

The Faculty of Public Health (FPH) Data Protection Policy **Approved by the FPH Board 23rd September 2009**

The Faculty of Public Health (FPH) is the standard setting body for specialists in public health. FPH was established as a joint Faculty of the three Royal Colleges of Physicians of the United Kingdom in 1972 and is a registered charity.

In order to satisfy operational and legal obligations FPH processes and maintains personal information about its staff, members and other individuals. The types of personal data FPH may require includes information about current, past and prospective employees, FPH members, suppliers and other individuals with whom it has business or with whom it communicates.

FPH fully endorses and adheres to the eight principles of the Data Protection Act 1998 (the 'Act' for purposes of this policy). All FPH employees and other individuals who obtain, handle, process, disclose, transport and store personal data for FPH are expected to adhere to these principles.

The eight principles of Data Protection are that personal data must be:

- fairly and lawfully processed
- processed for specified and lawful purposes and not in any manner incompatible with those purposes
- adequate, relevant and not excessive
- accurate and kept up to date
- no kept for longer than is necessary
- processed in line with the data subjects' rights
- secure
- not transferred to countries outside the European Economic Area without adequate protection

FPH has put in place appropriate organisational and management controls to ensure it meets its obligations to observe these principles. These are outlined in the FPH Data Protection Procedures and Guidance document and summarised below.

Subject Consent

FPH will communicate the need to process personal data to all data subjects and seek consent from data subjects to process personal data. In some cases, if the data is sensitive, for example information about health, race or gender, express consent to process the data will be obtained.

Subject Access

FPH will ensure that the rights of individuals who are the subject of personal data held by FPH can be fully exercised. Including the right to:

- ask what information FPH holds about them and why;
- ask how to gain access to it;
- be informed how to keep it up to date and
- be informed what FPH is doing to comply with its obligations under the Act.

This is subject to certain exemptions which are set out in the Act and the FPH Data Protection Guidance and Procedures Manual. Any individual who wishes to exercise this right should make the request in writing using the Subject Access Request Form available from the Chief Executive or the FPH website: (insert link)

Publication of FPH information

FPH will seek permission from individuals before transferring any personal data to a third party such as media and will make clear from the outset the nature of the query and the ways in which any information given can be used.

Information that is already in the public domain is exempt from the Act and includes for example information on staff or members contained within externally circulated publications such as the Annual Reports and *ph.com*.

Disclosure of data

FPH will ensure that personal data are not disclosed to unauthorised third parties which includes family members, friends, government bodies and in certain circumstances, the Police without prior notification.

Data security

FPH will ensure that personal data are kept securely and adequate precautions taken against physical loss or damage regardless of whether it is held on paper, computer or other media.

Data retention and disposal

FPH will retain data only for the period of time required for processing in accordance with the Act and with other relevant laws. FPH will ensure that data is disposed of in a way that protects the rights and privacy of data subjects.

Employee supervision, awareness and training

FPH will:

- appoint someone with specific responsibility for data protection;
- ensure that everyone managing and handling personal information understands that they are contractually responsible for following good data protection practice;
- describe clearly methods of handling personal information;
- arrange for appropriate training for everyone managing and handling personal information;
- supervise appropriately everyone managing and handling personal information;
- ensure that staff deal with queries about personal information promptly and courteously;
- conduct a regular review and audit of the way personal information is managed;
- assess and evaluate regularly methods of handling personal information.

FPH reserves the right to modify this policy at any stage. It will carry out regular assessments of compliance with the Data Protection Act 1998.

For further information or for a copy of the FPH Data Protection Procedures and Guidance document please contact:

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