



LEVEL 5 DIPLOMA IN FAMILY COUNSELLING

A course for counsellors who are qualified and would
like to work with families

Course Handbook

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The Course

Level 5 Diploma in Family Counselling is aimed at students who already hold a Counselling Qualification at level 4 or equivalent and who wish to work with families.

It is assumed that students will already have a sound theoretical knowledge gained from their initial qualifying course. The course is taught in an experiential way and will introduce systemic theory during the course as a way of working with families.

Course Information

Tutors:	Rachel Ellis and Rebecca Metcalf
Awarding Body:	Counselling and Psychotherapy Central Awarding Body (CPCAB)
Course Code:	TM5D
Session Dates:	Commencing Thursday 17 th September 2026
Session times:	Thursdays during Hampshire Schools term time from 9:00 until 13:00
Session venue:	Royal Oak Wellbeing Hub, Yateley
Guided learning hours:	92 hours
Total Qualification Time:	370 hours (92 Guided Learning Hours and 278 Additional Learning Hours)
Structure of the day: (subject to change)	9:00 – 9:15 Check – in 9:15 – 11:00 Teaching 11:00 – 11:20 Break 11:20 – 12:50 Group presentations or Supervision or Skills or Personal Development. 12:50 – 13:00 Check-out
Entrance Requirements:	A minimum of Level 4 Diploma or equivalent in Counselling

You may be required to attend an interview. Entrance to the course will be dependent on you meeting the entrance requirements and the interview. If a course is oversubscribed Hart Voluntary Action retains the right to not offer a place even if all criteria are met.

Applying

How to apply: Visit our webpage at <https://hartvolaction.org.uk/community-services/counselling/training-placements/familycounsellingintro> to download an application form or

contact Hart Voluntary Action on 01252 815652 or email 121@hartvolaction.org.uk to request an application form. Please return completed application forms to 121@hartvolaction.org.uk.

Structure of the Course

The course has been approved and accredited by the Counselling and Psychotherapy Central Awarding Body (CPCAB) and is based on their 7 Learning Outcomes. The learning outcomes are each broken down into criteria which you have to meet to pass the course.

1. Work safely, ethically, and legally with families
2. Work within a counselling relationship
3. Work with client diversity
4. Maintain a user-centred focus throughout the counselling work
5. Work with self-awareness in the counselling process
6. Work with a coherent framework of counselling theory and skills
7. Work self-reflectively as a family counsellor

The course comprises written work (doc), placement work (test) and tutor observations (tobs). All candidates are required to keep a record of their learning by compiling a portfolio of their work throughout the course. Each portfolio will contain a Candidate Learning Record (CLR) which details all the criteria you are required to obtain for the course (a list of the criteria is in Appendix 1). The CLR must show that all criteria for the course have been met at least two times, ideally three, in different ways.

Assessment: A variety of assessment methods are used throughout the course.

To gain the criteria required to pass the course you will need to show the following in your portfolio:

Supervisor Reports (test) – you will be able to obtain all the criteria once through this report

Tutor Reports (tobs) – you will be able to obtain all the criteria once through this report

4 assignments (doc) - you will be able to obtain all the criteria once through the assignments.

You will also need to have the following in your portfolio to demonstrate your learning but you will not be expected to gain criteria through these methods:

Client presentations

Learning Journal

Tutor Feedback

Candidates will be expected to update their own Candidate Learning Record and keep a portfolio of their work. Portfolios need to be completed by ?.

Portfolios need to be kept on OneDrive and the 'Portfolio' folder must be shared with your tutors. In your Portfolios you will need to have the following folders:

- Assignments
- Learning Reviews
- Placement
- Tutor Feedback and tutorials
- Work to be marked

Attendance Requirements: To be able to pass the course you must have attended at least 80% of all available sessions.

Assignments: By completing all the assignments you will be able to obtain all the criteria once (the criteria available in each assignment is subject to change).

Assignment 1 (Ethical, legal and safeguarding) – **1.1, 1.2, 1.3, 1.4, 1.5, 1.6, 2.1, 3.2, 7.3**

Assignment 2 (Theory) – **2.2, 2.3, 6.1, 6.2,**

Assignment 3 (Case study – presentation) – **2.1 2.4, 3.1, 3.3, 4.1, 4.2, 4.3, 5.4, 6.1, 6.2, 6.3,**

Assignment 4 (Self Review) – **5.1, 5.2, 5.3, 7.1, 7.2**

Learning Journal: You will be required to complete a weekly journal. This will not need to be handed in but must be present in your portfolio.

Client work: You are required to complete at least 30 hours of clinical work with families during the course. You are required to find your own placement which must then be agreed with your Tutor.

You must keep a client log during your placement and your client work must be supervised by a suitably qualified supervisor in line with BACP requirements with at least 5 hours of supervision during the course.

For your placement you must have a contract in place and you will be required to get a supervisor report after your 30 hours have been completed.

Tutorials: You will be expected to attend 1-on-1 tutorials twice during the course to check on your progress and highlight any problems or issues. These will be arranged during course hours.

Pastoral support: Students will also have tutorials throughout the course.

What next: This is a standalone course.

Plagiarism: All work that you submit as part of the assessment for the Level 5 in Adolescent Counselling must be your own work. Any work that is submitted that is not your own will be dealt with at a centre level. The Malpractice policy would also be applicable here.

Workplace requirements

Students are responsible for finding their own placement. Any placement must be agreed with the Tutor and organisation before it commences.

Students will need to complete 30 hours of client work with families.

The placement must be able to provide suitable families for the students. The placement must have all relevant policies in place.

Students must have supervision for the clients they are seeing as part of the course. If this is not provided by the placement then the student is responsible for finding and paying for their own supervision.

Course Administration

Emails

All Students will be issued with a Hart Voluntary Action email address for the duration of the course. Please read the Hart Voluntary Action Policy concerning IT usage (available on SharePoint).

You will require this email address to be allowed access to Windows 365 which will allow you to use online versions of Word, Excel and Powerpoint as well as having access to SharePoint (an area where everyone can access the same documents), OneDrive (an area where only you can access to save documents that you want to) and Microsoft Teams which can be used for communication between the group, private communication with your Tutor and Video Conferencing if this is ever required because our venue is unavailable (please see Appendix 3 for instructions on how to use this package).

Paperwork Required during the Course

All required paperwork for the Course is available on SharePoint. Please download the documents you need and these can be completed by you locally. The following is a list of the paperwork available:

Criteria Assessment Sheet (CAS)	Supervisor Contract
Record of Learning	Supervisor Report
Completion Statement	Record of Client Hours
Placement Contract	

At the end of the course you will be required to submit the electronic portfolio of your work using OneDrive. Your portfolio will need to be divided into folders with the following headings:

- Assignments
- Learning Reviews
- Placement
- Tutor Feedback and tutorials
- Work to be marked

Submitting Work

You will need to share your OneDrive with the tutors so that they can access your portfolio. Assignments that are put in your 'work to be marked' folder will then be accessed by the tutors and they will return them to you by email.

