



## Data Protection Policy

### Purpose

This policy explains how the General Chiropractic Council (GCC) protects personal data and ensures compliance with all applicable UK data protection laws, including the UK GDPR, the Data Protection Act 2018, and all updating legislation, such as the Data Use and Access Act (DUAA) 2025. References to “applicable UK data protection laws” throughout this policy refer to these Acts.

It sets out how the GCC collects, uses, shares, and stores personal data in its role as a statutory regulator, and outlines the rights of individuals and the safeguards applied to protect their information.

See the [glossary](#) at the end of this policy for an explanation of key terms.

### Scope

1. This policy covers all personal data processed by the GCC or by third parties acting on its behalf, regardless of the format or method of collection.

### Introduction

2. This policy applies to all personal data held by the GCC or by third parties acting on its behalf. It covers personal data collected from/about registrants, employees, partners, complainants, members of the public, and website users.
3. The GCC is a ‘Data Controller’ under the UK GDPR and the Data Protection Act 2018, responsible for ensuring that personal data is handled lawfully and transparently. The GCC’s primary role is to protect the public by regulating chiropractors, and personal data is used solely to enable us to perform this statutory function.

### Our commitment to data protection

4. We recognise the importance of privacy and are committed to handling personal data responsibly.
5. The GCC uses personal data only to enable it to perform its statutory functions and never for marketing purposes.
6. We regularly review this policy and our practices to ensure ongoing compliance and proportionality.

7. The GCC's Data Protection Officer (DPO) is primarily responsible for advising on and assessing our compliance with the UK data protection laws and making recommendations to improve compliance. The DPO can be contacted at [dpo@gcc-uk.org](mailto:dpo@gcc-uk.org).

### Why we use personal data and the legal basis

8. We process personal data to fulfil the GCC's statutory role of protecting the public and maintaining a register of chiropractors.
9. The primary legal basis for processing is the exercise of official authority or public task. We may also process data to meet legal or contractual obligations, respond to information requests or where appropriate, rely on our legitimate interests.
10. When relying on our legitimate interests to process personal data, we document our reasoning and ensure appropriate safeguards are in place.
11. Further information about the lawful bases we rely on when processing specific types of personal data are set out in our [Privacy Policy](#), which is readily available on the GCC's website.

### How we use and share personal data

12. We use only the minimum data necessary to fulfil our purposes and publish a clear privacy notice on our website which covers the different groups of data subjects whose personal data we process.
13. Personal data may be shared with legal advisors, other regulators, suppliers, and authorities as required by law, but never for marketing.
14. We may share data with:
  - Chiropractors involved in complaints
  - Legal advisors
  - Other regulators and public bodies under formal agreements
  - Suppliers who provide services on our behalf; and
  - Organisations such as the police or other authorities performing public tasks, where disclosure supports their statutory functions or where we are legally obliged to do so.
15. We publish details of regulatory proceedings in line with our [Publication and Disclosure Policy](#).

### Data processors, other data controllers and international transfers

16. Data processors (those acting solely on our behalf) may include providers of IT services, translation services, research, printing, and mailing. We ensure all suppliers follow our instructions, protect your data, and return or delete data when the service ends.

17. Some of the third parties we share information with are data controllers in their own right, such as legal advisors, other regulators and the police. Where appropriate, we have in place data sharing agreements with these third parties, which govern these data sharing arrangements. We always ensure that personal data is shared securely.
18. We do not routinely transfer personal data outside the UK. Where we use providers located outside the UK, we apply appropriate safeguards to protect the data, as set out in the UK GDPR, such as standard contractual clauses.

### Data protection principles

19. The GCC adheres to the following data protection principles:
  - Lawfulness, fairness and transparency
  - Purpose limitation
  - Data minimisation
  - Accuracy
  - Storage limitation
  - Integrity and confidentiality
  - Accountability
20. We apply these principles in all our processing activities and use encryption, access controls, and secure systems to protect personal data.

### Accountability

21. In accordance with the accountability principle set out in the UK GDPR, we ensure that appropriate and effective measures are in place to meet our legal requirements, including:
  - a. **Privacy notice.** We have a detailed privacy notice published on our website and provide additional privacy information to individuals where required.
  - b. **Staff training.** We provide all staff with detailed data protection and security training as part of their on-boarding process, and ensure this training is updated periodically.
  - c. **Breaches.** We investigate any personal data breach incidents and have a procedure in place for reporting any data breaches. The DPO assesses whether a data breach needs reporting to the ICO and ensures appropriate action is taken to make data subjects aware, if necessary.
  - d. **Information rights.** We have clear procedures in place for handling and processing information rights requests.
  - e. **Record of processing activities (ROPA).** We record our processing activities, including the processing of special category personal data.
  - f. **Policies and procedures.** We have a number of policies and procedures on information management and compliance that we communicate to staff.
  - g. **Data protection impact assessments (DPIA).** We have a procedure in place to assess processing of personal data perceived to be high risk and carry out DPIAs where: (a) legally required; and (b) we are making significant changes to our data processing activities, even where not legally required.

- h. **Contracts.** Our standard contracts and data sharing agreements contain appropriate and adequate data protection clauses to ensure that contracts comply with the UK GDPR.
- i. **Retention and deletion of data.** We maintain a [Retention Policy](#) to ensure personal data is deleted after a reasonable time, in line with the purposes for which it was being held and any statutory retention periods.

