# Royal College of Physicians

## **Information governance**

## Full processing statement for permanent collections and collection management systems

Under the General Data Protection Regulation (GDPR), the RCP must provide comprehensive information on how records and information about living people are being collected, used and disposed of.

This processing statement explains what data the Library, archive and museums services (LAMS) team hold about you in our archive, museum and permanent print collections and collection management systems, why we hold it, how we protect it and how you can access your rights.

## What we do with your data

We selectively collect and retain information relating to the RCP's activities, which may include personal data and patient identifiable data. Where such data is retained, it is stored securely for future research use in accordance with Articles 5 and 89 of GDPR. We collect oral history recordings from members, outlining their lives and careers. LAMS' collecting policies are available upon request.

We collect and retain biographical information on current fellows. Upon notification of a fellow's death, this information is used to contact next of kin in order to identify a suitable author for the notice. We collect and retain contact information on past owners, donors, sellers, borrowers and lenders. In addition, contact information is collected and retained on all research visitors and picture library service users. This enables LAMS to retain full records of ownership and use of permanent collection items.

### Why we need to collect and use your data

Records of the activities of the RCP, its members, and other significant persons relating to medicine are necessary to inform future study on the history of medicine.

Under legitimate interest as a legal basis, information on current fellows' lives and careers is collected and retained to deliver a summary biographical notice on our Lives of the Fellows series, after death.

Information on past owners, donors, sellers, borrowers and lenders is retained in order to maintain full ownership and use records on permanent collection items. This is essential in terms of demonstrating authenticity and preserving collections. Information on research visitors is necessary to ensure appropriate access and security for collection items.

Under a contract legal basis, information on picture library users is necessary to confirm copyright ownership and licensing arrangements.

### Who we share your data with outside the RCP

Records containing personal or patient identifiable data retained for future research purposes will be closed for an appropriate period (e.g. 100 years for medical records); after such time, they will be shared with registered researchers, remote service users and RCP event attendees. Oral history recordings are published on the library catalogue and freely available, although closure periods to ensure confidentiality may be



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applied. Information on deceased fellows is shared with authors, to produce summary biographical notices on the Lives of the Fellows service. LAMS' access policies are available on request.

Information on past owners, donors, sellers, borrowers and lenders will be shared with Insurance providers to ensure adequate cover for collection items. Information will also be shared with borrowers, lenders and conservators, as appropriate, to manage collection items to professional standards. Information on past owners and sellers is sometimes shared with research visitors to facilitate their study of the collections.

## How long we keep your data and why

Information retained for future research, including records of the activities of the RCP, its members, and other significant persons relating to medicine will be retained permanently.

Information on Lives of the Fellows authors is retained until the biographical notice is published online and 1 year thereafter in case of amendments. However, authors may have other records as members, fellows or service users and these are unaffected.

Information on past owners, donors, sellers, borrowers and lenders will be retained permanently to demonstrate the provenance of the collection and to enable historical research.

Information on research visitors will be retained permanently to record usage for historical research and to comply with security requirements. Information on picture library users will be retained for 6 years to evidence compliance with copyright legislation.

Information on past owners, donors, sellers, borrowers, lenders of items which are reviewed for inclusion to the collection, but which are not acquired, or items which are removed from the permanent collections, will be deleted once the formal decision is made.

#### Where we got your data from, if not you

Personal data in department records may be transferred to the permanent collections if it is deemed by LAMS staff to have value for future research in the public benefit. Personal data may also appear in records donated to LAMS by a third party such as a physician or family member of a physician. All such records are assessed by LAMS staff for confidentiality considerations and closed for an appropriate period.

If you contacted another department (e.g. membership) to inform the RCP of a deceased fellow, your data will be forwarded to LAMS to deliver the Lives of the Fellows service. If an item is transferred to the RCP collections from another collection, or private owner, data relating to provenance and to the object's history will be passed to us alongside the item.

#### Your rights:

You have the right to access information which identifies you as a living person, held on RCP systems (Article 15). You also have the right to a copy of your data in a standard format, where technically possible (Article 20). For more information please contact the <u>data protection officer</u>.

Information on past owners, donors, sellers, borrowers, lenders, research visitors and service users is necessary for core collection management activities, copyright and as part of the permanent historical



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record. Information on living people which is included as an integral part of collection items is part of the permanent historical record. This data will not be deleted from our systems.

You do have the right to restrict the use of your data (Article 18), stop your data being used (Article 21), or have data deleted (Article 17) under certain circumstances. Information on current fellows will be deleted, on request, although this will mean that no future biographical summary will be published. For more information please contact the data protection officer.

## Who to contact at the RCP and how to complain

Contact the data protection officer if you have queries or concerns about the above.

If you are not satisfied with the service provided by the RCP, you have the right to complain to us or the UK regulator, the Information Commissioner. See their website for further information on GDPR and your rights.

If the use of your data changes, we will update this statement to reflect that. Regularly reviewing this information ensures you remain aware of what data we hold and use.