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## Terms and Conditions – Privacy Statement

Vital Pathways Training will keep a record of the details you provided on your application form, any supporting documents requested as part of your admission, and additional details provided by any referees and recorded following any interview process. Where your application does not proceed, your personal data is destroyed within 3 months. Where your application leads to your registration as a student, we will maintain records about your studies, and about your use of the vocational training and services that we offer. This personal information will include data such as your name, home address, date of birth, course studied, fee payments, and information about your assignments, placement, practice hours, assessments and results.

Your personal information is created, stored and transmitted securely in a variety of paper and electronic formats, including databases that are shared between the core tutors and the online learning platform. Other than outlined below, access to your personal information is limited to core tutors only who have a legitimate interest in it for the purpose of carrying out their contractual duties, and our use of your personal information will not be excessive.

In addition to this, Vital Pathways Training may process some information about you that is classed as ‘sensitive’ or ‘special category’ personal data, and which requires additional protections. This includes information concerning your ethnicity, sexual orientation, religious beliefs or health/disability that we use for course delivery, planning and monitoring purposes, or in order to provide care, help or suitable adjustments. For the purposes of study to equip students to work with vulnerable people, other sensitive information may be processed, such as information about past criminal convictions, working with children or vulnerable adults, and fitness to practise. Access to, and the sharing of, your ‘sensitive’ personal data are controlled very carefully. You will normally be given further details about our use of any such data when we collect it from you.

### What is the purpose and legal basis of the processing?

Vital Pathways Training will process your personal information for a range of contractual, statutory or public interest purposes, including the following:

- To deliver and administer your training, record the details of your studies (including any placements with external organisations), and determine/confirm your academic achievements, such as results.

- To administer the financial aspects of your relationship with us and any funders.
- To deliver IT facilities to you. Some of these IT services are specific to an educational context (e.g. the use of lecture capture facilities, anti-plagiarism software or online learning environments).
- To deliver facilities and services to you (e.g. lecture videos, academic support).
- To enable your participation at events (e.g. functions, graduation).
- To communicate effectively with you by post, email and phone, including the distribution of relevant newsletters and circulars.
- To operate security, governance, disciplinary, complaint, audit and quality assurance processes and arrangements. Note that information collected for a different purpose may be re-used for disciplinary purposes, including to identify you, where this is proportionate and necessary.
- To support your training, safety, welfare and wellbeing requirements
- To compile statistics and conduct surveys and research for internal reporting, governing body, or public or legitimate interest purposes.
- To fulfil and monitor our responsibilities, including ethical practice, equality and public safety legislation.
- To enable us to contact others in the event of an emergency. We will assume that you have checked with the individuals before you supply their contact details to us.

We consider the processing of your personal information for these purposes to be either necessary for the performance of our contractual obligations with you (e.g. to manage your education, student experience and welfare while studying at Vital Pathways Training), or necessary for compliance with a ethical obligation (e.g. reporting to COSCA/BACP), or necessary for the performance of tasks we carry out in the public interest (e.g. teaching and placements), or necessary for the pursuit of the legitimate interests of Vital Pathways Training or an external organisation (e.g. to enable your access to external services). We require you to provide us with any information we reasonably ask for to enable us to administer your student agreement. If we require your consent for any specific use of your personal information, we will collect it at the appropriate time and you can withdraw this at any time. However, in the event that such withdrawal affects our ability to provide services to you (including the administration of any Courses) or comply with our legal obligations, you will be unable to remain registered as a learner with Vital Pathways Training and we may not be able to complete certain processes for you.

### **Who will my personal information be shared with?**

As described above, your personal information is shared with relevant core tutors and directors of Vital Pathways Training as required. In addition, it is shared as permitted or required by law, on a considered and confidential basis, with a range of external organisations, including the following:

- Student Management System. Every training organisation keeps records about learners and is required by Data Protection regulations to inform learners about the personal data held. Vital Pathways training uses an online application form made available

through our website. This function enables us to process and manage admissions, collect payment and provide administrative duties. Additional to this, applicant details are stored on an excel spreadsheet and stored securely on the Vital Pathways Training private Dropbox. Vital Pathways Training does not hold and store credit/debit card details; this data is handled by online payment processors. The types of personal data that are stored include: demographic data, payment records and academic records. The processing occurs for the purposes of providing educational programmes.

- Online learning platform. To make education accessible and provide continuity of learning, Vital Pathways Training must have a reliable, sustainable IT infrastructure to ensure training related tasks are completed effectively and efficiently. Vital Pathways Training engages an online learning provider who will provide assistance. This provider may have to access personal data when their expertise is required to resolve IT related issues. This provider may also hold communication records between Vital Pathways Training and key stakeholders (such as students, tutors and assessors) as part of their data backup service. The online learning platform will enable peer and tutor discussions, capture and store assignments and store student identifiable information. Students will be asked for their permission to store such data and consent to the terms and conditions of the online learning provider.
- The providers of training placements.
- External examiners and assessors, and external individuals involved in relevant
- Committees, governance or procedures.
- On occasion and where necessary, the police and other law enforcement agencies.