## Requests for information

22. We have systems in place to manage requests for information under the UK GDPR, the Freedom of Information Act 2000 (FOIA) and the Environmental Information Regulations 2004 (EIR). Our process for handling FOIA and EIR requests is set out in our FOI Policy, which is available on our website.
23. Individuals have certain rights under the data protection laws to:
- Be informed about how and why we process your personal data
  - Access your data (subject access request)
  - Correct inaccurate or incomplete data
  - Request deletion of your personal data
  - Restrict how we use your data
  - Move your data to another organisation
  - Object to processing
  - Object to automated decisions
24. Some rights only apply in certain circumstances. As we generally process personal data for our public tasks and functions, the right to erasure and the right to have personal data moved to another organisation will not apply to much of the personal data we process.
25. We may ask for proof of identity before responding to a request or, if the request has come via a third party, we will ask for proof of authority. We will not share personal data with anyone if we are not entirely satisfied of their identity and/or authority.
26. For more detailed information in relation to how we handle subject access requests, please see our [Subject Access Requests](#) policy, which is available on our website.
27. All information rights requests are managed by our Data Protection Officer to ensure a thorough and consistent approach. All GCC staff are provided with regular training to ensure they can identify any of the above requests and ensure these are forwarded on promptly.

## Automated decision-making

28. We do not use automated decision-making or profiling. If this changes, we will ensure compliance with all legal requirements.

## Cookies and online services

29. We set certain cookies on our website and further information about this can be found in our Cookies Policy.
30. Users have the right to opt out of non-essential cookies, and we provide clear information about cookie types and purposes on our website.

## Requests and complaints

### Requests

31. You can contact our Data Protection Officer (DPO) to exercise any of your data protection rights:

Data Protection Officer  
General Chiropractic Council  
Park House, 186 Kennington Park Road  
London SE11 4BT

Email: [dpo@gcc-uk.org](mailto:dpo@gcc-uk.org)

### Complaints

32. If you wish to make a complaint about the way we have handled your personal data or how we have dealt with an information rights request, you can use our electronic form available on our website. We will acknowledge your complaint within 30 days, keep you updated as to the progress of your complaint and provide you with an outcome without undue delay.
33. We may ask for proof of identity before investigating and responding to a complaint or, if the complaint has come via a third party, we will ask for proof of authority. We will not share personal data with anyone if we are not entirely satisfied of their identity and/or authority.
34. All data protection complaints are managed by our DPO. All GCC staff are provided with training to ensure they can identify data protection complaints and ensure these are forwarded on promptly.
35. If you are not satisfied with how we have handled your complaint, you can contact the Information Commissioner's Office (ICO):

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Telephone: 0303 123 1113  
Website: [www.ico.org.uk](http://www.ico.org.uk)  
Email: [icocasework@ico.org.uk](mailto:icocasework@ico.org.uk)

Further information can be found here: [Make a complaint | ICO](#)

36. The ICO normally expects individuals to raise data protection complaints with the data controller organisation concerned (i.e. the GCC) before complaining to them.

### Oversight and review

37. We will keep this policy under regular review and update this policy as needed to ensure it reflects the requirements of the data protection legislation.

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## Glossary – Explanation of key terms

A glossary of key terms is provided below for reference.

Term	Definition
Data Controller	An organisation that decides how and why to use personal data. The GCC is a data controller.
Data Processor	A person or organisation that processes personal data on behalf of a data controller.
Data Protection Officer (DPO)	The person responsible for advising on and monitoring data protection within an organisation.
Data Subject	The individual whose personal data is being used.
DPA 2018	The Data Protection Act 2018. UK law that works alongside the UK GDPR.
DUAA 2025	The Data Use and Access Act 2025, which amends the UK GDPR and DPA 2018. Further information and guidance are available from the Information Commissioner's Office (ICO): <a href="#">Data Use and Access Act 2025 (DUAA) - what does it mean for organisations.</a>
UK GDPR	The UK General Data Protection Regulation. A law that sets rules for using personal data in the UK.
ICO	The Information Commissioner's Office (and its successor body, the Information Commission). The UK regulator for data protection and access to public information.
Personal Data	Information that identifies or could identify a living person.
Processing	Any action taken with personal data, including storing, sharing, or deleting it.
Public Task	A legal basis for using personal data to carry out official duties.
Special Category Data	Sensitive personal data that needs extra protection, such as health or racial information.
Subject Access Request	A request to see the personal data an organisation holds about you.

		Document Version Control			
Version No.	Date	Author	Reviewed by	Approved by	Changes made
1.0	May-2018	GCC Executive	Audit & Risk Committee (ARC)	Council	New policy.
2.1	Oct-2025	Director of Corporate Services	ARC		This version supersedes all previous editions, including the May 2018 version.  It reflects updates aligned with the Data Protection Act 2018, UK GDPR, and the Data Use and Access Act 2025 (DUAA). Major changes made to align the policy with DPA 2018 and GDPR 2018.
2.2	19/12/25		Capsticks Solicitors		Tracked changes in document dated 19/12/25.
2.3	04/03/26		ARC, March 2026	Council, June 2026	