Equal opportunities

Hart Voluntary Action is committed to providing equal opportunities and has policies covering the delivery of the Level 5 Diploma in Counselling Adolescents. Please see appendix for all policies.

Quality Assurance

Moderation of student work: A cross section of student work will be moderated to ensure consistency of marking across the board. Tutors will collaborate together during each assignment to discuss standardised marking.

Internal Quality Assurance: The person carrying out the role of Internal Quality Assurance (IQA) will be responsible for ensuring that Hart Voluntary Action (HVA) are providing the course Level 5 Diploma in Family Counselling to the correct standard as outlined by the Counselling and Psychotherapy Central Awarding Body (CPCAB).

The IQA will carry out this work with HVA twice during the course of the academic year. The first time will be 50% of the way through the course and the second time once the course has completed.

Complaints

Complaints procedure: Hart Voluntary Action has a complaints procedure which you are expected to follow if you have a complaint about any aspect of the course. See 'Handling Students Complaints Policy' in appendix.

Malpractice/maladministration: As an organisation Hart Voluntary Action has a policy regarding Malpractice and Maladministration. See general policy section 5

Reading List

Bartholomew, K., et al (2001) In: Clulow, C. (Ed.) *Adult Attachment and Couple Psychotherapy*; East Sussex: Routledge.

Bowlby, J. (1988) *A Secure Base*. Oxon: Routledge.

Dallos, R & Draper, R. (2005) *An Introduction to Family Therapy: Systemic Theory and Practice*; Open University Press: Maidenhead

D.W. Winnicott, 1964. *The Child, the family and the Outside World*. Penguin Books

D.W. Winnicott, 2006. *The Family and Individual Development*. Routledge

Hedges, F. (2005) *An Introduction to Systemic Therapy with Individuals*; Palgrave Macmillan: Basingstoke

Hills, J. (2013) *Introduction to Systemic and Family Therapy*. Palgrave Macmillan: Basingstoke

J. Sharry, 2004. *Counselling Children, Adolescents and Families*. SAGE Publications

Jones, E. (1993) *Family Systems Therapy: Developments in the Milan-Systemic Therapies*. Wiley: West Sussex

Lloyd, M. (2024) *An Introduction to Solution Focused Brief Therapy*; Unpublished

Lowenstein, L. (Ed.) (2010) *Creative Family Therapy Techniques*. Toronto: Champion Press.

Marschall, A. (2025) *Neurodiversity Affirming Therapy*. London: WW Norton & Co.

McGoldrick, M., Gerson, R. & Petry, S. (2008) *Genograms: Assessment and Intervention (Third Edition)*; W.W. Norton & Company: New York and London

M. Sunderland, 2015. *Conversations that Matter, Talking with Children and Teenagers in ways that help*. Worth Publishing

N. Luxmoore, 2008. *Feeling Like Crap, Young People and the Meaning of Self-Esteem*.

Jessica Kingsley Publishers

Siegel, D. (2014) *Brainstorm: The Power and Purpose of the Teenage Brain*. Victoria: Scribe Publications

White, M. & Morgan, A. (2006) *Narrative Therapy with Children and Their Families*. Adelaide: Dulwich Centre Publications

Appendix 1

Course Outline

Level and title of qualification – Level 5 Diploma Family Counselling	
LEARNING OUTCOME 1 Work safely, ethically, and legally with families	
Assessment criteria	Guidance
1.1 Comply with relevant legal requirements for family counselling	<ul style="list-style-type: none"> • Demonstrate a thorough knowledge of relevant legislation, e.g. The Children Act, Data Protection Act, Prevent duty, Equality Act • Apply legislation to your practice, e.g. GDPR to your record keeping, legal limits to confidentiality • Demonstrate an understanding of legislation around capacity, consent, and parental rights and responsibilities
1.2 Work within an ethical and professional framework that supports family counselling	<ul style="list-style-type: none"> • Demonstrate a thorough knowledge of the BACP Ethical Framework or another similar framework for ethical practice. • Evidence how the BACP Ethical Framework (or similar) informs your practice
1.3 Work within the ethical, legal and procedural framework in which your setting (e.g. agency or private practice) operates	<ul style="list-style-type: none"> • Demonstrate how your practice is informed not only by law and ethics, but also by the policies and procedures of your setting. • Describe how law, ethics, policy and procedure inform the boundaries established in your contract with client families • Describe how law, ethics, policy and procedure inform your boundaries around confidentiality, consent and information sharing, and record keeping • Demonstrate knowledge of organisational structure and the scope of its work • Apply organisational policies and procedures • Explore the rationale for and challenges of interagency working, information sharing and inter agency policy

<p>1.4 Recognise and respond to safeguarding concerns affecting both families and individual family members</p>	<ul style="list-style-type: none"> • Evidence a thorough awareness of risk factors relevant to working with families, including risks to both children and vulnerable adults • Demonstrate and apply your knowledge of legislation around domestic abuse and child protection • Use supervision to assess for risk, identify relevant resources and external support, and report or signpost appropriately
<p>1.5 Use client assessment to inform and shape the family counselling work</p>	<ul style="list-style-type: none"> • Describe and critically evaluate your setting's process for client assessment • Show how information gathered in the client assessment process, including therapeutic goals, has informed your practice
<p>1.6 Monitor limits of proficiency and fitness to practise as a family counsellor</p>	<ul style="list-style-type: none"> • Demonstrate ability to self-monitor and maintain appropriate standards of conduct and competence
<p>LEARNING OUTCOME 2 Work within the complex dynamics of the family counselling relationship</p>	
<p>Assessment criteria</p>	<p>Guidance</p>
<p>2.1. Establish and maintain the boundaries of the counselling relationship with the client family</p>	<ul style="list-style-type: none"> • Establish appropriate ethical relationship boundaries with the client family • Demonstrate an understanding of power dynamics within the family and the impact or potential impact on the therapeutic relationships • Evidence an awareness of when and how relationship boundaries might be challenged within a family and how you would maintain them • Reflect on the quality of the therapeutic relationships throughout the work

<p>2.2. Use theory to inform and shape the therapeutic relationship with the client family</p>	<ul style="list-style-type: none"> • Describe the challenges of working with more than one client in the room • Demonstrate an awareness of the challenges presented by working with family members of different ages and levels of maturity, making reference to childhood development stages • Describe what is meant by a collaborative therapeutic relationship, evidencing how you have achieved this in practice • Describe and demonstrate how systemic concepts such as curiosity, irreverence and circularity allow the therapist to remain as impartial as possible
<p>2.3 Manage breaks and endings appropriately within the family counselling process</p>	<ul style="list-style-type: none"> • Demonstrate how you have worked towards a planned ending with a family • Describe how you have managed a premature or unplanned ending • Describe how you have approached referral for members of the client family
<p>LEARNING OUTCOME 3 Work with complex aspects of family and client diversity</p>	
<p>Assessment criteria</p>	<p>Guidance</p>
<p>3.1 Explore diversity issues between self and diverse family systems.</p>	<ul style="list-style-type: none"> • Demonstrate awareness of diversity between you and your client family and how you have responded to this • Evidence awareness of your own prejudices and assumptions, and how these have, or could have impacted therapeutic work • Describe an area of diversity between you and a family or family member that you have researched, e.g. cultural beliefs, neurodiversity, gender, sexuality • Demonstrate understanding of child developmental stages and how you have adapted your approach to offer age appropriate interventions
<p>3.2 Reflect on diversity issues that may impact on clients accessing your service</p>	<ul style="list-style-type: none"> • Reflect on how accessible your counselling service is to clients of various backgrounds. • Reflect on your physical setting in terms of inclusivity

