



Privacy Policy – GP Trainee Recruitment Process

Introduction

This Privacy Notice provides you, the data subjects (applicants of the General Practitioners Trainee Recruitment Programme) with information about the processing of personal data by the Irish College of General Practitioners (ICGP). In order to apply, participate and for ICGP to deliver its training effectively, it will be necessary to process your personal data. This may include your contract details, information we collect in support of assessing your application and information regarding the payment of application fees for the Clinical Knowledge Problem Solving Test (CPST) and Situational Judgement Test (SJT).

Who We Are

The ICGP, located at 4/5 Lincoln Place, Dublin 2, D02 XR68, Ireland, is a professional body for general practice in Ireland. ICGP's primary aim is to serve the patient and the general practitioner by encouraging and maintaining the highest standards of general medical practice. It is the representative organisation on education, training and standards in general practice. ICGP is also the recognised body for the accreditation of specialist training in general practice in Ireland and is recognised by the Medical Council as the representative academic body for the specialty of general practice.

As a data controller, ICGP is responsible for deciding how and why your personal data will be used under the applicable EU data protection laws. This notice therefore only applies to the two-part GP Trainee Recruitment process (i.e. part A consisting of examinations and if successful, part B consisting of the subsequent completion of an application form).

Collection, Processing and Lawful Basis

ICGP will collect personal data necessary to examine your candidature and process your application to the GP Trainee Recruitment Programme. This personal data is collected directly from you through application forms. These application forms are divided into two parts i.e. Part A and Part B. In Part A we will process the following personal data:



Category of Personal Data	Purpose	Lawful Basis
Contact Details	This data is used to send communications to you about your candidature and examinations	Processing is necessary for the performance of a contract
Immigration Status	To carry out research and statistical analysis. This data is shared with HSE.	Processing is necessary for the legitimate interests pursued by ICGP
Country of Citizenship	To carry out research and statistical analysis so as to satisfy reporting purposes	Processing is necessary for the legitimate interests pursued by ICGP
Irish Medical Council Registration Number (optional)	This data is used to identify you within our database	Processing is necessary for the performance of a contract
Education Qualification	To consider your eligibility for the Part A of the application process	Processing is necessary for the performance of a contract
Current Position in the Medical Field	To consider your eligibility for the Part A of the application process	Processing is necessary for the performance of a contract
Health/ Medical Consideration	To provide reasonable adjustments	Processing is necessary to comply with our legal obligations and for reasons of substantial public interest, on the basis of Union or Member State law

In Part B we will process the following categories of personal data:

Category of Personal Data	Purpose	Lawful Basis
Contact Details	This data is used to send communications to you	Processing is necessary for the performance of a contract
Immigration Status	This data is processed to verify the right to work in Ireland and seek training	Processing is necessary for the performance of a contract
Country of Citizenship	This data is processed to verify the right to work in Ireland and seek training	Processing is necessary for the performance of a contract



Identity Proof (passport or national identity card)	This data is used to confirm your identity and to identify you in our database	Processing is necessary for the performance of a contract
Photograph	This data is used to identify you within our database	Processing is necessary for the performance of a contract
Irish Medical Council Registration Number and Type	This data is used to identify you within our database	Processing is necessary for the performance of a contract
Education Qualifications and Certifications	This data is used to assess your candidature	Processing is necessary for the performance of a contract
Work and Internship Experience	This data is used to assess your candidature	Processing is necessary for the performance of a contract
CSCST or CSTEM Details	This data is used to assess your candidature	Processing is necessary for the performance of a contract
References and Contact Details	To seek character and work experience referrals	Processing is necessary for the performance of a contract

In addition to the above ICGP may link your applications to your ICGP account to gain membership benefits. In doing so ICGP may also process the personal data provided at that instance for research and statistical analysis purposes. In such cases ICGP will implement appropriate measures to ensure data is pseudonymised or anonymised.

