Appendix A - RCPCH Examinations Privacy Statement

RCPCH EXAMINATIONS PRIVACY STATEMENT

RCPCH Examinations Privacy Statement v.1.7
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Revision History

Version	Date	Author	Comments
1.0	July 2012	Examinations Manager. RCPCH Information Governance	Published Policy
1.1	August 2016	Examinations Manager	Published Policy
1.2	July 2017	Examinations Manager. RCPCH Information Governance	Revised Policy
1.2	August 2017	Examinations Manager	Published Policy
1.3	June 2018	Examinations Manager. RCPCH Information Governance	Revised Policy
1.4	July 2018	Examinations Manager.	Published Policy
1.5	August 2019	Examinations Manager. RCPCH Information Governance	Revised/Published Policy
1.6	January 2020	Examinations Manager. RCPCH Information Governance	Revised/Published Policy
1.7	May 2020	Examinations Manager. RCPCH Information Governance	Revised/Published Policy

Review date: August 2020 and then every year thereafter during the relevant Examinations Executive Committee with input from the RCPCH Information Systems Team.

Approval: Examinations Executive Committee (RCPCH Information Systems. Information Governance)

Name	Date	Version	Comments
Examinations Executive Committee	July 2016	1.1	
Examinations Executive Committee	July 2017	1.2	
Examinations Executive Committee	July 2018	1.4	
Examinations Executive Committee	August 2019	1.5	
Examinations Executive Committee			

Relevant Policies, Templates and Forms:

The following policies, procedures and guidance should be used or referred to when necessary alongside this policy.

Name	Version	Date
MRCPCH and DCH: Regulations and Rules	2.1	August 2019

RCPCH Examinations Privacy Statement

This document explains how the Royal College of Paediatrics and Child Health (the Data Controller) uses any information examination candidates or other key stakeholders provide to us for the RCPCH examination process through general correspondence and more specifically through the RCPCH online account and online examination application systems. This privacy statement covers both overseas and UK candidates and operational examination stakeholders (examiners, host, role-players, children and parents/carers).

Sometimes we will ask our supplier for our theory examinations, BTL, to operate theory exam test centres for us. In these cases, BTL will be joint data controllers with RCPCH in regard to candidate information.

This document also explains how the RCPCH uses any information that doctors provide to us for the purposes of applying to become an examiner or for carrying out duties as an examiner.

If you have any questions or concerns about how your personal data is used by the College, you can contact the College's Data Protection officer by writing to: The Information Governance Manager, 5-11 Theobalds Road, London, WC1X 8SH or emailing: information.governance@rcpch.ac.uk.

This privacy statement does not cover links within this site to websites owned or administered by other organisations.

This statement also explains how we protect your privacy. Protecting the privacy and personal data of visitors to our site is highly important to us.

CANDIDATES

Data Protection Legislation

In accordance with Data Protection legislation, we have a legal duty to protect any information we collect from you.

We collect both special category data and personal data about you. This data may be used and shared with or transferred to other organisations and individuals, including Deaneries/LETBs, the GMC or relevant regulatory body, educational supervisors, overseas centres and other organisations involved in the planning, management and delivery of examinations held in the UK and overseas using secure channels. This information will be shared for the following purposes only:

i. Managing the provision of examination delivery as part of our agreement with you to provide you with the exam. If we do not process your personal data, we will not be able to provide you with this service.

ii. Where there is a public interest to maintain patient safety and confidentiality

iii. Compliance with legal and regulatory responsibilities, including monitoring under the Equality Act 2010. Provision of equal opportunities data is optional, but it will enable us to better monitor equality opportunities within paediatrics.

iv. To verify your eligibility for sitting the exam. If we are unable to verify your eligibility, we cannot let you sit the examination.

v. We are sometimes asked to verify exam results, but we will only do this where we have legal grounds to do so. For more information please visit our verification pages

vi. We will share anonymised statistical information internally to help us to monitor and improve our examination process.

UK

For UK trainees only, this information will subsequently be transferred to trainee's individual ePortfolio accounts to assist with their ongoing assessment.