<p>3.3 Recognise and Respond to diversity within the family system</p>	<ul style="list-style-type: none"> • Describe differences between members of the client family • Demonstrate ability to engage with the perspectives of each member of the family • Demonstrate ability to facilitate a session in which all members of the family are able express themselves verbally
<p>LEARNING OUTCOME 4- Maintain a user-centred focus throughout the family counselling work</p>	
<p>Assessment criteria</p>	<p>Guidance</p>
<p>4.1 Enable clients to explore their attitudes and expectations of counselling</p>	<ul style="list-style-type: none"> • Gain an understanding of how the decision to come for family counselling was made, and by whom • Develop awareness of the various hopes and fears of each family member and describe how you addressed these
<p>4.2 Negotiate a shared agreement for family counselling</p>	<ul style="list-style-type: none"> • Describe how you negotiated a shared agreement, highlighting those areas of the agreement that are specific to working with more than one client in the room • Describe how you have identified presenting issues and objectives with the client family
<p>4.3 Respond and work with the changing needs of the family</p>	<ul style="list-style-type: none"> • Reflect on the roles of various family members and how they acquired them • Describe key life stage transitions a family is likely to encounter • Demonstrate how you have assisted a family to negotiate transitions and roles in order to more successfully navigate change
<p>4.4 Review and evaluate the working agreement in collaboration with the client family</p>	<ul style="list-style-type: none"> • Describe how you have adapted an aspect of the working agreement in order to meet the changing needs of the family. • Describe how you have been tempted to side with, rescue or blame one member of the client family, and how you have used reviews, supervision and your own reflection to rebalance this • Use regular reviews and supervision to maintain an approach to counselling that does not privilege the agenda of one family member over another
<p>LEARNING OUTCOME 5 Work with self-awareness in the family counselling process</p>	

Assessment criteria	Guidance
<p>5.1 Reflect on own beliefs about family</p>	<ul style="list-style-type: none"> • Demonstrate awareness of how you define 'family' and your own assumptions about what makes a family 'healthy' • Describe the dominant discourses, values and beliefs that shaped your own family-of-origin culture • Demonstrate awareness of the discourses, values and beliefs that shape your current family culture, noting those which differ from your family-of-origin and reasons for keeping or discarding them
<p>5.2 Reflect on your own personal history through the lens of family systems</p>	<ul style="list-style-type: none"> • Reflect on the roles you played in your family system as a child, and those you now play in your current family system • Reflect on how your family responded and responds to key transitions and events, and how this impacted you
<p>5.3 Critically Reflect on the importance of self-awareness in family counselling work</p>	<ul style="list-style-type: none"> • Describe how aspects of your self or personal history have conflicted with the belief system of your client family, and how you managed this • Describe how your assumptions based on your own experiences of family life have not aligned with those of the client family and how you have addressed this
<p>5.4 Use self-awareness to enhance family counselling work</p>	<ul style="list-style-type: none"> • Describe how you have utilised supervision to become aware of your own implicit processes • Demonstrate how you have used your self-awareness to contribute to the counselling work
<p>LEARNING OUTCOME 6- Work within a coherent framework of counselling theory and skills as a family counsellor</p>	
Assessment criteria	Guidance

<p>6.1 Use a coherent range of therapeutic models and interventions in counselling work with families</p>	<ul style="list-style-type: none"> • Demonstrate your knowledge of systemic theory and its application to family counselling • Demonstrate your knowledge of key psychodynamic concepts and their application to family counselling • Describe the key tenets of Solution Focused Brief Therapy and their application to family counselling • Demonstrate your use of externalisation in family work • Demonstrate your ability to develop circular questions • Reflect on your use of creative interventions to enhance family counselling • Demonstrate awareness of the wider systems that impact families e.g. socio-cultural systems, collegial systems, friendship systems
<p>6.2 Apply a systemic approach to mental health within family counselling</p>	<ul style="list-style-type: none"> • Demonstrate an awareness of dominant narratives associated with a range of mental health issues • Describe the impact of diagnosis on a family system • Demonstrate your ability to focus on the lived experience of the client in terms of their diagnosis • Evidence your use of externalisation in the case of diagnosis
<p>LEARNING OUTCOME 7-Monitor and maintain professional effectiveness as a family counsellor</p>	
<p>Assessment criteria</p>	<p>Guidance</p>
<p>7.1 Critically evaluate own ongoing development as a family counsellor, to identify strengths, limitations, and areas for further professional growth</p>	<ul style="list-style-type: none"> • Reflect on facilitation skills including appropriate division of attention to each family member • Reflect on ability to apply theoretical models to family counselling, identifying learning edges • Reflect on ability to review counselling and respond constructively to feedback from families

<p>7.2 Critically reflect on use of supervision to inform work with families and family systems</p>	<ul style="list-style-type: none"> • Demonstrate ability to work collaboratively with the supervisor • Monitor capacity for self-appraisal, reflection and effective use of supervision
<p>7.3 Select and use a range of outcome measures to monitor, evaluate, and evidence the effectiveness of own family counselling practice</p>	<ul style="list-style-type: none"> • Demonstrate knowledge of commonly used measures, identifying their purpose and application • Monitor ability to select and administer outcome measures

Appendix 2

Dates for Level 5 Diploma in Family Counselling 2026/27:

Thursdays 09:00 – 13:00

17th September

24th September

1st October

8th October

15th October

22nd October

Half Term (29th October)

5th November

12th November

19th November

26th November

3rd December

10th December

Christmas Break

7th January

14th January

21st January

28th January

4th February

11th February

Half Term (18th February)

25th February

4th March

11th March

18th March

25th March

Appendix 3

Using Microsoft Windows 365

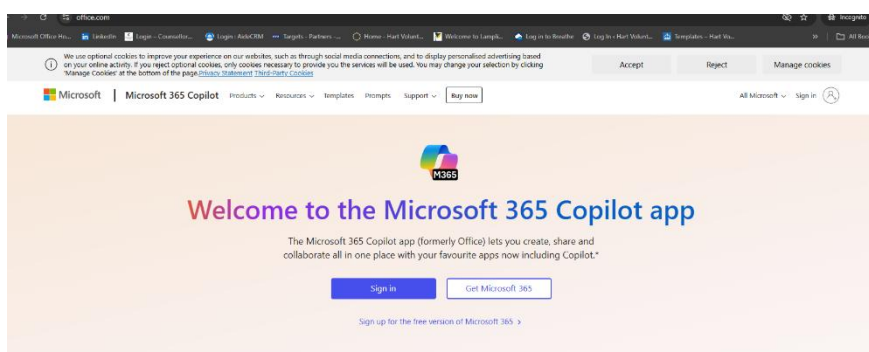
You will be provided with a Hart Voluntary Action email address which will allow you access to Microsoft Windows 365 Office Suite. You will have the use of Word, Excel and PowerPoint online as a part of this package.

