

# REGISTRY 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 Frazer House, 6 Netherhall Gardens, London NW3 5RR, 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. The College will keep a record of the details you provided on your application form, any supporting documents requested as part of your admission and additional details provided by any referees and recorded following any interview process. We will also maintain records about your studies at BCOM, and about your use of the academic and non-academic facilities and services that we offer. This personal information will include data such as your name, home address, date of birth, course studied, fee payments, and information about your examinations, assessments and results.

Your personal information is created, stored and transmitted securely in a variety of paper and electronic formats, including data that are shared between the College and our validating body, University of Plymouth. Access to your personal information is limited to College staff who have a legitimate interest in it for the purpose of carrying out their contractual duties, and our use of your personal information will not be excessive.

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 or BCOM application form, enrolment form, together with the supporting documents requested during the Admissions process and additional details provided by any referees and recorded following any interview process. For certain courses (Masters in Osteopathy & Diploma in Naturopathy), we will also conduct a Disclosure and Barring Service Enhanced Check for safeguarding purposes.

For applicants to graduate degree courses:

BCOM will use the details you provide on your UCAS or BCOM application form, enrolment form, together with the supporting documents requested during the Admissions process and additional details provided by any referees and recorded following any interview process. For certain courses, we will require applicants

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to have a DBS check. If you provide any information about relevant unspent criminal convictions during the application process, we will use this information as described at <https://www.bcom.ac.uk/wp-content/uploads/2017/10/Admissions-Policy-Procedure-2018-19.pdf>, and at <https://www.plymouth.ac.uk/schools/education/dbs-assessments>.

## 4 - Legal basis for processing any personal data

The College will process your personal information for a range of contractual, statutory or public interest purposes, including the following:

- To deliver and administer your education, record the details of your studies (including any placements with external organisations), and determine/confirm your academic achievements (e.g. results, prizes).
- Where relevant (e.g. for PhD students), to monitor, evaluate and support your research activity.
- To administer the financial aspects of your relationship with us and any funders.
- To deliver facilities to you (e.g. IT, library).
- To enable your participation at events (e.g. functions, graduation).
- To communicate effectively with you by post, email and phone, including the distribution of relevant newsletters and circulars.
- To operate security, governance, disciplinary (including plagiarism and academic misconduct), complaint, audit and quality assurance processes and arrangements.
- To support your training, medical, safety, welfare and religious requirements.
- To compile statistics and conduct research for internal and statutory reporting purposes.
- To fulfil and monitor our responsibilities under equalities, immigration and public safety legislation.
- To enable us to contact others in the event of an emergency (we will assume that you have checked with the individuals before you supply their contact details to us).

We consider the processing of your personal information for these purposes to be either necessary for the performance of our contractual obligations with you (e.g. to manage your student experience and welfare while studying at BCOM), 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. teaching and research), or necessary for the pursuit of the legitimate interests of the College or an external organisation (e.g. to enable your access to external services). If we require your consent for any specific use of your personal information, we will collect it at the appropriate time and you can withdraw this at any time. We will not use your personal information to carry out any wholly automated decision-making that affects you.

## 5 – Disclosure

As described above, your personal information is shared with relevant staff at the College or at University of Plymouth, as required. The University of Plymouth privacy statement may be found at <https://www.plymouth.ac.uk/student-life/your-studies/essential-information/data-protection>. In addition, it is shared as permitted or required by law, on a considered and confidential basis, with a range of external organisations, including the following:

- Your funders and/or sponsors (e.g., as relevant, the Student Loans Company, the funders of any awards or prizes).
- The providers of any external/collaborative learning and training placements or fieldwork opportunities.
- Relevant Government Departments (e.g. Department for Education, Home Office, Foreign and Commonwealth Office, Department of Health).
- Relevant executive agencies or non-departmental public bodies (e.g. UK Visas and Immigration, HM Revenue and Customs, the Health and Safety Executive).

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- Relevant Higher Education bodies (e.g. Higher Education Funding Council for England, Office for Students, UK Research and Innovation, Universities and Colleges Admissions Service, Office for Fair Access, Office of the Independent Adjudicator, the organisation(s) running the National Student Survey and other student and leaver surveys).
- Any relevant professional or statutory regulatory bodies (e.g. General Osteopathic Council).
- The University of Plymouth students' union, in order to facilitate your membership of this (only if you have opted in).
- The BCOM Alumni Association, headed by BCOM's Head of Marketing, who will use your contact details (e-mail address) to send details to you about alumni events, job opportunities and other alumni information – only if you have opted in when you complete your course.
- On occasion and where necessary, the police and other law enforcement agencies.
- On occasion and where necessary, auditors.
- Companies or organisations providing specific services to, or on behalf of, the College, such as the Student Loans Company – via University of Plymouth - (to confirm your attendance and resolve possible tuition fee queries), as well as debt recovery agents
- The General Osteopathic Council (GoSC) - where a student has been found guilty of breaching the Fitness to Practice policy, the GoSC requires us to provide them with name, nature of allegation and the outcome of the Fitness to Practice proceedings.

We will normally confirm details of your results, and degrees awarded, to the General Osteopathic Council (GoSC) in order for students to register upon completion of all aspects of the course, and will provide references to third parties. Your name and the type of degree awarded will be published in the relevant graduation programme, with your consent, which will be sought at the appropriate time.,

Other than as set out above, we will not normally publish or disclose any personal information about you to other external enquirers or organisations unless you have requested it or consented to it, or unless it is in your vital interests to do so (e.g. in an emergency situation).

## 8 - Retention Policy

If your application has been 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). After you graduate a core record of your studies is retained indefinitely so that the details of your academic achievements can be confirmed and for statistical or historical research. Your contact and core personal details are entered onto the Alumni database, if you give your consent. You will be given more details about the Alumni database at the appropriate time.

## 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.

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- 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 three months. A minimum of one piece of photographic ID listed above and a supporting document is required. If BCOM 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 BCOM 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/>