

Academy of Medical Sciences Programmes Privacy Policy

Overview

Privacy Policy (this "**Policy**"): governing personal information used by the Academy as part of the various career development programmes and activities, managed by it (together, the "**Programme(s)**") and which the Academy works on with various funders and other third party partners details of which can be found at www.acmedsci.ac.uk).

Details of the Programmes offered by the Academy which are covered by this Policy are available on the Academy's website at www.acmedsci.ac.uk.

If you attend any of our events in connection with a Programme or you are a Fellow of the Academy we will use your personal information in accordance with the terms of our general privacy policy which can be found on the website above. In all other respects, the Academy's general privacy policy will not apply to the way it uses personal information of Participants, Mentors, Referees, Mentoring Facilitators, Research Officers and Sponsors (each as defined below) in connection with the Programmes.

You have the right to object to our use of your personal information at any time in certain circumstances. For further information on all of your rights, please see the **Your rights in relation to your personal information** section below. Details of who to contact if you want to exercise these rights can be found in the **Contact information** section below.

Any questions regarding this Policy or the way in which the Academy uses personal information should be sent to the Academy's Data Representative by email to info@acmedsci.ac.uk or by telephoning 02031413200 or by writing to The Data Representative, The Academy of Medical Sciences, 41 Portland Place, London, W1B 1QH.

Key terms

This Policy sets out the basis on which the Academy will process any personal information received by it (including via its online application portal, any other Academy website established for the submission of Programme applications, e-mail or survey monkey) in relation to a Programme, from:

- (a) applicants/participants of the Mentoring Programme (including those that apply but are not eligible) ("**Mentee Participants**"), successful applicants/participants of the SUSTAIN Programmes ("**SUSTAIN Participants**") and unsuccessful applicants of the SUSTAIN Programmes ("**SUSTAIN Applicants**"), applicants/participants of the FLIER Programmes ("**FLIER Participants**") and unsuccessful applicants of the Leadership Programmes ("**FLIER Applicants**") and any other applicants/participants of other Programmes (together "**the Participants**");
- (b) mentors of the Programmes ("**the Mentors**"); and

(c) any referees, mentoring facilitators research officers and sponsors of an Applicant (the "**Referees**", "**Mentoring Facilitators**", "**Research Officers**" and "**Sponsors**", as applicable).

In this Policy, where the words "**personal information**" are used these words describe information that is about an individual and which identifies that person such as their name, address and email address. Personal information is protected by law and set out below is a summary of the personal information that the Academy collects, stores and uses in connection with the Programmes.

Where personal information is provided by an individual to the Academy which relates to a third party either during the application process or during participation in the Programmes, the individual who has provided that information confirms that it has the consent of the third party to share such personal information with the Academy and that the individual has made the information in this Policy available to the third party.

Responsibilities of the Academy

The Academy is the data controller for the purpose of data protection law, in respect of the personal information collected and used in relation to the Programmes. This is because the Academy dictates the purposes for which the personal information is used.

Personal information held by the Academy

The personal information that the Academy collects includes:

1. Information provided to the Academy

The personal information that Participants provide to the Academy as part of their application and/or nomination form will include, depending on the Programme, their:

- name;
- postal address;
- email address;
- telephone number;
- details of employment, degree/qualifications, type of research award/fellowship and awarding organisation and name of the individual who has sponsored your application;
- details of Host Institution/your employer;
- National Training Number (NTN(A));
- details of current research/project including title, start date and estimated end date;
- expected CCT date;
- details of PhD or equivalent, including title, department/institution, name of supervisor, date awarded;
- dietary requirements;
- access requirements;
- video footage;
- name of nominated Mentor and reasons for nomination; and

- co-coaching pair or groups.

SUSTAIN Participants and FLIER Participants may also be asked to provide, as part of a survey to facilitate the residential workshop and matching of mentoring and co-coaching pairs:

- dietary requirements;
- availability for workshops;
- career summary;
- details of interests and commitments outside work;
- motivation for applying; and
- profile photograph (which is shared between Mentors and Participants for the purposes of the residential workshop and which may be published on our website or used in case studies).

In relation to FLIER Participants we will also obtain details of any ideas for a work based project.

This information will be provided:

- in the course of communications between the Academy and the Participants (including by phone, email or otherwise);
- when Participants express an interest in a Programme by email or register for the online application portal, including Flexi-Grant;
- when Participants submit applications for the Programmes; and
- through forms, surveys and reports that are completed by the Participants before, during and after the relevant Programme is running.

Mentors will provide certain personal information to the Academy to create an online profile as a result of their involvement with a Participant or Programme.

