

Associates recruitment privacy notice

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Privacy notice – MPTS Associate recruitment

The Medical Practitioners Tribunal Service (MPTS) is committed to protecting your personal data and respects your privacy. This privacy notice statement relates to the processing of your personal data by the MPTS/GMC for purposes of recruitment.

When you apply for an associate role, you will visit <https://jobs.mpts-uk.org/> and this involves the processing your personal data. This online recruitment system is provided by the MPTS/GMC and hosted by its third-party supplier. Your personal data includes information like your name, email address or telephone number and processing includes collecting, storing, using or disclosing your personal data.

We are bound to comply with the UK General Data Protection Regulation (UK GDPR). This statement sets out how the MPTS/GMC adheres to our legal obligations under UK GDPR. Other policies or processes may contain further privacy notices or statements specific to that policy or process. These privacy notices or statements shall supplement this privacy notice statement.

Data controller

Personal data is data which identifies or makes an individual identifiable. The GMC is the data controller in relation to your personal data that we collect, store and use, which means we are legally responsible for deciding how and for what purposes it is used. This is a responsibility we take very seriously.

What we use your personal data for and the legal basis for doing so.

When you visit <https://jobs.mpts-uk.org/> to apply for a role you will be asked to provide certain information yourself, including your name, contact details, date of birth and job history. This information is mandatory and is collected to facilitate the recruitment process.

We will also ask for equality and diversity data, such as age, ethnicity, disability, gender, sexual orientation, caring responsibilities and religion or belief. The data on ethnicity, disability, religion and sexual orientation is considered in data protection law “[special category](#)” data and has extra legal protections on its use. The equality and diversity data we collect is used for anonymised statutory monitoring and reporting purposes and enables us to understand and report on trends in all stages of our recruitment process. This information is optional, and you can choose not to provide it. You can update or ask us to delete these details by contacting AssociateServices@gmc-uk.org. If you are offered a role we will transfer this information to our GMC Associates database, which is kept secure and confidential.

The MPTS/GMC and/or persons acting on our behalf may use your personal data for any of the following purposes:

- ▶ for general People team and finance administration, expense processing, travel and accommodation booking, training and development;
- ▶ equal opportunities monitoring, business continuity planning;
- ▶ for monitoring and assessing compliance with MPTS/GMC's policies and standards;
- ▶ for administrative purposes in relation to the security and access of our systems, premises, and IT systems;
- ▶ to comply with our legal and regulatory obligations and requests;
- ▶ to comply with court orders and exercise and/ or defend our legal rights;
- ▶ for any other legitimate business purpose; and
- ▶ as otherwise permitted by any applicable law or regulation

Our processing conditions for using your personal data for the above listed purposes are article 6(1b) of the UK GDPR, processing is [necessary to perform a contract or to take steps at your request, before entering a contract](#), and/or article 6(1f) of the UK GDPR- our or a third party's [legitimate interests](#), where such interests are not overridden by your interests or fundamental rights and freedoms and/or Article 6(1c) of the UK GDPR "[legal obligation](#)".

When you apply for a role at the GMC, we process the personal data you provide to us in order to assess your suitability for a role you have applied for and to help us develop and improve our recruitment process. The lawful basis we rely on for processing your personal data are article 6(1)(b) of the UK GDPR, which relates to processing [necessary to perform a contract or to take steps at your request, before entering a contract](#). We also rely on "[legitimate interests](#)" for our purpose of processing when where such interests are not overridden by your interests or fundamental rights and freedoms.

The lawful basis we rely on to process any information you provide as part of your application which is "[special category data](#)", for example health, religious, sexual orientation or ethnicity information are article 9(2)(g) - necessary for reasons of substantial public interest.

For [special category data](#) we are required to link the above conditions under Article 9 of the UK GDPR to conditions in the Data Protection Act 2018. For this we rely on Schedule 1, part 2 paragraph 6 – "statutory etc and government purposes" of the [Data Protection Act 2018](#). For the [special category data](#), our legal basis under Article

6 of the UK GDPR is our or a third party's [legitimate interests](#), where those the individuals' interests do not override those legitimate interests.

