



IGAP GDPR Policy

The Data Protection Lead is the Lead Administrator

Email: office@igap.co.uk

IGAP takes privacy and confidentiality seriously, and this document explains how we collect personal information and retain and manage data. Personal information is held strictly in accordance with the Data Protection Act 2018.

IGAP has three functions: it is a membership organisation, a professional association, and training organisation. Personal data is only collected and retained to the degree that it is necessary in order to carry out these three functions.

This policy applies to information we collect about:

- our own members
- people who visit our website
- applicants to our Programme of Preparation to become Jungian analysts
- candidates and advanced candidates on our Programme of Preparation
- people who use our services, for example to enquire about entering Jungian analysis with one of our members
- any other information that members of the public may choose to send to us
- IGAP employees

Information we collect

If you visit our website (igap.co.uk)

We collect standard internet log information, in order to have a sense of the number of visitors to the various parts of our site. No personal information is recorded or retained.

Search engines

Search queries and results are logged anonymously to help us improve our website and search functionality. No user-specific data is collected by either IGAP or any other third party.

People who use IGAP online services

IGAP offer various services to its members, candidates, and the public, including:

Public

- 'Find an Analyst': search member and advanced candidate listings via the website
- event bookings



Members

- members area of the website
- event bookings

Most of the services we provide are run in their entirety by IGAP.

One subsection of the IGAP website (<https://www.igap.co.uk/seminars-and-events>) advertises the seminars of our Studies Programme. We use [tickettailor.com](https://www.tickettailor.com) to allow members of the public to book the seminars we run. In order to book, some personal identifiable information (e.g. your name and email address) is required. We ask people who book seminars if they wish to join our mailing list, for which we currently use mailchimp. If attendees agree to joining the mailing list we may retain this information in order to publicise future seminars. When financial transactions take place online, personal details such as name and address are stored on the IGAP servers.

Access to the IGAP Portal, the members' area of [igap.co.uk](https://www.igap.co.uk), is via a shared passcode, so does not require the use of any personal identifying information.

People who email us

Any email sent to the IGAP office, including any attachments, may be monitored and used by us for reasons of security and for monitoring compliance with office policy. Email monitoring or blocking software may also be used. Your emails will be stored in accordance with the IGAP retention policy (see Appendix 1 below).

Grievances and complaints about our members

Please note that IGAP has a grievance procedure, but all complaints against an IGAP member are administered not by IGAP but by the UKCP, our regulatory body. In order to process a grievance, it will be necessary to obtain certain details, which will usually include some personal information. This may include special categories of personal data such as health information. We may need to keep and use the information even if the grievance is subsequently withdrawn—for instance in order to be able to demonstrate in the event of legal challenge that we have handled the matter in a manner consistent with our grievance procedure.

It is unlikely to be possible to work with a grievance in a responsible and ethical manner without disclosing the identity of the person with the grievance to the candidate, member or members concerned. We will always notify the person with the grievance of our intention to disclose their identity to the candidate, member or members.



If they object, we will consider whether we may need to disclose the information in any event, out of fairness to the candidate, member or members against whom the grievance is being raised. We will keep personal information in a safe place and access is restricted according to the 'need to know' principle and in accordance with our grievance procedure and Code of Ethics. This information is retained for seven years.

Application, Candidacy, and Membership information

It is necessary to provide IGAP with certain types of personal information and data under three different circumstances:

1. on application to the Programme of Preparation
2. on becoming a candidate (and later an advanced candidate)
3. on becoming a member.

The majority of new members of IGAP are graduates of our own Programme of Preparation, though a few people apply to become IGAP members having qualified with other training programmes (e.g. in Zurich). In most cases, therefore, there is a continuous progression from 1 to 3.

1. On making an application to IGAP, the following information needs to be submitted:
 - name
 - home address
 - date of birth
 - telephone number
 - email address

Also required are the following (see special category data):

- information about your health, including mental health
- information about criminal convictions and offences

The following information is requested via an optional form, which is seen only by the IGAP office:

- other EDI data such as disabilities, sexuality, and ethnicity

The EDI data, but not the form, is retained for statistical monitoring purposes. We are required to request this data by UKCP, but applicants are not obliged to submit it.

If your application is successful, the personal information above becomes part of your ongoing file, as do the four interviewers' reports.



If your application is unsuccessful, this information is retained for seven years. If we have interviewed you, the four interviewers' reports are also retained for the same period. IGAP allows for one further application to be made, after at least a year. Because the criteria for selection include psychological maturity, it may be necessary for the interviewers to consult the reports on your first set of interviews in order to get a sense of what may have changed.

2. On becoming a candidate (and later an advanced candidate)

In addition to the information under 1., above, the following personal information and data is retained by IGAP:

- home address (this is only shared with members and candidates, on a confidential contact details list, from which members can opt out)
- work address (if requested, this is the address used on our 'Find an Analyst' tool once advanced candidacy is reached)
- telephone number (this is only shared with members and candidates, on a confidential contact details list, unless the person is happy for it to be used on our 'Find an Analyst' tool)
- personal email address (this is only shared with members and candidates, on a confidential contact details list)
- indemnity insurance information (for advanced candidates)
- the reflective essay at the end of the initial year of preliminary candidacy
- review committee reports, reports on dialogues and written papers, case reports, and other progress records

We will ask for permission to retain and share the following:

- written submissions (e.g. the history of neurosis essay, fairy-tale interpretation, thesis, alchemy paper, and long case report), which may be sent to IGAP's external examiner and moderator, in order to help ensure the consistency and quality of our examining

These documents and pieces of personal data are retained for five years after the candidate or advanced candidate has progressed to membership (and so has attained senior membership).