This personal information will include:

- name;
- employment details including job title and broad research field;
- email address;
- your PA's email address;
- personal/research group websites;
- links to public social media accounts;
- details of career;
- details of key roles and responsibilities outside research/clinical work;
- mentoring experience;
- main hobbies/interests outside research;
- photo; and
- any preferences you express as to areas you are happy to mentor Participants on.

2. Information that the Academy collects from Participants

- (a) Information contained in and records of communications between the Academy and the Participants, including emails, letters and text messages;
- (b) Feedback from Participants relating to the Programmes;
- (c) Information regarding Participants' marketing preferences; and
- (d) Information relating to reasons for which mentoring, guidance and training is being sought by Participants.

3. Information that the Academy receives from other sources

- (a) Information that the Academy obtains from any letter of support provided by a Host Institution/Employer;
- (b) Information from individuals involved in the selection panel meetings as part of FLIER Applicants' application and FLIER and SUSTAIN Participants' ongoing review/evaluation process;
- (c) Information relating to FLIER and SUSTAIN Participants' website traffic data obtained from our online application portal;
- (d) The Academy receives personal information about Referees, Mentoring Facilitators, Research Officers and Sponsors from Participants but does not collect any personal information directly from Referees, Mentoring Facilitators, Research Officers or Sponsors. The personal information the Academy receives includes name, employer, job title and contact details.

What the law says

Under data protection law, the Academy can only use personal information where it has a lawful reason to do so. A lawful reason is one or more of the following:

- the Academy has the **consent** of the individual;
- the Academy is entering into or is **performing a contract**, for example, with the Applicant in relation to the provision of the relevant support/marketing;
- it is in the Academy's **legitimate interests**; and
- the Academy is under a **legal duty**.

When the Academy relies on its **legitimate interests** it means:

- the pursuit by the Academy of its aims and objectives, or those of a third party;

- compliance with applicable legal and regulatory obligations and any codes of conduct;
- improvement and development of the operation of the Academy and its provision of Programmes, or those of a third party; or
- the protection of the Academy's aims, objectives and business and those involved with it (such as its Fellows or employees or other stakeholders), or those of a third party.

How the Academy uses personal information

The Academy uses personal information in connection with applications for, and participation in relation to, the processing, management and operation of the Programmes for the purposes listed in the table below.

The Academy has set out its lawful reason for using the personal information it collects or has been provided with in relation to a Programme under the heading Legal Basis in the table below. Personal information will only be used as stated for the said purposes and/or in such other circumstances where there is an obligation to do so, or as the law permits, or where the Academy has consent to use it in these circumstances.

Where the Academy relies on legitimate interests, it has specified those interests in the table below.

| Purpose | Legal Basis |
|--|--|
| To check eligibility of Participants applying for the Programmes. | This is in the Academy's legitimate interests in order to process applications for the Programmes; administer the Programmes and further the Academy's aims, objectives and business. |
| To communicate with the Participants and Mentors. | This is in the Academy's legitimate interests in order to process applications for the Programmes and administer the Programmes and further the Academy's aims, objectives and business. |
| To improve and sustain the career development opportunities of the Programmes. | This is in the Academy's legitimate interests in order to administer the Programmes and further the Academy's aims, objectives and business. |
| To manage the Academy's activities. | This is in the Academy's legitimate interests because it furthers its aims, objectives and business. |

| Purpose | Legal Basis |
|---|--|
| To process the Programmes' application and acceptance forms. | This is in the Academy's legitimate interests in order to administer the Programmes. |
| To resolve queries relating to the Programmes. | This is in the Academy's legitimate interests in order to administer the Programmes. |
| To manage a dispute, appeal or complaint. | This is in the Academy's legitimate interests in order to administer the Programmes and benefit the interests of Participants and Mentors. |
| To operate the Programmes' processing and management information systems (including, without limitation, corresponding about the Programmes with any organisations that fund the Programmes). | This is in the Academy's legitimate interests in order to administer the Programmes. |
| To make payments of expenses where agreed with you. | This is in the Academy's legitimate interests to secure the contributions of facilitators/speakers at the Academy's events. |
| To manage and operate the Programmes. | This is in the Academy's legitimate interests in order to further its aims, objectives and business. |
| To match Participants with Mentors in relation to the Programmes. | This is in the Academy's legitimate interests in order to administer the Programmes. |
| To obtain UK and/or international selection panel comments. | This is in the Academy's legitimate interests in order to administer the Programmes. |
| To prepare materials to promote the Programmes. | This is in the Academy's legitimate interests in order to further the aims, objectives and business of the Academy. |
| To undertake an audit and statistical analysis and commission evaluation reports in relation to the evaluation of research and the study of trends in relation to the Programmes. | <p>This is in the Academy's legitimate interests in order to administer the Programmes effectively and efficiently and help further the aims, objectives and business of the Academy.</p> <p>The Academy may also rely on consent to use personal information in this way.</p> |

