

# DATA PROCESSING STATEMENT

## Medical workforce unit

*Last updated 28 Jun 2021*

Under the Data Protection Act (2018), incorporating the General Data Protection Regulation (GDPR), the Royal College of Physicians of London (RCP), or Royal Colleges of Physicians of London, Royal College of Physicians of Edinburgh and Royal College of Physicians and Surgeons of Glasgow (hereafter referred to as “RCP/RCPE/RCPSG”) must provide comprehensive information on how records and information about living people are being collected, used and disposed of. This processing statement explains what data the medical workforce unit hold about you, why we hold it, how we protect it and your rights to access it, restrict it, or delete it.

The medical workforce unit takes your information rights seriously. We ask that you read this statement carefully as it contains important information on:

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We won't disclose your information to anyone other than where set out in this document and in any applicable terms and conditions. We will never sell your personal data to any external companies, and no data will ever be shared that could be used for financial gain.

### Terminology:

In this document, the “we”, “us” and “our” refer to the RCP’s medical workforce unit or RCP/RCPE/RCPSG.

## 1. What we do with your data

*We maintain information about you in order to administrate a range of core RCP and/or RCP/RCPE/RCPSG activities.*

*Data obtained from our projects will be used for monitoring, administration and research purposes by departments within the Federation of the Royal Colleges of Physicians. Specifically,*

- a. to undertake the annual censuses of consultant physicians and higher specialty trainees in the UK on behalf of the Federation of Royal Colleges of Physicians, and to provide the RCP/RCPE/RCPSG and the Joint Royal Colleges of Physicians Training Board (JRCPTB) with data on the UK medical workforce*
- b. to undertake similar and related studies to the above*
- c. to publish anonymous, aggregated and trended data from the censuses and similar projects in documents that are available to RCP/RCPE/RCPSG fellows and members, or the general public, such as the annual census summary, the RCP's Medical Care website, and many other RCP or RCP/RCPE/RCPSG reports*
- d. to undertake the RCP's annual support and citation process for the Advisory Committee on Clinical Excellence Awards for physicians (ACCEA) and similar processes*
- e. to consider existing RCP or RCP/RCPE/RCPSG members for the fellowship election process*
- f. to find fellows in relevant specialties who may be able to serve as representatives of the RCP on advisory appointments committees (AACs) to appoint doctors to consultant roles in the NHS*
- g. to provide an evidence base to shape RCP/RCPE/RCPSG policy, aid our fellows and members and improve standards of medicine for patients.*
- h. to undertake and inform such projects as are part of running our organisation and which does not materially impact your rights, freedom or interests.*
- i. to support consultant physicians and protect patients. Trust-level aggregated data will be shared with RCP Regional Advisors, RCP/RCPE/RCPSG representatives, and, if appropriate, disseminated locally for this purpose. No personal data will be released as part of this process.*

In order to do this

- We will collect census data using secure online forms, and process that data under legitimate interest in a way which might reasonably be expected as part of running our organisation and which does not materially impact your rights, freedom or interests.
- We will carry out analysis of demographic data and trends in such data, in order to look at specifics and patterns in the UK medical workforce

The data we collect and hold includes some, or all, of the following:

- i. Your contact details (in order to distribute the census and other surveys or data collection projects)
- ii. Your personal details for identification and/or profiling, eg date of birth, gender
- iii. Your current and former employment details and career stage, eg GMC number, national training number (NTN), place(s) of work, start date(s), employment grade, specialties
- iv. Optional personal details, eg ethnicity, citizenship, place of graduation
- v. The census and other of our projects collect additional, in most cases non-personal, information about you and your work. Examples are:
  - details of work contracted and undertaken
  - details of job planning
  - plans for the future, eg moves or retirement
  - personal opinions on workplace, workload, training and working in the NHS or medicine
  - personal statements and details of achievements submitted as part of the ACCEA process

In addition, if you are selected, or wish to apply, for consideration for fellowship, the RCP's or RCP/RCPE/RCPSG membership department will use workforce data as part of their fellowship election process

## 2. Why we need to collect and use your data

*The Medical workforce unit must maintain up to date information (including contact details) in order to communicate with service users.*

*Information on the medical workforce – specifically consultant physicians and HSTs – is essential if the RCP/RCPE/RCPSG are to shape their policy, influence medical care, set standards in medicine and improve patient outcomes in the United Kingdom*

## 3. Who we share your data with outside the RCP or RCP/RCPE/RCPSG

- a. We will share census information with the following trusted third parties as part of a process to confirm that our data are up to date, to ensure accuracy of the information we publish in our annual studies of the medical workforce. No sensitive personal data will be shared.
  - the GMC
  - the UK medical specialty societies

