

## UK-Med – Privacy Notice

### What is the purpose of this document?

UK-Med is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your relationship with us, in accordance with the General Data Protection Regulation (GDPR).

It applies to all members of the UK-Med Community of Practice.

UK-Med is a Charitable Incorporated Organisation (registered with number 1166956). Our main place of business is at UK-Med, c/o Humanitarian & Conflict Response Institute, C1.54 Ellen Wilkinson Building, The University of Manchester, Oxford Road, Manchester M13 9PL. Our telephone number is 0161 275 7873.

UK-Med is a "*data controller*". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to current and former members of the UK-Med Community of Practice. We may update this notice at any time but if we do so, we will provide you with an updated copy of this notice as soon as reasonably practical.

It is important that you read and retain this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information and what your rights are under the data protection legislation.

### Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

## The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are certain types of more sensitive personal data which require a higher level of protection, such as information about a person's health or sexual orientation. Information about criminal convictions also warrants this higher level of protection.

We will collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- Gender.
- CV.
- Marital status.
- Next of kin and emergency contact information.
- Your speciality and grade.
- Employment status.
- Your registration body and registration number.
- The year in which you were initially registered.
- Passport details.
- Certificates of education.
- Photographic image(s).

We may also collect, store and use the following more sensitive types of personal information:

- Information about your health, including any medical condition, health and sickness records, including:
  - blood group;
  - details of any allergies; and
  - details of any additional support needs (for example as a result of a disability, specific learning difficulty or medical condition).
- Information about criminal convictions and offences.

## **How is your personal information collected?**

We initially collect personal information about potential members of the UK-Med Community of Practice through our application process, either directly from potential members of the UK-Med Community of Practice or sometimes from a background check provider. Either you or we may update your personal information from time to time.

We may sometimes collect additional information from third parties including third -parties that provide pre-deployment medicals (such as Well Travelled Clinics) and background check agencies.

We may collect additional personal information in the course of any deployment-related activities whilst you are a member of the UK-Med Community of Practice.

## **How we will use information about you**

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform the contract we have entered into with you.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for legitimate interests pursued by us or a third party and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest or for official purposes.

## **Situations in which we will use your personal information**

We need all the categories of information in the list above primarily to allow us to facilitate any deployment and to enable us to comply with legal obligations. In some cases we may use your personal information to pursue legitimate interests, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below.

- Making a decision about your application to join the UK-Med Community of Practice.
- To administer and enable your participation in the UK-Med Community of Practice and the UK-Med Register and membership of a UK Emergency Medical Team (UKEMT).
- To respond effectively and efficiently to the needs of our work in international emergency humanitarian assistance.
- Checking you are legally entitled to work in the UK and overseas.
- Administering the terms of membership of the UK-Med Community of Practice.
- Business management and planning.

- Conducting performance reviews and managing performance.
- Assessing qualifications for a particular role or task.
- Making decisions about your continued engagement.
- Education, training and development requirements.
- Dealing with legal disputes involving you, or other employees, workers, contractors and members of the UK-Med Community of Practice including accidents that may occur whilst you are a member of the UK-Med Community of Practice.
- Ascertaining your fitness to work.
- Complying with health and safety obligations.
- To contact you.
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- To periodically contact you with updates and news relating to UK-Med and for feedback on the resources made available to you.
- To provide you with a photo ID card.
- To host your online profile.
- To manage your membership of an on-call register or a UKEMT team.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

### **If you fail to provide personal information**

If you fail to provide certain information when requested, we may not be able to consider your application to join the UK-Med Community of Practice, or to deploy you in the field if you are a member, or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of members of the UK-Med Community of Practice).

### **Change of purpose**

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## How we use particularly sensitive personal information

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations or exercise rights in connection with your membership of the UK-Med Community of Practice.
3. Where it is needed in the public interest, such as for equal opportunities monitoring.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

## Our obligations in relation to particularly sensitive personal information

We will use your particularly sensitive personal information in the following ways:

- We will use information about your physical or mental health, or disability status, to ensure your health and safety whilst deployed.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

## Do we need your consent?

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your membership of the UK-Med Community of Practice that you agree to any request for consent from us. However, we may not be able to accept you as a member of the UK-Med Community of Practice or deploy you if you are not willing to consent to the disclosure of special categories of personal data.

## Information about criminal convictions

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our data protection policy.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We envisage that we will hold information about criminal convictions.

We only collect information about criminal convictions if it is appropriate given the nature of your role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the application process or we may be notified of such information directly by you in the course of your membership of the UK-Med Community of Practice.

Subject to a risk assessment, we may collect and process disclosure and barring data (DBS) on past criminal convictions (for example for clinicians proposed for on-call and/or deployment teams or other roles covered by the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975). We consider this data highly sensitive and its handling will be undertaken in line with the DBS Code of Conduct.

We are allowed to use your personal information in this way with your consent, which we will seek during the application process. We have in place an appropriate policy and safeguards which we are required by law to maintain when processing such data.

### **Automated decision-making**

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

1. Where we have notified you of the decision and given you 21 days to request a reconsideration.
2. Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.
3. In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

### **Data sharing**

We may have to share your data with third parties, including third-party service providers.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU.

