

## **UCO Privacy Notice for Applicants & Students**

We, the University College of Osteopathy (UCO), of 275 Borough High Street, London SE1 1JE, telephone number: +44 (0)20 7407 0222, the Data Controller for personal data relating to you that we process.

This Privacy Notice explains how we will process your personal data and relates to prospective, current and future students of the UCO.

### **Effective Date**

This Privacy Notice is effective from: 25<sup>th</sup> May 2018.

The current version of this Privacy Notice can be found at <https://www.uco.ac.uk/policies-and-procedures>.

### **What information we collect**

As a potential or current student of the UCO, we hold a range of personal data about you, some of which you provide to us direct and some of which we receive from third parties. Examples of categories of personal data which we may hold are:

- Your name and contact information, your date of birth, gender, national insurance number (or other tax identification number) and your passport number or national identity card details, country of domicile and your nationality.
- Your unique student number that we shall allocate to you.
- Your photograph.
- Your course of study and current student status, i.e. if you are Enrolled, taking Time Out, Graduated or Withdrawn.
- Information relating to your education and employment history.
- Information relating to your attendance, academic and clinical performance and achievements.
- Information about your financial circumstances.
- Sensitive personal data, including information concerning your health and medical conditions (e.g. disability needs) and/ or your racial or ethnic origin, religion or similar beliefs and sexual orientation (should you wish to provide this information).
- Information about criminal convictions and offences.

### **How we collect your information**

We collect your data in a number of ways which include:

- From the information you provide us with before joining the UCO, for example when you express and interest in studying at the UCO and/ or on your application form.
- From the information provided to us when you apply to study at the UCO via the Universities and Colleges Admissions Service (UCAS).
- From the information you provide to us during your time as a student of the UCO.

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- From third parties, including:
  - your previous or current school, sixth form college, university or employers who may provide a reference about you or who may sponsor your studies;
  - the Disclosure & Barring Service for information about criminal convictions where appropriate;
  - the Home Office (UKVI);
  - the Student Loans Company; and
  - the Office of the Independent Adjudicator.

**The purposes for which we process your personal data and the legal basis**

We only process data for specified purposes and if it is justified in accordance with data-protection law.

The legal justification for the purposes for which we shall process your data is as follows:

- a) Contract** (the processing is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract).

Under this lawful basis we may use your personal information for the following purposes:

- To interact with you before you are enrolled as a student, as part of the recruitment and admissions process or to answer your enquiries about the UCO.
- Once you have enrolled, to provide you with academic programmes and related services.

**b) Explicit Consent**

Under this lawful basis we may use your sensitive personal information for the following purpose:

- To make reasonable adjustments for disabilities and providing relevant support for health concerns.

- c) Public Interest and Substantial Public Interest** (the processing is necessary for us to perform a task in the public interest).

Under this lawful basis we may use your sensitive personal information for the following purposes:

- To monitor the profile of students studying at the UCO in order to promote equality of opportunity we may process information you provide about your racial or ethnic origin, religion or similar beliefs and sexual orientation;
- To safeguard the UCO community and assess suitability to practise as an osteopath, we may process information you provide about criminal convictions.

- d) Legal Obligation** (the processing is necessary for us to comply with the law).

Under this lawful basis we may use your personal information for the following purposes:

- To meet our compliance and regulatory obligations, such as compliance with anti-money laundering laws and complying with Office for Students requirements.

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- To deal with immigration matters and comply with our legal obligations in relation to students who hold Tier 4 visas.

**e) Legitimate Interests** (the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests).

Under this lawful basis we may use your personal information for the following purpose:

- Our legitimate interests in developing and maintaining an alumni network and marketing our services to alumni.

We may also process your personal data where it is necessary to protect your or another person's vital interest.

### **Whom it will be shared with**

On occasion we may need to share your personal data with certain internal and external third parties, including:

- Our employees, agents and contractors where there is a legitimate reason for their receiving the information, including:
  - Staff responsible for admission and administration, ICT and library services.
  - Student support staff.
  - UCO's academic and clinic staff.
  - Third parties who work with us to provide student support services (e.g. counselling).
  - Third parties who work with us to provide security services.
  - Organisations operating anti-plagiarism software on our behalf (such as Turnitin® or any equivalent);
  - Internal and external auditors.
- Those with an interest in tracking student progress and attendance, including:
  - Student sponsors (e.g. the Student Loan Company (or its equivalent), bursary or funding sponsors, research sponsors, Research Councils).
  - Current or potential education providers (for example, where you take part in an exchange programme as part of your course).
  - Current or potential employers (to provide references and, where students are sponsored by their employer and/or where you take part in a placement, to provide details of progress/attendance).
- Professional and regulatory bodies (e.g. the General Osteopathic Council) in relation to the confirmation of qualifications, professional registration and conduct and the accreditation of courses.
- As part of your professional learning experience we also provide all pre-registration osteopathic students (i.e. students studying on the M.Ost or MSc in Osteopathy (Pre-Registration) courses)