In such cases only the following information, and no other information, will be shared

- i. GMC number
- ii. First name and surname
- iii. Medical specialty/specialties
- iv. Work location/locations
- v. Work start date

*b. Data collected during the ACCEA process will be shared with designated individuals who will use it to provide citations for the individuals who have applied and are successful under the RCP's scheme.*

*c. All workforce data that are published in any of our public reports, or any that we have undertaken on behalf of another organisation, or organisations, are aggregated and anonymous. No personal data are ever published to the public by us.*

#### 4. How we protect your data outside the territories covered by the GDPR

*Most information managed by us is held and used within the UK. Any data managed or held outside the EU is covered by full written agreements which include GDPR requirements (eg the EU-US Privacy Shield covers activity managed via our SurveyMonkey account)*

#### 5. How long we keep your data and why

*Whenever we collect or process your personal data, we will only keep it for as long as is necessary. At the end of our retention period, your data will be either: deleted, destroyed, deactivated or anonymized. All data published by us to the general public will be aggregated and anonymous.*

*a. We will keep data relating to your basic core information (including name, date of birth, UK region, country, member type, qualifications, census work location and specialty history) permanently as a historical record when your membership expires.*

*b. Any membership information held on our database will be deactivated once your membership has expired.*

*c. We will keep full data relating to the annual censuses and workforce surveys for a period not exceeding 5 years from the census or survey date. After this time all data will be made anonymous (if kept for research purposes) or otherwise securely deleted.*

*d. Data from the ACCEA project will be kept only for the duration of the project and will be securely deleted afterwards. Data will remain no longer than 1 year.*

*e. Where a third party has commissioned us to collect data on their behalf, all data will be treated according to the GDPR and we will comply with the commissioning organisation's requirements. We will securely delete the collected data at the point of handing it over to the commissioning organisation or the termination of the project.*

*f. Data sourced from places other than you (see section 6: **Where we got our data from, if not you**) will kept for a period not exceeding 5 years. After this time all data will be made anonymous (if kept for research purposes) or otherwise securely deleted.*

## 6. Where we got your data from, if not you

*The majority of our data come from users who complete the RCP/RCPE/RCPSG census (or other) forms and directly provide us with information. In addition, certain core information may be extracted from the RCP's Customer Relationship Management system (CRM) under legitimate interest in a way that might reasonably be expected as part of running our organisation.*

*However, we also collect data for other sources:*

- a. The RCP undertakes AACs for the appointments of doctors in England, Wales and Northern Ireland. RCP fellows serve as representatives on these panels and, afterwards, data on appointees are fed back to the RCP. Information about newly appointed consultant physicians, and relocations of existing consultant physicians are used to ensure accuracy of our census data. In such instances, data collected are:*
  - i. First name and surname*
  - ii. GMC number*
  - iii. Specialty/specialties*
  - iv. Work location/locations*
  - v. Date of AAC*
  
- b. The UK medical specialty societies will advise us if we are missing known individuals who are substantive consultant physicians from our census records, or if individuals are no longer practising. In such instances, the data collected are:*
  - i. First name and surname*
  - ii. GMC number (if known)*
  - iii. Specialty/specialties*
  - iv. Work location/locations*
  - v. Date of appointment (if known)*
  - vi. If individual has retired from practising*
  
- c. We purchase databases of consultant physicians from the online supplier SpecialistInfo. This is done under the terms of their service and complies with their policy on GDPR. In such instances, the data collected are:*
  - i. First name and surname*
  - ii. GMC number (if known)*
  - iii. Specialty/specialties*
  - iv. Work location/locations*
  
- d. We confirm census data for RCP/RCPE/RCPSG fellows and members (only) with the GMC as part of a legal data sharing agreement we have with them. We upload the following census data through a secure, password-protected portal on the GMC's website and the GMC confirm if our data are correct to the best of their knowledge.*
  - i. First name and surname*
  - ii. GMC number*
  - iii. Specialty/specialties*
  - iv. Work location/locations*

- e. *Data for HSTs are collected from the JRCPTB. This is done under legitimate interest in a way that might reasonably be expected as part of running our organisation.*
- f. *At the end of our census process we sometimes need to confirm if individuals are still practising in the specialties and locations we maintain in our census. In order to do so we contact NHS trust in the UK and confirm the following information with them:*
  - i. *First name and surname*
  - ii. *Specialty/specialties*
  - iii. *Work location/locations*
  - iv. *If individual has retired from practising*
- g. *We are sometimes contracted by a third party to undertake a census or other survey on their behalf. For instance we have undertaken censuses for the Royal College of Anaesthetists and the Royal College of Ophthalmologists. Data collected for third parties may be of a sensitive or personal nature. In such instances we will comply with the commissioning organisation's data requirements and the GDPR. We will securely delete the collected data at the point of handing it over to the commissioning organisation or the termination of the project.*