If you provide us with any information about reasonable adjustments for a disability you require under the Equality Act 2010, we rely on article 6(1)(c) of the UK GDPR complying with a "[legal obligation](#)" to process this information. Any other personal data processing required by law is also conducted using "[legal obligation](#)" as our processing condition in UK data protection law.

Criminal conviction and offences data

We also ask applicants applying to be MPTS associates for information about applicant criminal convictions and offences. The lawful basis we rely on to process this criminal offence data is Article 6(1)(e) of the UK GDPR for the "[performance of a public task](#)" which is linked to the GMC's statutory functions. We also rely on the processing condition [at Schedule 1 part 2 paragraph 6\(2\)\(a\) of the Data Protection Act 2018](#) which relates to the exercise of our statutory functions. More information about legal basis for processing personal data under UK data protection law can be found on the [ICO's website](#).

Rectifying your personal data

We make every effort to maintain the accuracy and completeness of your personal data we store and to ensure all your personal data is up to date. However, you can assist us with this by promptly contacting us if there are any changes to your personal data or if you become aware that we have inaccurate personal data relating to you.

Access to your personal data

In the event of your application resulting in an offer, your personal data will only be accessed by MPTS/GMC staff and/or persons acting on our behalf, that have a legitimate reason for doing so; for example by the Associate Services and Finance staff for expense processing.

Please be aware that the MPTS/GMC uses a third-party supplier to hold the information you submit. The third-party company complies with the MPTS/GMC's security policy and therefore will not share your data with anyone other than the MPTS/GMC.

During the recruitment process you may be asked to complete a video interview. We also undertake virtual interviews using Microsoft Teams and your email address will be provided to the MPTS Tribunal Development Team to set up your interview.

In the event of your application resulting in an offer and your acceptance of a position at the MPTS, your personal information will be transferred to the MPTS/GMC's associate's database. Your name, telephone number, GMC Reference Number (medical associates) and email address will also be sent to and held in the MPTS operational database so that you can be contacted to perform your duties as an associate, for example, enlisting on an MPTS tribunal hearing.

When you have accepted a position, we will also register you with a third-party supplier to complete verification and background checks. The MPTS/GMC will give the third party your name, telephone number and email address. The third-party company complies with the MPTS/GMC's security policy and has their own fair processing/privacy policy which will be made accessible to you. They will not share your data with anyone other than the MPTS/GMC without your prior agreement or as necessary for providing their screening service or as required by law.

You can request a copy of personal data we hold about you.

You are entitled to request a copy of the personal data we hold about you. To do this, you can email the [Information Access Team](#). We'll usually respond within one month, but if the request is complex or involves large amounts of data, we have up to three months to respond. To find out more about your other data subject rights please visit the [ICO's website](#).

Retaining your personal data

We will only retain your personal data for as long as necessary to fulfil the purpose for which it was collected or to comply with legal, regulatory or MPTS/GMC policy requirements.

Data you enter on our online recruitment system will be stored in the system so that it can be available for you to 'reuse' as part of a future application. If you do not use the online recruitment system for twelve months your details will be automatically removed after being alerted by email.

A copy of our Retention and disposal policy can be found on our [website](#).

Controlling how we use your data

You have the right under UK GDPR to control how we use your data, by asking us to delete it or limit how we use it. You can find out more about your rights under UK GDPR [here](#). If you have any queries about your rights under UK GDPR, please email DPO@gmc-uk.org.

Making a complaint

You can make a complaint if you think your personal data has been misused by the MPTS/GMC or it is not being kept securely. You should advise us immediately by writing to DPO@gmc-uk.org so we can investigate and take corrective action where necessary.

If you're unhappy with our response to an issue or concern you have raised, you can make a complaint to the Information Commissioner's Office (ICO). You can contact the ICO on 0303 123 1113 and further information on making a complaint can be found on their [website](#).

Updates to this statement

We may change or update parts of this privacy notice statement to maintain our compliance with applicable law and regulation or following an update to our internal policies and processes.

For further information on this statement and how the MPTS/GMC collects, stores and uses your personal data please contact:

- The GMC's [Data Protection Officer](#)
- [Information access team](#)
- [Associate Services team](#)
- tribunaldevelopmentsection@mpts-uk.org

Useful links:

- ▶ [MPTS Privacy policy](#)
- ▶ [MPTS Data Protection Policy](#)
- ▶ [Information Commissioner's website](#)