
POLICY

Registered Student Privacy Notice

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Chief Operating Officer

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Registered Students Privacy Notice

**Data controller: The McTimoney College of Chiropractic, part of The College of Health Ltd,
McTimoney House, 1 Kimber Road, Abingdon OX14 1BZ**

Privacy Notice Statement

This notice provides information about the use of personal information while you are a registered student of the College.

What is personal data (also often referred to as personal information)?

Personal data means any information which relates to or identifies you as an individual and includes opinions about you or information which may not explicitly identify you (e.g. where your name has been removed) but which nevertheless does identify you if it is combined with other information that is readily available.

How does this notice relate to other information about data protection?

When you applied to become a student you were told how the College would use your personal information to process your application. This notice provides you with the details about the uses we make of your personal information while you are a registered student.

Who will process my personal information?

This notice explains how the College will hold and process your personal information whilst you are a registered student of the College.

How do we obtain your personal data?

- We obtain personal data from you when you disclose this to us, as a student, including annually at registration/enrolment and during the course of your relationship with us when accessing or using any of our services
- We might obtain personal data disclosed to staff
- We also receive personal data about you from other organisations when you make an application to study at the College and this information will form the basis of your student record when you become a registered student of the College e.g. from UCAS and/or from individual referees, and/or the Student Loans Company

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- On rare occasions we may also receive personal information about you from other third-party organisations that have relationships with the College such as the Police, external health agencies and providers.

What personal information will you process?

The College needs to collect, maintain and use personal data relating to or about you. This includes:

- Personal contact details such as name, title, home and term time address, telephone numbers, and personal email addresses
- Date of birth
- Gender
- Marital status and dependants
- Next of kin and emergency contact information
- Course studied
- Records of payments made to the College
- Bank account details where required for the collection of fees and charges, and where applicable, bursaries and other payments made by the College
- Information about your assessments and results
- National Insurance number where required for Disclosure and Barring Services checks
- Where relevant a copy of passport, visa and other right to study documentation
- 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
- Information relating to your health including about a disability collected as part of registration (please see section 10 for more information about how we handle this information)
- For the purposes of assessing eligibility for bursaries, hardship funds and programmes linked to the receipt of a bursary, a record of household income will be maintained
- Records about you and your studies during your time at College
- Records about your use of the academic and non-academic facilities and services that we offer including details of your engagement with your programme
- CCTV footage and other information obtained through electronic means
- Information about your use of our information and communications systems
- Photographs used to identify you and those taken at College events. You will be informed separately where photographs are taken at events and consent will be sought before an image identifying you is re-used

What is the purpose of the processing under data protection law?

We will only use your personal information when the law allows us to do so by providing us with a legal basis or valid condition. Most commonly, we will use your personal information in the following circumstances where it is necessary for the:

- Performance of our contractual obligations with you (e.g. to manage your student experience)

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and welfare while you study at the College)

- Compliance with a legal obligation (e.g. UK equal opportunities monitoring)
- Performance of tasks we carry out in the public interest (e.g. teaching and research)
- Necessary for the pursuit of the legitimate interests of the College or an external organisation (e.g. to enable your access to external services)

We may also use your personal information in the following situations, which are likely to be rare:

- Where we need to protect your vital interests (or someone else's interests)

If we require your specific and informed consent for any additional uses of your personal information not referred to in this notice, we will collect this from you separately and explain why it is we need this. You can withdraw your consent at any time.

We might seek additional consent from you when we are taking photographs and want to use the images online or when we need to use or share more sensitive information about you.

Can you provide examples of processing?

The College will process your personal information, including where applicable your image, 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)
- To administer student related policies and procedures including appeals, complaints, grievances, disciplinary matters (including academic misconduct, Fitness to Practise and Fitness to Study. On rare occasions this may also include matters relating to off-site issues such as anti-social behaviour or matters related to health and welfare
- To operate security (including CCTV), governance, audit and quality assurance processes and arrangements
- To administer the financial aspects of your relationship with us and any funders, including international funders and manage the granting of scholarships, bursaries and other discretionary payments
- To deliver facilities or services to you (e.g. IT, including the provision of a College email address, academic advising or any other support to help you achieve your academic potential and support your wellbeing)
- To produce student identification cards containing images and maintain records of your image so, for example, that we can identify you and provide access to buildings and services.
- To support your training, medical, safety, welfare and religious requirements
- To compile statistics and conduct research for internal and statutory reporting purposes, for business improvement, and/or to support changes to service delivery
- To fulfil and monitor our responsibilities under UK equalities, immigration and public safety legislation
- To monitor the attendance of students in accordance with our Attendance Policy, and where relevant for UKVI Student Route Visa compliance.
- To enable us to contact others in the event of an emergency, including your designated

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emergency contacts (we will assume that you have checked with the individuals before you supply their contact details to us) in line with the Student Emergency Contact statement

- To record certain lectures.
- To record other remote teaching and learning interactions utilising online meeting tools. You will be provided with further information about these recordings at the time they are made
- Where relevant, to monitor, evaluate and support your research activity
- To enable your participation at events, including graduation ceremonies
- To communicate effectively with you (typically by email, post or phone) including the distribution of relevant newsletters and circulars sent to your student email account containing information the College considers necessary to support your student experience. Where appropriate you will be given the opportunity to opt-out of receiving certain communications from us
- We may also contact you by social media channels and applications where you have joined an official College social network or initiated contact with us in this way
- To comply with our obligations to funders and sponsors (including our disclosure obligations under their terms and conditions and policies)

What constitutes “Special Category Data”?