| Purpose | Legal Basis |
|---|---|
| To report to the Other Funders and the UK National Academies, on the impact of the Programmes. | This is in the Academy's legitimate interests in order to comply with its obligation to the Other Funders (defined below). |
| To inform applicants of any other Academy or UK National Academies (as defined below) of funding opportunities with us or other third party funders, meetings, publications and events, initiatives or personal or career development opportunities, if applicable, in accordance with any marketing preferences expressed. | <p>The Academy relies on either:</p> <ul style="list-style-type: none"> • legitimate interest: the Academy's and the Participants' legitimate interests as it furthers the aims, objectives and business of the Academy and benefits Participants by identifying useful opportunities. • consent to use personal information in this way. |
| To allow cohorts of each of the Programme's Participants to contact each other. | This is in the Academy's legitimate interests to improve the service the Participants receive. |
| To invite participation in surveys to provide feedback in relation to the Programmes; the Academy's processes and the impact of the Academy's activities. | This is in the Academy's legitimate interests to improve the service Participants receive. |
| To publicise basic details of Participants' applications to, and participation in, the Programmes. | This is in the Academy's legitimate interests to promote its work in relation to the Programmes. |
| To comply with any legal or regulatory obligations (including in connection with a court order). | This is to comply with the Academy's legal obligations. |
| To evaluate the inputs and outputs of the Programmes in conjunction with the UK National Academies and any other contractors involved in the evaluation of the Programmes. | This is in the Academy's legitimate interests to assess the success of the Programmes. |
| To carry out equal opportunities monitoring. | <p>The Academy relies on either:</p> <ol style="list-style-type: none"> 1. legitimate interests: This is in the Academy's legitimate interests to promote or maintain equality within the Academy. |

| Purpose | Legal Basis |
|---------|---|
| | 2. consent to use personal information in this way. |

The Academy may be required to obtain personal information to enable it to fulfil the terms of its contract with the Participants or in preparation of the Academy entering into a contract with the Participants. A failure to provide this information could result in an application being rejected.

Special Categories of Personal Information

The Academy may also collect certain sensitive personal information about Participants, Mentors, Referees, Mentoring Facilitators, Research Officers and Sponsors. This is sometimes referred to as special categories of personal data. This type of personal information will include information concerning Participants' ethnic origin and gender as well as information relating to Participants' health (for example dietary requirements), including any disability they may have.

When we process Special Categories of Personal Information we will rely on either of the following legal bases:

- your explicit **consent**; or
- one or more of the other legal bases set out in the table above and the use is:
 - o **necessary for the establishment, exercise or defence of legal claims, or whenever courts are acting in their judicial capacity** (for example, when a court issues a court order requiring the processing of your sensitive Personal Information); or
 - o in your **vital interests**.

Where we use Special Categories of Personal Information for equal opportunities monitoring (for further information see below), we will do so in reliance on the basis that it is in the **substantial public interest to have equality of opportunity or treatment**.

Our commitment to equal opportunities

To help us meet our commitment to equal opportunities, we may collect information on nationality, age, ethnic origin, gender and disability. This information is only available to us if you choose to supply it and is only used for equality, diversity and inclusion purposes.

Where we collect Special Categories of Personal Information for equal opportunities monitoring (such as your ethnic origin or information regarding a disability you may

have), we will process this in accordance with the **Special Categories of Personal Information** section immediately above.

We report equal opportunities information annually on our website on an aggregated and anonymised basis.

Who the Academy discloses personal information to

The Academy will share personal information with the organisations described below for the purposes set out above:

- (a) the British Academy, the Royal Academy of Engineering and the Royal Society (together the "**UK National Academies**");
- (b) any government department that may fund any of the Programmes;
- (c) funders of the Programmes (the "**Other Funders**"), details of which can be found on our website;
- (d) the Academy's business partners, suppliers, sub-contractors and individuals/organisations who evaluate the effectiveness of the Programme (including any provider of online services relating to the online management of (including applications to) the Programmes, including Flexi-Grant, and who may transfer personal information to a third party host service provider);
- (e) other companies and entities within the Academy's group (which the Academy is a member of);
- (f) the Academy's professional advisors (including accountants and lawyers) that assist the Academy in carrying out its business activities;
- (g) external agencies and organisations (including the police, the relevant local authority and other law enforcement agencies) for the purpose of complying with applicable legal and regulatory obligations;
- (h) selection panels assessing the applications received from the FLIER applicants, committees to review abstracts of scientific meetings; and
- (i) Mentors and other Participants.

