Information and data Processing at the RVC

- A guide for Veterinary Practices and Veterinary Practitioners.

1. How we use client information and comply with UK Data Protection Law:

What you provide and your responsibilities: Client personal data (such as name and address) is provided by you (as a Data Controller) to us (as a Data Processor) - for the purposes of referrals and other relevant clinical engagements.

It is held by us in accordance with UK Data Protection Law and the General Data Protection Regulations so long as you (as the Data Controller) have properly informed the client of the referral and of the transfer of both relevant clinical records and basic client information to aid identification of the client at the next point of contact with us.

We will only use the client/ referral information for these purposes and only until such time as they register with us.

The law requires that we (the RVC and you) have documented arrangement (not necessarily a contract) setting out respective roles and responsibilities with regard to data protection matters, including who individuals can contact if they want to complain or exercise any of their rights under the GDPR.

This document in combination with our 'client privacy notice' and supported by the information you provide to your clients regarding sharing data with us - should meet this requirement of the law.

If you wish to have a form of contract or agreement with us then please contact <u>data@rvc.ac.uk</u>, however the primary protection for clients should be the information you and the RVC provide to them.

What we hold and our responsibilities: When the client then engages with us we collect their personal data (in accordance with UK Data Protection Law and the General Data Protection Regulations). The data we collect directly from the client is then our responsibility as a Data Controller.

We use the client personal data in order to manage and complete the clinical interaction and billing and, with their consent, future marketing or clinical care updates (e.g. appointment or vaccination reminders) or following up with clients on 'patient outcomes' or 'owner practices' (e.g. feeding, environment, training) for our research and education activities which advance and enhance veterinary care and the management and treatment of disease and injury.

We inform the client of our use of their data through our booking and registration systems, through a 'Client Privacy Notice' and with reference to our <u>Data Protection Policy</u>.

If you have any queries or concerns about how we manage 'personal data' please contact: <u>data@rvc.ac.uk</u>.

Further requests for client information in support of our research activities: Although generally we will not do so, it is possible that from time to time we (a member of our clinical academic staff or a student) may contact you to ask for 'client' contact details in order for us to contact them and ask them to participate in research. You should **not** supply these to us unless:

a) your clients have given you explicit permission (i.e. via consent) to do so and you or your practice hold a record of that consent, **and**

b) they provide you with an ethical approval number from the RVC (this will take the alphanumeric form URN SRXXXX-XXXX).

If you wish to check ethical authorisation you may email <u>ssrerb@rvc.ac.uk</u>.

2. How we use information on veterinary practices and practitioners

What we hold: The Royal Veterinary College holds its own records of veterinary practices and practitioners who have referred clients and their patients to our hospitals or who may also have seen or treated patients brought to our hospitals by clients.

Our hospitals include: The Queen Mother Hospital for Animals (Small Animal Referral Hospital), The Beaumont Sainsbury Animal Hospital (Exotics and Small Mammal Referral), our Equine Referral Hospital and our Farm Animal Clinical Centre.

The Royal Veterinary College is a research active higher education institution and as such carries out teaching and research activities which are designed to advance and enhance veterinary care and practice, and the management and treatment of disease and injury. More detail on our research activities can be found here: <u>https://www.rvc.ac.uk/research</u>

The information we hold as a result of referrals or that we have accessed via the RCVS register on referring veterinary practices or practitioners is either **not** personal data (and so not covered by UK Data Protection Law) or is personal data in the public domain and so accessible and usable for legitimate purposes.

How we use it: We normally use this to provide you with updates on the referrals you have made to us. We may use it to contact Veterinary Practices with information about our products and services that we think might interest you.

Please note that it is legitimate for us to contact veterinary practices and practitioners to ask either for clinical 'patient' information (so **not** personal data) to inform research or to ask you as veterinary practitioners to take part as a research subject.

However in each case you are under no obligation, to supply and have a right to refuse or simply not take part.

We emphasise that we only do this to support the education of veterinary practitioners and to advance and enhance veterinary care and practice, and the management and treatment of disease and injury.