

# FoM Staff Development and Training Data

## Privacy Notice

## INTRODUCTION

The University's Faculty of Medicine ('FoM') is responsible for ensuring the educational training of clinicians and academics and offers those employed by, or contracted to NHS Trusts, or other organisations involved in teaching our students, access to training and development related to education. We value your privacy and we recognise the need to process your Data appropriately and lawfully.

'Data' refers to the personal data that we hold about you from which, either on its own or in combination with other data, you can be identified. A list of the types of Data we collect and process about you is set out below.

'Processing' means doing anything with your Data, such as collecting, recording or holding the Data, as well as disclosing, destroying or using the Data in any way.

We process your Data in compliance with the UK Data Protection Act 2018 and the General Data Protection Regulation (GDPR) in force from 25 May 2018.

We keep this Privacy Notice under regular review and it may be amended from time to time. You can obtain a current version at [https://www.southampton.ac.uk/meded/staff\\_development/privacy.page](https://www.southampton.ac.uk/meded/staff_development/privacy.page).

## 1. WHAT WE ARE PROCESSING

We will collect and process the following Data about you:

1. Title, forename, and surname
2. Work e-mail address, telephone number, and mobile phone number
3. Name of employer, job description, and postal address
4. Role within the Faculty of Medicine, and name of sponsor
5. Regulatory registration numbers (GMC, NMC, LAK)
6. Education qualifications held
7. Professional education body Membership
8. Trust /employee name and details
9. Teaching Role Data
10. Equality and Diversity Training Compliance
11. Academic role and start/end date, Academic Unit, job type and Post Class Description – if Soton Uni contract
12. Training course completion
13. Application form training Data
14. GMC/FoM Recognition Data

## 2. WHERE WE GET IT FROM

We obtain your Data directly from you, through training applications and registers, from any NHS Medicine External User Database that you have signed up for, from Southampton University HR, and from Southampton University Placements administrative team data.

## 3. LEGAL BASIS FOR PROCESSING

We will usually only process your Data where we need to process it to comply with our legal obligations, or where we have obtained your consent to do so. However, exceptionally it may also be necessary for us to process your Data for the protection of your vital interests, or because we need to achieve our legitimate interests or the legitimate interests of others in circumstances where your rights are not overridden.

We will only process sensitive personal data about your ethnic origin, political opinions, religious or similar beliefs, trade union membership, health, sex life, and data about criminal proceedings or convictions either where you have given us your explicit consent, or where we are legally required to do so. We have not requested this data and don't anticipate needing to do so.

Where you have given your consent to us processing your Data, you have a right to withdraw that consent at any time by emailing us at: [meded@soton.ac.uk](mailto:meded@soton.ac.uk).

You may also request the deletion or removal of your Data, in certain circumstances, by emailing us at: [serviceline@soton.ac.uk](mailto:serviceline@soton.ac.uk)

## 4. WHY WE ARE PROCESSING YOUR DATA

Your Data is stored in our Staff Development and Training Database on a secure area of the University's network, and/or secured in a locked cabinet if it is paper based. The purpose of the database is to ensure that we meet the General Medical Council ('GMC') requirements that all teachers of undergraduate medical students are trained and that we keep records of this. We use this information to inform individuals via email of any training or development that might be suitable for them to enable them to meet GMC requirements. We also use mail addresses to inform users of FoM changes, teaching opportunities, and news that is relevant to our medical teachers. Users can request that they are not contacted regarding FoM business other than training by emailing us at: [meded@soton.ac.uk](mailto:meded@soton.ac.uk).

The GMC requires that we keep information about our Southampton undergraduate medical student teachers and assessors. 'Promoting Excellence: standards for medical education and training' (GMC, 2015) states that "medical schools have the responsibility to make sure that educators have the necessary knowledge and skills, support and resources they need for their role." (p.28). By applying to utilise our training resources, and/or as someone required to undertake the GMC recognition process, you understand that you fall within this group and therefore we are required to keep a record of your data and any training that you undertake with us to meet our statutory obligations to the GMC.

We may also process your Data in respect of historical records of training undertaken by you, and teaching roles you have held, for the purpose of allowing the University to appropriately target support and resources to individuals and groups who need them most. To this end, your Data may be further interrogated by a business intelligence tool called Qlikview within the University to report on provision of support and resources in particular

to shape suitable programmes of training to support teachers in providing students with high quality teaching and assessments.

We may include within your Data records of any training undertaken with the University both online (MEDUSA) and/or face to face courses, away days and workshops, as well as any other courses that you let us know that you have attended. We expect that you will also hold your own personal copies of training that you have undertaken.

