



IPAC SYSTEM - PRIVACY NOTICE

1 Introduction

The IPAC system team (“we” “us”, or “our”) respects your privacy and is committed to protecting your personal data.

Please read this Privacy Information carefully – it describes why and how we collect and use personal data and provides information about your rights. It applies to personal data provided to us by your host institution when using the IPAC system.

2 About us

The IPAC team is part of the Medical Physics and Biomedical Engineering department, at University College London (**UCL**).

UCL, a company incorporated by Royal Charter (number RC 000631), is processing your data under contract with your home institution. Your home institution is determining the purpose and means of processing your personal data and we follow its instructions when doing so. This means that UCL is the ‘processor’ of your personal data for the purposes of data protection law.

3 Personal data that we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

3.1 In the case of students

The IPAC system has access and collects some of your data **ONLY** in the case that a member of staff, lecturer or module organizer in your institution chooses to use the IPAC system in a module or course where you are registered, typically done for the Individual Peer Assessment of Contribution to group work. The staff, lecturer or module organizer using the IPAC system will be in control and decides when that transfer of information between the module or course and the IPAC system occurs.

In the case set up above, we may collect, use, store and transfer different kinds of personal data about you. This may include:

- Your name, email address and student number;
- The name of the institution and module that is using the IPAC system for your assessment;
- The ratings and comments provided by (a) you about your teammates and (b) your teammates about you via the IPAC system when this is used by the module organizer or lecturer for the assessment of the Individual Contribution to the group work carried out as part of your education.
- Your final Individual Peer Assessment of Contribution to group work mark (the IPAC value) calculated as set by the lecturer or module organizer and with their moderations applied.
- Staff observations of your participation in the group work being assessed with the IPAC system, and/or moderations applied by the lecturer/module organizer to your IPAC value, e.g. if penalty for late submission applies or if you have used unproper language when giving written feedback to your peers.
- The same information is recorded for all students enrolled in the module where the IPAC system is used by the lecturer and/or module organizer.

3.2 In the case of staff

3.2.1 In the case of staff enquiring about/organizing the use of the IPAC system

In the case of staff who enquired or are using the IPAC system or our support services, we collect, use and store the following information:

- You name, contact details, and the institution where you work.
- The reason for you to contact us and any relevant resolution.

3.2.2 In the case of other staff registered in a module that uses the IPAC system

The IPAC system only requests from the institutional Virtual Learning Environment the list of students who are registered in the modules where the IPAC system is used. However, in rare occasions, the institutional VLE also list as students the staff or observers who are enrolled in such modules/courses, giving us access to their names and email addresses. This only happens rarely and it is related to how the institution handles the different roles in their VLE.

3.3 In the case of an institution or an individual IPAC system user

Each licensee of the IPAC system is provided with a unique two-way password protected log-in such that (a) only the licensee can access the IPAC system, and (b) the IPAC system can receive data from the institutional Virtual Learning Environment (VLE). In technical terms, the log-in to the LTI is defined by the “key”, “shared secret”, and “token”. We keep these log-in details securely store and password protected.

4 How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

4.1 *In the case of students*

- To identify you as a student in the course/module where the IPAC system is being used.
- To record your submission of scores and comments to your peers, which is used for the calculation of their IPAC value and towards the construction of their formative feedback.
- To assess your individual contribution to the group work, that might include the calculation of your IPAC score and the construction of your feedback.

Your home institution has control over the data that we keep about you as it is part the data used for your assessment during your education.

4.2 *In the case of staff*

4.2.1 In the case of staff enquiring about/organizing the use of the IPAC system

- To register you as a client and to manage our relationship with you.
- To help you with your enquiry. Depending on the circumstances, this may include specific data related to your course or class. Here, the processing of your information is carried out on the basis of your explicit consent.

4.2.2 In the case of other staff registered in a module that uses the IPAC system

Your personal information is stored and not further processed.

4.3 *In the case of an institution or an individual IPAC system user*

- To register you as a client and to manage our relationship with you.
- A summary record of your use of the IPAC system is kept, which includes generic/non-personal data such as number of times and when the IPAC system was used, how many students were involved in each instance, etc.

4.4 *Use of anonymised data*

For staff and students involved on the use of the IPAC system, we may also use anonymised data, meaning data from which you cannot be identified, or the name of your institutions or departments/schools for the purposes of:

- Service evaluation;
- Education and research; or
- Fundraising and promotional purposes.

Anonymised data may also be used in published reports or journals and at conferences.

5 Who we share your personal data with

5.1 In the case of students

Your personal data will be collected and processed primarily by your home institution, with access to your personal information limited to staff who have a legitimate need to see it for the purpose of carrying out their job at such institution. The personal data used by the IPAC system (as detailed in section 3.1) is recorded and kept in UCL servers, but access to it is limited to staff who maintain the IPAC system, the associated databases, and the servers where they are hosted, or others with legitimate need.

We do not share your personal data with third parties.

5.2 In the case of staff

5.2.1 In the case of staff enquiring about/organizing the use of the IPAC system

Your personal data (specifically name, contact details and school/department where you work) might be shared internally with relevant staff in your own home institution for the purposes of specifying who is using the IPAC system.

Your personal data will not be shared with any other third party unless you give specific written consent.

5.2.2 In the case of other staff registered in a module that uses the IPAC system

Your personal information is not shared with any third party in any way.

5.3 In the case of an institution or an individual IPAC system user

Personal or secret data will not be shared with any third party.

5.4 Use of anonymised data

Anonymous data might be used for the purposes outlined in section 4, which might include disclosure to third parties.

6 Lawful basis for processing

Data Protection Legislation requires that we meet certain conditions before we are allowed to use your data in the manner described in this notice. Your personal data is processed pursuant to a contract with your home institution, which is required under the UK GDPR. As data controller, your host institution will determine the "lawful basis" for the processing of your personal data and we process your personal data under their instruction.

7 International transfers

We do not transfer your personal data outside the European Economic Area (EEA).

8 Information security

All data (personal and otherwise) stored by the IPAC system is kept in UCL servers. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We have established procedures to deal with any suspected personal data breach and will notify your home institution via relevant channels and any applicable regulator of a breach where we are legally required to do so.

9 Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Subject to these requirements, your data will be deleted or returned to your host institution on request. For further information on data retention, please contact your host institution.

10 Your rights

Under certain circumstances, you may have the following rights under data protection legislation in relation to your personal data:

- Right to request access to your personal data;
- Right to request correction of your personal data;
- Right to request erasure of your personal data;
- Right to object to processing of your personal data;
- Right to request restriction of the processing your personal data;
- Right to request the transfer of your personal data; and
- Right to withdraw consent.

If you wish to exercise any of these rights, please contact your host institution, which is responsible for handling these requests as the data controller.

11 Contacting us

You can contact UCL by telephoning +44 (0)20 7679 2000 or by writing to: University College London, Gower Street, London WC1E 6BT.

12 Complaints

If you wish to complain about the use of personal data, please contact the Data Protection Officer of your host institution so they can look into the issue and respond to you.

You also have the right to lodge a complaint with the Information Commissioner's Office (**ICO**) (the UK data protection regulator). For further information on your rights and how to complain to the ICO, please refer to the [ICO website](#).