



Life Science Industry Credentialing Register

Data Protection Policy

Including Publication Scheme

How the Life Science Industry Credentialing Register uses and safeguards personal information and discloses information about its operation,

23 January 2018

Version 1.1

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To incorporate compliance with GDPR

Introduction

The Life Science Industry (LSI) Credentialing Register needs to collect personal information about people with whom it deals to carry out its business and provide its services.

Such people include members, registrants, employees (present, past and prospective), suppliers and other business contacts. The information includes name, address, email address, data of birth, private and confidential information, sensitive information.

In addition, we may occasionally be required to collect and use certain types of such personal information to comply with the requirements of the law.

No matter how it is collected, recorded and used (e.g. on a computer or on paper) this personal information must be dealt with properly to ensure compliance with the Data Protection Act 1998 (the Act).

The lawful and proper treatment of personal information by the Life Science Industry Credentialing Register is extremely important to the success of our business and to maintain the confidence of our service users and employees.

We ensure the Life Science Industry Credentialing Register treats personal information lawfully and correctly.

Data Protection Principles

The Life Science Industry Credentialing Register, is part of a regulatory Framework overseen and managed on its behalf by The Academy for HealthCare Science (AHCS). It fully supports and complies with the eight principles of the Act which are summarised below:

1. Personal data shall be processed fairly and lawfully.
2. Personal data shall be obtained/processed for specific lawful purposes.
3. Personal data held must be adequate, relevant and not excessive.
4. Personal data must be accurate and kept up to date.

5. Personal data shall not be kept for longer than necessary.
6. Personal data shall be processed in accordance with rights of data subjects.
7. Personal data must be kept secure.
8. Personal data shall not be transferred outside the European Economic Area (EEA) unless there is adequate protection.

Data Controller (LSI Head of Registration Services)

Any personal information that you provide on this website is controlled by the Life Science Industry Credentialing Register.

The Life Science Industry Credentialing Register will:

- Ensure that there is always one person with overall responsibility for data protection
- Provide training for all staff members who handle personal information
- Provide clear lines of reporting and supervision for compliance with data protection.

Personal information

Users of the Life Science Industry website and participants in our activities may be asked to submit personal information (e.g. name, address and email address) in order to receive or use our services. Such services include events, newsletters, publications, information and advice.

By giving us your details, you are consenting to the processing of your information by LSI and its agents in accordance with this Data Protection Policy. You may also provide personal information to us when you contact us by email, telephone or letter. Whenever you provide such personal information, we will treat that information in accordance with this policy. LSI will, always, act in accordance with current legislation and aim to meet current Internet best practice.

Use and storage of personal information

When any personal information by you or about you is supplied to the LSI Credentialing Register we have legal obligations towards you in the way we deal with that information. We must collect the information fairly, that is, we must explain how we will use it. This Data Protection Policy explains how we will use your personal information.

We will use personal information provided by you or gathered by LSI about you for the following purposes:

- To process and respond to requests, enquiries and complaints received from you;
- To provide services requested by you;
- To communicate with you about services provided to you;
- To update our records;
- To analyse trends and profiles;
- For audit purposes;
- To carry out customer satisfaction research;
- To prevent or detect fraud;
- To recommend products and services that we believe will be of interest to you;
- To enable third parties to carry out any of the purposes above on our behalf.

If you are notified that your personal information may be used to allow LSI to contact you for 'service administration purposes', this means that LSI may contact you for a number of purposes related to the service you have signed up for. For example, we may wish to provide you with password reminders or notify you that the particular service has been suspended or changed.

We will not contact you for promotional purposes unless you specifically agree to be contacted for such purposes at the time you submit your information on the site, or at a later time if you sign up specifically to receive such promotional information.

We will hold your personal information on our systems for as long as is necessary for the purposes set out above and we will remove it when the purposes have been met, unless you opt in to future communications with us.

Where you have opted in to future communications, we will, on each subsequent communication, offer you an easily executable 'opt out' option, which will allow you to remove yourself from any future mailings.

Sharing of your personal information

LSI may share your personal information with third parties in the following ways:

- We sometimes use agents and service providers to process personal information on our behalf. For example, we use third parties to perform administrative services, to carry out credit checks and to maintain our IT systems. Where we use agents and service providers to process your personal information, we will ensure that they have adequate security measures in place and are governed by our privacy policies in respect to the use of your personal information.
- We may share information with government departments and government bodies that provide funding to AHCS or have an interest in AHCS's activities. Information is passed to government departments and government bodies for analysis purposes.
- We will release your personal information when we are required to do so by law.
- We will release your personal information to others when you have given your consent to that release.

