

Policy on Information

The Register of Clinical Technologists (RCT) complies with the Data Protection Act 1998, and is preparing to comply with the General Data Protection Regulations which will come into force from May 2018.

When you register with the RCT you give personal details on the application form such as your address, qualifications, date of birth, email address, home address, work address, etc. This information is important as it allows us to keep in touch with you and keep you informed about changes to your registration.

The RCT keeps this information secure and will not reveal it to any third parties. All members of the RCT panel and those who work on behalf of the RCT management panel are bound by the Data Protection Act and are fully aware of their obligations to keep the data confidential and secure.

The RCT sometimes receives requests for statistics about the number of registrants by, for example, age, area, or gender. We do release these statistics but we make sure that no registrant can be identified: non-identifiable data is not covered by the Data Protection Act.

The information that we publish about you in the online register is your name, registration number, approximate geographical area of practice and the date your registration started. It is important that you keep the RCT informed of any changes to your personal details so that we are able to keep touch with you. We also publish information on your registration status showing, for example, whether you are currently subject to any professional conduct proceedings. This is a requirement of the Professional Standards Authority for the RCT's accredited register status.

Name change: If you have changed your name you must send us a certified photocopy of the relevant document (e.g. marriage certificate).

Home address: We ask you to give us your main home address. This address is not published on the publicly available register but is required by us for the RCT correspondence.

Work address: The work address you give us should be for your main place of work. The online register will only show the approximate geographical area in which you practice (e.g. Cambridge). If you are not currently practising you can leave this section blank and contact us as soon as you are able to give us a work address.

Telephone number(s): Telephone numbers are required for contact by the RCT only. This information is not made available to third parties. If you do not wish to have contact by telephone simply leave the space blank.

Email address: Email communication is used by the RCT to inform you of relevant issues relating to registration, so it is important that you tell us your email address.

Data retention, disposal of information and archive periods

The RCT Policy on Information should be read in conjunction with IPEM's 'Information retention and disposal policy' (document 01-20-15 0032) which provides full details on data retention, disposal of information and archive periods affecting the RCT. This is because IPEM provides the administrative support to the RCT. The relevant sections of this document are shown overleaf.

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IPEM Information Retention and Disposal Policy

The Institute of Physics and Engineering in Medicine (IPEM) holds a great deal of important information that is crucial to the running of the organisation. The objective of IPEM's 'Information Retention and Disposal Policy' is to provide staff and volunteers a specific retention period for different types of data and information, which balance the need to store information with the obligations to destroy the data when it is no longer required. The archive periods (minimum retention periods) shown in this document are either legal requirements or industry standard.

This policy applies to information in all its forms. It may be on paper, stored electronically or held on film, microfiche or other media. It includes text, pictures, audio and video. This policy applies to all staff and volunteers of the IPEM.

Staff and volunteers have an obligation to dispose of personal, confidential and business critical information in a secure manner, once the retention periods for the record has passed. It is IPEM's policy to dispose of data within one year of the minimum retention period.

For confidential paper information, including personal information and sensitive personal information, staff and volunteers must cross shred and/or put into the confidential waste bins.

For confidential, electronic information:

- DVDs/CDs must be shredded and then put into the recycling
- Computer hard drives and external storage media (such as USB Sticks) must be wiped with a suitable software tool. No unencrypted data should be left on these types of media before re-using/recycling/disposal

The IPEM Trustees have agreed the following minimum retention periods for RCT data:

Description	Record	Minimum Retention Period	Action
Registration	RCT application forms, CVs, Certificate Diplomas	Length of Registration & 2 Years	Disposal within 1 year
Disciplinary Case (RCT)	Disciplinary: record of investigation where allegations are unsubstantiated	Conclusion of investigation+ 6 months (a note may be retained showing investigation took place but allegation was unsubstantiated)	Destroy within 1 year of MRP (See Note)
	Disciplinary: record of investigation where allegations are substantiated	Life of the Organisation	Keep Permanently

Privacy Policy

The RCT has a separate 'Privacy Policy' (document 01-21-19 0412) – see Appendix 1 overleaf.

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APPENDIX 1: Privacy Policy

The Register of Clinical Technologists (RCT) is committed to protecting your privacy, including your personal data. We will be the data controller under applicable data protection laws of any personal data which we collect from or about you in connection with the provision of our services. This policy sets out the basis on which we will process your personal data. If you have any queries about this policy or how we use your data, you can contact us using the contact details below.

When do we collect information?

We will collect information from you when you make an application for registration to the RCT or contact us in person, by telephone, by email or by post. We will also collect information from you when you voluntarily complete registrant surveys or when you provide feedback to us.

Information may also be collected about you when you visit our website (for example via cookies) such as your IP address and other browser-generated information.

What information will we collect?

We may collect the following information:

- Your contact details, such as your name, address, telephone number and email address;
- Your date of birth;
- Your employment status.

In some cases, you are not obliged to provide any personal data to us but if you have requested information or a service from us we will not be able to provide it without certain information such as your contact details.

How we will use your information

We use information held about you in the following ways:

- To process your application for registration;
- To help protect your information and prevent unauthorised access to it;
- To deal with any queries, complaints or problems reported by you;
- For payment verification;
- To enable you to participate in marketing promotions and surveys;
- To generate statistics relating to our registrants although we do not use personally identifiable information for this purpose;
- To provide you with information about services we offer that are similar to those you have already requested from us;
- To notify you of changes to our services; and
- To help improve the services we provide to you.

Unless otherwise stated in this policy, the legal basis for our use of your personal data will be that this information is required for one or more of the legitimate interests described above, except where we require your consent to use your personal data for a specific purpose, as identified above.

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Disclosure of your information

We may disclose your information:

- To investigate activities believed to be a breach of the Code of Conduct to which you signed up to at the point of your application for registration with the RCT.

We will not lend or sell your information to third parties.

Storage of your personal data

We will only keep your personal data for as long as we need to in order to fulfil the relevant purpose it was collected for as set out above in this policy and for as long as we are required or permitted to keep it by law.

We retain copies of registrants' applications forms in order to enable us to deal with any issues relating to the application.

We take appropriate security measures (including physical, electronic and procedural measures) to help safeguard your personal information from unauthorised access and disclosure. For example, only authorised employees are permitted to access personal information and they may do so only for permitted business functions. In addition, we use firewalls to help prevent unauthorised persons from gaining access to your personal information.

Cookies

Our website uses cookies to distinguish you from other users to enable us to provide you with a better experience when you browse our website and to allow us to improve our site.

Your rights

You have the following rights which can be exercised by contacting us using the details provided below.

The right:

- To ask us not process your personal data for marketing purposes;
- To access personal information held about you and to obtain a copy of it;
- To prevent any processing of personal data that is causing or is likely to cause unwarranted and substantial damage or distress to you or another individual;
- To obtain the rectification or completion of personal data which are inaccurate or incomplete;
- To restrict or object to the processing of your personal data and to request its erasure under certain circumstances.

Where we rely on your consent to use your personal data you have the right to withdraw that consent at any time.

Changes to this policy

We reserve the right to amend this policy at any time. Any substantive changes we make to our policy in the future will be notified to you in writing but we would advise you to check the website regularly to ensure that you are familiar with the most up-to-date version.

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Contact us

If you have any queries, comments or requests regarding this policy or you would like to exercise any of your rights set out above you can contact us at:

Email: enquiries@therct.org.uk

Post: **The Register of Clinical Technologists, Fairmount House, 230 Tadcaster Road, York, YO24 1ES**

Policy approved at the RCT Management Panel held on 13 February 2018.