

PRIVACY NOTICE

GP's registered as tutors on the Undergraduate Primary Care Education Unit teaching database and mailing list

What is the purpose of this document?

Imperial College of Science, Technology and Medicine (the “**University**”, “**Imperial**”, “**we**”, “**our**” or “**us**”) is committed to protecting the privacy and security of your personal data.

This privacy notice describes how we collect and use personal information about you during and after your relationship with us, in accordance with the applicable data protection legislation the Data Protection Act 2018 and the General Data Protection Regulations (the “**GDPR**”) and Imperial’s *Data Protection Policy* - PDF.

Imperial 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 GPs and other providers registered as approved to teach Imperial’s undergraduate medical students on the GP tutor teaching database and mailing list as held by the Undergraduate Primary Care Education Unit. 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 data about you, so that you are aware of how and why we are using such personal data. Other Privacy notices of note include.

- Events Privacy Notice / [Events Privacy Notice](#) [PDF]
- Staff Privacy Notice / [Staff and Prospective Staff Privacy Notice](#) [PDF]

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.

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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).

We may collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Gender.
- Current work location and/or GP practice
- Feedback relating to previous experience and/or survey data provided by personnel who engage with you.
- Data relating to any Quality Assurance etc. along with any findings and data collected from those exercises.
- Details pertaining to role and expertise where teaching takes place. This would also include any details (if any) relating to investigations and/or findings by third party organisation or regulators (including the Care Quality Commission // [Care Quality Commission](#) or General Medical Council GMC // <https://www.gmc-uk.org>).

How is your personal information collected?

We will only collect the above personal information about you via the new tutor registration and approval form, or at your request to be included on our GP teaching mailing list. Collection of this data requires your consent via completion and submission of the new approval tutor form, or via direct request from you via email.

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:

1. Where we need to perform the contract we have entered into with you or in order to take steps at your request prior to the entry into a contract.
2. Where we need to comply with a legal obligation.
3. 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.
4. Where you have consented to the processing.
5. As part of ours (or other parties) Legitimate Interests.

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Situations in which we will use your personal information

We need all the categories of information in the list above (see

The kind of information we hold about you) primarily to allow us to perform our contract with you. In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below. We have indicated by a number, corresponding with at least one of the above legal basis, the purpose or purposes for which we are processing or will process your personal information.

- To provide you with relevant medical student teaching information and confirmation of quality assurance approval processes which confirm your eligibility to teach and host students on their primary care placements. (1)(3)
- To contact you in relation to student feedback and/or curriculum requirements. (1)(3)
- To contact you in relation to tutor education, training, development requirements and relevant CPD offered by the Undergraduate Primary Care Education Unit. (1)(3)
- To ensure the information we hold about you is up to date and accurate.(1)(2)(3)
- To provide you with relevant news by email, or telephone where you have consented to receive this information.(4)
- To undertake reviews and/or quality assurance exercises when engaging with you (3)(5).

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 perform the contract we have entered into with you, and may need to remove your record from our teaching database.

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. We need to have further justification for collecting, storing and using this type of personal information.

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Any special category data collected, processed or retained will be in accordance with our Special Category and Criminal Offence Appropriate Policy, which can be accessed via the following URL / [*Special Category and Criminal Data Policy*](#) - PDF and requires an additional legal basis.

Our obligations

Whilst we do not envisage processing special category data outside an emergency, if this should change we will inform you along with the reason for data collection. management of health or social care systems and services.

Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

Data sharing

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

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?

"Third parties" includes third-party service providers (including contractors and designated agents) and other entities within the University group.

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

All our third-party service providers 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.

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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 University. 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 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 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. Details of retention periods for different records Imperial holds are available in our retention policy which is available via the following URL.

[*Retention Schedule*](#) - 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. 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 data protection legislation you have the following rights:

- to obtain access to, and copies of, the personal data we hold about you.
- 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.

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- 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 incorrect.

For more information about the above rights please view the following URL.

<https://www.imperial.ac.uk/admin-services/governance/policies-and-guidance/guidance/guide-10---use-of-data-for-university-purposes/> - URL

Please note that the above rights are not absolute, and requests may be refused where exceptions apply.

If you have any questions about these rights or how your personal data is used by us, you can contact the Data Protection Officer.

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 Imperial'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:

- Post – Data Protection Officer Address - Imperial College of Science, Technology and Medicine, The MediaWorks, 191 Wood Lane, W127FP.
- Email – 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.

V1.0 May 2026