If the candidate leaves the Programme, these documents and pieces of personal data are retained for seven years, as occasional reapplications occur.

3. On becoming a member

The following personal information and data is retained by IGAP. If the new member is a graduate of our own Programme, much of this data will roll on from candidacy:



- name
- home address (this is only shared with members and candidates, on a confidential contact details list, from which members can opt out)
- work address (if requested, this is the address used on our 'Find an Analyst' tool)
- telephone number (this is only shared with members and candidates, on a confidential contact details list, unless the person is happy for it to be used on our 'Find an Analyst' tool)
- personal email address (this is only shared with members and candidates, on a confidential contact details list)
- work email address (this is used on our 'Find an Analyst' tool)
- organisational membership details
- annual CPD forms
- declaration of any criminal convictions or ongoing complaints (please see section on special category data)
- other diversity data such as disabilities, sexuality, or ethnic group (see special category data).

As part of the membership process we send out annual invoices for membership fees. Payment is made by bank transfer and IGAP does not retain any financial information (though the bank may).

Personal information about a member is retained for a period of seven years after resignation from IGAP.

Personal information about a member is retained indefinitely after retirement from analytic practice, unless requested otherwise, as many retired members remain active contributors to the life of the organization.

Job applicants, current/former IGAP employees and contractors

We share bank details, pension information, and HMRC information with a third party who processes salary payments and expenses.

We may also collect, store and use the following 'special categories' of more sensitive personal information:

- information about your health, including any medical conditions, health and sickness records
- information about criminal convictions and offences
- other diversity data such as disabilities or ethnic group (see special category data).



Special category data

Note that in some cases we may process 'special categories' of personal data, and information about criminal convictions and offences. For example:

- information in relation to our employees (such as health data), which is necessary for the performance of our contract with them or under employment law
- information in relation to our members (for example, whether they have criminal convictions) which is necessary to uphold high standards and to protect the public
- information provided by persons raising a grievance (such as health data, sexuality), which is necessary in order to process the grievance
- other diversity data such as disabilities, sexuality, or ethnic group.

The Equality Act 2010 says public authorities must comply with the public sector equality duty. This extends to organisations that carry out public functions, which includes IGAP as a registered charity that works in the public interest.

The duty aims to make sure such organisations think about things such as discrimination and the needs of people who are disadvantaged or suffer inequality, when they make decisions about how they provide their services and implement policies.

- In order to deliver tailored services or to shape policies, it is important to have a good understanding of challenges and requirements, the make-up of the profession, as well as any gaps or overlaps. This is why IGAP processes diversity data.

We take particular care of this information, using appropriate security measures, including limiting who has access to such information and always working on the 'need to know' principle.

Lawful processing of personal data

IGAP will only process your personal data in accordance with one of the conditions for lawful processing set out in the GDPR. The main ways in which we process data are as follows:

- processing on the basis of consent
- processing necessary for the performance of a contract
- processing based on legitimate interests.

Consent – When people become candidates in training with IGAP, or subsequently members, they are held to have agreed to being contacted by the organisation with necessary information, such as details of seminars and meetings and any other material IGAP deems relevant and important.



Contract – In order to perform our obligations to our members, we need to process their personal data. Similarly, where members of the public sign up to paid events, we need to process their personal details in order to administer the booking.

Legitimate interests – Where it is necessary to process personal data for our purposes as an organisation (our ‘legitimate interests’), we may do so provided that this does not override the rights and freedoms of the person whose data we are processing. IGAP exercises some functions where it is necessary to process personal data (including that of non-members) for the performance its public protection functions (such as the referral of a complaint to UKCP).

Where it is necessary to use personal data to provide services and explicit consent has not been provided, we will rely on our legitimate interests in providing the services to further our organisation’s aims, provided they are not outweighed by the rights and freedoms of those using the services.

Retention of data

For non-members, we will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Recipients of personal data

In addition to bodies mentioned in this policy, we may occasionally need to transfer personal data to other organisations, including but not limited to:

- persons making an enquiry or complaint (for example with an organisational member or UKCP)
- police forces (for example if a criminal investigation is being carried out involving one of our members or candidates)
- central government
- charitable organisations, including the Charity Commission
- ombudsmen and regulatory authorities.

We will ensure we have a legal basis for any such transfers before doing so.



Security

We will respect your confidentiality and will keep the information about you confidential. We store it securely and control who has access to it.

Other websites

If you transfer to another website from a link within the IGAP website (e.g. a member's personal website), this privacy notice does not apply. We recommend you examine all privacy statements for all third-party websites to understand their privacy procedures.

Your rights

Request access to your personal data (commonly known as a 'data subject access request'). You will receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Withdraw consent at any time where we are relying on consent to process your personal data.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

November 2025



APPENDIX 1

IGAP's Data Retention Policy

Retained for less than five years

Emails to the IGAP office, including their attachments

Retained for five years

Personal data and information belonging to a new member in relation to their original application, candidacy, and advanced candidacy (i.e. this is deleted when senior membership is reached)

Written work by candidates and advanced candidates which has been retained, with the author's permission, in order to be seen by IGAP's External Examiner and Moderator or the UKCP

Retained for seven years

Personal data and information in relation to an unsuccessful application to the Programme of Preparation

Personal data and information in relation to a successful application to the Programme of Preparation, if the candidate subsequently leaves the Programme before qualification

Personal data and information about a member after resignation (not retirement) from IGAP

Personal data and information in relation to a person who raises a grievance against an IGAP candidate or member, in accordance with IGAP's Grievance Procedure

Members' CPD forms

Retained indefinitely unless requested otherwise

Personal data and information about a member after retirement from analytic practice (including supervising and examining)

Anonymous data optionally submitted on the EDI form with an application to the Programme of Preparation