

# COLLEGE OF INTEGRATED CHINESE MEDICINE

## PRIVACY NOTICE FOR PROSPECTIVE AND CURRENT STUDENTS

The College of Integrated Chinese Medicine (CICM) are the Data Controller for personal data relating to you that we process. CICM is registered with the Information Commissioner's Office (Registration Number: Z8468925) and <https://www.acupuncturecollege.org.uk/> is a website operated by CICM. This Privacy Notice explains how we will process your personal data and relates to prospective and current students of CICM.

This Privacy Notice is effective January 2024

### **What information we collect**

As a prospective or current student of CICM, we hold a range of personal data about you, some of which you provide to us direct and some of which we receive from third parties.

Examples of categories of personal data which we may hold are:

- Your name and contact information, your date of birth, gender, national insurance number (or other tax identification number) and your passport number or national identity card details, country of domicile and your nationality.
- Your unique student number that we shall allocate to you.
- Your photograph.
- Your course of study and current student status, i.e. if you are Enrolled, taking Time Out, Graduated or Withdrawn.
- Information relating to your education and employment history.
- Information relating to your attendance, academic and clinical performance, and achievements.
- Information about your financial circumstances.
- Sensitive personal data, including information concerning your health and medical conditions (e.g. disability needs) and/ or your racial or ethnic origin, religion or similar beliefs and sexual orientation (should you wish to provide this information).
- Information about criminal convictions and offences.

### **How we collect your information**

We collect your data in several ways which include:

- From the information you provide us with before joining CICM, for example when you express an interest in studying at CICM and / or on your application form.
- From the information provided to us when you apply to study at CICM via the Universities and Colleges Admissions Service (UCAS) if applicable.
- From the information you provide to us during your time as a student of CICM.
- From third parties, including:
  - your previous or current school, sixth form college, university or employers who may provide a reference about you or who may sponsor your studies.

- the Disclosure & Barring Service for information about criminal convictions where appropriate; or the Home Office (UKVI).
- the Student Loans Company; and
- the Office of the Independent Adjudicator.
- University College of Osteopathy

## **The purposes for which we process your personal data and the legal basis**

We only process data for specified purposes and if it is justified in accordance with data-protection law. The legal justification for the purposes for which we shall process your data is as follows:

- a) **Contract** (the processing is necessary for a contract we have with you, or because you have asked us to take specific steps before entering a contract). Under this lawful basis we may use your personal information for the following purposes:
  - To interact with you before you are enrolled as a student, as part of the recruitment and admissions process or to answer your enquiries about CICM.
  - Once you have enrolled, to provide you with academic programmes and related services.
- b) **Explicit Consent** Under this lawful basis we may use your sensitive personal information for the following purpose:
  - To make reasonable adjustments for disabilities and providing relevant support for health concerns.
- c) **Public Interest and Substantial Public Interest** (the processing is necessary for us to perform a task in the public interest). Under this lawful basis we may use your sensitive personal information for the following purposes:
  - To monitor the profile of students studying at CICM to promote equality of opportunity we may process information you provide about your racial or ethnic origin, religion or similar beliefs and sexual orientation.
  - To safeguard CICM community and assess suitability to practise as an acupuncturist, we may process information you provide about criminal convictions.
- d) **Legal Obligation** (the processing is necessary for us to comply with the law). Under this lawful basis we may use your personal information for the following purposes:
  - To meet our compliance and regulatory obligations, such as compliance with anti-money laundering laws and complying with Office for Students requirements.
  - To deal with immigration matters and comply with our legal obligations in relation to students who hold Tier 4 visas.
- e) **Consent** (you have given clear consent for us to process your personal data for a specific purpose). Under this lawful basis we may use your personal information for the following purpose:
  - To develop and maintain an alumni network and marketing our services to alumni. We may also process your personal data where it is necessary to protect your or another person's vital interest.