The Academy will also disclose the personal information of Participants and Mentors to other third parties, for example:

- (a) if the Academy or substantially all of the Academy's assets are acquired by a third party (or are subject to a reorganisation within the Academy's corporate group), personal information held by the Academy will be one of the transferred assets;

- (b) if the Academy is under a duty to disclose or share such personal information in order to comply with any legal obligation, to investigate fraud, credit risk reduction purposes or it is in the public interest; and
- (c) in other situations where the Academy has the consent of the individual to do so.

To maintain public accountability and promote the Programmes, the Academy will publish, including on its website, or disclose into the public domain, details of Participants, including basic details of their applications (such as name and institution) and/or participation in the Programmes.

Where the Academy transfers personal information to

It may be necessary to share your personal information outside of the European Economic Area (EEA) for example due to the international nature of some of our Programmes. This may include:

- our service providers located outside the EEA;
- if you are based outside the EEA;
- if a fellow, staff member or peer reviewer accesses personal information remotely through one of our secure systems whilst travelling or residing outside the EEA; or
- if we collaborate with an institutional partner in a country outside the EEA in relation to a Programme. This will be made clear to any Applicants of the Programme.

These transfers are subject to special rules under European and UK data protection law. We make sure that transfers are limited to the minimum amount of information possible. To obtain further information about where your personal information may be transferred to, please contact us using the details in the **Contact Information** section below.

When we transfer your personal information outside the EEA, we will take reasonable steps to ensure that such information will be adequately protected, in particular by either:

- using standard data protection clauses which have been adopted by the European Commission and can be accessed [here](#); or
- in respect of some transfers to the United States, in reliance on the EU/US Privacy Shield. For further information please see www.privacyshield.gov/welcome.

This approach is compliant with applicable data protection law (being Articles 45 and 46.2 of the General Data Protection Regulation). For further information about these transfers and the safeguards in place (including to obtain a copy of any documents in place), please contact us using the details in the **Contact Information** section below.

Maintenance of data

It is the Academy's policy to ensure that all personal information held by the Academy is handled correctly and appropriately according to the nature of the information, the risk associated with mishandling that information, including the damage that could be caused to an individual as a result of loss, corruption and/or accidental disclosure of any such information, and in accordance with any applicable legal requirements.

Unfortunately, the transmission of information via the internet is not completely secure.

Although the Academy will seek to protect personal information, it cannot guarantee the security of personal information transmitted to any online application portal and any transmission is at the individual's own risk.

The Academy will put in place appropriate security measures to seek to keep personal information secure. The Academy undertakes regular security and risk reviews and monitors all of the controls that it has in place to ensure the security, accuracy and integrity of the personal information it holds.

Individuals should notify (by email, telephone or in writing) the Academy if any personal information is incorrect or out of date. Registered users of any relevant online application portal (for instance, the online grant management system Flexi-Grant) will also be able to access and update their details online.

Personal information retention

We will only retain your personal information for as long as necessary to fulfil the purposes for which we collected it, including satisfying any legal, accounting or reporting requirements. To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of it, and the purposes for which we process your personal information.

For example, we will retain personal information related to Unsuccessful Applicants for a period of 6 years from the date we make a decision in relation to the relevant application.

If you are successful in your application we will retain your personal information for the duration of the Programme and following the completion of the Programme we will retain personal information relating to your involvement in the Programme as part of our commitment to retaining a true and accurate historical record of the activities and business of the Academy as a national institution. It is in the public interest to retain these archiving records.

We regularly review our databases and when it is no longer necessary to retain some or all of your personal information, we will delete or anonymise it. In some circumstances we may anonymise your personal information (so it can no longer be associated with you) for research or statistical purposes without further notice to you. For further

information on retention periods, please contact the Data Representative using the details below.