In addition you will also have storage space on One Drive and access to the SharePoint for the course which will enable you to access all the documents and paperwork that you need for the course.

To start you need to log in to Windows 365 following the instructions below:

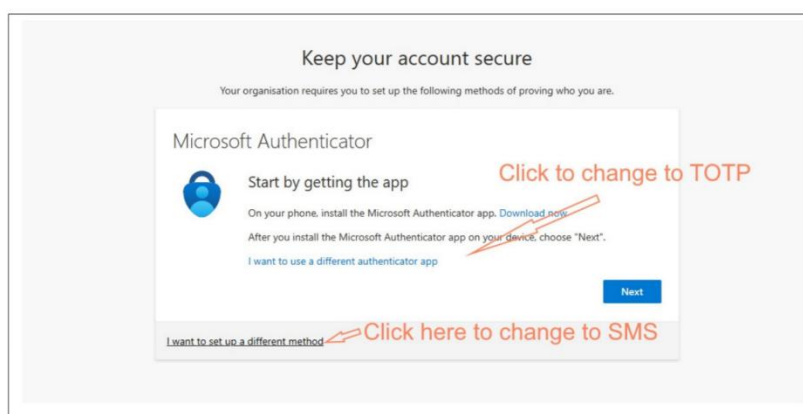
- To use your HVA Office 365 account launch a browser and navigate to the Office 365 sign-in screen at:

www.office.com



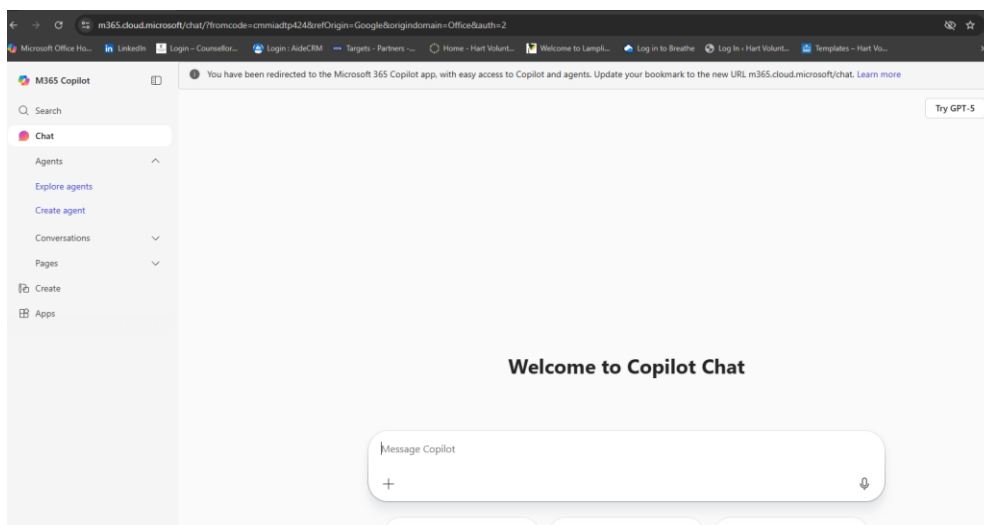
- Sign in with your HVA email address (someone@hartvolaction.org.uk)
- On the next screen use your Office 365 password

You will then need to set up Two factor Authentication for your account. Here is the screen shot of the screen where the 2FA method is chosen pointing out what to click to choose the preferred method. Click 'Next' for Microsoft authenticator app Push Notification. Click 'I want to use a different app' for One-Time Passcode with any authenticator app. Click 'I want to use a different method' to use SMS Text without needing an authenticator app at all.



Then you're asked if you want to be permanently signed in. It is only ever safe to say 'yes' if you are the exclusive user of the PC and only ever use 1 Office 365 account otherwise you or the next person who uses the PC will be straight into this email account because you're permanently signed in!

You arrive at the home page of Office 365:



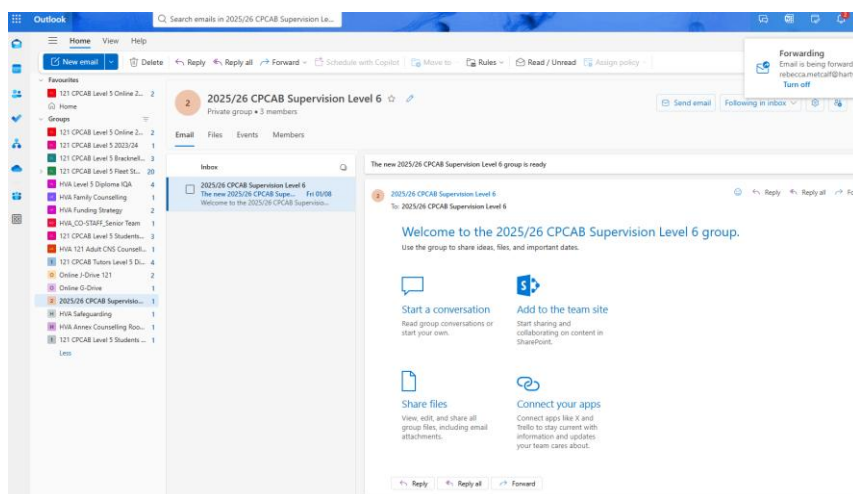
From this 'dashboard' you are able to access all the apps available to you – click on 'Apps' in the left hand menu. Below are some very basic instructions on the Apps you will be required to use during the course. If you want any help with any further aspects please contact Rebecca Metcalf on rebecca.metcalf@hartvolaction.org.uk.

Email

To view your email click the 'Outlook' icon and the Outlook Web App opens and displays your email. Please ensure that you check your email on a regular basis because this is how your tutor will communicate with you throughout the course.

SharePoint

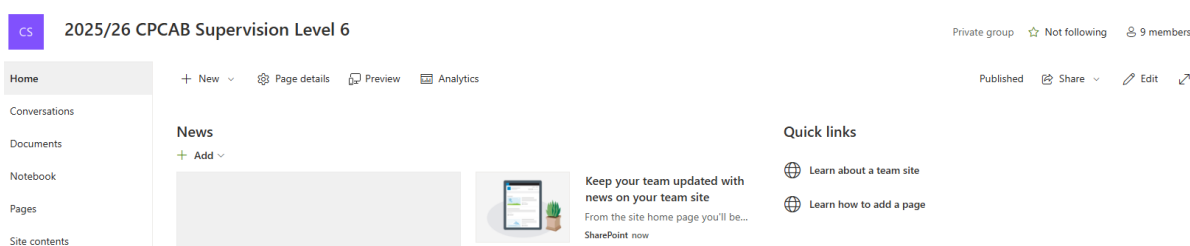
- To set up your SharePoint you will first need to access your email.
- On the left hand side in your email there is a column which has various subheadings in it. Go down to the groups subheading. Under this there should be listed 'Online CPCAB Level 5 Diploma Course Students'
- Click on this message and the following will be displayed:



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- If you click on 'Add to the team site' then it will take you to the SharePoint site.
- Click on the 'Not following' star in the top right to follow this page



- If you go back to your dashboard and click on the SharePoint app you should be able to access it through here too.
- In the left hand column there is a 'Documents' tab. Click on this and this will give you access to all paperwork required during the course.
- Please do not edit documents in here – download the document to your local machine to edit. You are then also able to upload it to your OneDrive.

