

RCVS Privacy policy

1. Introduction

The Royal College of Veterinary Surgeons (RCVS) aims to enhance society through improved animal health and welfare. We do this by setting, upholding and advancing the educational, ethical and clinical standards of veterinary surgeons and veterinary nurses.

Whether you have a professional or public link to the RCVS, we aim to be transparent about the data we hold about you. As the regulatory body for the veterinary professions, we must retain and process personal data in order to fulfil our statutory and charter functions acting in the public interest. Aside from these, we may retain and process personal information in order to implement various related procedures, programmes, policies and College-wide objectives.

The purpose of this policy is to give you a clear explanation about how we collect and process your personal data. We are committed to protecting your personal and sensitive personal data.

2. How we define personal information (personal data)

'Personal data' means information which relates to a living person who can be identified from that data (a 'data subject') on its own, or when taken together with other data that is likely to come into our possession. This may be, for example, a name, address, phone number, email address or even an IP address. It does not include anonymised data.

This policy applies to all personal data, whether it is stored electronically, on paper or on other materials. We will comply with the lawful basis processing requirements under Article 6 of the GDPR.

3. How we define sensitive personal data (Special Category Data)

Special categories of personal data are those which contain information about your:

- race or ethnic origin
- political opinions
- religious or philosophical beliefs
- trade union membership
- genetic or biometric data
- health, and/or
- sex life and sexual orientation

We recognise the need for stronger protections in terms of storage and retention of sensitive personal data both in physical and electronic files.

When processing sensitive personal data, we will comply with the lawful basis for processing requirements for sensitive personal data under the GDPR.

4. How long we hold personal data for

We will only retain personal data for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, or reporting requirements.

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.

This means that we may keep your personal data after a particular matter or exchange has concluded, for record-keeping purposes, and to be able to respond to queries.

In some cases, we are also obliged to hold personal data to comply with legal or statutory obligations. Generally, we will retain information for between five and ten years, but this depends on the nature of the matter. In some areas, such as records of members, we currently hold this information indefinitely.

If you would like more information on our retention policy for your particular matter then please [contact us](#).

5. Types of data we collect/what we use it for

We may collect and process different kinds of personal data about you depending on your relationship with us and why you are in contact with us. We have broken down the types of personal data we collect, and what we use it for, by broad subject areas within the RCVS, as follows:

Registration and contact information

Under the legal obligations of the Veterinary Surgeons Act 1966 and public task / public interest functions of our Royal Charter 2015, we maintain registers of veterinary surgeons and veterinary nurses. We do this to ensure that the veterinary professionals on our registers are suitably qualified.

We therefore hold data about veterinary surgeons and veterinary nurses who are currently registered. We also hold data about student veterinary nurses veterinary surgeons and veterinary nurses who apply for registration and those who are no longer registered.

In order to meet registration requirements we hold personal data, eg name(s) address(es), date of birth, qualifications and other data surrounding entitlement to registration and continued upkeep of the register.

As part of the registration process, we will also collect data about criminal convictions/adverse findings that have been supplied as part of the registration application or annual renewal process. These will be processed by our Registration and Professional Conduct departments (see professional conduct section, below, for more details).

We may hold additional contact information, such as email addresses and telephone numbers. We do this in order to contact veterinary surgeons and veterinary nurses about their registration, fees, and/or concerns raised about them, and other RCVS-related matters. We will also contact veterinary surgeons and veterinary nurses with relevant news and information, such as updates to the Code of Professional Conduct, Supplementary Guidance and *RCVS News*.

Professional Conduct - Enquiries/Concerns/Disciplinary

As the regulator of veterinary surgeons and as part of our legal obligation under the Veterinary Surgeons Act 1966, we are required to uphold professional standards. This includes maintaining a Preliminary Investigation Committee and a Disciplinary Committee.

We also regulate veterinary nurses, on grounds of public task/public interest under the RCVS Royal Charter of 2015, and similarly maintain a Registered Veterinary Nurse Preliminary Investigation Committee and Registered Veterinary Nurse Disciplinary Committee.

As an initial step, we operate an Enquires process to determine if any matter raised should be dealt with through our concerns process; if not, individuals may be signposted to the [Veterinary Client Mediation Service \(VCMS\)](#).