Individual's rights under data protection law

You have certain rights in relation to your personal information. Some of these rights only apply in certain circumstances, and may be subject to exemptions. The table below sets out a summary of your rights, which can be exercised by contacting info@acmedsci.ac.uk:

| | Summary of your rights |
|--|--|
| Right of access to your personal information | <p>You have the right to receive a copy of your personal information that we hold about you, subject to certain exemptions.</p> <p>We may require further information in order to respond to your request (for instance, evidence of your identity and information to enable us to locate the specific personal information you require).</p> |
| Right to rectify your personal information | <p>You have the right to ask us to correct your personal information that we hold where it is incorrect or incomplete.</p> |
| Right to erasure of your personal information : | <p>You have the right to ask that your personal information be deleted in certain circumstances. For example:</p> <ul style="list-style-type: none"> • where your personal information is no longer necessary in relation to the purposes for which they were collected or otherwise used; • if you withdraw your consent and there is no other legal ground for which we rely on for the continued use of your personal information; • if you object to the use of your personal information (as set out below); • if we have used your personal information unlawfully; or • if your personal information needs to be erased to comply with a legal obligation. |

| | Summary of your rights |
|---|--|
| Right to restrict the use of your personal information | <p>You have the right to suspend our use of your personal information in certain circumstances. For example:</p> <ul style="list-style-type: none"> • where you think your personal information is inaccurate but only for so long as is required for us to verify the accuracy of your personal information; • the use of your personal information is unlawful and you oppose the erasure of your personal information and request that it is suspended instead; • we no longer need your personal information, but your personal information is required by you for the establishment, exercise or defence of legal claims; or • you have objected to the use of your personal information and we are verifying whether our grounds for the use of your personal information override your objection. |
| Right to data portability | <p>You have the right to obtain your personal information in a structured, commonly used and machine-readable format and for it to be transferred to another organisation, where it is technically feasible. The right only applies:</p> <ul style="list-style-type: none"> • to personal information which you have provided to us; • where the use of your personal information is based on your consent or is necessary for the performance of a contract; and • when the use of your personal information is carried out by automated (i.e. electronic) means. |
| Right to object to the use of your personal information (including to object to direct marketing, automated decision making and profiling) | <p>You have the right to object to the use of your personal information in certain circumstances and subject to certain exemptions. Examples of this right include:</p> <ul style="list-style-type: none"> • where you have grounds relating to your particular situation and we use your personal information for our legitimate interests (or those of a third party); • where we use your personal information to take a decision which is based solely on automated |

| | Summary of your rights |
|--|---|
| | <p>processing where that decision produces a legal effect or otherwise significantly affects you; and</p> <ul style="list-style-type: none"> • if you object to the use of your personal information for direct marketing purposes. |
| Right to withdraw consent | You have the right to withdraw your consent at any time where we rely on consent to use your personal information. |
| Right to complain to the relevant data protection authority | You have the right to complain to the relevant data protection authority, which is, in the case of the Academy, the Information Commissioner's Office, where you think we have not used your personal information in accordance with data protection law. |

To exercise any of these rights please contact info@acmedsci.ac.uk

Changes to this Policy

Where appropriate, the Academy will communicate any future changes to this Policy by email, letter, pop-up on the Academy website or other method of communication as the Academy may consider appropriate. Where appropriate, the updated Policy will take effect as soon as it has been updated or as otherwise communicated to individuals.

This Policy was last updated in September 2018.

Cookies

Please see the Academy's [cookies policy](#) for a summary of the cookies which may be placed on your device and your rights in relation to those cookies.

How to complain

We hope we can resolve any query or concern you may raise about our use of your personal information. If you wish to complain, the first step is to write or speak to the member of Academy staff who has been your contact point. If this does not apply, or you would prefer not to refer your complaint to a staff contact, or you are not satisfied with the response, you should write to the Data Representative at the Academy using the details below.

Your complaint will be acknowledged within 3 working days and we will try to ensure you receive a response within 21 working days of us sending you our acknowledgement. If we cannot give you a full response within this time we will let you know how long it will take. We will contact you if we require further information.

We will investigate your complaint but if you are not satisfied with our response, or believe we are processing your personal information unlawfully, you can complain to the UK Information Commissioner's Officer by calling 0303 123 1113. Further information about your rights and how to get in contact is set out on the ICO website at www.ico.org.uk.

The EU General Data Protection Regulation also gives you the right to lodge a complaint with a supervisory authority, in particular in the European Union (or EEA) State where you work, normally live or where any alleged infringement of data protection laws occurred. The UK supervisory authority is the Information Commissioner.

Contact information

Please contact us or our Data Representative by post, email or telephone if you have any questions about this Policy or the personal information we hold about you.

| Our contact details | Our Data Representative |
|---|---|
| info@acmedsci.ac.uk Tel : 0203141 3200 Post: The Academy of Medical Sciences 41 Portland Place London W1B 1QH | Chris Straw Director of Finance & Resource |