

## Brighton and Sussex Medical School - Privacy Notice

The Brighton and Sussex Medical School (BSMS) is an equal partnership between the Universities of Brighton and Sussex, that works with NHS organisations, in the delivery of the following:

- The delivery of undergraduate and postgraduate education and training;
- Medical research;
- Alumni engagement
- The provision of the Academic Training programme.

To deliver the above, and to meet legal and regulatory requirements, the Universities of Brighton and Sussex, through BSMS process and share personal data on prospective and current students, graduates, employees and research participants.

As part of the Universities of Brighton and Sussex, BSMS is committed to protecting the privacy and security of your personal information and being transparent about how it collects and uses personal data.

This Privacy Notice summaries how the Universities collect and use personal information about you in relation to the Brighton and Sussex Medical School.

Further details can be found at:

| Data Controller        | Links and Policies  | ICO registration | Data Protection Officer   |
|------------------------|---|------------------|---|
| University of Brighton | <b>Privacy Notices</b><br><a href="https://www.brighton.ac.uk/about-us/statistics-and-legal/requesting-information/index.aspx">https://www.brighton.ac.uk/about-us/statistics-and-legal/requesting-information/index.aspx</a><br><b>Data Protection Policy</b><br><a href="https://staff.brighton.ac.uk/reg/legal/other/Data_Protection_Policy.pdf">https://staff.brighton.ac.uk/reg/legal/other/Data_Protection_Policy.pdf</a> | Z5395727         | Rachel Page<br>01273 642010<br><a href="mailto:dataprotection@brighton.ac.uk">dataprotection@brighton.ac.uk</a> |
| University of Sussex   | <b>Privacy Notices</b><br><a href="https://www.sussex.ac.uk/about/website/privacy-and-cookies/privacy">https://www.sussex.ac.uk/about/website/privacy-and-cookies/privacy</a><br><b>Data Protection Policy</b><br><a href="http://www.sussex.ac.uk/ogs/policies/information/dpa">http://www.sussex.ac.uk/ogs/policies/information/dpa</a>   | Z6428144         | Alexandra Elliott<br>01273 678472<br><a href="mailto:Alex.Elliott@sussex.ac.uk">Alex.Elliott@sussex.ac.uk</a>   |

If you have any questions about the privacy notice or how your personal information is used, then please contact the relevant Data Protection Officer.

## Data Protection Notification

Both Sussex and Brighton are Higher Education institutions in English and Wales, and with regard to the sharing and processing of personal Data are both Data Controllers for Brighton and Sussex Medical School.

Data Protection Officers from Brighton and Sussex are responsible for advising BSMS on compliance with Data Protection legislation and monitoring its performance against it.

### Personal data we collect about you and how we use it

During the course of your involvement with BSMS, you will be a member and, in some cases, a data subject of both the University of Brighton and University of Sussex; you will be able to access all facilities and support offered by both Universities. To facilitate this access, your personal data will be processed and shared between both institutions.

Administrative responsibilities for personal data have been delegated as follows:

- Prospective and current enrolled students will have student contracts with the University of Brighton
- Academic and professional services staff will hold contracts of employment with the University of Sussex
- BSMS Alumni relations is overseen by the University of Sussex.
- Research participants will have their data processed by the University of Sussex, with some data held on the University of Brighton IT networks.

For staff and students, the University of Brighton will allocate and maintain IT accounts, including allocation of a BSMS.ac.uk email account. This account will authenticate users to access both Brighton and Sussex systems, which include online storage, library access etc

Information is collected in several different ways dependent on your interaction with the Universities and personal data is processed for the purposes outlined below.

### Prospective and current enrolled students

When you apply to study at BSMS, we collect and process your information in order to process your application, assess your suitability to attend one of our courses, and communicate with you about decisions on your application, and about preparing for university.

We create a record in your name, with a unique student number, login id and university email address. To that record we add information that you give us when registering or enrolling and throughout your studies. We keep records of your participation in learning activities and your use of other services we offer, e.g. disability services, library and employability services.

We also have a duty to report to statutory authorities on data such as the qualifications our applicants enter university with.

## Academic and professional services staff

The information you provide during the recruitment process will be used for the purpose of progressing your application, or to fulfil legal or regulatory requirements if necessary. If you accept a final offer from us, you enter into a contract as an employee and data is required to facilitate that – for example to pay you in accordance with your contract and to administer pension's entitlements.

In some cases, the University of Sussex needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check an employee's entitlement to work in the UK, to deduct tax, to comply with health and safety laws and to enable employees to take periods of leave to which they are entitled.