## 7. Your rights to:

- **access your data (Article 15)**
- **have a copy in a standard format (Article 20)**
- **restrict the use of your data (Article 18)**
- **stop your data being used (Article 21)**
- **have data deleted (Article 17)**

a. **Access to your data (GDPR Article 15)** – You have the right to access all information which identifies you as a living person, held on RCP/RCPE/RCPSG systems by making a 'subject access request'.

b. **Standard format (GDPR Article 20)** – You have the right to a copy of your data in a standard format, where technically possible.

The above rights are general rights which will apply across all work areas in the RCP/RCPE/RCPSG. If you wish to exercise the above rights, please contact our [data protection officer](#)

c. **Rectify errors (GDPR Article 16)** – You have the right to rectify factual errors in current RCP/RCPE/RCPSG systems and processes when incorrect, out of date, or incomplete.

d. **Data deletion, restriction or stopping its use (GDPR Articles 17 & 21)** – As a member we will need to keep your data in order to provide your membership. Records on the RCP's CRM and/or the RCP/RCPE/RCPSG CRM will include census data from the medical workforce unit (where appropriate). As an ex-member we will need to keep your basic core information (eg name, location, membership type, join & leave dates) for our historical records. If your data are being used for our fellowship election process you do have the right to delete or stop your data from being used. If you wish to exercise this right please contact the RCP [data protection officer or for RCPE/RCPSG data protection](#)

[officers see end.](#)

You have the right to request that we no longer send you a census or other survey. If you wish to do so please email us at [mwucensus@rcp.ac.uk](mailto:mwucensus@rcp.ac.uk) or by contacting us by telephone or in writing at the address at the end of this document.

## 8. Where we use automated decision making and how this affects you (Article 22)

*No automated decision-making is taken by us.*

## 9. Who makes the decisions about using your data, if not the RCP or RCP/RCPE/RCPSG

*We are sometimes contracted by a third party to undertake a census or other survey on their behalf. For instance we have undertaken censuses for the Royal College of Anaesthetists and the Royal College of Ophthalmologists. Data collected for third parties may be of a sensitive or personal nature. In such instances we will comply with the commissioning organisation's data requirements and the GDPR. We will securely delete the collected data at the point of handing over to the commissioning organisation or the termination of the project.*

## 10. Who to contact at the RCP and/or RCPE/RCPSG and how to complain

*If you have any queries or concerns about how we manage privacy, please contact*

- i. the [RCP data protection officer](#) (for RCP matters)*
- ii. [the RCPE data protection officer \(for RCPE matters\)](#) or*
- iii. [the RCPSG data protection officer \(for RCPSG matters\)](#).*

*If you are not satisfied with the service provided by the RCP, RCPE or RCPSG you have the right to complain to us using the address below, or by contacting the **relevant data protection officer** (above) or the UK regulator, the Information Commissioner. See their [website](#) for further information on GDPR and your rights.*

*If the use of your data changes, we will update this statement to reflect that. Regularly reviewing this information ensures you remain aware of what data we collect, hold, how we use it, and under what circumstances we will share it with other parties.*

**For further information on the RCP privacy policy please visit**

[www.rcp.ac.uk/privacy-and-cookies](http://www.rcp.ac.uk/privacy-and-cookies)

Deputy Data Protection Officer  
Medical Workforce Unit  
Royal College of Physicians  
11 St Andrews Place, Regent's Park  
London NW1 4LE  
+44 (0)20 3075 1340

[MedicalWorkforce.Unit@rcp.ac.uk](mailto:MedicalWorkforce.Unit@rcp.ac.uk)

Normal office hours are 09.00–17.00 GMT, Monday–Friday

**For further information on the RCPE privacy policy please visit**

<https://www.rcpe.ac.uk/college/privacy-notice>

Data Protection Officer  
Royal College of Physicians of Edinburgh  
9 Queen Street  
Edinburgh  
EH2 1JQ  
dpo@rcpe.ac.uk

**For further information on the RCPSG privacy policy please visit**

<https://rcpsg.ac.uk/help/privacy-policy>

Data Protection Officer  
Heather Ferguson  
232/242 St Vincent Street  
Glasgow  
G2 5RJ  
+44 (0)141 221 6072  
dpo@rcpsg.ac.uk

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For information on your individual rights in relation to the General Data Protection Regulation (GDPR) please see: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>