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with student membership of the Institute of Osteopathy (iO). The iO strives to raise standards of osteopathic care and improve understanding and awareness of the benefits of osteopathy amongst the public and fellow health professionals. The basic information we supply them with such as your name and email address is used to inform you about its work, provide conference invites and other related activities. The iO's full privacy policy can be found here: <https://www.iosteopathy.org/privacy-policy/>

- Government departments and agencies where we have a statutory obligation to provide information (e.g. the Office for Students, the Home Office (in connection with UK visas and immigration), Council Tax and Electoral Registration Officers at relevant local authorities (for the purpose of assessing liability for Council Tax and for electoral registration purposes) or their equivalents or replacements).
- The Higher Education Statistics Agency (HESA) the body responsible for collecting and disseminating information about higher education in the UK and the Designated Data Body for England) – please see their student collection notice for further information about how they collect and process student data here: <https://www.hesa.ac.uk/about/regulation/data-protection/notices>
- NHS trusts, NHS foundation trusts and Local Authorities (for the purpose of assessing whether you are entitled to free NHS hospital treatment).
- Crime prevention or detection agencies (e.g. the police, the Department for Work and Pensions and Trading Standards (or its equivalent)).
- Parents, guardians, and next-of-kin (where there is a legitimate reason for disclosure).
- Third parties conducting surveys, including:
  - The National Student Survey (NSS) identified by HESA in their data protection collection notices<sup>1</sup>.
  - The Destination of Leavers from Higher Education Surveys (DLHE) where about six months after graduation we will contact you to complete this survey after which you may be contacted as part of an audit check to ensure that we have carried out this survey properly.
  - Leavers' surveys which you may be included in to track the progress of leavers in the years after they graduate. If a third party organisation is contracted to carry out these surveys, we will pass your contact details to them which they will use for the purpose of the survey only and will then delete them.
  - If you do not want to take part in any of the above surveys, please let us know.
- Destinations outside the European Economic Area (EEA); some of the personal data we process may be transferred to, and stored at, a destination outside the EEA, for example where it is processed by staff operating outside the EEA who work for us or for one of our suppliers, or where personal data is processed by one of our suppliers who is based outside the EEA or who uses storage facilities outside the EEA. In these circumstances, your personal data will only be transferred on one of the following bases:

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<sup>1</sup> <https://www.hesa.ac.uk/about/regulation/data-protection/notices>

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- Where the transfer is subject to one or more of the "appropriate safeguards" for international transfers prescribed by applicable law (e.g. standard data protection clauses adopted by the European Commission);
  - A European Commission decision provides that the country or territory to which the transfer is made ensures an adequate level of protection; or
  - There exists another situation where the transfer is permitted under applicable law (e.g. where we have your explicit consent).
- UCO Fundraising and Alumni Teams when you graduate. For further information, please also see our Privacy Notice for Fundraisers, Supporters and Alumni here:

<https://www.uco.ac.uk/policies-and-procedures>

### **How long we shall keep it for**

Subject to any other notices that we may provide to you, we may retain your personal data for a period of six years after your association with us has come to an end.

Information relating to criminal convictions shall be retained for no longer than is necessary and for a maximum of six months following your provision of a criminal conviction certificate to the UCO as part of student admission procedures or when required throughout your course in line with the Revised Code of Practice for Disclosure and Barring Service Registered Persons published by the Home Office<sup>2</sup>.

We may retain your personal data within our Virtual Learning Environment for the duration of the time you study with us.

Some information (e.g. your academic transcripts and dissertations or final year projects) may be retained indefinitely by us in order to maintain your academic record for research and /or archiving purposes (or by the Fundraising & Alumni Teams for the purposes of supporting your lifelong relationship with the UCO).

For osteopathic students we may retain your personal data on clinical practice management software (e.g. TM2) for the following time periods in line with current guidance published by the General Osteopathic Council:

- a) For patients who are adults (aged 18 years +): a minimum of eight years since their last consultation.
- b) For patients who are children and young people: until their 25<sup>th</sup> birthday.

For osteopathic students we may retain your personal data on home exercise software (e.g. Physiotec) that you may use as part of patient treatment.