Depending on the seriousness of an allegation, concerns may proceed to the Preliminary Investigation Committee and then to a Disciplinary Committee hearing. The Professional Conduct Department will process personal data throughout the various stages of the enquiry/concerns process. This will involve collecting personal data from veterinary surgeons, veterinary nurses and members of the public, eg name(s) address(es), telephone and email contact details.

We will also collect details about fitness to practice allegations, details of investigations carried out and records of the outcome of our investigations, as well as records of Disciplinary Committee hearings.

Personal data may be shared amongst those involved in the concerns/complaints investigation process, so that copies of complaints and documents submitted by complainants in connection with a complaint and witness statements (if appropriate) may be sent to registrants to enable them to respond to allegations made; copies of responses to complaints will be sent to the complainant.

We may also share complaints information with experts as well as RCVS-appointed solicitors and external counsel who advocate on our behalf during Disciplinary Committee hearings. Complaint information will also be shared as required with members of the RCVS Preliminary Investigation Committee / Disciplinary Committee and its Legal Assessors.

Sensitive personal data (Special Category Data)

We may also hold sensitive personal data. Most commonly, this relates to the health of a veterinary surgeon or veterinary nurse in the context of a concern or enquiry raised, or under the RCVS Health Protocol; via Registration as part of an application for registration or annual renewal process; or, as reasonable adjustment requests in relation to examinations.

If you volunteer such information in such circumstances, we will retain and consider it for that purpose and we will do so on the basis that you have explicitly consented to our doing so. We will not use the data for any other purpose.

Criminal conviction data

We will hold personal data in relation to criminal allegations, proceedings or convictions. We have authority for the processing of such criminal conviction data as part of our legal/public interest duties as a regulator.

Standards and advice

In order to uphold the standards of the profession, and provide guidance to registrants and the public, we will hold personal data on both legal-obligation and public-interest grounds.

The standards and advice team will hold personal data of veterinary surgeons, veterinary nurses and members of the public. This will include details such as names(s), address(es), telephone numbers, email address(es), details of enquiries raised, and advice and guidance given.

Educational information

As part of our legal obligations under the Veterinary Surgeons Act 1966 and public task/interest functions in terms of our Royal Charter of 2015, we uphold the educational standards within the veterinary and veterinary nursing professions.

PDR and CPD

The Education Department monitors the Professional Development Phase (PDP) for veterinary surgeons and continuing professional development (CPD) records of veterinary surgeons and veterinary nurses in order to ensure that they meet the requirements specified in the *RCVS Code of Professional Conduct*.

The personal data that we hold consists of name(s) address(es) emails and telephone numbers. If you are recording your PDP/CPD on the secured electronic professional development record (PDR) there will be some personal data held on this system.

Statutory Membership Exam

As part of our statutory duties, we hold a statutory examination for membership annually. In order to assess whether a veterinary surgeon is eligible to sit the examination, we require a degree certificate, grades and university of qualification, as well as other personal information surrounding entitlement to undertake the examination and to register following success in the examination.

Any requests for reasonable adjustments or withdrawal from examinations may include sensitive personal information. If you volunteer such information in such circumstances, we will retain and consider it for that purpose and we will do so on the basis that you have explicitly consented to our doing so. We will not use the data for any other purpose.

VN pre-registration exam

As part of the RCVS Charter/public functions, our Veterinary Nursing Department holds a pre-registration examination for those nurses who do not hold a UK-accredited qualification to assess whether they are eligible to enter the register of veterinary nurses.

In order to process this we require a veterinary nursing qualification, grades and university of qualification, as well as other personal data surrounding entitlement to undertake this examination.

Any requests for reasonable adjustments or withdrawal from nursing examinations may include sensitive personal information. If you volunteer such information in such circumstances, we will retain and consider it for that purpose and we will do so on the basis that you have explicitly consented to our doing so. We will not use the data for any other purpose.

Advanced Practitioners, Specialists and Fellows

For those applying for Advanced Practitioner status, Specialist status and/or to join the RCVS Fellowship, we will hold personal data in order to make a judgment as to whether our criteria are being met.

In addition, we would hold personal data of veterinary surgeons registered to undertake the RCVS Certificate in Advanced Veterinary Practice or RCVS Diplomas, and veterinary nurses registered to undertake the Diploma in Advanced Veterinary Nursing. This we do on the basis of the consent of those supplying us with the information.

