**PRIVACY POLICY FOR RCPATH EDI REVIEW AUG 2024**

**Introduction**

The Royal College of Pathologists is committed to protecting and respecting your privacy. This policy (together with any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

This privacy policy applies to any member who provides us with data through our EDI review.

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

**What kind of personal data do we collect?**

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.

In our EDI review we may collect, store, and use the following categories of personal information about you:

* Personal details such as name and title
* Age band
* Information relating to any disabilities, long-term conditions or impairments
* Gender
* Gender reassignment information
* Status in relation to pregnancy and maternity
* Religion and belief
* Socio-economic indicators
* Work patterns
* Caring responsibilities
* Location of employment or workplace.

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

* Information about your race or ethnicity.
* Information about your sexual orientation

**How do we collect your personal data?**

We will collect this information through our EDI review and triangulate this with the data we hold in your membership record.

**How do we use your personal data?**

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. To better understand the demographics of our members
2. To better understand any barriers to engagement
3. 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 will use the data you provide us, along with the information other members provide to report on member demographics and barriers. This information will be anonymised. Should there be any data across members which is present at such a small number that individuals could be identified, we will not use this data in our reporting.

**CHANGE OF PURPOSE**

We will only use your personal information for the purposes for which we collected it.

**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.

We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations and in line with our General Data Protection policy.
3. Where it is needed in the public interest, such as for equal opportunities monitoring or in relation to our pension scheme, and in line with our General Data Protection policy.
4. Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.

**Who do we share your personal data with?**

Your data will be limited to staff who will be processing the data. This will include:

* Director of Professional practice
* Data Analyst (Professional practice directorate)
* Database Support Officer

**How do we protect your data?**

We care about protecting your information. That's why we put in place appropriate measures that are designed to prevent unauthorised access to, and misuse of, your personal data. The data that we collect from you may be transferred to, and stored at, our servers in the UK.

Details of these measures are available upon request.

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, workers, 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

**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. Our retention period for member data is up to seven years following the end of membership. Details of retention periods for different aspects of your personal information are available upon request.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a member of the College we will retain and securely destroy your personal information in accordance with our data retention policy or current applicable laws and regulations.

**How do we uphold your rights to use personal data?**

**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 working relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

* **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
* **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
* **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
* **Object to processing** of your personal information 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.
* **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
* **Request the transfer of your personal information to another party**

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 Professionalism directorate.

**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).

**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 Professionalism directorate in writing. 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.

**Right to complain**

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 the this privacy policy:**

This privacy policy was last updated on 08 August 2024. The College reserves the right to vary this privacy policy from time to time. Such variations become effective on posting on the College intranet.

### **Contact:**

Questions, comments and requests regarding this privacy policy should be addressed to dpo@rcpath.org.