum or AGM to share how they have approached data protection in their private practice. Please let either Paola or myself know if you have advice that you consider helpful for other members on data protection in private practice.

Best regards,

David.

David Jones,
Chair IPSS Council.