LSI may occasionally present a promotion that is sponsored by a third-party company. To qualify for entry, we may ask you to provide personal information. If we plan to share that information with the sponsor(s) we will make this clear at the point of collection of your information.

In some circumstances we may transfer your personal information to countries outside of the European Economic Area, where data protection safeguards are not as high as they are in the UK. If this occurs we will ensure that adequate procedures are put into place to protect your personal information.

Access to your personal information

You have the right to request a copy of the personal information LSI holds about you and to have any inaccuracies corrected. We will ask for confirmation of identity before we disclose any personal information and may charge a £10 administration fee to process the request. Please address requests to the Data Protection Officer, Academy for Healthcare Science, 6 The Terrace, Rugby Road, Lutterworth, Leicestershire LE17 4BW 9DZ.

Governing Law

These terms and conditions shall be governed by and construed in accordance with the laws of England and Wales. Any dispute arising under these terms and conditions shall be subject to the exclusive jurisdiction of the courts of England and Wales. Visit the Information Commissioner's website (www.ico.org.uk) for more information on UK data protection.

LSI Credentialing Register Staff Responsibilities

All staff of the LSI Credentialing Register and the Academy for Healthcare Science are covered by the scope of this document. This includes contractors, temporary staff, secondees, interns and all permanent employees. All staff will, through appropriate training and responsible management:

- Observe all forms of guidance, codes of practice and procedures about the collection and use of personal information.

- Understand fully the purposes for which the Life Science Industry Credentialing Register uses personal information.
- Collect and process appropriate information only in accordance with the purposes for which it is to be used by the Life Science Industry Credentialing Register, to meet its service needs or legal requirements.
- Ensure the information is correctly input into the Life Science Industry Credentialing Register's systems.
- Ensure the information is destroyed (in accordance with the provisions of the Act) when it is no longer required.
- On receipt of a request from an individual for information held about them, (by or on behalf of them), immediately notify their line manager.
- Not send any personal information outside of the United Kingdom without the knowledge and consent of a senior manager.
- Understand that breaches of this Policy may result in disciplinary action, including dismissal.

Distribution and implementation

This document will be made available via the Life Science Industry Credentialing Register website and directly on a personal basis to all employees, consultants and contractors.

A training needs analysis will be undertaken with staff affected by this document, with appropriate training being provided to staff as necessary.

Monitoring

Compliance with the policies and procedures laid down in this document will be monitored via the Head of Registration Services, together with independent reviews by both internal and external audit on a periodic basis.

The Head of Registration Services is responsible for the monitoring, revision and updating of this document.

Implementation and Equality impact assessment

This document forms part of the Life Science Industry Credentialing Register's aim to create a positive culture of respect for all staff and service users. The intention is to identify, remove or minimise discriminatory practice in relation to the protected characteristics (race, disability, gender, sexual orientation, age, religious or other belief, marriage and civil partnership, gender reassignment and pregnancy and maternity), as well as to promote positive practice and a valuing of the diversity of all individuals and communities.

As part of its development this document and its impact on equality has been analysed and no detriment identified.

Freedom of Information

The Life Science Industry Credentialing Register and the Academy for Healthcare Science is not subject to the Freedom of Information Act (FOIA) (www.legislation.gov.uk/ukpga/2000/36/contents). However, as it is our aspiration that the Healthcare Science groups that we register will be subject to Statutory Regulation, in which case we would be covered by the FOIA, and as far as possible we intend to act as if the FOIA already applied to the AHCS's work.

AHCS Publication Scheme

This publication scheme has been prepared and approved by the Board of the Academy for Healthcare Science and is based upon the Model Publication Scheme produced by the Information Commissioner's Office.

This publication scheme commits us to make information available to the public as part of our normal business activities. The information covered is included in the classes of information mentioned below, where this information is held by us. Additional

assistance is provided relating to the definition of these classes in guidance issued by the Academy for Healthcare Science Board.

