

CLINICAL ACADEMIC TRAINING OFFICE (CATO) PRIVACY NOTICE

What is the purpose of this document?

Imperial College of Science, Technology and Medicine (the “College” or “Imperial”) is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your relationship with us, in accordance with the General Data Protection Regulations (the “GDPR”) from 25 May 2018 and the College’s *Data Protection Policy*.

The College is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to staff, clinical academic trainees, researchers, students, course/event attendees, applicants and other users of the Imperial College Academic Health Science Centres (AHSC) CATO Office services. This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection.

We may collect, store, and use the following categories of personal information about you (depending on the nature of the CATO service/resource you are engaging with):

- Personal contact details such as name, title, role, addresses, telephone numbers, and email addresses
- Gender
- Post/fellowship start date/end date and next job destination
- Location of employment or workplace
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process).

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

- Gender, race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life and/or sexual orientation

How is your personal information collected?

We collect the personal information about you via our online forms, in person at events, via email correspondence with you, by referrals from other colleagues and in the course of providing services to you or after we have provided services to you (e.g. event feedback responses).

How we will use information about you and the legal basis for processing your data under the GDPR

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- To allow us to deliver our service to you.
- Where we need to comply with a legal obligation.
- Where it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

Situations in which we will use your personal information

We need the information listed above (see Information we hold about you) primarily to allow us to deliver our services to you and allow us to undertake our objectives in developing and supporting the clinical academic training community across the Imperial AHSC. In some cases we may use your personal information to pursue a legitimate interest of our own or those of a third party, provided your interests and fundamental rights do not override that interest. The "legitimate interest" is generally the interest of Imperial (or third party) in providing or supporting the provision of higher education. The situations in which we will process your personal information are listed below.

- To provide you with the information and services that you request from us
- To contact you in relation to your event booking / fellowship or job application / bursary application/ feedback comments / survey submission

- To notify you about changes to our service
- To communicate education, training, research and development information and requirements
- To monitor your use of our information and communication systems to ensure compliance with our IT policies
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution
- To conduct data analytics studies to review and better understand researcher/clinical academic retention and attrition rates and career progression
- To ensure the information we hold about you is up to date and accurate
- To ensure that content from our site is presented in the most effective manner for you and your computer or mobile device
- To provide you with relevant news, opportunities and special offers by email, phone or post where you have consented to receive this information
- For equal opportunities monitoring.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to supply you with information about our services, process your application or support your development as a clinical academic/researcher.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

How we use particularly sensitive personal information

"Special categories" of particularly sensitive personal information require higher levels of protection (such as data concerning health, racial or ethnic origin, sexual orientation or criminal convictions). We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where it is necessary in the context of employment law, or laws relating to social security and social protection.
3. Where the processing is necessary to protect your vital interests (or those of another person)

where you are incapable of giving consent.

4. Where the processing is necessary for archiving purposes in the public interest, for historical, scientific, research or statistical purposes, subject to appropriate safeguards.

Our obligations

We will use your sensitive personal information in the following ways:

- We will use information about your gender, race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

Do we need your consent?

We do not need your consent to process sensitive personal information if we use special categories of your personal information to monitor/report on equal opportunity matters. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

Data sharing

We may have to share your data with third parties, including third-party service providers and other entities in the College group.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU.

If we do, you can expect a similar degree of protection in respect of your personal information.

Why might you share my personal information with third parties?

We may share your personal information with third parties where required by law, where it is necessary to administer the relationship with you or where we have another legitimate interest in doing so.

Which third-party service providers process my personal information?

- Health Education England, for recruitment and monitoring of clinical academic training posts
- Sponsors, including the UK research councils and other external bodies who fund awards/support research activities
- Other employees, agents, contractors and service providers (e.g. third parties processing data on our behalf as part of administering services) including currently the following service providers:
 - *Qualtrics*, online software experience management platform. This system allows us to conduct online surveys and manage event bookings and bursary applications

- Partner institutions, research organisations and other bodies involved in the delivery of a course, programme or clinical academic/research initiative
- Relevant professional bodies where this is a requirement in connection to your role/fellowship/research activity (e.g, the GMC)
- Academic Health Science Centre partners, for delivery of CATO services across the AHSC (The AHSC is a partnership between Imperial College London (ICL), Imperial College Healthcare NHS Trust (ICHT), Royal Brompton and Harefield NHS Foundation Trust (RBHT) and The Royal Marsden NHS Foundation Trust (RMH)).

How secure is my information with third-party service providers and other entities in our group?

All our third-party service providers and other entities in the College group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

What about other third parties?

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business and operations of the College. We may also need to share your personal information with a regulator or to otherwise comply with the law.

Data security

We have put in place measures to protect the security of your information.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

How long will you use my information for?

We will only retain your personal information 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. Details of retention periods for different records the College holds are available in our retention policy which is available on this website: <https://www.imperial.ac.uk/media/imperial-college/administration-and-support-services/records-and-archives/public/RetentionSchedule.pdf>
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.

Anonymous data from surveys and feedback exercises is retained for a longer period to aid year on year comparisons.

Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

Your rights in connection with personal information

Under the GDPR, you have the following rights:

- To obtain access to, and copies of, the personal data we hold about you. Further information of how to make such an application can be found at: <http://www.imperial.ac.uk/admin-services/legal-services-office/data-protection/subject-access-requests/>
- To require that we cease processing your personal data if the processing is causing you damage or distress
- To require us not to send you marketing communications
- To request that we erase your personal data
- To request that we restrict our data processing activities in relation to your personal data
- To receive from us the personal data we hold about you, which you have provided to us, in a reasonable format specified by you, including for the purpose of transmitting that personal data to another data controller; and
- To require us to correct the personal data we hold about you if it is incorrect

Please note that the above rights are not absolute, and requests may be refused where exceptions apply. You can find out more about your rights at www.ico.org.uk

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the College's Data Protection Officer in writing

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the College's Data Protection Officer. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Data Protection Officer

We have appointed a Data Protection Officer to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the Data Protection Officer at:

Imperial College London
Data Protection Officer
Exhibition Road
Faculty Building Level 4
London SW7 2AZ

e-mail: dpo@imperial.ac.uk

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.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.