



ePortfolio Privacy Notice

This privacy notice explains how RCPCH handles the data we hold about you on ePortfolio, the lifelong learning online portfolio for paediatricians and paediatric trainees, and your access rights.

Who we are

We are the Royal College of Paediatrics and Child Health (RCPCH), 5-11 Theobalds Road, London, WC1X 8SH (telephone: +44 (0)20 7092 6000).

The contact details for the Data Protection Officer are the same as above or via email to:

Information.Governance@rcpch.ac.uk

Where do we get the data from if not directly from you?

We receive trainee data from external organisations notifying us of information relating to recruitment, registration, exams, training and certification. For example, we receive ARCP outcomes, NTN and Training posts, including working less than full time from your Postgraduate Deanery or LETB.

From within RCPCH we use your name and GMC number as provided by you either as part of your RCPCH Membership and/or Recruitment application. All this information will be visible to you on your ePortfolio.

Why do we collect this information?

Trainees and those applying for CESR

We are required to keep your training data for the administration of specialist registration and certification by the General Medical Council (GMC) under the Medical Act 1983. It is mandated by our GMC approved curriculum that this information must be maintained on an ePortfolio.

Non-trainees (e.g. Consultants, SAS doctors, other career grade doctors)

Our lawful basis for processing your personal data is that it is necessary for our performance of a contract with you or because we are intending to enter into a contract with you. We need to process your personal data so that we can provide you with a personal account on ePortfolio for your CPD and also to enable you to fulfil any other roles you may hold relevant to postgraduate training, e.g. educational supervisor, training programme director etc.

ePortfolio integrates with your RCPCH member account so changes you make to your RCPCH account, such as updating your email address, will also update your ePortfolio account.

Specifically, we may use your personal data for the following purposes:

- To communicate with you about the ePortfolio service and any maintenance via the relevant dashboard(s). It is your responsibility to ensure that your personal details are kept up to date and accurate (all users);
- To provide supporting evidence for your training progression (trainees only);
- Managing the provision of training programmes including recommending entry onto the GMC specialist register for CCT or CESR to the GMC (trainees and those applying for CESR);
- Revalidation (trainees only);
- Quality assurance of training programmes;
- Maintaining patient safety. We may be required under Section 35A of the Medical Act 1983 to disclose information held on ePortfolio to the GMC if it is relevant to a Fitness to Practice investigation. If the GMC allow us to, we will inform the individual of the request (all users);
- We will also share anonymised data with the RCPCH Workforce team for Workforce planning as it is in our legitimate interests to inform workforce planning and child health policy in the future (all users).
- Compliance with regulatory and legal obligations (all users)

Who might we share your information with?

We will only ever share your data where we have a legal reason to do so. As part of the process of administering your training programme or application for registration on the GMC specialist register, we will share your information with the following (as appropriate):

- The General Medical Council.
- Postgraduate Medical Deans and their staff (Deaneries, LETBs and Heads of School), Training Programme Directors, Educational and Clinical Supervisors and College Tutors. Access permissions are restricted on ePortfolio for each role so that they can only view and edit the information as required by their role.
- If we are asked to verify training and qualifications with potential employers or other Royal Medical Colleges.

Your personal data will not be transferred outside of the EEA.

How can I access the information you hold about me?

Under GDPR you have certain rights regarding the data we hold about you. You can ask us to:

- **Right of access and right to have a copy of your personal data in a standard format (data portability).** You can ask us for a copy of the information that we hold about you. The right to data portability only applies for non-trainees where we are processing your data with consent or as part of a contract with you and where technically possible.
- **Change any factual errors in current systems and processes.** Some of your personal data you can change yourself via your RCPCH website account. Some of your data you cannot change yourself as it has been added by other people. If you think some of this data is inaccurate, please let us know so that we can investigate.
- **delete your personal data (called a right to be forgotten).** For trainee data, we are legally required to keep some data permanently to evidence requirements for completion of training. For this reason, we cannot delete all personal data. We can delete non-essential contact information not relating to training on request, but this may affect our ability to offer you training if your training is still ongoing. For non-trainees, this will only apply in certain circumstances and will be considered on a case by case basis in line with GDPR.
- **Restrict the use of your data.** You can request that we deactivate your account so that we only store your data but undertake no further processing, but this is only available under certain circumstances. For training, if this right is applicable, we can only do this if you are no longer in training or have completed training. If you are still in active training, we cannot do this.
- **Object to processing.** You can ask that we stop using data that is not necessary for fulfilling our regulatory obligations ahead of the 12-year deletion period. However, we cannot do this whilst you are still in training. For non-trainees, if you object to processing and no longer want to use the service, we will archive your account.

To find out more about your rights visit the ICO website or to make a request contact the Data Protection Officer Information.Governance@rcpch.ac.uk or write to [Information Governance Manager](#), RCPCH, 5-11 Theobalds Road, London WC1X 8SH.

In accordance with Data Protection Legislation, we have a legal duty to protect any information we collect from you and we have measures in place to ensure your data is securely and safely stored. You do have the right to complain to the

ICO if you have concerns about the way your personal data is being handled:
casework@ico.org.uk.

How long do we keep hold of your information for?

We will retain your data for the duration of your training and ongoing for the purposes of CPD recording. In line with our Retention Policy, if you do not login to your ePortfolio account for a period of two years, we reserve the right to archive your account. If you do not login or request access to your data for a further 10 years after the point of archiving, we will delete your data in its entirety from ePortfolio. If you are a trainee, we will also retain a record on our membership database that you have completed training. This will be held indefinitely for audit purposes or for any legal requests made by the GMC.

Last updated 02/07/2019