

## Health Partners International Data Protection Policy

### Introduction

The Health Partners International (HPI) Data Protection Policy aims to clarify what information on our consultants is stored by the organisation, how we use this information for the purposes of HPI business and how we safeguard this information.

HPI's policy works in accordance with the UK's Data Protection Act introduced in 2000, which stipulates rules by which organisations must abide when processing personal information. It applies to information stored on computers and paper records. HPI is required to comply with the rules of good information handling outlined by the Data Protection Principles and other requirements of the Act. HPI's Finance Manager is the data controller under the Act and can be contacted through the HPI website.

### Why HPI stores information on consultants

We store information on consultants for use when providing those consultants with assignments in projects in which HPI is involved. The information is kept solely for the business purposes of HPI and is not shared with any other partner companies without the express consent of the individual consultant.

### Information held by HPI

Information held on consultants includes:

- 1) Consultant CVs
- 2) Personal information and consultant record

#### 1) Consultant CVs

HPI holds the original CV of the consultant on its database. In addition, HPI may also hold CVs that have been edited into the HPI format or a format required by a particular client. CVs are only edited for particular projects or tenders and are based on information provided by the consultant in their original CV.

#### 2) Personal information and consultant record

The HPI consultant database has a record for each individual consultant, which summarises their professional experience and holds their personal details. Each record contains the following information:

- Personal information
  - Name
  - Country of residence

- Nationality
  - Contact details including telephone numbers, email address(es) and physical and mailing addresses
  - Details of next of kin or of person to contact in case of emergency
  - Fee rates
  - Dates of availability
  - Bank details (if the consultant has worked for HPI and HPI has made a consultancy fee payment)
  - Frequent flyer numbers of airlines if HPI frequently makes airline bookings for the consultant
- Professional experience
    - Areas of expertise
    - Countries worked
    - Languages spoken
    - Whether the consultant has worked for HPI previously and if so, on what projects

### How HPI complies with the eight enforceable principles of good information handling

- 1) Data must be fairly and lawfully processed
  - HPI aims to acknowledge all new and updated CVs. HPI assumes on receiving such a CV that the consultant has consented to HPI storing the consultant's information.
  - No sensitive information regarding the consultant's racial or ethnic origin, religious or other beliefs is included in the database by HPI unless the consultant has included such information in their CV of which they are the author.
- 2) Processed for specified purposes
  - HPI processes information in order to provide the consultant with work should they have the expertise required for particular assignments or projects in which HPI is involved, and to contact them if the need arises.
- 3) Adequate, relevant and not excessive
  - HPI asserts that it does not retain any information on the consultant that is not necessary or relevant to fulfilling its business.
- 4) Accurate, and where necessary, kept up to date
  - HPI aims to update consultant records and CVs every 18 months, directly contacting the consultant if the consultant has not already updated the information him/herself.

- 5) Not kept for longer than necessary
- HPI affirms that it is both necessary and appropriate to retain consultant information indefinitely subject to an inclusion of when the data was first received and updated.
  - However, if HPI has not been in contact with an individual consultant for five years, it is likely that the consultant's details will be deleted from HPI's records.
- 6) Processed in line with the rights of the individual
- HPI undertakes not to share any personal consultant information with partner companies without the express consent of the consultant.
  - The consultant has the right to find out what personal information is stored by HPI on the database.
- 7) Kept secure
- Consultant information is restricted to HPI employees whose job descriptions require such access to fulfil their work.
  - HPI undertakes to ensure security of the database and that personal data is safeguarded.
- 8) Not transferred to countries outside the European Economic Area unless there is adequate protection for the information
- HPI may transfer a consultant's CV outside the European Economic Area when submitting the consultant as a candidate for an assignment or project.

### **The rights of individual consultants**

The Data Protection Act gives consultants the right to find out what personal information about them is held by HPI. There is, however, a charge of £10 per request to cover administrative costs. Should you require such information, please contact HPI, who will undertake to provide it within 30 days.

HPI will delete personal information, CVs and the consultant record at the request of the individual consultant.

For further information on the codes of practice relating to the Data Protection Act, please visit [www.dataprotection.gov.uk](http://www.dataprotection.gov.uk)