## Alumni

When you leave the Brighton and Sussex Medical School, we will use your data to facilitate an ongoing relationship between you and the Universities of Brighton and Sussex – this includes fundraising, promotion of alumni events and reunions, engagement with alumni mentoring and volunteering. The University of Sussex's Development and Alumni Relations Privacy Notice provides further information on how your data is used.

We will also use your information to facilitate the Graduate Outcomes survey which is a survey of the perspectives and status of recent graduates.

## Research

If you participate in research conducted by the Brighton and Sussex Medical School which includes your personal data, it will be processed in accordance with the University of Sussex's Code of Practice for Research. Further information about how your personal data will be used can be found within our Research policies and will you be provided with specific information at the start of the research project.

Research data may be held within the IT networks of the University of Sussex and / or the University of Brighton.

## Special category data

Some personal information used for the above purposes will be 'special categories of personal data'. These can include race and ethnicity for the monitoring of our equalities responsibilities for example, or medical information relating to the delivery of necessary learning support. Access to and the sharing of this kind of 'special category' personal information is controlled very carefully.

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.

## Who has access to data?

University of Brighton and University of Sussex, working with Brighton and Sussex Medical School, may disclose certain personal information to external organisations to carry out its legal responsibilities, functions and manage our operations or because you asked us to. Some of this is anonymised or aggregated.

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 were 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, and will not be published in a way which could identify you.

We may also share your personal information with other organisations, which include, but are not limited to:

- Statutory bodies, such as The Higher Education Statistics Authority (HESA), Universities and Colleges Admissions Service (UCAS), Student Loans Company (SLC) and other loan and grant providers; Office for Students (OFS); Office for Fair Access (OFFA); Office of the Independent Adjudicator (OIA);
- Relevant Government Departments (e.g. Home Office, including UK Visas and Immigration, Foreign and Commonwealth Office, Department of Health. Department of Education);
- Relevant executive agencies or non-departmental public bodies (e.g. HM Revenue and Customs, Health and Safety Executive);
- Employers and other educational providers (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). We will seek your permission for any disclosure;
- Service providers and professional advisors;
- University of Brighton Student Union and University of Sussex Students Union; and
- Debt collection agencies working on behalf the Universities.

### How do the Universities of Brighton and Sussex protect data?

The Universities take the security of your data seriously. They have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties. For more information, please see the respective Data Protection Policies:

- University of Brighton – Data Protection Policy  
[https://staff.brighton.ac.uk/reg/legal/other/Data\\_Protection\\_Policy.pdf](https://staff.brighton.ac.uk/reg/legal/other/Data_Protection_Policy.pdf)
- University of Sussex - Data Protection Policy  
<http://www.sussex.ac.uk/ogs/policies/information/dpa>

### How long we will keep your data?

BSMS, as part of the Universities of Brighton and Sussex, will only keep your personal data for as long as is necessary for the purpose for which it is processed.

Personal data is processed and stored in line with Retention Schedules which set out how long different categories of personal data should be held by the Universities. Retention Schedules are linked to from the respective Privacy Notices

- University of Brighton <https://www.brighton.ac.uk/about-us/statistics-andlegal/privacy/index.aspx>
- University of Sussex  
<http://www.sussex.ac.uk/ogs/policies/information/recordsmanagementguidance>

### Data subject's rights (access, rectification, erasure, restriction of processing, objection to procession, right to data portability)

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request
- request BSMS to change incorrect or incomplete data;
- request BSMS to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data;
- withdraw your consent at any time, where we have requested and obtained your consent;
- we must allow portability of your data, if we have obtained your consent or are relying on a contractual obligation.

Further information about your rights can be found on the ICO's website. You may also contact the relevant Data Protection Officer for further information.

- Applicants and students exercising their data subject rights should contact the University of Brighton – [dataprotection@brighton.ac.uk](mailto:dataprotection@brighton.ac.uk), for further information see <https://www.brighton.ac.uk/about-us/statistics-andlegal/requestinginformation/index.aspx>
- Staff, alumni and research participants exercising their data subject rights should contact the University of Sussex - [dpo@sussex.ac.uk](mailto:dpo@sussex.ac.uk) for further information see <http://www.sussex.ac.uk/ogs/policies/information/dpa/rightsofindividuals>

## The right to complain to the ICO

If you are unsatisfied with the way Brighton and Sussex Medical School has processed your personal data, or have any questions or concerns about your data please contact [dataprotection@brighton.ac.uk/dpo@sussex.ac.uk](mailto:dataprotection@brighton.ac.uk/dpo@sussex.ac.uk) if we are not able to resolve the issue to your satisfaction, you have the right to apply to the Information Commissioner's Office (ICO). They can be contacted at <https://ico.org.uk/>.

## Changes to this privacy notice

We keep our privacy notices under regular review. This privacy notice was last updated in June 2020.