



Universities Psychotherapy  
& Counselling Association

## **UPCA Data Retention Policy**

### **1. Purpose**

UPCA is committed to ensuring that personal data is managed securely, lawfully, and transparently in line with UK data protection legislation.

This policy outlines how UPCA manages, stores, and retains personal data relating to members, applicants, and other stakeholders.

### **2. Principles of Data Management**

UPCA applies the following principles:

- Personal data will be:
  - processed lawfully, fairly, and transparently
  - collected for specified and legitimate purposes
  - limited to what is necessary
  - accurate and kept up to date
  - stored securely and protected from unauthorised access
- Appropriate technical and organisational measures are in place to safeguard data.

### **3. Data Retention**

UPCA retains personal data only for as long as necessary for the purposes for which it was collected, including membership administration, professional standards, and legal obligations.

Retention periods are determined based on the nature of the data, legal requirements, and risk.

UPCA's approach is informed by sector best practice, including guidance from the UK Council for Psychotherapy.

UPCA maintains a Data Retention Schedule which outlines specific retention periods. This document is available on request.



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#### **4. Member Responsibilities**

UPCA expects members to:

- Comply with UK data protection legislation, including GDPR
- Maintain secure, accurate, and appropriate client records
- Provide clients with clear information about how their data is used and retained

Members should determine appropriate retention periods based on:

- professional guidance
- insurance requirements
- legal obligations

Members may refer to sector guidance, including that of the UK Council for Psychotherapy, when determining appropriate retention periods.

#### **5. Review and Disposal**

All retained data will be periodically reviewed to ensure it remains necessary.

Data that is no longer required will be securely:

- deleted (digital records), or
- destroyed (physical records)

#### **6. Availability of Full Retention Schedule**

UPCA maintains a detailed internal **Data Retention Schedule**, which sets out specific retention periods for different categories of data.

This document is available **on request**.