Teams

If the course needs to be taught remotely for any reason this may be done via Teams.

Before the meeting:

A meeting will be scheduled by either a tutor or staff member inviting all members of the course. You should receive an email in your Outlook inbox. Please accept this by clicking the green tick in the email.

To join the meeting:

- Access Teams via the Microsoft 365 dashboard or download the App and log in using your Hart Voluntary Action email address.
- Access your calendar within Teams (in the task bar to the left hand side of your screen). The meeting will be shown. Click on the meeting.
- Click 'Join'
- This will pop up a box asking you to 'join now'.
- Before selecting join now ensure your video and sound are turned on and you are happy with what is being shown.
- To join click 'Join Now'.
- If no-one else is in the meeting yet you may be required to wait until someone admits you to the meeting.
- You will be able to see others in the meeting (but not necessarily everyone depending on how many people your screen can display).
- If you mute yourself remember to unmute before you talk so everyone can hear you.
- At the end of the session select 'leave'. (It is important you do this otherwise anyone logging back into a meeting at a later date may then be able to see you).

Teams can also be used as a course forum page.

- Click on 'Teams' in the task bar on the left hand side.
- Select your Team.
- You can then post questions/comments which others will be able to see and respond to

OneDrive

You can access your OneDrive storage page via the Windows 365 dashboard. In this area you can create folders and save work in the same way as you would when saving to a local machine.

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You can use OneDrive to store your Portfolio. Ensure that you keep this in order by creating folders for each section ie a folder for assignments, a folder for learning reviews, a folder for placement, a folder for feedback etc.

NB Hart Voluntary Action are unable to accept responsibility for any work lost when using OneDrive. Therefore, please do keep a back up of all your work on a memory stick or your local machine.

Appendix 4 - Policies

i. General Policy

Introduction

The purpose of this document is to outline the policies around the provision of training courses managed by Hart Voluntary Action.

By providing courses Hart Voluntary Action is aiming to upskill some of its staff to be able to work with other client groups and provide an opportunity for others to also gain these qualifications.

By providing courses Hart Voluntary Action will also be able provide placements to some of the students which will help to meet the Counselling provision that is needed in the Hart District.

1 Admissions

1.1 Pre-requisites

Applicants will be expected to have all pre-requisites for the course before they are accepted and provide proof of this to the Centre. Applicants will be treated equally and fairly regardless of disability, ethnic identity, religion or gender. As a centre, we will follow CPCAB Recognition of Prior Learning (RPL) and entry requirements

1.2 Identity

All students will need to provide proof of identity in the form of photographic identification before commencing the course

1.3 Attendance

Students will be required to attend at least 80% of the course in order to pass. This will be verified by an attendance register

1.4 Emotional Impact

Applicants will be made aware of the emotional impact that the course may have before they begin, so that they can make a decision as to whether the course is a suitable one for them at that stage.

1.5 Payment

Applicants will be required to pay any fees associated with the course which will be advised in writing before the start of the course and due before the commencement of the course. There are payment plans available when requested.

1.6 Interview

Applicants may be required to attend an interview as part of the application process

2 Hart Voluntary Action (HVA) Responsibilities

2.1 Service

HVA is committed to providing a professional service to all students. This will include providing information about the course structure, the requirements, how to apply and where the course will take place.

2.2 Resources

HVA will provide access to all necessary staff, paperwork and resources required to complete the Course. As a centre, we will ensure that the course can be delivered to an appropriate standard. We will retain the correct number of staff to be able to run the course.

2.3 Certificates

CPCAB will provide a certificate on completion of the course and HVA will ensure that all paperwork is carried out in order for this to be issued.

2.4 Supporting students

HVA will provide a reasonable level of support to students with learning difficulties or physical needs. As a small organisation we are unable to provide any specific learning support help but we will be able to help in ways such as extending deadlines for those with learning difficulties and ensuring access to buildings to those with physical needs.

2.5 Data protection

All student information will be handled in line with HVA's 'Data protection policy'. In addition, all students will have a copy of the 'Privacy Notice' made available to them.

2.6 To Tutors

HVA will provide support in the form of administration and will ensure that the tutors are aware of the provision of peer supervision

2.7 Attendance

As a centre, we will register attendance of all students to ensure the criteria for attendance is met.

3 Tutor Responsibilities

3.1 Qualifications

All tutors will hold a relevant qualification for the course they are teaching

3.2 Teaching

Tutors will prepare for each session they deliver and will follow the curriculum as outlined in the bespoke CPCAB qualification.

3.3 Marking of work

All work will be marked and returned to the students within a month of the deadline date unless the work has been submitted after the deadline. Tutors have the responsibility to assess whether the candidate has met the specific requirements of the qualification.

4 Student Responsibilities

4.1 Deadlines

All students are responsible for meeting deadlines set by the course tutors. If they are aware they will be unable to meet a deadline then they must get approval for this from the tutor.

4.2 Placement

Students are responsible for finding their own placements for seeing clients but they must have the approval of the course tutor/provider before the placement is started.

5 Malpractice and Maladministration

5.1 Malpractice

CPCAB defines malpractice as an intentional act that threatens the integrity and/or validity of delivery, assessment or certification of one of its qualifications.

5.2 Maladministration

CPCAB defines maladministration as a lack of care, judgement or competence by anyone involved in the development, delivery, assessment or award of its qualifications. On-going maladministration could constitute malpractice.

5.3 Implementation of Courses

HVA will provide courses that are implemented in a professional way ensuring that the processes and procedures that are in place are transparent and honest. HVA will follow CPCAB procedures for conducting assessments, moderation and verification

5.4 Notification

HVA will notify the CPCAB of any malpractice/maladministration relating to the course accredited by CPCAB.

HVA will inform the person that has been implicated in writing of the nature of the alleged event

5.5 Progress

HVA will keep the CPCAB updated of the progress of any investigation.

5.6 Complaints

If a student has a grievance/complaint about the course or a member of staff they should follow the procedure outlined in the 'Handling Student Complaints Policy'

5.7 Academic Appeal

If a student wishes to make an academic appeal they should follow the procedure outlined in the 'Handling Student Complaints Policy'

6 Contingency Planning

6.1 Finance

The cost of delivering this course is being underwritten by Hart Voluntary Action in the first year of operation, and bursaries may be available for students, who undertake a placement with Hart Voluntary Action's Counselling Services. This ensures that the course will be able to run for the required period. The aim is to enroll a minimum of 6 and a maximum of 16 students per course.

The future of the delivery of this course will be based on the experience of delivering this course in the first year, and further fundraising/income generation.