This Publication Scheme commits the Academy:

- To proactively publish or otherwise make available as a matter of routine, information, including environmental information, which is held by the Academy and falls within the classifications below.
- To specify the information which is held by the Academy and falls within the classifications below.
- To proactively publish or otherwise make available as a matter of routine, information in line with the statements contained within this scheme.
- To produce and publish the methods by which the specific information is made routinely available so that it can be easily identified and accessed by members of the public.
- To review and update on a regular basis the information the Academy makes available under this scheme.
- To produce a schedule of any fees charged for access to information which is made proactively available.
- To make this publication scheme available to the public.
- To publish any dataset held by the Academy that has been requested, and any updated versions it holds, unless we are satisfied that it is not appropriate to do so; to publish the dataset, where reasonably practicable, in an electronic form that is capable of re-use; and, if any information in the dataset is a relevant copyright work and the Academy is the only owner, to make the information available for re-use under a specified license. The term 'dataset' is as defined in section 11(5) of the Freedom of Information Act (www.legislation.gov.uk/ukpga/2000/36/contents). The terms 'relevant copyright work' and 'specified license' are as defined in section 19(8) of that Act. This document will be reviewed to ensure compliance with GDPR

Classes of information

Who we are and what we do

Here (www.ahcs.ac.uk) we will proactively publish information relating to our organisation, our senior staff, how you can contact us, our priorities and scope of ambition and information relating to constitutional and legal governance.

What we spend and how we spend it

Here (www.ahcs.ac.uk) we will proactively and regularly publish financial information relating to projected and actual income and expenditure, tendering, procurement and contracts.

What our priorities are and how we are doing

Here (www.ahcs.ac.uk) we will publish information relating to strategy and performance, future plans, assessments, inspections and reviews.

How we make decisions

Here (www.ahcs.ac.uk) we will publish policy proposals and decisions; information about our decision-making processes and procedures and external consultations.

Our policies and procedures

Here (www.ahcs.ac.uk) we will publish our protocols for delivering our functions and responsibilities and a full list of policies and procedures.

Lists and registers

Here (www.ahcs.ac.uk) we will publish information in registers we are required to hold by law and other lists and registers relating to the functions of the Academy.

The services we offer

Here (www.ahcs.ac.uk) we will publish advice and guidance, booklets and leaflets, transactions and media releases relating to the services we offer.

The classes of information will **not** generally include:

- Information the disclosure of which is prevented by law, or where, if the Academy were subject to it, an exemption might be available under the FOIA or is otherwise properly considered to be protected from disclosure.
- Information in draft form.
- Information that is no longer readily available as it is contained in files that have been placed in archive storage, or is difficult to access for similar reasons.

The method by which information published under this Scheme will be made available

The Academy will indicate clearly to the public what information is covered by this scheme and how it can be obtained.

Where it is within the capability of the Academy, information will be provided on a website. Where it is impracticable to make information available on a website or when an individual does not wish to access the information via the website, the Academy will set out how information can be obtained by other means and provide it by those means.

In exceptional circumstances some information may be available only by viewing in person. Where this manner is specified, contact details will be provided. An appointment to view the information will be arranged within a reasonable timescale.

Information will be provided in the language in which it is held or in such other language that is legally required. Where an authority is legally required to translate any information, it will do so.

Obligations under disability and discrimination legislation and any other legislation to provide information in other forms and formats will be adhered to when providing information in accordance with this scheme.



Charges which may be made for information published under this scheme

The purpose of this scheme is to make the maximum amount of information readily available at minimum inconvenience and cost to the public. Charges made by the Academy for routinely published material will be justified and transparent and kept to a minimum.

Material which is published and accessed on a website will be provided free of charge.

Charges may be made for information as indicated below. Charges may be made for actual disbursements incurred such as:

- Photocopying
- Postage and packaging
- The costs directly incurred as a result of viewing information.

Charges may also be made for making datasets (or parts of datasets) that are relevant copyright works available for re-use.

If a charge is to be made, confirmation of the payment due will be given before the information is provided. Payment may be requested prior to provision of the information.

Written requests

Information held by the Academy that is not published under this scheme can be requested in writing, when its disclosure will be considered in line with the provisions of the Freedom of Information Act.

If you ask us in writing for information which is not disclosed through our Publication Scheme we aim to respond to you within 20 working days of receipt of the request unless there are special circumstances which we will inform you about.

While there is an assumption of disclosure contained within the legislation there are also limited circumstances in which organisations are able to claim exemptions from disclosure. When we are of the view that such exemptions might be engaged were we subject to the Act, we will inform you in accordance using the proscribed format. If you disagree with any decision we may make not to disclose information you may ask us to conduct an internal review of that decision.

If you wish to make a request for information not routinely and proactively published through our Publication Scheme please contact:

Academy for Healthcare Science

6 The Terrace, Rugby Road

Lutterworth

Leicestershire LE17 4BW

Phone: 07592 803609

Email: admin@ahcs.ac.uk