

# ADMISSIONS PRIVACY NOTICE

## Scope

This document refers to personal data, which is defined as information concerning any living person (a natural person who hereafter will be called the Data Subject) that is not already in the public domain.

The General Data Protection Regulation (GDPR), which is EU wide and far more extensive than its predecessor the Data Protection Act, along with the Privacy and Electronic Communications Regulations (PECR), seek to protect and enhance the rights of EU data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU and its storage within the EEA.

**1** – The British College of Osteopathic Medicine (trading as 'BCNO Ltd'), based at Lief House, 3 Sumpter Close, London NW3 5HR, which hereafter for the purposes of this Privacy Notice will be referred to as 'BCOM' or 'the College', is pleased to provide the following information:

## **2 - Who we are**

BCOM is a higher education institution, which also provides outpatient osteopathic care and undertakes research.

## **3 - Personal Data**

For the purposes of facilitating student enrolment and study at BCOM, the College may collect and process personal data, including 'special category' or 'sensitive' data. This may be data collected directly from you, or via the UCAS process. We will only collect and process what is relevant and necessary for the admissions process and any related Registry department activities. This data is always held securely, and is not shared with anyone outside the College, unless specified below. All BCOM staff have signed a confidentiality agreement.

In addition to this, the College may process some information about you that is classed as 'sensitive' or 'special category' personal data, and which requires additional protections. This includes information that you may have declared concerning your ethnicity, sexual orientation, religious beliefs or health/disability that we use for planning and monitoring purposes, or in order to provide care, help or suitable adjustments. For certain courses of study, other sensitive information may be processed, such as information about past criminal convictions, working with children or vulnerable adults, and your fitness to practise in certain regulated professions. Access to, and the sharing of, your 'sensitive' personal data are controlled very carefully. You will normally be given further details about our use of any such data when we collect it from you.

For applicants to undergraduate degree courses:

BCOM will use the details you provide on your UCAS application and Supplementary Application Questionnaire (SAQ), together with the supporting documents requested in the SAQ and additional details provided by any referee and recorded following any interview process. We will also conduct screening checks for safeguarding purposes.

For applicants to graduate degree courses:

BCOM will use the details you provide on your application form, together with the supporting documents requested and additional details provided by any referees and recorded following any interview process.

For all applicants, if you provide any information about relevant unspent criminal convictions during the application process, we will use this information as described in the BCOM Criminal Convictions Policy, a copy of which will be sent to you as part of the Admissions process.

## **4 - Legal basis for processing any personal data**

BCOM will process the personal information provided on your application and the other information referred

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to above for the purposes of identifying you, processing your application, verifying the information provided, deciding whether to offer you a place for the course you have applied for, and communicating that outcome (together with any feedback).

We may also use or disclose the information provided for the following contractual, statutory or public interest purposes:

- To prevent or detect fraud.
- For equal opportunities monitoring.
- To help us to make reasonable adjustments for any disability, as requested by you.
- For research and statistical purposes, but no information which could identify you will be published.

We consider the processing of your personal information for the above purposes to be either necessary for us to take steps with a view to creating a contractual relationship with you (e.g. to assess your application to study with us), or necessary for compliance with a legal obligation (e.g. equal opportunities monitoring), or necessary for the performance of tasks we carry out in the public interest (e.g. admissions research). We require you to provide us with the information we ask for during the application process in order to assess your application properly except where its supply is marked as optional. Admissions decisions are not automated.

## 5 – Disclosure

BCOM will keep your personal information safe and secure, and will not disclose your personal information unless compelled to, in order to meet legal obligations, regulations or valid governmental requests. The practice may also enforce its Terms and Conditions, including investigating potential violations of its Terms and Conditions to detect, prevent or mitigate fraud or security or technical issues; or to protect against imminent harm to the rights, property or safety of its staff.

As well as circulating your application and related materials to the appropriate staff at BCOM, we will share your personal information for the above purposes as relevant and necessary with:

- Your referees.
- Where relevant and as required and/or notified to you, your school/college or training organisation.
- Once you have enrolled on course of study at BCOM, and for the duration of your studies, we will share relevant data with Plymouth University, our validating body. The Plymouth University privacy statement may be found at <https://www.plymouth.ac.uk/student-life/your-studies/essential-information/data-protection>.
- Your examination boards or awarding bodies.
- Your student support assessment body.
- Your funders and/or potential funders (including the Student Loans Company).
- In the case of international applicants, the British Council or appropriate agencies.
- Where relevant and as required, UK Visas and Immigration in order to act as your sponsor for visa purposes, and with the immigration law specialists engaged by BCOM (Mark Taylor Associates).
- Where relevant and as required, governmental bodies including local authorities, the Home Office, and the Department for Work and Pensions and its agencies.
- Other Higher Education organisations, in order to assist with tracking and research into access to Higher Education.
- Companies or organisations providing specific services to, or on behalf of, the College

## 8 - Retention Policy

We store your personal information for as long as necessary to complete the application process. If you are successful, your information will be kept as part of your student record for the duration of your studies (and it may be used as part of our assessment of any future application you make for further studies at BCOM). If you are unsuccessful, your information will be normally kept for at least one year after the completion of

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the application process. Thereafter, your UCAS form and any interview notes will be kept for a further calendar year. Information about how long different types of information are retained by the College is published in BCOM Registry and Admissions Records Management Policies (available on request)

## 9 - Data storage

All data is held in the United Kingdom.

## 10 - Your rights as a data subject

At any point whilst BCOM are in possession of, or processing your personal data, all data subjects have the following rights:

- Right of access –you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – under certain circumstances, you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply you have a right to restrict the processing.
- Right of portability – under certain circumstances, you have the right to have the data we hold about you transferred to another organisation.
- Right to object – under certain circumstances, you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right not to be subject to the legal effects of automated processing or profiling.

In the event that BCOM refuses your request under rights of access, we will provide you with a reason as to why, which you have the right to legally challenge. At your request BCOM can confirm what information it holds about you and how it is processed.

## 11 - You can request the following information:

- Identity and the contact details of the person or organisation (BCOM) that has determined how and why to process your data.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of BCOM and information about these interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- How long the data will be stored.
- Details of your rights to correct, erasure, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority (ICO).
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

- **12 - To access what personal data is held, identification will be required**

BCOM will accept the following forms of identification (ID) when information on your personal data is requested: a copy of your driving licence, passport, birth certificate and a utility bill not older than

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three months. A minimum of one piece of photographic ID listed above and a supporting document is required. If Osteopaths is dissatisfied with the quality, further information may be sought before personal data can be released. All requests should be made to [dpo@bcom.ac.uk](mailto:dpo@bcom.ac.uk) or by phoning +44 (0) 207 435 6464 or writing to us at the address further below.

- **13 Complaints**

In the event that you wish to make a complaint about how your personal data is being processed by Osteopaths you have the right to complain to us. If you do not get a response within 30 days, you can complain to the ICO.

The details for each of these contacts are:

Data Protection Officer Telephone 0207 435 6464 or email: [dpo@bcom.ac.uk](mailto:dpo@bcom.ac.uk)

## ICO

Wycliffe House, Water Lane, Wilmslow, SK9 5AF Telephone +44 (0) 303 123 1113 or email:

<https://ico.org.uk/global/contact-us/email/>