## **Whom it will be shared with**

On occasion we may need to share your personal data with certain internal and external third parties, including:

- Our employees, agents, and contractors where there is a legitimate reason for their receiving the information, including:

- Staff responsible for admission and administration, ICT, and library services.
  - Student support staff.
  - CICM's academic and clinic staff.
  - University College of Osteopathy
  - Third parties who work with us to provide student support services (e.g. counselling).
  - Third parties who work with us to provide security services.
  - Organisations operating anti-plagiarism software on our behalf (such as Turnitin® or any equivalent).
  - Internal and external auditors.
- Those with an interest in tracking student progress and attendance, including:
    - Student sponsors (e.g. the Student Loan Company (or its equivalent), bursary or funding sponsors, research sponsors, Research Councils).
    - Current or potential education providers (for example, if you take part in an exchange programme as part of your course).
    - University College of Osteopathy
    - Current or potential employers (to provide references and, where students are sponsored by their employer and/or where you take part in a placement, to provide details of progress/attendance).
    - Agencies providing student schemes or discounts (where we are required to inform them of your student status, for example your local council or Transport for London),
  - Professional and regulatory bodies (e.g. the British Acupuncture Council) in relation to the confirmation of qualifications, professional registration and conduct and the accreditation of courses.
  - As part of your professional learning experience we also provide all pre-registration acupuncture students (i.e. students studying on the BSc in Acupuncture with student membership of the British Acupuncture Council <https://acupuncture.org.uk/> which strives to raise standards of acupuncture care and improve understanding and awareness of the benefits of acupuncture amongst the public other healthcare professionals. The basic information we supply them with such as your name and email address are used to inform you about its work, provide conference invites and other related activities.
  - Government departments and agencies where we have a statutory obligation to provide information (e.g. the Office for Students, the Home Office (in connection with UK visas and immigration), Council Tax and Electoral Registration Officers at relevant local authorities (for the purpose of assessing liability for Council Tax and for electoral registration purposes) or their equivalents or replacements).
  - The Higher Education Statistics Agency (HESA) the body responsible for collecting and disseminating information about higher education in the UK and the Designated Data Body for England) – please see their student collection notice for further information about how they collect and process student data here: <https://www.hesa.ac.uk/about/regulation/dataprotection/notices>
  - Crime prevention or detection agencies (e.g. the police, the Department for Work and Pensions and Trading Standards (or its equivalent)).

- Parents, guardians, and next-of-kin (where it is necessary to protect your or another person's vital interest).
- Third parties conducting surveys, including:
  - The National Student Survey (NSS) and Graduate Outcomes Survey identified by HESA in their data protection collection notices
  - If a third-party organisation is contracted to carry out these surveys, we will pass your contact details to them which they will use for the purpose of the survey only and will then delete them.
  - If you do not want to take part in any of the above surveys, please let us know by emailing [admin@cicm.org.uk](mailto:admin@cicm.org.uk).
- Destinations outside the European Economic Area (EEA); some of the personal data we process may be transferred to, and stored at, a destination outside the EEA, for example where it is processed by staff operating outside the EEA who work for us or for one of our suppliers, or where personal data is processed by one of our suppliers who is based outside the EEA or who uses storage facilities outside the EEA. In these circumstances, your personal data will only be transferred on one of the following bases:
  - Where the transfer is subject to one or more of the "appropriate safeguards" for international transfers prescribed by applicable law (e.g. standard data protection clauses adopted by the European Commission).
  - A European Commission decision provides that the country or territory to which the transfer is made ensures an adequate level of protection; or o There exists another situation where the transfer is permitted under applicable law (e.g. where we have your explicit consent).
  - Should you opt in to do so, CICM Alumni Teams when you graduate.

### **How long we shall keep it for**

Subject to any other notices that we may provide to you, we may retain your personal data for a period of six years after your association with us has come to an end. Information relating to criminal convictions shall be retained for no longer than is necessary and for a maximum of six months following your provision of a criminal conviction certificate to CICM as part of student admission procedures or when required throughout your course in line with the Revised Code of Practice for Disclosure and Barring Service Registered Persons published by the Home Office.

### **Academic records**

We keep details of your academic achievements to enable us to monitor your progress while working towards your degree. We need this record of achievements so that the UCO can award you with the correct degree. These records are stored on CICM's secure server

We keep scanned copies of your submitted work/exam papers on CICM's secure server and generally deleted 18 months from the date of the relevant assessment board. This allows for reference back to scripts if required and includes allowance for an appeal to be lodged.

All hard copy assignments will be returned to you with comments. Electronic copies will be retained on CICM's secure server.

This information will only be shared with staff/tutors and academic institutions such as the UCO as part of their review process in the pursuit of our core business, namely educating in Chinese medicine.