6.2 Staffing and HR

In the event of short-term illness of a tutor the second tutor will cover for that session. If both tutors are ill at the same time then the course will need to be suspended for 1 week and the time added on to the end of the course

In event of long-term illness of a tutor a new tutor will need to be advertised for immediately to ensure as little disruption as possible

The course will be able to be taught at Hart Voluntary Action by any tutor, not just the authors of the course

Back-office administration will be provided by 4 people in the office who can be trained in the administration of the course to cope with any short- or long-term illness that may occur.

6.3 Premises

The venue is Hart Civic Offices, provided by Hart District Council, or one of our satellite centres. In the event that the usual training room is not available another room within the building will be made available at short notice to provide a suitable place for teaching. Alternatively the delivery of the Course could be moved online (subject to completion of the relevant CPCAB paperwork for this).

6.4 Quality Assurance

An Internal Quality Assurance will be in place, with the correct qualification, to ensure that the centre meets the necessary standards for the CPCAB. The person who carries out this role will meet with HVA and the teaching team once or twice a year to ensure quality control.

6.5 Moderation

A cross section of work will be marked by a moderator to ensure the marking is consistent and fair to the standard that is required by the CPCAB.

6.6 Legal requirements

Hart Voluntary Action has the following in place: Health and Safety policy and Data protection policy.

6.7 Insurance

Hart Voluntary Action has the following in place: Public and Employers Liability Insurance and Professional Indemnity Insurance and the company have confirmed that this covers the provision of training courses.

6.8 Student support

Academic support will be provided by the tutors in relation to all aspects of the curriculum. Special needs support can be given in the form of extension of deadlines for those with learning difficulties

All rooms used for teaching are accessible by people with limited mobility.

Hart Voluntary Action can provide administrative help for students to allow them to meet the course requirements with regards to the administration/paperwork required. This will not include help with the content of the course or any assignments that are due.

7 Closure of Course

7.1 Notifying of Course Closure

HVA will inform CPCAB and Students immediately of the closure of the course. Wherever possible, when it is necessary to withdraw a course, any students currently on that course would be supported to complete the course. However, if this was not possible then students would be supported to find a similar course elsewhere and would be provided with certification/evidence of achievement/credits so far.

7.2 Reasons for closure

Loss of CPCAB backing – would work to gain this back as quickly as possible.

Loss of Staff through death/illness/unforeseen circumstances – alternatives would be sought out immediately but in the event that this can't be solved the course may need to close

Building unusable due to unforeseen circumstances such as flood or fire – would seek to provide an alternative location to offer the course from

8 Refund Policy

8.1 Circumstances of refund

A refund would be given under the following circumstances:

The course is cancelled before it begins

The student withdraws before the start of the course (some may be retained for administration fees)

A refund will not be given under the following circumstances:

If a student has not met their obligations to the course

If a student decides to leave part way through

A refund may be given in exceptional circumstances but this will be considered on a case-by-case basis and is entirely at the discretion of Hart Voluntary Action.

If a student wants to request a refund this must be done in writing to the Chief Executive at Hart Voluntary Action stating clear reasons for wanting a refund to be awarded. If fees were paid by a sponsor these will be refunded to the sponsor.

ii. Handling Students' Complaints

1 Introduction

1.1 HVA aims to deliver a professional service that responds to the needs of its service users in whatever capacity. Policies and procedures are in place to ensure that professional standards of service provision are adhered to and we continually strive to improve this service through training and policy reviews with an aim to developing best practice.

1.2 However there may be times when service users feel a valid complaint needs to be made and it is our intent to take all complaints seriously and to respond in an honest, open and fair manner.

1.3 Complaints may be verbal or written and may be made personally by a service user or on behalf of the service user by a close relative or someone directly involved in their care **provided the service user has consented to the complaint being made**. Staff responsible for the delivery of services are to ensure that those using their services are aware of their right to make a complaint and the procedures set out in this policy.

1.4 All complaints should be made as soon after the cause as possible and will be dealt with promptly within the time frames set out below. It is also hoped that complaints can be resolved as informally as possible. Notwithstanding, those members of staff who deal with a complaint are to record the details, action taken, including any investigation and the outcomes.

1.5 Service users should be assured that making a complaint will not affect their right to receive a service from HVA unless their complaint is found to be unfounded and malicious, in which case their continued participation in the service will be reviewed. Equally, in exercising their right to make a complaint, HVA will ensure that service users are neither victimised nor discriminated against. Depending on the nature and circumstances of the complaint, consideration will however be given to whether the complainant should continue to use the relevant service whilst the complaint is being investigated.

1.6 Any member of staff considered guilty of inappropriate behaviour or misconduct as a result of a service user's complaint will be dealt with separately under HVA's disciplinary procedures.

2 Confidentiality

2.1 All complaints will be dealt with as a matter of confidentiality; any details or information relevant to the complaint will only be shared with those who have a right or a need to know (eg those required to investigate the complaint). This right to confidentiality extends to both the service user making the complaint and any member of staff who might be the subject of a complaint.

3 Complaints Procedure

3.1 A service user may make a complaint to any member of staff responsible for the delivery of the relevant service. Where the complaint relates to the staff responsible for the service delivery, the service user may then make their complaint direct to the Chief Executive.

3.2 In line with the intent to deal with complaints as informally as possible, the member of staff receiving the complaint should endeavor to resolve the matter immediately. To ensure a satisfactory resolution it is good practice to ask the complainant what they want to see happen as a result of their complaint. Where a complaint can be resolved informally at this level the member of staff dealing with it should nonetheless ensure the complainant has been made aware of all the options open for pursuing the complaint and that the details and outcome have been fully and properly recorded and a summary of the discussion is to be sent to the complainant to ensure accuracy

3.3 In the event that a complaint cannot be resolved informally, the member of staff who first received it should refer the matter, as soon as possible, to their line manager. If the complaint involves the line manager it should be referred to the Chief Executive. The line manager or Chief Executive will then be responsible for fully investigating the complaint and submitting a written response to the complainant within 10 working days. This response should address all the issues raised in the complaint and, if substantiated, any remedial action being taken. If the complaint is unsubstantiated the response should explain why not and set out what further action the complainant may take.

3.4 If unsatisfied with the outcome of the investigation the complainant should submit details of their complaint in writing together with the reasons they are dissatisfied to the Chief Executive or, if the Chief Executive conducted the initial investigation, the Chairman of the Trustees. The Chief Executive or Chairman will review the initial investigation and, if necessary, conduct a separate investigation and inform the complainant of the outcome within 15 working days of receipt. The decision of the Chief Executive or Chairman will be final.

4 Academic Appeal

4.1 If a student has a concern about the marking of work or a decision that has been made that has an impact on them academically then they should first approach the tutor to try and resolve the situation.

4.2 If the student feels that this is not handled in the appropriate way they should then ask for the work/decision to be reviewed by a second tutor.

4.3 If the student is still not satisfied with this outcome then their appeal should be made in writing to The Chief Executive who will then consider the appeal.

iii. Privacy Notice

Introduction

The processing of your personal data for Level 5 Diploma is carried out by Hart Voluntary Action Limited (HVA). HVA is a registered charity in England & Wales No: 1119912. HVA is registered with the Information Commissioner's Office (ICO) for the United Kingdom and the Channel Islands, registration number Z2108957.

