



Data Retention Policy

Introduction

The Genetic Counsellor Registration Board (GCRB) needs to collect and use personal data about the genetic counsellors with whom we come into contact with in order to carry on our work. The GCRB may also hold information about a member of the public, or a patient, if they have made a complaint against a genetic counsellor, or against the GCRB. The GCRB will store records on an individual if:

- he/she is a Registered Genetic Counsellor currently in practice
- he/she was a Registered Genetic Counsellor but their registration has lapsed
- he/she was a Registered Genetic Counsellor but has been removed from the register or is the subject of a complaint or fitness to practice investigation.
- personal information may also be stored in order for us to handle expenses claims, enquiries or other information requests.

This information must be collected and dealt with appropriately – whether on paper, electronically, or recorded on other material - and there are safeguards to ensure this under the Data Protection Act 2018.

Data Controller

The GCRB is the Data Controller under the General Data Protection Regulation (GDPR) 2016 and the Data Protection Act 2018, and will determine for what purposes the information held will be used. It is also responsible for notifying the Information Commissioner Office (ICO) of the data it holds or is likely to hold, and the general purposes for which this data will be used. The GCRB acts as a Data Processor in order to carry out our legitimate interests of protecting the public in relation to genetic counselling in the UK through and managing expenses claims, enquiries, information requests, fitness to practice investigations and complaints.

Disclosure

The GCRB is unlikely to share data with other organisations, but in circumstances where this is required, the Data Subject will be made aware how and with whom their information will be shared, and where required in law, their consent will be sought.

The GCRB places great importance on the correct treatment of personal data in maintaining the confidence of genetic counsellors and others with whom we deal. The GCRB intends to ensure that personal information is treated lawfully and correctly.

Principles of the Data Protection Act 2018

Specifically, the Principles require that personal information:

- shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met
- shall be obtained only for one or more of the purposes specified in the Act, and shall not be processed in any manner incompatible with that purpose or those purposes
- shall be adequate, relevant and not excessive in relation to those purpose(s)
- shall be accurate and, where necessary, kept up to date
- shall not be kept for longer than is necessary
- shall be processed in accordance with the rights of data subjects under the Act
- shall be kept secure by the Data Controller who takes appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal information
- shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal information.
- The GCRB will, through appropriate management, meet these Principles, and all other requirements of the Data Protection Act, including ensuring the rights of people about whom information is held are upheld. These include:
 - the right to be informed that processing is being undertaken
 - the right of access to one's personal data
 - the right to prevent processing in certain circumstances
 - the right to correct, rectify, block or erase information which is regarded as wrong information

- take appropriate technical and organisational security measures to safeguard personal information
- ensure that personal information is not transferred abroad without suitable safeguards
- treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information
- set out clear procedures for responding to requests for information

Individuals can request an electronic copy of all information held by the GCRB about them. The only exceptions to this allowed under the Data Protection Act 2018 is disclosing personal data about another person, or if disclosing the information is likely to cause unwarranted and substantial damage or distress.

Where information is provided to the GCRB and there is a reasonable expectation that it will be treated in confidence, the GCRB will ensure that the information is used in keeping with the common law duty of confidence.

Data Storage

Information and records relating to genetic counsellor will be stored securely and will only be accessible to authorised staff. Information will be stored for only as long as it is needed or required statute and will be disposed of appropriately.

All GCRB records are held electronically in a password-protected Dropbox account which is accessed by the GCRB Administrator and Board members. This cloud storage service uses several host servers in the USA. The records are also 'backed up' once a month on an external hard drive, which is kept in a secure location in the GCRB office premises. Some data may be stored within the GCRB website which uses a host server located in Denmark. In addition, hard copies of information relating to expenses claims will be stored securely within a locked office accessed by the GCRB treasurer for the purpose of maintaining financial accounts and audit.

Records will not be kept any longer than they are needed for the operation of the GCRB, bearing in mind its key purpose of public safety. Unnecessary records will be destroyed. Information will be stored for only as long as it is needed or required by

statute and will be disposed of appropriately. The organisation will store personal data securely and data relating to expenses claims will be disposed of after 5 years.

Records will be held indefinitely on any Registered Genetic Counsellor whether they are currently registered, removed from the register or whose registration has lapsed. This is because they may at some point return to practice and/or there may be a retrospective complaint made about the individual at a time when they were registered with the GCRB. It is the responsibility of the GCRB to ensure all personal and company data is non-recoverable from any computer system previously used within the organisation which has been passed on/sold to a third party.