## 5. PROCESSING FOR LIMITED PURPOSES

We will only process your Data for the specific purpose or purposes that we tell you about, or if specifically permitted without notice by law, and we will only process your Data to the extent necessary for that specific purpose or purposes.

## 6. AUTOMATED DECISION MAKING AND PROFILING

We will not use the Data that we obtain about you to conduct automated decision making and profiling of you.

## 7. ACCURATE DATA

We will keep the Data we store about you accurate and up to date as far as reasonably possible. Data that you tell us is inaccurate and/or out of date will be destroyed.

Please let us know if your details change or if you feel that the Data we hold about you is inaccurate or incomplete at: [fdrec1@soton.ac.uk](mailto:fdrec1@soton.ac.uk)

## 8. HOLDING DATA

We create and hold your Data both electronically and on paper. We will only hold your Data as long as is reasonably necessary for the purpose or purposes that we have collected it and to satisfy our legal obligations. Currently, this may require certain of your Data to be held for up to the duration of the working lifetime of our staff. However, please note that it is your responsibility to also store and keep safe a record of the dates, times and details of training undertaken with us.

In line with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018, our processes and procedures to safeguard your rights in respect of the Data we process about you have been reviewed to ensure that:

- Data administration is streamlined to reduce unnecessary duplication,
- Limited staff have access to the Data (on a 'need to know' basis only),
- Data held on paper is destroyed safely when no longer needed, and accessible online only if necessary,
- Email correspondence is routinely destroyed/archived and is held within generic email addresses where possible,
- GMC recognition forms containing staff development and training Data due for review is transferred to individuals through secure systems such as 'drop off'.

## 9. DATA SECURITY

Our staff have a legal duty to keep Data about you confidential. There are strict codes of conduct in place to keep your Data safe. Staff abide by the Data Protection Act 2018, the GDPR, and the University's Data Protection Policy available at:

<http://www.southampton.ac.uk/assets/sharepoint/intranet/Is/Public/Information%20Governance%20Policies/Data%20Protection%20Policy.pdf>.

We endeavour to ensure that suitable organisational and technical measures are in place to prevent the unlawful or unauthorised processing of your Data and against the accidental loss of or damage to your Data. This includes:

1. Storing Data on an appropriately secure system.
2. Training all our staff in their data protection responsibilities.
3. Working with reputable companies for data processing services who are data protection compliant and who enter into appropriate data sharing agreements. Ensuring that appropriate protection is in place when we work with trusted organisations based outside the European Economic Area (EEA).

## 10. SHARING YOUR DATA

We will not share your Data to a third party without your consent unless we are satisfied that the third party is legally entitled to it.

We may be asked by the GMC to give overall percentages and numbers for staff who have undertaken specific training. This would be done at an aggregated level and would not identify individuals. To enable us to do this, your information will be stored in a FoM Staff Development and Training database which records any training done with us or reported to us. We may be asked to provide individual data to the GMC relating to those staff who have undertaken, or are currently undertaking, GMC recognition. These individuals will be made aware that they fall into this category and will be asked for specific information to comply with GMC guidelines.

We may have to disclose your Data if the University is required to do so by law in order to comply with a legal obligation, to protect our rights, interests or property and those of others, act in urgent circumstances to protect the personal safety of our staff, students, and the public, or to protect us against any legal liability.

## 11. HOW DO I ACCESS MY DATA?

If you would like to access your Data please make a request in writing to:

The Data Protection Officer

Legal Services

University of Southampton

Highfield

Southampton

SO171BJ

Email: [data.protection@soton.ac.uk](mailto:data.protection@soton.ac.uk)

In certain circumstances you can request your Data for reuse for your own purposes across different services by emailing us at: [fdrec1@soton.ac.uk](mailto:fdrec1@soton.ac.uk)

## 12. FURTHER INFORMATION

We also have additional policies and guidelines concerning particular activities. If you would like further information, please see our webpage on Data Protection, Freedom of Information and Data Breach (<https://www.southampton.ac.uk/about/governance/freedom-of-information.page>) and our Publication Scheme ([http://www.southampton.ac.uk/about/governance/regulations-policies-guidelines.page#publication\\_scheme](http://www.southampton.ac.uk/about/governance/regulations-policies-guidelines.page#publication_scheme)).

If you are unhappy with the way that we have handled your data you can contact us at: [serviceline@soton.ac.uk](mailto:serviceline@soton.ac.uk) or contact the Information Commissioner's Office. See their website at: <https://ico.org.uk/>

The University of Southampton is the Data Controller and our registration number with the Information Commissioner's Office is Z6801020.