Overseas

Overseas based candidate and examiner information including name, contact details, RCPCH number and eligibility criteria will be shared with the examination committee of the overseas centres in order to help facilitate examination placement and to prioritise candidates based in that country. In these cases, information may be transferred outside of the EEA, where transfer is necessary for the provision of this service. If we are transferring your data outside of the EEA, we will only do so where it is necessary for us to be able to provide you with the exam as part of our agreement with you and we will always transfer your data securely.

If you are a Hong Kong or Singapore candidate, we will share the personal data on your application form and individual exam results with the oversees centre as it is necessary in relation to your progression within your local training programme. All other centres will receive a breakdown of pass and fail data only, but this will be in an anonymised format, we will not share your individual results. For Hong Kong candidates, it is also necessary for us to share your personal information with Hong Kong centres so that they can confirm that they have received payment for the exam.

If you are registered or anticipate being registered with the GMC then your personal data, including data about your examination results and number of attempts, will be passed to the GMC for quality assurance and research purposes. This includes sensitive data such as ethnicity which is required so that the GMC can assess the fairness of GMC approved assessments for the protected characteristics. The GMC will also share your data with the UKMED database so that it can be linked with other data about you and used for research purposes. To find out more, visit the UKMED website: https://www.ukmed.ac.uk/faq#for_medical_students. RCPCH is legally obliged to share this data with the GMC under the Medical Act 1983 to assist the GMC in its objective to regulate medical education in the UK.

How do we make decisions about you

If you undertake the theory exam, we will use a computerised system to calculate your overall mark. We manually mark 10% of the mark sheets to ensure that the process is accurate, and our psychometric team also review pass marks for each question to ensure that the questions are adequate and fair. If you are unhappy with your mark you can submit a request for a theory exam re-mark. Please refer to Appendix I. Theory examination re-marking policy within the Regulations and rules for MRCPCH and DCH examinations on the RCPCH website.

For clinical exams, these are manually scanned and marked. We manually mark 10% of the mark sheets to ensure that the process is accurate You will receive a copy of your mark sheet so that you are able to see how your mark has been calculated. For information on the clinical examinations appeals process please refer to Appendix J. Clinical examination appeals policy.v.1.2 within the Regulations and rules for MRCPCH and DCH examinations on the RCPCH website.

Your Rights

You have certain rights with regards to the data we hold about you. You can ask us to delete your personal data, change any inaccuracies, restrict what we use your personal data for or ask us to stop processing your data. You can also request that the data we hold about you is given back to you or given to another service provider in a commonly used format. This is called data portability. You are also entitled to a copy of the information we hold about you. However, there are some restrictions that apply to these requests, such as where we have overriding legal requirements we have to comply with. To find out more about your rights, visit the **ICO website** or to make a request please contact the Data Protection Officer on **information.governance@rcpch.ac.uk** or writing to: **Information Governance Manager, RCPCH, 5-11 Theobalds Road, London WC1X 8SH.**

If you have any concerns about the way your personal data is handled, please contact the College in the first instance. If you are still unhappy you do also have the right to complain to the ICO by contacting: **casework@ico.org.uk**.

Site usage

We undertake end-to-end tracking of exam user journeys so that we can monitor and make improvements to our exams. This includes information about what pages you visit, how long you are on the site, how you got here and what you click on.

We also use cookies for authentication purposes and to validate an active browsing session.

Security

This site has security measures in place to protect the loss and alteration of information under our control. The security of any documents/data downloaded from this site becomes the responsibility of the user. RCPCH cannot be held responsible for the security of data copied to and held outside of its systems or its accuracy. Such information should only be accessed from a secure computer and/or held in a safe place.

EXAMINERS

Data Protection Legislation

In accordance with Data Protection legislation, we have a legal duty to protect any information we collect from you.

We might collect both special category data and personal data about you. This data may be used and shared with or transferred to other organisations and individuals, including members of the Examiner Review Panel, Examinations Executive Committee, Educational and Training Divisional Committee, the Examinations team, UK and Overseas hosts, other organisations involved in the examiner application process and the planning, management and delivery of examinations held in the UK and overseas.