### **Emails**

Generally, CICM will retain email correspondence for 2 years post-graduation or from formal withdrawal from the course, following which they will be deleted from the CICM server. This is to ensure that we have an audit trail of all correspondences between you and CICM staff should it be required.

### **Deferall**

If you defer, we will keep all correspondence for 2 years after the last day that you are eligible to re start the course as designated by the validating body.

Your correspondence will only be shared with staff working on behalf of CICM as necessary – for example CICM tutors or our IT provider.

### **Storage**

Your information is stored on our secure server which is maintained by Connexions.

We keep records of your personal data on a Filemaker Pro Database on our secure server also for the purposes of contacting you as necessary.

We also keep records of any sensitive data on FileMaker Pro database, allowing staff to be aware of your individual requirements, and HESA reporting to take place.

Paper records will be kept in a locked cabinet at the CICM office to which only authorized staff have access. It will not leave our premises.

We will delete the hard copy of all the above personal information 6 months after you graduate.

Some information (e.g. your academic transcripts and dissertations or final year projects) may be retained indefinitely by us to maintain your academic record for research and /or archiving purposes (or by the Alumni Teams for the purposes of supporting your lifelong relationship with CICM).

For all acupuncture students we may retain your personal data on clinical practice management software (e.g. Acuity) in line with current guidance published by the British Acupuncture Council:

a) For patients who are adults (aged 18 years +): a minimum of seven years since their last consultation.

b) For patients who are children and young people: until their 25th birthday.

(<https://bacc-wp-media-library.s3.eu-west-2.amazonaws.com/wp-content/uploads/2022/07/20121908/21111-Code-of-Professional-Conduct.pdf>)

When your information is no longer required, we will always dispose of it securely

### **Information Security**

Your information is vitally important and as such we are dedicated to ensuring that your information is kept securely and used appropriately.

## **Your rights**

Under the GDPR you have the following rights:

- To obtain access to, and copies of, the personal data that we hold about you.
- To require us not to send you marketing communications. If you ask us to delete your personal data, we will continue to maintain a core set of personal data comprising very brief information to ensure that we do not inadvertently contact you in future.
- To require us to correct the personal data we hold about you if it is incorrect or where appropriate, given the purposes for which your personal data is processed, the right to have incomplete data completed.
- To require us to erase your personal data. This is a limited right which applies, among other circumstances, when the data is no longer required, or the processing has no legal justification. There are also exceptions to this right, such as when the processing is required by law or in the public interest.
- To require us to restrict our data processing activities. This is a limited right which will apply in specific circumstances and for a limited period.
- Where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal.
- To receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller.
- To object to the processing of your personal data when such processing is based on the public interest or other legitimate interests unless we have compelling legitimate grounds to continue with the processing.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exemptions or exceptions apply

If you wish to access the personal data we hold about you, please submit a Subject Access Request to us.

If you are an applicant and have given your consent and you wish to withdraw it, please contact our Admissions Team [registrar@cicm.org.uk](mailto:registrar@cicm.org.uk)

If you are a current student and have given your consent and you wish to withdraw it or, please contact our admin team on [admin@cicm.org.uk](mailto:admin@cicm.org.uk)

Please note that:

- Where our processing of your personal data relies on your consent and where you then withdraw that consent, we may not be able to provide all or some aspects of our services to you and/or it may affect the provision of those services.
- Where the legal basis for our processing of your personal data is contractual necessity, we may not be able to perform the contract we have entered with you if you fail to provide certain personal data.

## **Changing your information**

Please tell us promptly about any changes to the information we hold about you. This is particularly important for your contact details. If you are an applicant, you can do this by emailing [registrar@cicm.org.uk](mailto:registrar@cicm.org.uk) with the relevant information.

If you are a current student, you can do this by emailing [admin@cicm.org.uk](mailto:admin@cicm.org.uk) with the relevant information.

Contact the Data Protection Officer (DPO) If you have any queries about this privacy notice or how we process your personal data, by: Email: [dpo@cicm.org.uk](mailto:dpo@cicm.org.uk) Telephone: +44 (0) 1189508889 Post: Data Protection Officer, The College of Chinese Integrated Medicine 19 Castle Street Reading RG1 7SB

If you are not satisfied with how we are processing your personal data, you can make a complaint to the Information Commissioner. You can find out more about your rights under data protection legislation from the Information Commissioner's Office website: [www.ico.org.uk](http://www.ico.org.uk)