The College will also process some information about you that is considered more sensitive and this is referred to as ‘special category’ personal data in the General Data Protection Regulation and Data Protection Act 2018. When we process this type of information we are required to apply additional protections. Special category personal data is defined as racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health - including mental health and disability information, or sex life and sexual orientation, genetic data and biometric data which is processed to uniquely identify a person. In the UK any personal information relating to criminal convictions and offences also requires additional protections.

How will you process my Special Category and criminal conviction personal information?

We will only process special category personal information in certain situations in accordance with the law. For example, we can do so if we have your explicit consent and, in some circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do, we will provide you with full details for the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent, which you can withdraw at any time. Where you provide sensitive information such as details about disability/SLD/health conditions at registration, or at another time in order to receive an additional service, such as occupational health, counselling or register with the Disability Advisory and Support Service (DASS) you will be given further details about the use of this data.

We do not need your consent to process special category personal data when we are processing it for the following purposes as these satisfy another legal justification:

- where we need to carry out our legal obligations
- where you have made the data public
- where it is necessary to protect your vital interests or those of another person and where you/they are physically or legally incapable of giving consent. This would be in an emergency

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- situation where your health, wellbeing or welfare was at risk
- where processing is necessary for the establishment, exercise or defence of legal claim
- where the processing is necessary in the public interest for the purposes of protecting the public.

We will use your special category personal information in the following ways:

- your race, disability status, national or ethnic origin, religious, philosophical or moral beliefs or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting (including where for monitoring purposes conducted by the Higher Education Statistics Agency)
- for certain courses of study, information about past criminal convictions and offences will be processed where this is relevant because you are working with children or vulnerable adults, and/or because of fitness to practise or fitness to train requirements in certain regulated professions. In these circumstances a DBS check may be required. Where this is the case you will be informed separately.
- for courses other than those above, information relating to ‘unspent’ criminal convictions is collected once an offer has been accepted. This is to ensure that appropriate risk assessments can be carried out. A record of your response to this question is maintained and is updated if the College is made aware that you have been convicted of an offence during your time as a registered student
- information about your physical health or mental health or disability status to ensure your health and safety whilst registered at the College and to assess your fitness to practice, study, travel, take part in certain teaching and learning opportunities, provide appropriate reasonable adjustments and where you request it, to make decisions relating to applications for mitigating or changed circumstances or other academic appeals
- where you choose to provide the College with sensitive information about yourself for the purposes of student support we will use this to work with you and provide the support you requested. On occasion, where we receive information about you relating to a concern from a third party we will also use this to provide you with appropriate support which may include taking action to safeguard you or someone else.

Who will my personal information be shared with?

As described above, your personal information is shared with relevant College staff as required. In addition, it is shared as permitted or required by law, on a considered and confidential basis, with a range of external organisations or third parties, including the following:

- UK Higher Education Statistics Agency (see HESA’s statement about the uses made by them of your personal information published at <https://www.hesa.ac.uk/about/regulation/data-protection/notices#student>).
- Your funders and/or sponsors (e.g., as relevant, the UK Student Loans Company, other funders or sponsors, funders based in other countries including those outside the UK, Research and Innovation, Research Councils, Teach First, the funders of any awards or prizes)
- The providers of any external/collaborative learning, training, work or other placements
- The relevant overseas College centre if you are studying a course with learning based abroad
- External examiners and assessors, and external individuals involved in relevant College

