

DATA PROTECTION POLICY

The College is preparing a separate document that gives guidance on trainee logbooks

Background

The Data Protection Act 1998 applies, subject to certain exemptions, to the processing of data which are deemed to be personal data. Personal data is that which enables the identification of a living individual, either directly from that information or from additional information which is in the possession of, or is likely to come into the possession of, anyone processing that data. It includes actual information and expressions of opinion about the individual and it can be held electronically or on paper records.

There are no special obligations or exemptions that relate specifically to charities and the College therefore has responsibilities under the act. Regulation of the 1998 Act lies with the Information Commissioner's Office, which is a government department

Information held by the College

The personal data that is entered on the College databases includes membership identification data (name, date of birth, home address, ethnicity etc), examination details and attendance on courses.

The data is primarily used for the administration of the College by its staff and elected officials. It is also used to send out to members information that relates to College membership, College services and that which the College believes will be of professional benefit.

Generally, the College will not pass members' personal data to any outside organisations or individuals. The two exceptions to this rule are:

1. Address details may be passed to a third-party organisation directly contracted by the College to fulfil a specific College administrative task on its behalf.
2. Address details may be passed to a third-party organisation or to an individual for research projects or educational events which have individually been approved by the Honorary Secretary.

Protection of data

The College will take all reasonable technical precautions to ensure that data is safely collected and stored. In practice this means that the membership database can only be altered by a limited number of staff and the data is password protected.

Confidential papers are security shredded after meetings and committee members who have been sent data on electronic devices are required to delete the data after the meeting has ended.

The relevant departments operate a "clear desk" policy so that confidential documents are routinely filed away.

Emails are routinely deleted after two years.

Paperwork relating to appointments is routinely destroyed once the probation period has passed.

The College does not ever sell its membership mailing list or e-mail list, to advertisers

The College does not employ direct marketing techniques

Members' Rights

Members' have the right to see the personal data that the College holds that relates to them. This applies to information held on a computer or organised in a filing system. The College is entitled to make a charge for the provision of such data (or any part of it) and it may seek information from the enquirer to

limit the area of search. Legal advice and police documents are protected from disclosure.

Members' Lists

In response to members' wishes, the College is investigating the publication of membership lists on the website. The details are yet to be agreed but it is clear that prior consent of members will be required if any information is to be put into the public domain. Within the members area, prior consent will be required if email addresses are to be published.

Kathy Evans
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Review date: April 2010

In 2015 the RCOphth commissioned Andstrom Consulting Ltd to review its Data Protection Policy and the report is expected late Spring 2016