We respect your privacy and are committed to maintaining the security of your personal information. This notice outlines how and why we collect and use personal data. We want to ensure you are informed and in control of your personal data.

Please be assured that we will never sell your personal data, and will only ever share it with third parties where we have your permission to do or where it is required under Duty of Care.

Questions

If you have any questions about how your data is used, you can contact the Chief Executive of HVA directly, by contacting ceo@hartvolaction.org.uk or calling 01252 815652.

What data we collect

The personal data we collect is: name, e-mail address, postal address; telephone number(s), gender, date of birth, health condition, qualifications employment history

By enrolling on the course and giving all or part of the above information, it is understood that you consent to HVA storing your personal information.

How we use this information

We will use your information to contact you about general management and administration of the training course and compliance with Duty of Care and Health and Safety.

Some of the information you supply will be used by:

- CPCAB (the awarding organisation associated with your course) in carrying out its functions when verifying your Unique Learner Number and uploading your achievement data (if any) to your Personal Learning Record.
- The Learning Records Service to fulfil its statutory functions, issue/verify your Unique Learner Number (ULN) and update/check your Personal Learning Record. The Learning Records Service may share your ULN and Personal Learning Record with other education related organisations, such as your careers service, school, college, university, Government Departments and public bodies responsible for funding your education.

How do we protect personal information?

HVA uses a secure server to store and/or record personal information provided by you for its own purposes and access to personal information is limited to appropriate HVA staff and protected by passwords. We also take appropriate measures to ensure that the information disclosed to us is kept secure, accurate and up to date and kept only for as required by law.

Withdrawing consent

You can change or withdraw your consent for us to hold or to use your personal data for the purposes set out above by contacting admin@hartvolaction.org.uk. Please be aware that by withdrawing consent you will no longer be able to complete the course.

Right of access

You have the right to ask for a copy of the personal information we hold about you and to have any inaccuracies in your personal details corrected.

Changes to personal details

If your personal details change, please help us to keep your information up to date by notifying us in writing to admin@hartvolaction.org.uk.

We reserve the right to amend this privacy notice so please do check back from time to time. If we do so, we will post notice of the change on our website and make every effort to inform you of any material changes to the notice.

Complaints

If you have any complaints about how your data is used, you can contact the Chief Executive of HVA directly, by contacting ceo@hartvolaction.org.uk or calling 01252 815652.

If you are not happy with our response, or you believe that your data protection or privacy rights have been infringed, you can complain to the UK Information Commissioner's Office which regulates and enforces data protection law in the UK. Details of how to do this can be found at www.ico.org.uk.

iv. Placement Policy

Work Placement – Guidelines for Work Placements

Students are responsible for finding their own placement. Any placement must be agreed with the Tutor and organisation before the course commences.

Students will need to complete client hours as outlined in the handbook and with a suitable client group.

The placement organisation must provide suitable clients for the students.

The placement organisation must have all relevant policies in place including data protection, privacy and complaints.

Students must receive clinical supervision for the clients they are seeing as part of the course. If this is not provided by the placement organisation, then the student is responsible for finding and paying for their own supervision.

v. Hart Voluntary Action Data Protection Policy (extracts)

1. Introduction

1.1 Current data protection legislation permits Hart Voluntary Action Ltd (HVA) to process individual personal data, providing it is relevant to carrying out of our business. However, from May 2018 new data protection regulations came into force which significantly enhanced UK data protection practices. The changes had implications for many of the aspects of the HVA's operations, including finance, IT, HR, and communications. They

also impacted on how HVA deals with service users and external organisations. The regulations cover in much more specific detail than previous data protection legislation the areas of Awareness, Information Held, Communicating Privacy Information, Individuals' Rights, Subject Access Request, Legal Basis for Processing Personal data, Data Breaches, Data Protection Impact Assessments, Data Protection Officers, and International Implications.

1.2 This policy sets out Hart Voluntary Action's approach to meeting the requirements and, more importantly, ensuring that all personal information is held securely and with the consent and support of all staff, volunteers and service users.

2. Personal Data

2.1 General Overview

2.1.1 HVA is under an obligation to protect the confidentiality of the information held and to ensure that personal data is not divulged to others unless in doing so it strictly follows the purpose for which the information was supplied.

2.1.2. HVA Trustees are the Data Controller, HVA staff and volunteers are Data Processors for the information held. HVA and volunteers will be personally responsible for processing and using personal information in accordance with the Data Protection Act.

2.1.3 All members of staff and volunteers who have access to personal information, gained via association with HVA, will be expected to read and comply with this policy.

2.2 Legitimate/Legal Interest

2.2.1 HVA may process personal information without an individual's knowledge or consent where:

- this is required or permitted by law and HVA needs to protect in individual's interests (or those of someone else) in an emergency
- HVA has a need to use such information in connection with a legal claim
- An individual has already made such information public, such as religious or philosophical beliefs or political opinions.

2.2.2 When processing personal information based on a legitimate interest, HVA will make sure that it is exercised proportionately and is always balanced against the privacy rights and other legal rights of the individual.

2.3 Who has responsibility for data protection in HVA

- The Trustee Board have overall responsibility for compliance.
- The Data Controller (the Chief Executive (CE)) has day to day management responsibility.
- The Administrator has responsibility for managing and processing staff data privacy, consents and processing.

- Individual staff have responsibility for any day to day personal information they may obtain and process.

2.4 Any enquiries about any aspect of HVA's data protection should be directed to the Data Controller, including general queries, specific personal staff questions, subject access requests and/or real or potential breaches of data or data protection requirements. Further information on their responsibilities is contained in paragraph 7.1 below.

2.5 Personal Data

- Shall be processed fairly, lawfully and in particular shall not be processed unless specific conditions are met.
- Shall be obtained only for one or more of the principles specified in the Data Protection Act (2004) and shall not be processed in any manner incompatible with that purpose.
- Shall be adequate, relevant and not excessive in relation to its purpose.
- Shall be accurate and where necessary kept up to date.
- Shall not be kept for longer than is necessary and within lawful legislation.
- Shall be processed in accordance with the rights of data subjects under the Act.
- Shall be kept secure by the HVA who takes appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to personal information.
- Shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal information.

3. Privacy Notices and Consents

3.1 HVA will issue individual Privacy Notices-to all new and existing staff, volunteers and service users. This will detail all the types of personal information which HVA holds and processes, its purposes, how it is processed, why and the security provisions.

3.2 Consent will be requested from staff every three years.

3.3 The Notice will also detail how an individual can have access to their information should they wish to. Individuals have the right to amend inaccuracies, add or delete any information held. However, they will be reminded that the deletion of any information which is relevant to their employment, working with HVA, could have a detrimental effect on their employment, work with HVA.

3.4 The Notice will include the option for individuals to confirm their consent to the Company holding and processing their personal information. This consent will be held in their personal file.

3.4.1 HVA will have a copy of all the Privacy Notices on its website on the appropriate pages for relevant projects and individuals.