Personal data such as your full name, email address and ICGP ID will be shared with our data processor Evolve. Evolve has been engaged by ICGP to assist in the process of examinations such as the SJT and CPST, and is located in the United Kingdom. Similarly, ICGP will also be transferring the results from the SJT examinations to Work Psychology Group (WPG) who are also located in the United Kingdom. In both the above instances appropriate data processing agreements have been executed to ensure safe, secure and lawful processing of personal data. The European Commission has deemed that the United Kingdom provide adequate levels of protection for personal data.

Apart from the above, we may also share your personal data with the Health Service Executive (HSE) (your Employer). Personal data will be shared with the HSE through an appropriate data



sharing agreement. HSE will act as an independent data controller and the details on how they process your personal data may be obtained from their website. We will also share your personal data with the concerned training site allocated to you and with the Medical Council.

Apart from the parties listed above, ICGP may also need to share your personal data with auditors and IT service providers. If these IT service providers are located outside the European Economic Area we will ensure appropriate safeguards are in place such as the Standard Contractual Clauses amongst other measures, to ensure there is an adequate level of protection over your personal data. These parties will also be obliged to protect your personal data by way of dedicated agreements and contracts. Your personal data will not be subjected to automated decision making or profiling and will not be used for purposes other than the ones outlines in this document.

Data Security and Retention

We use a range of physical, electronic, and organisational measures to ensure that we keep your personal data secure, accurate and up to date. These measures include education and training for relevant staff to ensure they are aware of our data protection obligations when processing personal data, administrative and technical controls to restrict access to personal data on a need-to-know basis, technological security measures, including firewalls, encryption and anti-virus software; and physical security measures such as staff security passes to access our premises. However, the transmission of information via the internet may not be completely secure, although we will do our best to protect your personal data.

ICGP will retain the personal data collected through both parts of the application form for the purposes of determining whether the applicant will be eligible for a GP Traineeship. This personal data will also be retained throughout the training process to facilitate communication and further assessment of your candidature. After the completion of your training, ICGP will anonymise the personal data and use it for research and quality assurance purposes. If your application is not successful, your personal data is deleted after a period of 12 months.

Cookies

Cookies are small pieces of information, stored in simple text files, placed on your computer or internet enabled device by a website. Typically, it is used to ease navigation through a website. Cookies can be read by the website on your subsequent visits. In addition, the information stored in a cookie may relate to your browsing habits on the webpage, or a unique identification number so that the website can remember you on your return visit. The ICGP only uses essential cookies.

Your Rights as Data Subjects



Your rights as data subjects are provided under the General Data Protection Regulations (GDPR) and the Data Protection Act 2018 (DPA 2018). They are as follows:

- Right to be informed – This enables you to be informed in a clear and transparent manner regarding our processing activities through a privacy notice
- Right of access to your personal data – This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it
- Right to rectification – This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us
- Right to seek erasure of your personal data (right to be forgotten) – This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it
- Right to object to processing of your personal data – This enables you to request that we stop or prevent us from processing your data in specific circumstances
- Right to seek restriction of processing your personal data – This enables you to ask us to suspend the processing of your personal data in specific circumstances
- Right to data portability – We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format
- Right not be subjected to automated decision making and profiling without human intervention and resulting in a legal consequence or impact

The aforementioned rights may be subjected to certain exemptions or limitations that are available under the GDPR and the Irish Data Protection Act. If you wish to exercise any of your rights, or want to know about the applicable exemptions please contact us. We will assess your request and seek to deal with your request without undue delay, and in any event within one month (subject to any extensions to which we are lawfully entitled).

Data Protection Officer (DPO)

ICGP has duly appointed Trilateral Research Limited as its Data Protection Officer (DPO). If you would like to learn more about how ICGP processes your personal data or want to exercise your rights and raise any concerns please contact the ICGP DPO directly (at dataprotection@icgp.ie).



OR ICGP, 4/5 Lincoln Place, Dublin 2, D02 XR68, Ireland). However, if you are not satisfied with the resolution of your request by ICGP you may also raise your concern by way of a representation to the Data Protection commission, Ireland through their [website](#)

This notice is kept under regular review and is therefore subjected to change.

Last Updated: 27/09/2023.