This information will be shared using secure channels. This information will be shared for the following purposes only:

i. Managing the examiner application process as part of our agreement with you to consider your application to become an MRCPCH or DCH examiner. If we do not process your personal data, we will not be able to proceed with the application process.

ii. Managing the provision of examination delivery, including allocating examiners to exam centres in the UK and overseas as part of our agreement with you to as an active examiner on any given exam. If we do not process your personal data, we will not be able to allocate you to examine.

iii. Where there is a public interest to maintain patient safety and confidentiality.

iv. Compliance with legal and regulatory responsibilities, including monitoring under the Equality Act 2010. Provision of equal opportunities data is optional, but it will enable us to better monitor equality opportunities within paediatrics.

v. To verify your eligibility to become an examiner for the MRCPCH or DCH exams. If we are unable to verify your eligibility, we are unable to process your application to become an examiner.

vi. To verify your continuing eligibility to act as an examiner for the MRCPCH or DCH exams. If we are unable to verify your continuing eligibility, you will be unable to continue to act as an examiner.

vii. We will share anonymised statistical information internally to help us to monitor and improve our examination process.

viii. We will share confidential performance information internally to help us to monitor and improve the examination process.

UK

For applicants to UK examiner positions, in order to process and evaluate your application, your personal data is shared with members of the College Examinations Team, the Examiner Review Panel and the Examinations Executive Committee, Educational and Training Divisional Committee. If you are accepted as an Examiner-Elect, your personal information will be shared with an examination host, the senior examiner for an exam and an examiner-mentor in order to confirm your travel arrangements for an exam and to help you complete the process of becoming an examiner.

For UK examiners, your personal data is shared with members of the College Examinations Team, exam hosts and senior examiners for specific exams for which you have agreed to be placed as an examiner. Post-exam, your personal information is shared with the College Psychometrics team and might be shared with the MRCPCH Clinical Examinations Chair and/or the Officer for Examinations.

Overseas

For applicants to Overseas examiner positions, in order to process and evaluate your application, your personal data is shared with members of the College Examinations Team, the Examiner Review Panel, the Examinations Executive Committee, Educational and Training Divisional Committee and the overseas host/lead and their team. If you are accepted as an Examiner-Elect, your personal information will be shared with the overseas examination host, the senior examiner for an exam, the Principal Regional Examiner for that host centre, and an examiner-mentor in order to schedule your training and confirm your availability as well as to help you complete the process of becoming an examiner.

For Overseas examiners, your personal data is shared with members of the College Examinations Team, exam hosts and their team, Principal Regional Examiners and Senior Examiners for specific exams for which you have agreed to be placed as an examiner. Post-exam, your personal information is shared with the College Psychometrics team and might be shared with the MRCPCH Chair for Overseas Examinations, the MRCPCH Clinical Examinations Chair, the Principal Regional Examiner for that exam, the Senior Examiner for that exam, and the Officer for Examinations.

How do we make decisions about you

If you submit an application to become an examiner for the MRCPCH Clinical exam, we will check your eligibility and evaluate your application and performance as an Examiner-Elect according to the criteria in the Becoming an MRCPCH Clinical Examiners documents available on the College website. You have the right to withdraw from the application process at any time.

If you make yourself available to examine for upcoming exams, we will try our best to allocate you to the centres you have selected but will also have to factor in the need for examiners across all exam centres.

Your Rights

You have certain rights with regards to the data we hold about you. You can ask us to delete your personal data, change any inaccuracies, restrict what we use your personal data for or ask us to stop processing your data. You can also request that the data we hold about you is given back to you or given to another service provider in a commonly used format. This is called data portability. You are also entitled to a copy of the information we hold about you. However, there are some restrictions that apply to these requests, such as where we have overriding legal requirements we have to comply with. To find out more about your rights, visit the **ICO website** or to make a request please contact the Data Protection Officer on **information.governance@rcpch.ac.uk** or writing to: **Information Governance Manager, RCPCH, 5-11 Theobalds Road, London WC1X 8SH.**

If you have any concerns about the way your personal data is handled, please contact the College in the first instance. If you are still unhappy you do also have the right to complain to the ICO by contacting: **casework@ico.org.uk**.

Security

The College and its systems have security measures in place to protect the loss and alteration of information under our control.

