

The JCCP respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

Privacy Notice

1. Purpose of this privacy notice

This privacy notice aims to give you information on how JCCP collects and processes your personal data through your use of this website (regardless of where you visit it from), for the purposes of the legitimate interests pursued by the JCCP, for the performance of a contract or when you exercise certain rights under legislation.

This website is not intended for children and we do not knowingly collect data relating to children except so far as a complaint is made by a member of the public.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

2. Controller

About the Joint Council of Cosmetic Practitioners

The Joint Council for Cosmetic Practitioners (JCCP) Charity is a PSA Approved and recognised self-regulator of the non-surgical aesthetic industry in the UK and the point of access for the public seeking information about this area of practice and where appropriate for raising concerns about practitioners. The JCCP places public protection and patient safety as the focus of its activities.

Key Functions of the JCCP include

- Establishing and managing Register(s) for practitioners and the approved education and training providers.
- Publishing a 'Code of Conduct' for its members and a set of procedures linked to other Codes of practice operated by Statutory Councils – GMC, NMC, GDC, GPhC and the HCPC.
- Publicising the Register(s) which will identify members of the JCCP – fully annotated, its function, Code of Conduct and be accessible to the general public.
- Accrediting individual practitioners and approved training/education providers against the agreed standards

The JCCP is a company limited by guarantee. This means that the JCCP operates as a 'not for profit' body governed by a 'Board of Trustees'. The JCCP is a registered charity and operates for the 'public benefit' by promoting patient safety and public protection.

Our Data Protection lead is Kirsty Benn-Harris who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, please email admin@jccp.org.uk

You have the right to make a complaint at any time to the [Information Commissioner's Office](#) (ICO), the UK supervisory authority for data protection issues. We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please email admin@jcp.org.uk in the first instance.

3. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes email, postal address and telephone numbers.
- **Health Data** includes information in the form of complaints received from members of the public. Information relating to staff and Trustees at the JCCP.
- **Recruitment Data** includes items of personal information such as your name, date of birth, address, qualifications and references.
- **Special Categories of Personal Data** (non-health) includes information about disability, race or ethnicity, religious or philosophical beliefs, sexual orientation or information about political opinions. It is collected to fulfil our statutory and legal requirements in the recruitment and appointment of staff and Trustees and through which we monitor their capacity, capability and diversity.
- **Other personal data** which does not fall within any of these categories (such as employment status and contract type, or bank details) is held to fulfil our recruitment function. This includes information and correspondence related to recruitment and appraisal, performance and development information for those who have either applied for roles that we advertise, have expressed an interest in applying for these roles or who have been appointed.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we have your consent.

- Where we need to perform a contract, we are about to enter into or have entered into with you.
- Where it is necessary for the purposes of the legitimate interests pursued by the JCCP.
- Where we need to comply with a legal or regulatory obligation for the purposes of recruitment and selection and where it is necessary to enter into a contract with you.
- In compliance with a legal obligation to which the JCCP is subject.

5. Purposes for which we will use your personal data

We have set out below a description of all the ways we plan to use your personal data, and the legal bases we rely on to do so.

Purpose/Activity	Type of Data	Lawful basis for processing including legitimate interest
Establishing and managing Register(s) for practitioners and the approved education and training providers.	Identity Data	Explicit consent
	Contact Data	Legitimate interests pursued by the JCCP
	Registrant Patient-related Activity Data	Legitimate interests pursued by the JCCP
Publicising the Register(s) which will identify members of the JCCP – fully annotated, its function, Code of Conduct and be accessible to the general public.	Identity Data	Explicit consent
	Contact Data	Legitimate interests pursued by the JCCP
To create and manage mailing lists, email alerts and newsletters	Identity Data	Explicit consent
	Contact Data	
To respond to a request under the the Data Protection Act or the General Data Protection Regulations	Identity Data	Comply with a legal or regulatory obligation
	Contact Data	
To recruit, appoint, appraise and manage staff and trustees	Identity Data	Explicit consent
	Contact Data	Performance of a contract
	Recruitment Data	
	Special Data	
Investigating complaints	Identity Data	Explicit consent

	Contact Data	
	Health Data	
	Special Data	

6. Your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes (for example your email address) during your relationship with us.

7. Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

8. Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at admin@jccp.org.uk

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so or obtain your consent.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required by law.

10. Disclosures of your personal data

We will not sell your data and we will use it only for the purposes detailed in this notice. If required by UK law, for example, high court order, commission of criminal offence or serious risk to patient safety we will release the minimum information that has been requested or is required; if appropriate we will inform you prior to releasing any information that you have provided to us unless this is not permitted by UK law e.g. Regulation of Investigatory Powers Act 2000 etc.

We may share your personal data with the Advertising Standards Authority or with the Professional Standards Authority or with a designated Professional Statutory Regulator (e.g. the GMC, GDC, NMC, HCPC or the GPhC) in responding to a complaint or whistleblowing case about a provider.

We may share with HF Resolution Limited information for the purposes of delivering the JCCP registration and membership functions; they will process your data on our behalf.

We may also share with NEC Software Solutions UK Limited for the purposes of providing audit and analysis services to the JCCP and the Cosmetic Practice Standards Authority (CPSA).

When we contract with third parties we provide them with personal information to enable them to carry out work for us, we ensure that they are supplied with only the appropriate amount of personal information, that it is used only in accordance with our instructions, and that there are suitable security arrangements in place.

11. Data security

The JCCP shall maintain appropriate technical and organisational measures for protection of the security (including protection against unauthorised or unlawful Processing and against accidental or unlawful destruction, loss or alteration or damage, unauthorised disclosure of, or access to, Customer Data), confidentiality and integrity of Customer Data. The JCCP regularly monitors compliance with these measures.

We limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so

12. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements have been considered.

Most records held by the JCCP will be kept for the duration specified by national guidance from the Department of Health & Social Care found in the [Records Management Code of Practice for Health and Social Care 2016](#), supplemented by HSIB's retention schedule.

In some circumstances you can ask us to delete your data: see 'request erasure' below for further information.

13. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

Request access to your personal data (commonly known as a subject access request). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. 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.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, please contact us on admin@JCCP.org.uk

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise this right set out above, please contact us on admin@JCCP.org.uk

Please note that we don't require you (whether under statute or contract) to provide personal data and we do not make use of automated decision making in relation to personal data. If this changes, we shall let you know.