

DATA PROTECTION STATEMENT FOR LEARNERS AND GRADUATES

Current from January 2026; renewable January 2027

The following information outlines how the Spiritual Companions Trust collects and keeps information about its learners and graduates.

Learners on the CFI Level 3 Diploma in Spiritual Coaching & Caregiving will be asked to provide the following personal information: full name and title, address, date of birth, telephone number, email address, and any health details that may affect full participation in the course. This information enables the Trust to make contact with learners. The Trust keeps learner details in the register after learners graduate.

Security

Data Protection legislation under General Data Protection Regulation (GDPR) requires us to keep online and manual information about learners/graduates safely. The Trust is committed to these principles and information kept about learners/graduates will comply with the law.

Any information that learners/graduates supply will be kept securely in double-locked on-line files. The Trust operates a clear desk policy and information about learners/graduates will not be left on a desk or open computer screen. Only designated staff of the Trust who have been trained in data protection will have access to learner/graduate files. Data protection legislation applies to all staff, volunteers and tutors who work with the Trust. Learner/graduate information will be retained within the Trust apart from:

1. Name, address, date of birth and details of any mitigating circumstances which might be shared with the accrediting body, the Crossfields Institute, for certification purposes
2. The contents of learner portfolios which may be viewed by the accrediting body as part of the external moderation process, where learners must provide sufficient evidence for the awarding organisation's External Quality Assurance (EQA) to confirm achievement. Learners have the right to request that selected pages are not viewed. Personal information contained within the portfolios can be removed before EQA sampling
3. Personal details pertaining to learners/graduates if there is an allegation against them relating to criminal or safeguarding matters
4. Any details that learners/graduates give permission to be shared for marketing, referral or other purposes

Individual Rights

Learners/graduates should be aware that some entitlements such as the right to erasure may not be fully complied with if records refer to reportable criminal or statutory issues.

Learners may request a copy of information held about them by the Trust. This will be supplied within 48 hours if delivered by email or 7 days if in writing. If learners/graduates request access to their files or wish to amend information about themselves they will be required to verify their identity before the Trust can process their request.

Learner records will be relocated to graduate files following completion of the Diploma in Practical Spirituality and Wellness. These records will be retained for as long as a graduate is an active member of the Trust. Permission to retain these records will be obtained in the form of written consent on graduation.

Graduate contact details may only be shared with the general public when a graduate explicitly requests, and gives written consent for their details to be placed on the open register. Any graduate who engages in work with the public will be expected to comply with the data protection requirements set out by the Trust.

Ex-learners and graduates can request that their details are removed from mailing lists or the open register at any time after leaving the Diploma in Practical Spirituality and Wellness. If at any point a graduate wishes to change or remove their details, they should write to Diana Brown at diana@spiritualcompanions.org

Learner course work is held until EQA sampling and certification is complete. After this, the Trust holds graduate work in individual graduate files. This is to provide graduates with a backup record of their work, in case anything should happen to their own records. It also ensures that the Trust can refer to graduate work records if there is any future query or complaint. The Trust will ask graduates at graduation for their written consent to grant permission to hold their course work on record. If graduates should ever want their work deleted, they should make a written request to Diana Brown at diana@spiritualcompanions.org

The Trust will advise learners and graduates of any changes to this policy.

Governance

The Trust is a controller of data protection information. The person responsible for controlling information is William Bloom.

If you would like to contact the Spiritual Companions Trust about this policy please email: admin@spiritualcompanions.org or telephone 01458 555008

Any complaints about the handling of information should be made to Nicolas Clements, Chairperson of the Board of Trustees

William Bloom
Director, Spiritual Companions Trust
spiritualcompanions.org