If we do, you can expect a similar degree of protection in respect of your personal information.

### **Why might you share my personal information with third parties?**

We will share your personal information with third parties where required by law, where it is necessary to administer our relationship with you or where we have another legitimate interest in doing so.

### **Which third-parties process my personal information?**

We work in partnership with the Department for International Development (DFID) and other recognised partners, including Humanity and Inclusion (HI). If you are a rehabilitation or spinal injury specialist we will need to share your Community of Practice profile information and associated data with HI (including your CV as required), and on occasion other partners to facilitate training and deployment. Please contact us for a full list of specialties that fall within this partnership.

In the event of a sudden onset-disaster, DFID or a recognised NGO partner may request that we share CVs of members of the UK-Med Community of Practice that might meet specific requirements and/or considerations. Further data will be shared with DFID at the point of deployment, for example your name, contact number, employing Trust, speciality, email, address and passport details.

If you are confirmed as a member of a training or deployment team led by a recognised partner (such as Humanity and Inclusion (HI)), we will share essential personal data e.g. name, mobile telephone number, email address, medical outcome result, passport details and next of kin, registration number, CV and we may ask you to provide additional documentation such as registration and qualification certificates. If you have any concerns about the use of data for this purpose, please contact the UK-Med Membership Team by email to [enquiries@uk-med.org](mailto:enquiries@uk-med.org) or by writing to Membership Team UK-Med c/o Humanitarian Conflict Response Institute C1.54 Ellen Wilkinson Building University of Manchester Oxford Road M13 9PL. At the time of deployment overseas, we are required to share your name and professional registration data and on request, certificates of education and registration, with partner organisations in destination countries to ensure authority to practice.

Your personal data will not be shared with next of kin unless there is judged to be a genuine and serious threat to your health or safety.

### **How secure is my information with third-party service providers?**

All our third-party providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-parties to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **What about other third parties?**

We may share your personal information with other third parties, for example in the context of the restructuring of UK-Med. In this situation we will, so far as possible, share anonymised data with the other parties before the transaction completes. Once the transaction is completed, we will share your personal data with the other parties if and to the extent required under the terms of the transaction.

We may also need to share your personal information with a regulator or to otherwise comply with the law.

## **Transferring information outside the EU**

We may transfer the personal information we collect about you to countries outside the EU to which you are to be deployed for the purposes of facilitating your deployment. We will advise you whether or not there is an adequacy decision by the European Commission in respect of any such country. This will determine whether the country to which we transfer your data is deemed to provide an adequate level of protection for your personal information.

However, to ensure that your personal information does receive an adequate level of protection we will put in place appropriate measures to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the EU and UK laws on data protection. If you require further information about these protective measures, you can request it from the Membership Team by email to [enquiries@uk-med.org](mailto:enquiries@uk-med.org) or by writing to Membership Team UK-Med c/o Humanitarian Conflict Response Institute C1.54 Ellen Wilkinson Building University of Manchester Oxford Road M13 9PL.

## **Data security**

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from the Membership Team by email to [enquiries@uk-med.org](mailto:enquiries@uk-med.org) or by writing to Membership Team UK-Med c/o Humanitarian Conflict Response Institute C1.54 Ellen Wilkinson Building University of Manchester Oxford Road M13 9PL.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## **Data retention**

### **How long will you use my information for?**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your personal information are available in our retention policy which is available from our Membership Team by email to [enquiries@uk-med.org](mailto:enquiries@uk-med.org) or by writing to Membership Team, UK-Med c/o Humanitarian Conflict Response Institute C1.54 Ellen Wilkinson Building University of Manchester Oxford Road M13 9PL.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a member of the UK-Med Community of Practice we will retain and securely destroy your personal information in accordance with our data retention policy.

### **Rights of access, correction, erasure, and restriction**

#### **Your duty to inform us of changes**

It is essential that the personal information we hold about you is accurate and current particularly in relation to professional data, current CV and contact details. Please keep us informed if your personal information changes during your membership of the UK-Med Community of Practice. We may contact you periodically to update your details.

#### **Your rights in connection with personal information**

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Membership Team by email to [enquiries@uk-med.org](mailto:enquiries@uk-med.org) or by writing to Membership Team, UK-Med c/o Humanitarian Conflict Response Institute C1.54 Ellen Wilkinson Building University of Manchester Oxford Road M13 9PL.

#### **No fee usually required**

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

### **Right to withdraw consent**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Membership Team by email to [enquiries@uk-med.org](mailto:enquiries@uk-med.org) or by writing to Membership Team, UK-Med c/o Humanitarian Conflict Response Institute C1.54 Ellen Wilkinson Building University of Manchester Oxford Road M13 9PL. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

### **Changes to this privacy notice**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

**If you have any questions about this privacy notice, please contact the UK-Med Membership Team by email to [enquiries@uk-med.org](mailto:enquiries@uk-med.org) or by writing to Membership Team, UK-Med c/o Humanitarian Conflict Response Institute C1.54 Ellen Wilkinson Building University of Manchester Oxford Road M13 9PL.**