When your information is no longer required, we will always dispose of it securely in accordance with our Records and Information Management Policy: <https://www.uco.ac.uk/policies-and-procedures>

### **Information Security**

Your information is a vitally important asset to the UCO and as such we are dedicated to ensuring that your information is kept securely and used appropriately. Your information shall be processed in line

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<sup>2</sup> <https://www.gov.uk/government/publications/dbs-code-of-practice>

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with our Information Security Policy to ensure that it is treated with the highest respect and appropriate standards to keep it safe and secure.

Please view our Information Security Policy here: <https://www.uco.ac.uk/policies-and-procedures>

#### **Your rights**

Under the GDPR<sup>3</sup> you have the following rights:

- To obtain access to, and copies of, the personal data that we hold about you.
- To require us not to send you marketing communications. If you ask us to delete your personal data, we will continue to maintain a core set of personal data comprising very brief information to ensure that we do not inadvertently contact you in future.
- To require us to correct the personal data we hold about you if it is incorrect or where appropriate, given the purposes for which your personal data is processed, the right to have incomplete data completed.
- To require us to erase your personal data. This is a limited right which applies, among other circumstances, when the data is no longer required or the processing has no legal justification. There are also exceptions to this right, such as when the processing is required by law or in the public interest.
- To require us to restrict our data processing activities. This is a limited right which will apply in specific circumstances and for a limited period.
- Where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal.
- To receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller.
- To object to the processing of your personal data when such processing is based on the public interest or other legitimate interests, unless we have compelling legitimate grounds to continue with the processing.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exemptions or exceptions apply (please see our Freedom of Information Policy for further details<sup>4</sup>).

If you wish to access the personal data we hold about you, please submit a Subject Access Request to us. Please refer to our Subject Access Request Procedure which helps you to do this: <https://www.uco.ac.uk/policies-and-procedures>

If you are an applicant and have given your consent and you wish to withdraw it or, please contact our Admissions Team ([admissions@uco.ac.uk](mailto:admissions@uco.ac.uk)).

If you are a current student and have given your consent and you wish to withdraw it or, please contact our Registry Team ([registry@uco.ac.uk](mailto:registry@uco.ac.uk)).

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<sup>3</sup> <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

<sup>4</sup> <https://www.uco.ac.uk/policies-and-procedures>

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Please note that:

- Where our processing of your personal data relies on your consent and where you then withdraw that consent, we may not be able to provide all or some aspects of our services to you and/or it may affect the provision of those services.
- Where the legal basis for our processing of your personal data is contractual necessity, we may not be able to perform the contract we have entered into with you if you fail to provide certain personal data.

### Changing your information

Please tell us promptly about any changes to the information we hold about you. This is particularly important for your contact details.

If you are an applicant, you can do this by emailing [admissions@uco.ac.uk](mailto:admissions@uco.ac.uk) with the relevant information.

If you are a current student, you can do this by emailing [registry@uco.ac.uk](mailto:registry@uco.ac.uk) with the relevant information.

### Contact the Data Protection & Freedom of Information Officer (DPFIO)

If you have any queries about this Privacy Notice or how we process your personal data, you can contact our Data Protection & Freedom of Information Officer by:

Email: [dpfio@uco.ac.uk](mailto:dpfio@uco.ac.uk)

Telephone: +44 (0) 20 7089 5355

Post: Data Protection Officer & Freedom of Information Officer, University College of Osteopathy, 275 Borough High Street, London, SE1 1JE.

If you are not satisfied with how we are processing your personal data, you can make a complaint to the Information Commissioner. You can find out more about your rights under data protection legislation from the Information Commissioner's Office website: [www.ico.org.uk](http://www.ico.org.uk)

Document Amendment Record						
Version number	Dates produced and approved (include committee)	Revision Summary	Reason for production/ revision	Author	Location(s)	Proposed next review date and approval required
V1.0	May 2018 SMT	New Document	To comply with new EU data protection legislation (GDPR).	DPFIO	All master versions will be held in: J:\0 Quality Team - Core Documentation Website	May 2020
V2.0	Jan 2019 DPFIO	Inclusion of the Institute of Osteopathy (iO) as an organisation with whom we may share pre-registration osteopathic students' data with.	Administrative: To reflect student membership arrangements with the iO.	DPFIO	All master versions will be held in: J:\0 Quality Team - Core Documentation Website	May 2020
V3.0	Aug 2019 DPFIO	Added new link to HESA collection notices.	Administrative: To clearly direct data subjects to newly produced HESA collection notices.	DPFIO	All master versions will be held in: J:\0 Quality Team - Core Documentation Website	May 2020