

Privacy Policy

[Last updated: 21st May 2018]

1. Privacy notice

This page explains our privacy policy and how we will use and protect any information about you that you give to us or that we collate when you visit this website, or undertake or participate in any The Christie PET-CT Academy training education and development (hereafter 'training').

This privacy Policy applies only to your use of The Christie PET-CT Academy website, Online Courses and Content and is intended to provide transparency regarding what personal data The Christie PET-CT Academy may hold about you, how it will be processed and stored, how long it will be retained and who may have access to your data.

Personal data is any information relating to an identified or identifiable living person (the data subject). An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number or factors specific to the physical, genetic or mental identity of that person, for example.

2. The Christie PET-CT Academy role in the NHS

THE CHRISTIE PET-CT ACADEMY is here to improve the quality of diagnostic imaging outcomes for patients through education, training and development of staff. The Christie PET-CT Academy aims to improve patient care and outcomes through diagnostic imaging (PET-CT in particular). All the information we collect is to support these objectives.

3. What this privacy statement covers

This privacy statement only covers the processing of personal data by The Christie PET-CT Academy that The Christie PET-CT Academy has obtained from data subjects accessing The Christie PET-CT Academy website, Online Courses and Content and from its provision of services and exercise of functions. It does not cover the processing of data by any sites that can be linked to or from The Christie PET-CT Academy websites, so you should always be aware when you are moving to another site and read the privacy statement on that website.

When providing The Christie PET-CT Academy with any of your personal data for the first time, for example, when you enrol in any The Christie PET-CT Academy training, you will be asked to confirm that you have read and accepted the terms of this privacy statement. A copy of your acknowledgement will be retained for reference.

If our privacy policy changes in any way, we will place an updated version on this page. Regularly reviewing the page ensures you are always aware of what information we collect, how we use it and under what circumstances, if any, we will share it with other parties.

4. Why the Christie PET-CT Academy collects your personal data

Personal data may be collected from you via the website, training enrolment site (event bright), our ELearning platform (Moodle) and through our feedback processes. Personal data may also be obtained from your employing organisations in connection with the functions of The Christie PET-CT Academy.

Your personal data is collected and processed for the purposes of and in connection with the functions that The Christie PET-CT Academy performs with regard to workforce education and training. The collection and processing of such data is necessary for the purposes of those functions. In connection with training, The Christie PET-CT Academy collects and uses your personal information for the following purposes:

1. To manage your training programme
2. To quality assure training programmes and ensure that standards are maintained
3. To identify training needs for the PET-CT workforce
4. To maintain patient safety through the management of competencies and training records
5. To comply with legal and regulatory responsibilities including but not limited to IMER 2017
6. To contact you about training opportunities, events, surveys and information that may be of interest to you

We also collect and use personal information from you so that we can promote our services, to monitor our own accounts and records, to monitor our work, to report on progress made, and to let us fulfil our contractual obligations.

Further information about our use of your personal data in connection with training can be found in the 'Reference Guide for Postgraduate Specialty Training in the UK', also known as the 'Gold Guide'.

5. Collection and use of data from website Online Courses and Content users

When you access The Christie PET-CT Academy website Online Courses and Content, small amounts of information are sometimes placed on your device, including small files known as cookies. These pieces of information are used to improve services for you. For example, we use a series of cookies to monitor website speed and usage, as well as to ensure that any preferences you have selected previously are the same when you return to our website.

Google Analytics for example stores information about what pages you visit, how long you are on the site, how you got here and what you click on. Personal information (e.g. your name or address) is not however collected or stored so this information cannot be used to identify who you are. We do not allow Google to use or share our analytics data.

Full details on the cookies set by Google Analytics are published on the Google website. Google also publishes a browser add-on to allow you to choose that information about your website visit is not sent to Google Analytics.

On a number of pages we use 'plug ins' or embedded media. For example, we might embed YouTube videos in pages. The suppliers of these services may also set cookies on your device when you visit the pages where we have used this type of content. These are known as 'third-party' cookies. To opt-out of third-parties collecting any data regarding your interaction on our website, please refer to their websites for further information.

We will not use cookies to collect personal data about you. However, if you wish to restrict or block the cookies which are set by our websites, or indeed any other website, you can do this through your browser settings. The 'Help' function within your browser should tell you how. Alternatively, you may wish to visit www.aboutcookies.org which contains comprehensive information on how to do this on a wide variety of browsers. You will also find details on how to delete cookies from your machine as well as more general information about cookies. Please be aware that restricting cookies may impact on the functionality of our website.

The systems we do use to collect personal data can be seen in the table below:

System	Why	Data we hold	Duration
Event bright	Used to book onto PET-CT Academy face to face, blended learning & eLearning courses	Name Employer Job role email address telephone number ethnicity	3 to 6 years
Moodle	eLearning training platform	Name email address Job role unique identifier (generated from the data management system)	As long as the candidate wishes to access the training
Data management system	keep a record of training undertaken and when it will need to be retaken	Name Employer Job Role employee ref number Unique Identifier email address Training courses undertaken	3 to 6 years

7. The Christie PET-CT Academy as Data Controller

The Christie NHS Foundation Trust, whose registered office is at The Christie Hospital, Wilmslow Road, Manchester, M20 4BX, who will be the Data Controller of any personal data processed as described in this Privacy Policy, in respect of any personal data it holds concerning trainees in training, individuals employed by The Christie PET-CT Academy and individuals accessing The Christie PET-CT Academy website, Event bright and Moodle eLearning Platform.