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committees or procedures

- Relevant UK Government Departments (e.g. Department for Education, Home Office (including UK Visas and Immigration), Foreign and Commonwealth Office, Department of Health) and other public bodies (e.g. HM Revenue and Customs, the Health and Safety Executive) for the assessment of student status for immigration and visa purposes; for the purposes of gathering census or other information including the assessment of fee
- Relevant Higher Education bodies (e.g. Office for Students, UK Research and Innovation, Universities and Colleges Admissions Service, Office of the Independent Adjudicator, the organisation(s) running the National Student Survey and other surveys)
- The General Chiropractic Council if you are a chiropractic student, including your student record, information pertinent to your educational achievements and to your fitness to practise.
- Any other relevant professional or statutory regulatory bodies
- Where you study at an overseas College centre personal information may be disclosed to international governmental/regulatory bodies based in that country
- To any third-party student accommodation providers operating under contract on behalf of the College
- The College's Students' Association, in order to facilitate your membership of this and associated clubs and societies. You have the opportunity to opt-out of membership of the Students' Association
- We may disclose the names and addresses of relevant students to relevant local authorities on an annual basis to assist with the administration of students' exemption from Council Tax
- We may also disclose the names, date of births, nationalities, term time residential addresses and College email addresses of relevant students to the local Council to support enrolment on the electoral register
- On occasion and where necessary, the police and other law enforcement agencies.
- Where necessary the emergency services and your designated emergency contact where there is an urgent requirement to share information e.g. illness, serious injury, bereavement or the suspicion/risk of this in accordance with the Student Emergency Contact statement
- On occasion and where necessary, College auditors and, where required, other statutory bodies acting in an audit capacity
- On occasion and where necessary, subsidiary companies of the College
- Companies or organisations providing specific services to, or on behalf of, the College under contract (a data processor) e.g. Microsoft for email services/Office 365 and of CRM services,
- To any third party wishing to access a catalogue within the College's library containing reference to student work
- To banks (and other payment agencies you may use), family members who are paying your fees, sponsors or other third parties to enable them to pay student debts and this includes the disclosure of relevant information to our supplier of banking services for the purposes of complying with anti-money laundering regulations
- To external agents and debt collectors acting for the College in relation to the repayment of student debts; where relevant to international sponsors and in the case of students in receipt of a student loan from a United States loan provider details about your studies will be disclosed to

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that provider

- The Police, for relevant overseas students from certain countries there may be a requirement to register under the terms of a student visa. In these cases only your name, date of birth and nationality and if applicable the details of any dependants are shared prior to your registration appointment with the Police. This requirement is in the process of changing and is expected not to be needed in the future.
- We will provide references to third parties with your consent
- We will make your name and confirmation of your award available at your graduation ceremony and in the graduation programme which may be published online but you have the opportunity to opt-out of this if you wish by contacting us
- On occasion, the above types of sharing may involve the transfer of your personal information outside the UK (e.g. to facilitate your participation in an exchange visit or to report to an overseas funding provider). Such transfers usually are necessary in order to meet our contractual obligations with you, and are carried out with appropriate safeguards in place to ensure the confidentiality and security of your personal information
- 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)
- Our funders and sponsors - this may include for the purposes of applying for grants/funding and managing successful applications (the College is required, for example, to disclose certain information to funders and sponsors under grant/funding terms and conditions including, for example, allegations of bullying and harassment raised in connection with individuals associated with the grant/funding)

How is my personal information used after I graduate?

After you graduate a permanent record of you and your studies is retained for two years following your graduation indefinitely so that the details of your academic achievements can be confirmed and used for statistical or historical research.

- Your contact details and details about your studies are passed to the Alumni Team at the point of formally becoming a student so that you can be added to the alumni database. A privacy notice for our alumni and supporters setting out how their personal information is used by the College is published on our website
- Your contact details will also be passed to HESA and/or an organisation contracted to undertake a graduate outcomes survey on their behalf (further information is available from <https://www.hesa.ac.uk/about/regulation/data-protection/notices>). The survey contractor will only use your contact details for the survey and will delete them when the survey is closed. HESA may hold your contact details for further graduate outcomes surveys where these are in the public interest. Your responses to the survey of graduate outcomes will be made available to the College. These surveys are used to create statistics to meet the public interest in the outcomes of higher education
- If you are contacted and asked to take part in post-graduation or student experience related surveys further privacy and data protection information will be provided to you. You might also be contacted as part of an audit to check that the survey has been undertaken properly

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What are my rights in connection with my personal information?

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing where there is no good reason for us doing so.
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it
- Request the transfer of your personal information to another party

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

If you would like to exercise any of these rights, you should contact the College Data Protection Officer dataprotection@collegeofhealth.uk.

How long is my information kept?

We store your personal information as part of your student record for the duration of your studies and for a defined period after you graduate or withdraw from your studies.

Who can I contact?

If you have any questions about how your personal information is used, or wish to exercise any of your rights, please contact the College Data Protection Officer by email dataprotection@collegeofhealth.uk or you can write to FAO Data Protection Officer, The McTimoney College of Chiropractic (part of the College of Health), McTimoney House, Kimber Road, Abingdon, Oxfordshire, OX14 1BZ.

How do I complain?

If you are not happy with the way your information is being handled, or with the response received from us, you have the right to lodge a complaint with the Information Commissioner's Office at Wycliffe House, Water Lane, Wilmslow, SK9 5AF (<https://ico.org.uk/>).

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1. Document Controls

1.1. Document Approvals

Named person(s) below indicates that this document has been reviewed and approved by the appropriate people. This document is subject to formal change control procedure.

Date	Role/Position	Name
02/12/22	COO	Matt Green

1.2. Amendment History

Date	Version	Author	Description
02/12/22	2.0	Matt Green	Updated as part of annual data protection review.

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