ROLE-PLAYERS and ROLE-PLAYER AGENCIES

We collect personal data about role-players through their agency. This data may be used and shared with or transferred to other organisations and individuals, including the Examinations team and UK hosts who are involved in the planning, management and delivery of examinations held in the UK. Without this information, role players will not be able to be allocated to act in an exam. This information will be shared using secure channels.

For UK exams, role player personal data (name, phone number, age and sex) is shared with members of the College Examinations Team and members of the UK host team for which they will act. This is in order for hosts or members of the College Examinations Team to contact role players on the day of the exam if necessary. If a role player makes themselves available to act for upcoming exams (through a role player agency), they will be allocated based on the need for patients with certain characteristics.

We will destroy this personal data after the completion of the diet of the exam on which they act.

Role Player Rights

You have certain rights with regards to the data we hold about you. You can ask us to delete your personal data, change any inaccuracies, restrict what we use your personal data for or ask us to stop processing your data. You can also request that the data we hold about you is given back to you or given to another service provider in a commonly used format. This is called data portability. You are also entitled to a copy of the information we hold about you. However, there are some restrictions that apply to these requests, such as where we have overriding legal requirements we have to comply with. To find out more about your rights, visit the **ICO website** or to make a request please contact the Data Protection Officer on **information.governance@rcpch.ac.uk** or writing to: **Information Governance Manager, RCPCH, 5-11 Theobalds Road, London WC1X 8SH.**

The College and its systems have security measures in place to protect the loss and alteration of information under our control If you have any concerns about the way your personal data is handled, please contact the College in the first instance. If you are still unhappy you do also have the right to complain to the ICO by contacting: **casework@ico.org.uk**.

CHILDREN, YOUNG PEOPLE AND PARENTS/CARERS

Data Protection Legislation

In accordance with Data Protection legislation, we have a legal duty to protect any information we collect from you.

We process both special category data and personal data about you. This data may be used and shared with or transferred to other organisations and individuals, including the Examinations team, the Finance team, UK hosts and examiners who are involved in the planning, management and delivery of examinations held in the UK. We will keep your child's name confidential. All information we process will be stored securely in line with data protection legislation and will only be shared using secured channels.

For children and young people (CYP) and their parents/carers assisting with UK exams, we process:

- Parent/carer name, signature and email address in order to provide a voucher for a minor. This is for the College to be in compliance with HMRC regulations regarding the receipt of vouchers for minors. Without this information, we might not be able to provide you with a voucher.

- Health information about the children and young people volunteering to assist us in the delivery of examinations. We collect this information in order to properly assess examination candidates. This information will be securely destroyed once the examination process has been completed.

Your Rights

You have certain rights with regards to the data we hold about you. You can ask us to delete your personal data, change any inaccuracies, restrict what we use your personal data for or ask us to stop processing your data. You can also request that the data we hold about you is given back to you or given to another service provider in a commonly used format. This is called data portability. You are also entitled to a copy of the information we hold about you. However, there are some restrictions that apply to these requests, such as where we have overriding legal requirements we have to comply with. To find out more about your rights, visit the **ICO website** or to make a request please contact the Data Protection Officer on **information.governance@rcpch.ac.uk** or writing to: **Information Governance Manager, RCPCH, 5-11 Theobalds Road, London WC1X 8SH.**

The College and its systems have security measures in place to protect the loss and alteration of information under our control. If you have any concerns about the way your personal data is handled, please contact the College in the first instance. If you are still unhappy you do also have the right to complain to the ICO by contacting: **casework@ico.org.uk**.

CHANGES TO THIS POLICY

These terms are subject to change at any time by the RCPCH. Any such changes will be posted online. Please check these terms on a regular basis to make sure you are aware of any changes made by the RCPCH. Your continued engagement with the examination process after changes are posted indicates that you agree to these terms as updated and/or amended.

If the privacy policy changes in any way, we will place an updated version on the website. Regularly reviewing the privacy policy page ensures you are always aware of what information we collect, how we use it and under what circumstances, if any, we will share it with other parties.

To see all MRCPCH and DCH examination rules and regulations, go to www.rcpch.ac.uk/exam-rules