### **How is my personal information used after I graduate?**

After you graduate, your results and accrued hours of learning are retained indefinitely or until company ceases to exist so that the details of your qualification can be obtained.

### **Online Classes: Privacy Notice**

- Vital Pathways Training may offer short online courses and/or move classes to an online facility hosted by Zoom. For this purpose, Vital Pathways Training will collect your name, email address and telephone number and profession is applicable. This information is stored on an excel spreadsheet and saved to a private Dropbox account, and this information is deleted within 3 months after the online course ends.
- During virtual classes we will be using Zoom Webinar to host our live course sessions, where you will have the opportunity to interact with our faculty in a live Q&A.

### **Zoom webinar/Online classes**

- **Will my personal information be visible during or after the virtual session?**
- Once the session has been started by the host, you will be placed in a Webinar room where the only participants will be the registered participants and Vital Pathways Training faculty.
- During the session, you will be encouraged to submit any questions for the faculty member hosting the event. These questions and your name will be visible to any other

attendees, and so we recommend that you do not use your full name or your email address when prompted to allow access to the session.

- These sessions will not be recorded. It should be noted that chat/messaging is recorded in order to allow the host to respond to questions. Students who attend the sessions are aware of and agree to the chat/messaging being recorded.
- Zoom collects certain personal data by default, while other data collection is optional (i.e., the host or individual user may choose not to provide the data to Zoom). Personal data collected includes:
  - o User profile: first name, last name, phone (optional), email, password (if single sign-on is not used), profile picture (optional), department (optional)
  - o Meeting metadata: topic, description (optional), participant IP address, device/hardware
  - o Cloud recordings (optional): Mp4 of all video, audio and presentations, M4A of all audio, text file of all in meeting chats, audio transcript file
  - o Instant messaging chat logs
  - o Telephone usage data (optional): call in number, call out number, country name, IP address, 911 address (registered service address), start and end time, host name, host email, MAC address of device used.

### Data Retention Policy

A Data Retention Policy has been implemented for Zoom Recordings of short courses or online classes. By default any recordings will be deleted within 6 months of the event.

### Class Recordings - Privacy Notice

Vital Pathways Training members use Zoom for remote teaching and learning, and meetings. Students who attend recorded classes are aware that the session is recorded, and consent to this recording.

Everyone who uses Zoom will have some of their personal data collected as part of this delivery.

Personal data collected by Zoom is stored in data centres within the EEA. Zoom uses security measures to protect personal data from unauthorized access. These are detailed in the ZOOM Privacy Notice, available here:

<https://zoom.us/privacy#Toc44414842>.

Zoom recordings may be stored locally on the host's computer or may be stored on the ZOOM cloud.

#### *ZOOM Cloud Recordings*

Where recordings are stored on the ZOOM cloud, the following information will be stored:

Username, Mp4 of all video, audio and presentations, M4A of all audio, text file of all in meeting chats, audio transcript file.

Zoom Cloud recordings are manually deleted by staff within 6 months of the recording.

### *Local Recordings*

Where recordings are stored locally, the following information will be stored on the meeting host's device:

User names, Mp4 of all video, audio and presentations, M4A of all audio, text file of all in meeting chats, audio transcript file.

Local recordings are manually deleted by Connexions Training staff within 6 months of the recording.

### *Publication of Recordings*

Recordings are uploaded to VIMEO and are made available on the online learning class page. As described in QAM Policy 11.5 Incorporating Digital Technology into the Curriculum, all materials stored in online learning sites are considered active and dynamic for the duration of the academic year during which the module runs. While the module is active, the Vital Pathways Training staff, faculty and class will have access to the class online learning page. At the end of the academic year, a phased process of archiving and eventual destruction is begun. At this stage students will no longer have access to their class online learning page.

### **What data does VIMEO collect?**

Vimeo is operated by Vimeo Inc. 555 West 18th Street, New York, New York 10011, USA. Using Vimeo establishes a connection to the Vimeo Servers, and data on the browser and computer system you are using can be collected. Vimeo is responsible for data processing and more information can be found in the Vimeo Privacy Policy available here:

[https://vimeo.com/privacy#data\\_we\\_collect\\_about\\_you](https://vimeo.com/privacy#data_we_collect_about_you)

### **Privacy of recordings**

The following settings are used to protect the privacy of a recording:

- Only people with access to the online learning class page and/or a password can watch the recording.
- Recordings cannot be embedded in other locations.
- Comments are disabled.
- Downloading is disabled.

### **Will my personal information be visible during or after the session?**

## **Privacy Statement**

Once the session has been started by the host, you will be placed in a Webinar room where the only participants will be the classes' registered students and teachers. Your contributions, your image and your name will be visible to any other attendees, and as required to Vital Pathways Training staff. These sessions will be recorded.

The host may move you to breakout rooms during class. Breakout rooms are not recorded.