



Ag Rialáil Gairmithe Sláinte  
agus Cúraim Shóisialaigh

Regulating Health +  
Social Care Professionals

# Returning to the Register: COVID- 19 Emergency Registration Section 98 Important Data Protection Information

An Chomhairle um Ghairmithe Sláinte agus Cúraim Shóisialaigh  
Health and Social Care Professionals Council



## 1. What is CORU?

As you will be already aware as a returning registrant, CORU is a Statutory Regulator and our role is to protect the public. The law that sets out our functions and powers is the Health and Social Care Professionals Act 2005 (as amended) which can be read here. This Act was recently amended to introduce section 98 which permits the registration of persons previously registered with CORU.

CORU's primary personal data processing purpose under the Article 6 (e) of the General Data Protection Regulation (GDPR) is 'in the exercise of official authority' or as part of our 'public task' and also in compliance with the Data Protection Act, 2018 and the Data Sharing and Governance Act 2019.

National legislation is available on [www.irishstatutebook.ie](http://www.irishstatutebook.ie).

The GDPR is available on [www.dataprotection.ie](http://www.dataprotection.ie).

CORU's privacy statement is available [on our website](#).

## 2. Returning to the Register – COVID-19 Emergency Registrations

On 27 March 2020, legislation was passed by the Oireachtas introducing section 98 to the Health and Social Care Professionals Act, 2005 (as amended).

Before you begin the application process please note you will be asked to provide information which is required to confirm your identity and to prove that you are eligible to return to the Register in response to the COVID 19 emergency. This information may include your:

- Contact Details
- Details of previous CORU Registration
- Proof of identity
- Details of your Current employment (If relevant)
- Evidence of your previous professional employment
- Fit & Proper Declarations
- Any other information that is required by us to complete your application.

When you apply to return to the Register in response to the COVID 19 Emergency, we will:



- Process and manage your application, including verifying the information you have provided to CORU. If necessary, CORU may share it with third parties (such as other regulators or employers).
- Communicate with you for any other reason related to your application.

### **3. Sharing your personal data during the process of the process of Returning to the Register: COVID-19**

CORU will release your personal data when we are required to do so by law.

CORU may also share information with necessary third parties on occasion, namely government departments and government bodies that provide funding to CORU or have an interest in CORU's activities. Information may be passed to government departments and government bodies for research, statistical or analysis purposes.

CORU may obtain or share information concerning your application from competent authorities in countries other than Ireland.

CORU will not provide your personal data to third parties for their marketing purposes.

### **4. Data Processors**

CORU has contracts with external service providers (data processors) to carry out certain activities or services on our behalf. These can include providers of ICT support services, legal support services, clerical support services. Sometimes in order to perform these services our suppliers require access to some of the personal data CORU holds.

### **5. Data Protection Rights**

Some of these rights do not apply or may be limited where CORU uses your data to enable us undertake a task in the exercise of our official authority or in the public interests. For example, rights may be subject to restrictions in the following ways:

- Your rights may be limited by the legal requirements in the Health and Social Care Professionals Act 2005 (as amended) which can include CORU's obligation to protect the titles designated in our Act or process complaints under Part 6 of the Act.



- CORU is using your data to carry out our statutory functions, because there are strong public interest and patient/service user safety grounds for us to process personal information in order to carry out our role.
- Your data protection rights may be restricted by the rights and freedoms of third parties.
- CORU has another legal or regulatory requirement to use your personal information in a particular way.

### **5A. Right of Access**

You can make a subject access request by emailing the Data Protection Officer in CORU at [DPO@coru.ie](mailto:DPO@coru.ie). More details are available on the CORU website.

### **5B. Right to Rectification**

As an applicant you are able to update your personal contact details through the relevant online portal at any time.

You can request that CORU corrects your personal data if you believe the data in your application that CORU holds is inaccurate. However this request must be made in writing and must explain the reason for the inaccurate information contained in your application.

### **5C. Right to Erasure**

Please note that the right to erasure under GDPR does not apply if the use of your data is necessary to enable CORU undertake a task carried out in the exercise of our official authority or in the public interest.

Please note that the right to erasure is not an absolute right and we may decline your request where we have a lawful basis to do so. In the event that this occurs, we will explain our legal basis to you.

### **5D. Right to restrict processing**

If you raise a concern about our processing of your data, you can restrict the way that we use your data while we consider your concern. You must explain the reason for your concern in writing. This may be because you believe it is inaccurate or excessive and you have requested that we rectify this. Please be aware that if our processing of your data is restricted, we may still be able to store your data if we have a lawful basis to do so.



Please note that the right to restrict processing is not an absolute right and we may decline your request where we have a lawful basis to do so. In the event that this occurs, we will explain our legal basis to you.

### **5E. Right to object**

CORU is required by law to undertake certain tasks in the public interest. If processing your data is needed to perform these tasks it is likely that CORU will be unable to agree to stop processing your data. CORU may also refuse to stop processing your data if we can demonstrate that our reasons for processing your data are more compelling than your reasons for wanting us to stop.

### **5F. Right to data portability**

This right only applies when data processing is carried out by automated means. As CORU does not process personal data in this way, this right does not apply to the data CORU holds.

### **5G. Rights in relation to automated decision making and profiling**

CORU does not use your data to carry out any personal profiling or automated decision-making.

### **5H. Our response**

If you choose to exercise any of your rights, CORU will respond to your request within one calendar month. If your request is particularly complex or large, we may extend this timeframe by a further two months. CORU will inform you if we need to extend our response time.

If CORU cannot comply with your request, we will let you know why.

## **6. The Data Protection Commission**

You have a right to lodge a complaint with the Data Protection Commissioner if you think that CORU has not processed your data in accordance with data protection legislation. Their website is [www.dataprotection.ie](http://www.dataprotection.ie).



## 7. Retention of Data

CORU's Retention Schedule is available on the CORU website.