Accrediting veterinary qualifications

We accredit and monitor institutions awarding veterinary degrees and veterinary nursing license to practice qualifications.

For veterinary surgeons and veterinary nurses as well as for student representatives undertaking university or awarding organisation visits we hold personal data as required in order to communicate with a visiting team in preparation for, and during a visit to, a veterinary school.

Practice Standards Scheme

The Practice Standards Scheme (PSS) is a voluntary initiative to accredit veterinary practices in the UK. Through setting standards and carrying out regular assessments, the Scheme aims to promote and maintain the highest standards of veterinary care.

Generally, we do not process personal data as part of the administration of this scheme, however, any personal data that is held is held on a contractual basis.

Financial information

Financial information will be processed in order to comply with HMRC and legislative requirements.

The RCVS Finance Department holds the following financial information:

- Personal data of suppliers and expense claimants including their personal bank information, name(s) and address(es).
- Personal bank details of all RCVS members in order to collect annual renewal fee by direct debit.
- Personal financial information for the administration of payroll to internal and external employees and for the administration of pensions.

Communications

We hold and use data (email addresses) to allow us to communicate with veterinary surgeons and veterinary nurses on a regular basis, to provide information on a wide variety of relevant issues including our news and activities, advice and guidance updates, projects and initiatives, surveys and consultations, and reports on our other statutory and Royal Charter functions. We also issue announcements about, and invitations to, various meetings and events.

Communications preferences

Registered veterinary surgeons and veterinary nurses can manage which communications they wish to receive from us by [logging into My Account](#) on our website (although certain communications, such as *RCVS News*, are mandatory, to enable us to carry out our statutory responsibilities).

Councils elections

We also use registered veterinary surgeons' and veterinary nurses' postal addresses and email addresses during the annual RCVS Council and Veterinary Nurses Council elections. We share these with Electoral Reform Services Ltd – the independent ballot scrutineer – in order to disseminate ballot papers, candidate information booklets and voting security codes, and email registrants with information and reminders about voting.

Website

We use Google Analytics as a statistical tool to gather information in order for us to analyse the use of our website. Google Analytics stores this information as a cookie on the visitors' computer.

The statistical information generated by Google Analytics relating to our website is used to create internal reports to help improve the content and user experience of our website. For further information on Google Analytics use of data please refer to Google's Analytics' specific '[Safeguarding your Data](#)' page.

In order for us to provide you with a better website experience and communicate with you most effectively online we will use cookies by enabling us to monitor which pages you find useful and which you do not.

A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. Please see the [RCVS Cookie policy](#) for further information.

Media relations

Members of the media and the public may also request to receive our communications and press releases, and so provide us with an address / email address (and, for the media, a phone number) for us to hold and use for this purpose, which we do on the basis of consent.

VetGDP

You may provide us with your data for the administration of our VetGDP programme which is part of our members regulatory obligations. In order for a practice or a workplace to be able to support graduates on the VetGDP they need to be [1] an RCVS-Approved Graduate Development Practice/Workplace

As a code requirement members must maintain and develop the knowledge and skills relevant to their professional practice and competence, and comply with RCVS requirements on the Veterinary Graduate Development Programme (VetGDP) / Professional Development Phase (PDP) and continuing professional development (CPD). The appointed senior veterinary surgeon must ensure that the training provided to graduates meets the requirements of the VetGDP. Veterinary surgeons must provide the RCVS with their VetGDP/PDP and CPD records when requested to do so.

The VetGDP programme will be initially hosted on the Royal College of Veterinary Surgeons Charitable partner Royal College of Veterinary Surgeons Knowledge (RCVSK) Moodle web based portal.

The VetGDP training content will be initially hosted on our Moodle-based site, Learn. Data on Learn is secured using industry-standard mechanisms. All data is encrypted at rest and in transit. Access to RCVS servers and databases is restricted to specific members of staff, and firewalls restrict traffic appropriately.

Data will be securely passed from the members My Account area and managed on the Moodle portal.

The following data will be securely passed to Learn by the RCVS when You log in to Learn:

- Email address
- Full name
- RCVS reference number

Data will be securely passed from the RCVS My Account area and managed on the Moodle portal. Data will be stored indefinitely in order to meet regulatory requirement and enable the users to login to assess the course after completion Data will be processed on a legal obligation basis to carry RCVS regulatory functions and for members to fulfil their code requirements and will not be shared for any other purpose save for the purpose of administering the VetGDP programme.