4. Training of staff

4.1 All staff are required to undertake training and/or briefing sessions on HVA's and their personal responsibilities under the data protection regulations. This will be covered in the induction training for new recruits.

5. Dealing with leavers' information

5.1 All personal information will be held for up to a period of six months. This is to facilitate any requests for references. However, individuals will be asked on leaving whether they consent to any or all of their personal information being held by HVA. They have the right to consent to some or all of their information being deleted on leaving. They will be asked to review their Privacy Statement and confirm which information they wish retained or deleted.

5.2 All information will be securely shredded by at least six months or shorter if advised by the leaver after leaving HVA. However HVA has to keep financial information for 7 years from a legal standpoint

6. Dealing with recruitment information

6.1 Successful candidates will be dealt with in exactly the same way as existing staff. They will be issued with a Privacy Statement on joining as part of their induction pack.

6.2 Unsuccessful candidates and candidates who reject a job offer will have their information containing any personal details e.g. CVs, References and/or notes, securely shredded within three months of being unsuccessful, either with no interview or following an interview, and/or rejection of a job offer. This will be confirmed in a letter to the individual.

7 Managing risks

7.1 The following procedures will apply to ensure that any risks arising from obtaining, managing and processing personal information are identified early and procedures put in place to manage.

7.2 The Trustee Board will retain overall responsibility for oversight of and compliance with the data protection regulations and requirements.

7.2.1 The Trustee Board will delegate responsibility to:

- The Chief Executive (CE) as Data Controller, for the day-to-day management and control of data protection in HVA, including application of the policy and procedures,

audits, risk identification and management, security, external subject access requests and any other related matters.

- HR, or the individual(s) responsible for HR, for the management and control of personal data of staff, relating to application of the policy and procedures, audits, privacy statements, risk identification and management, security, internal subject access requests and any other related matters. HR, or the HR responsible person, will report to the CE in relation to this.

7.3 The Company will undertake data information audits of all information covered by the regulations. The audits will cover: what data held, why held, whether right to consent applies, how consent will be obtained, length of period information will be held, security measures, vulnerabilities/risks and action needed to remedy gaps. See audit template at point 10.

7.4 The CE will undertake annual reviews of the data protection procedures and provide a report to the Trustee Board on the current situation with any deficiencies and action needed.

7.5 Simple Privacy or Data impact assessments will be conducted at the beginning or in the early stages of projects to identify the most effective way to comply with their data protection obligations and meet individuals' expectations of privacy.

7.5.1 The purpose of a PIA is to ensure that privacy risks are minimised while allowing the aims of the project to be met. Risks can be identified and addressed at an early stage by analysing how the proposed uses of personal information and technology will work in practice. Some of the ways risks can arise are through personal information being: inaccurate, insufficient or out of date; excessive or irrelevant; kept for too long; disclosed to those who the person it is about does not want to have it; used in ways that are unacceptable to or unexpected by the person it is about; or not kept securely.

7.7 Third party suppliers who hold personal information relating to HVA on their own systems, electronic or manual, will be required to comply with the Company's data protection requirements. They will be required to sign Third-party Data Protection Agreements to confirm that any Company data is held and processed securely in line with GDPR regulation. (See paragraph 8.3 below)

8 Subject access requests

8.1 Coverage and timescale

8.1.1 In accordance with legislation, staff, volunteers and service users are entitled to view their personal records, whether held in computerised or manual form. Much of the individual personal information is held electronically and staff, volunteers and service users

can ask for a copy of their file to be sent to them electronically. HVA will comply with this request within 3 working days.

8.2 To gain access to any other records held by HVA, an individual must submit a written request to the CE. HVA will generally comply with requests within a month.

8.3 Rejecting a request

8.3.1 Should a staff member, volunteer, service user submit an access request(s) which HVA considers manifestly unfounded, excessive or vexatious, it has the right to charge for the administration time involved and/or reject the request, giving its reasons. Staff, volunteers or service users can appeal any decision to charge or reject. If so, they should put their appeal in writing to the CE or the Chair of the Trustee Board within five working days. Any appeal will be dealt with within a timescale of ten working days, unless a different timescale is agreed with the individual.

9 Security

9.1 Information and records relating to service users will be stored securely and will only be accessible to authorised HVA personnel.

9.1.1 Information will be stored for only as long as it is needed or required statute and will be disposed of appropriately.

9.1.2 It is HVA responsibility to ensure all personal and company data is non-recoverable from any computer system previously used within the organisation, which has been destroyed or passed on/sold to a third party.

9.2 This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments made to the Data Protection Act 1998.

9.3 HVA uses various third-party Data Base Systems to store data. The information held within these databases are encrypted and only accessible by HVA personnel.

9.4 There are three further areas covered:

9.4.1 Staff, Volunteers, Services Users - individuals accessing their personal information out of office should ensure where relevant that their data is viewed private and securely, particularly in public locations.

9.4.2 Managers and administrators - similarly, managers and administrators should ensure that if they are viewing an individual's personal data outside of the office, that the data is viewed private and securely, particularly in public locations. They should ensure that they

are not physically overlooked but that their computers and any other personal devices are not accessible electronically.

9.4.3 Third party suppliers - all of these suppliers have signed Third-party Data Protection Agreements to confirm that any Company data is held and processed securely in line with GDPR and Company requirements.

10 Procedure for dealing with breaches

10.1 Breaches may arise from a number of resources e.g. complaint from an individual staff, client, supplier, the Information Commissioner's Office or a review of procedures. If a breach occurs, then it should be reported immediately to the CE. The CE will take immediate steps to close the breach. If possible, this will be done within one working day of the breach occurring

10.2 Where a breach is identified, it will be fully investigated by the CE. This may involve any or all of reviewing procedures, interviewing individuals involved or any other actions considered necessary.

10.2.1 Where possible, the investigation will be completed within ten working days. The CE will produce a written report, summarising the breach, why it occurred, how it was resolved and what further action is needed, including change of procedures, security and/or staff issues. If it is not possible to complete the report within this timetable, the CE will

communicate this to the relevant parties as appropriate (e.g. Trustees, ICO, staff member) with the reasons for the delay and a revised deadline.

10.3 Following completion of any investigation, the CE will submit a Report to the Trustee Board for consideration. The Trustee Board can approve, amend, or ask for further investigation. The Trustee Board will approve the report either within ten working days of receipt or ten working days of completion of any further investigation.

10.3.1 Once approved, the CE will communicate within a further five working writing to the other parties involved summarising the breach, why it occurred, how it was resolved and what further action is needed.

10.4 Should any disciplinary action be necessary against any individual(s) as a result of the breach, this will be dealt with in accordance with HVA's Disciplinary Procedure.

11 Data Audit

11.1 HVA will review all personal data it holds on staff, volunteers and service users on an annual basis as part of its Data Audit processes to ensure compliance as follows:

- HVA has asked individuals to positively opt in to have their personal data held by the company.
- HVA has verified the appropriate lawful basis or legitimate interest for data processing and retention.
- HVA has specified why it wants the data and what it is going to do with that data.
- HVA informs individuals that they can withdraw their consent.