

What is a Privacy Notice?

A privacy notice describes how University College London (UCL) Medical School collects, uses, retains and discloses personal information. Personal information is any information that can be used to identify a living individual, directly or indirectly. It is the same as 'personal data' as defined in data protection legislation.

Please see the section '*What personal information do we collect?*' for a description of the personal information we hold about you.

The law says that personal information should be processed fairly, lawfully and transparently:

- Information is used in a way that people would reasonably expect; and
- People know how their information will be used by us.

This means we are required to inform you of the following:

- Why we need your personal information;
- How it will be used;
- With whom it will be shared; and
- Your rights to control how we use your information.

Data protection legislation covers the lawful processing of personal information

Data Protection Registration

UCL is the 'Data Controller'¹ under the UK data protection legislation and is registered with the Information Commissioner's Office (ICO) under:

UCL
Gower Street
London
WC1E 6BT

Our registration with ICO describes, very broadly, the purpose for processing personal information. This information is publicly available from:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
www.ico.org.uk

¹ The organisation that determines the purposes for which and the manner in which any personal data are, or are to be, processed.

How to contact us?

If you have any questions about the privacy notice or how your personal information is used, then please contact the University's Data Protection Officer:

Data Protection Officer: data-protection@ucl.ac.uk
Address: University College London, Legal Services, 6th Floor,
Bidborough House, London, WC1H 9BF

What personal information do we collect?

The types of personal information we collect from you and use for the purposes set out below include, but are not limited to:

- Names, addresses, telephone numbers, date of birth, national insurance numbers;
- Next of kin details;
- Student funding details;
- Assessment scores and outcomes;
- Photographs;
- Responses to surveys including student evaluation questionnaires; and
- Criminal convictions and offences;

A full list of personal information collected is set out in UCL's general staff and student privacy notices www.ucl.ac.uk/legal-services/privacy.

Some personal information collected by UCL and the Medical School is classed as "special category personal data". This includes:

- Racial or ethnic origin;
- Physical or mental health condition.

A full list of the special category personal data collected by UCL is set out the general staff and student privacy notices: www.ucl.ac.uk/legal-services/privacy.

Any special category personal data will only be used for legitimate purposes. Please see the section on '*How do we process personal information about you?*' for more information.

How do we process personal information about you?

A full list of the purposes for which UCL processes personal information is set out in the general staff and student privacy notices: www.ucl.ac.uk/legal-services/privacy.

In addition the Medical School uses your personal and special category personal data in connection with the fulfilment of regulatory responsibilities, contractual obligations and medical education research. In particular, your personal information may be used by us, our employees, service providers, and disclosed to third parties for the following purposes. For each of these purposes, we have set out the legal basis on which we use your personal information.

Why we need to process your personal information:	The legal basis for our use of your personal information					
	Consent	To perform our contract with you	To comply with the law	To protect your vital interests	To fulfil public task/statutory responsibility	
For research projects that aim to provide information to improve the quality of medical education both at the local and national level, including Medical Schools Council.					✓	
Data sharing with external organisations, regulatory bodies and placement providers for the purposes of undergraduate medical training, registration with the General Medical Council and Foundation Training posts			✓	✓	✓	

Why we need to process your special category personal data:	The legal basis for our use of your special category personal data					
	Consent	To perform our contract with you	To comply with the law	To protect your vital interests	For reasons of substantial public interest	For scientific and historical research or statistical purposes
In case of a medical emergency				✓		
For research projects that aim to provide information to improve the quality of medical education both at the local and national level Including Medical Schools Council.						✓
Data sharing with external organisations, regulatory bodies and placement providers for the purposes of undergraduate medical training, registration with the General Medical Council and Foundation Training posts.			✓	✓	✓	✓

Criminal convictions and offences

Personal information related to criminal convictions and offences will only be used under the control of official authority or where processing is authorised by the law. Medical students require enhanced DBS clearance before they can take up clinical placements and access clinical environments.

The lawful bases for processing personal data relating to criminal convictions and offences will be as follows:

1. Protecting the public against dishonesty etc (DPA Schedule 1, Part 2, section 11)

This condition is necessary for the exercise of a protective function and is intended to protect members of the public against:

- dishonesty, malpractice or other seriously improper conduct
- unfitness or incompetence
- mismanagement in the administration of a body or association
- failures in services provided by a body or association.

2. Regulatory requirements relating to unlawful acts and dishonesty etc (DPA Schedule 1, Part 2, section 12)

This condition is necessary for the purposes of complying with, or assisting other persons to comply with, a regulatory requirement which involves a person taking steps to establish whether another person has (i) committed an unlawful act, or (ii) been involved in dishonesty, malpractice or other seriously improper conduct.

Who will we share your personal information with?

For applicants to medical schools and students enrolled on medical courses

We will share data with the General Medical Council (GMC), the regulator for medical education. We will share your information with the GMC to register you after graduation to practise medicine. We will also share your information with the GMC in order to assist it in its statutory functions. This will include:

- Registration: In your final year we will share information with the GMC to grant you provisional registration. This may include information about Fitness to Practise incidents which the university investigated while you were a student.
- Research: We will share information about applicants and students which will help the GMC to conduct research into medical education, through the UK Medical Education Database (UKMED). This may include demographic data, attainment and exam data, and fitness to practise information. This information will not be used for other purposes by the GMC, will not be used to make decisions about you, will not be published in a way which could identify you, and will only be used with the appropriate safeguards as set out in data protection legislation to ensure your privacy is respected.

A list of the organisations and categories of organisations we may share your personal information with include, but are not limited to, those set out in UCL's general privacy notices: <https://www.ucl.ac.uk/legal-services/privacy>.

The Medical School may also share your information with:

- Statutory bodies, such as The General Medical Council (GMC)
- Health Education England for the purposes of Foundation School applications and training
- NHS Trust employers as required by Foundation Training Transfer of Information and Special Circumstances processes
- The Medical Schools Council for its own research purposes
- Placement Providers for managing undergraduate medical training
- NHS Bursaries Office for the administration of student funding in Years 5 and 6 of the MBBS programme

TRANSFERS OF YOUR PERSONAL INFORMATION?

UCL Medical School does not routinely transfer or store your personal data outside the EEA. It may transfer your personal data in response to requests from students or graduates who wish to practise overseas but would only do so with the student's permission.

How long will we hold your personal information?

The University will only retain your personal information for as long as necessary. Please see the University's retention schedule for more information:

www.ucl.ac.uk/library/docs/retention-schedule.pdf

What are the rights to your personal information?

To exercise your rights to your personal information, please contact the university's data protection officer using data-protection@ucl.ac.uk. A full list of your rights are provided in UCL's general privacy notices:

<https://www.ucl.ac.uk/legal-services/privacy>

Complaints

If you have any complaints about how we use your personal information, then please contact us using the contact details given in this notice. You can also lodge a complaint with the Information Commissioner's Office.

Changes to our privacy policy

Any changes to our privacy policy will be posted on <https://www.ucl.ac.uk/legal-services/privacy>