[1] Or for 2021, working towards being an RCVS Approved Graduate Development Practice

6. How do we collect your data?

We collect your personal data in a number of ways, depending on your relationship with us.

When you give it to us directly

As a registered veterinary surgeon, veterinary nurse or member of the public, you may give us your personal data, in order to register with us, in connection with an enquiry or concerns or to access the services of our various departments, or to participate in our activities, or to take part in surveys.

Where a third party provides us with your data

Your personal data may be provided to us by third parties in certain circumstances, for example, where a concern or enquiry has been raised about you, or via another organisation who may host or run events.

Where it is available publicly

We may combine personal data you provide with information from other sources, such as newspapers and Companies House.

When you use our websites and designated products

We use cookies to measure visits to our website and use of digital products. This helps us to understand our website users and to improve the website experience for you. Please see our [Cookie policy](#).

We may collect other data from your use of the website, e.g. IP address.

Even though we may link to other websites from our website, this policy does not cover third-party websites and we cannot be responsible for the content or privacy policies of those sites.

When you connect with us on social media

We use several social media sites and applications, eg Facebook, Twitter and Instagram, to raise awareness about our work and to engage with veterinary professionals and members of the public.

Your use of these sites and applications will be subject to each one's terms and conditions. Please read their privacy and cookie notices carefully and ensure you are happy with how your information is being used by that site.

7. Disclosing your details to third parties

We deal with third-party processors in order to fulfil our statutory and Charter functions. We seek to use service providers who are able to provide appropriate data privacy and security standards.

There are certain circumstances under which we may disclose your personal information to third parties, which are as follows:

- We will disclose personal data to our service providers who process data on our behalf and on our instructions.
- Where we are under a duty to disclose your personal data in order to comply with our statutory and related functions or if asked to do so by the police or other authority investigating suspected illegal activities.
- If you hold an online account with the RCVS, we will disclose your data to organisations that you have agreed to under our consent process within your My Account profile. Your opt-in

preferences can be amended, giving you control over the information we may share about you.

- If any of your personal data/personal sensitive data is to be transferred to another country outside of the EU/EEA, we will ensure that suitable safeguards are in place before personal data is shared. We will not transfer, process or store your data anywhere that is outside of the European Economic Area, unless we have a contractual agreement in place that is of an equivalent standard to GDPR.

We do not sell personal data to third parties for any purpose.

8. Security of your personal data

We place the highest importance on the securing of your personal data. We employ industry-leading approaches to secure both your physical (paper) and digital (files and database entries) data. For cyber security reasons we do not publicly disclose the exact nature of the methods/ techniques we use to secure your data.

We make every effort to protect our databases against loss, theft, unauthorised access, disclosure, copying, unauthorised use or modification.

We only allow those of our employees who require access to such information in order to fulfil their duties to have such access; not every member or employee of the RCVS has or can have access to our databases or the personal data of registered veterinary professionals.

For security purposes we use software programs to monitor traffic to identify unauthorised attempts to upload or change personal data, to screen our system for viruses, or otherwise cause damage to our database.

In addition to a broad range of cyber security provision, across all our systems and information stores, certain sections of our websites and web applications encrypt your data in transit using SSL and comparable encryption standards.

When it is necessary for you to make a card payment, eg for renewal fees, information is handled by established industry partners and is not stored by us. However, no data transmission over the Internet can be guaranteed to be totally secure. As a result, whilst we strive to protect your personal information, we cannot ensure or warrant the security of any information which you send to us, and so you do so at your own risk.

When we outsource any processes, we require the third-party supplier to have appropriate security measures in place and be compliant with the GDPR principles. We require all third parties to respect the privacy of your personal data and to treat it in accordance with the law.

Third-party service providers should process your personal data for specified purposes and in accordance with our instructions and should not use your personal data for their own purposes.

9. Your Legal Rights

The General Data Protection Regulation provides certain rights for individuals. Please note that you may only use/benefit from these in defined circumstances.

For more information you can check the [Information Commissioner's Office \(ICO\) website](#) or contact us using the details in section 10 on this policy. We are committed to upholding these rights, which are as follows.

10. Complaints

If you have any queries or concerns then please contact us. If you are unhappy with the way in which we have handled your personal data, please contact us at:

Ms Eleanor Ferguson
Registrar

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