8. Legal basis for processing

The GDPR requires that data controllers and organisations that process personal data demonstrate compliance with its provisions. This involves publishing our basis for lawful processing which can be broken into 3 categories

Purpose test: are you pursuing a legitimate interest?

Necessity test: is the processing necessary for that purpose?

Balancing test: do the individual's interests override the legitimate interest

As personal data is processed for the purposes of The Christie PET-CT Academy functions, The Christie PET-CT Academy's legal bases for the processing of personal data as listed in Article 6 of the GDPR are as follows:

- 6(1)(a) – Consent of the data subject
- 6(1)(b) – Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract

- 6(1)(c) – Processing is necessary for compliance with a legal obligation
- 6(1)(e) – Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller (National Contract)

Where The Christie PET-CT Academy website processes special categories of personal data, its additional legal bases for processing such data as listed in Article 9 of the GDPR are as follows:

- 9(2)(a) – Explicit consent of the data subject
- 9(2)(g) – Processing is necessary for reasons of substantial public interest
- 9(2)(h) – Processing is necessary for the purposes of occupational medicine, for the assessment of the working capacity of the employee, or the management of health and social care systems and services
- 9(2)(j) – Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes

Special categories of personal data include data relating to racial or ethnic origin, political opinions, religious beliefs, sexual orientation and data concerning health.

Please note that not all of the above legal bases will apply for each type of processing activity that may undertake. However, when processing any personal data for any particular purpose, one or more of the above legal bases will apply.

We may seek your consent for some processing activities, for example for sending out invitations to you to training events. If you do not give consent for us to use your data for these purposes, we will not use your data for these purposes, but your data may still be retained by us and used by us for other processing activities based on the above lawful conditions for processing.

6. Information that we may need to send you

We may occasionally have to send you information from, The Christie PET-CT Academy and will not send you generic information from other public authorities and government agencies on issues of government policy.

Transfers Abroad

The GDPR imposes restrictions on the transfer of personal data outside the European Union, to third countries or international organisations, in order to ensure that the level of protection of individuals afforded by the GDPR is not undermined.

Your data may only be transferred abroad where is assured that a third country, a territory or one or more specific sectors in the third country, or an international organisation ensures an adequate level of protection.

How we protect your personal data

The personal data we hold may be held as an electronic record on data systems managed by or as a paper record. These records are only accessed, seen and used as required and/or permitted by law by staff who need access to personal data so they can do their jobs and other partner organisations under data sharing agreements.

Electronic information is stored on secure servers. When you register, we will ask you to choose a password which enables you to access The Christie PET-CT Academy. You are responsible for keeping this password confidential. We ask you not to share this password with anyone.

The security of the data is assured through the implementation of The Christie NHS Foundation Trust policies on information governance management.

We make every effort to keep your personal information accurate and up to date, but in some cases we are reliant on you as the data subject to notify us of any necessary changes to your personal data. If you tell us of any changes in your circumstances, we can update the records with personal data you choose to share with us.

We retain personal information we collect from you where we have an ongoing legitimate need to do so (for example, to provide you with a service you have requested or to comply with accreditation by external bodies)

In line with the fifth data protection principle, when we have no ongoing legitimate need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

9. Sharing personal data

We may disclose your personal information to third parties when permitted by law including:

- with your consent;
- to our commissioning organisations on your behalf;
- to organisations who are undertaking research into the value of training in Diagnostic imaging;
- our provider of customer relationship management services (which allows us, for example, to send personalised email communications to you);
- These organisations' use of your personal data may be subject to their own privacy policies, which are available on their websites.
- if we are under a duty to disclose or share your information in order to comply with any legal obligation.

10. Your rights

Right to rectification and erasure

The GDPR extends and strengthens your rights as a data subject. Under the GDPR you have the right to rectification of inaccurate personal data and the right to request the erasure of your personal data. However, the right to erasure is not an absolute right and it may be that it is necessary for The Christie PET-CT Academy to continue to process your personal data for a number of lawful and legitimate reasons.

Right to object

You have the right in certain circumstances to ask The Christie PET-CT Academy to stop processing your personal data in relation to any The Christie PET-CT Academy services. As set out above, you can decide that you do not wish to receive information from The Christie PET-CT Academy about education, training. However, the right to object is not an absolute right and it may be that it is necessary in certain circumstances for The Christie PET-CT Academy to continue to process your personal data for a number of lawful and legitimate reasons.

If you object to the way in which The Christie PET-CT Academy is processing your personal information or if you wish to ask The Christie PET-CT Academy to stop processing your personal data, please contact by emailing petctacademy@christie.nhs.uk. However, if we do stop processing personal data about you, this may prevent The Christie PET-CT Academy from providing the best possible service to you.

Subject Access

You can access a copy of the information about you by emailing petctacademy@christie.nhs.uk

Data Portability

If you want to complain about how we have used your personal data or to know more about how your information will be used, please contact

The Education Programme Manger
The PET-CT Academy
The Christie School of Oncology
Wilmslow Road
Manchester M20 4BX
E-mail: petctacademy@christie.nhs.uk

Alternatively, you can also contact the Information Commissioner if you have a complaint about our processing of your personal data:

The Office of the Information Commissioner
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Your responsibilities

It is important that you work with us to ensure that the information we hold about you is accurate and up to date so please inform The Christie PET-CT Academy if any of your personal data needs to be updated or corrected.

11. Contact

If you have any questions about these terms and conditions or the practices of this website, please contact the Communications Team by email at: petctacademy@christie.nhs.uk

12. Document Management

Revision History

Version	Date	Summary of Changes
0.1	21-05-2018	1 st draft Implementing new GDPR standards